Report to District Development Management Committee

Report Reference: DEV-004-2016/17
Date of meeting: 8 June 2016



Subject: Planning Application re: EPF/0232/16 – Abridge Golf and Country Club, Epping Lane, Stapleford Tawney – Environmental enhancement scheme embracing hydrology, conservation and access allied to enabling development (fourteen detached houses) to ensure delivery.

Responsible Officer: Nigel Richardson (01992 564110)

Democratic Services: Gary Woodhall (01992 564470)

Recommendation(s):

(1) That planning permission be refused for the following reasons:

- 1. The site lies within the Metropolitan Green Belt. The proposed development, more specifically its associated enabling development, is inappropriate in the Green Belt and, by definition, harmful. It fails to protect the openness of the Green Belt and encroaches into the countryside to a significantly greater degree than existing structures on site. The details accompanying the application do not amount to very special circumstances sufficient to outweigh the harm to the Green Belt that would result from the development. The proposal is therefore contrary to policies GB2A and GB7A of the Adopted Local Plan and Alterations and the aims and objectives of the National Planning Policy Framework.
- 2. The proposal would fail to provide any Affordable Housing and as such would be detrimental to public amenity and contrary to Policies H5A, H6A, H7A and H8A of the adopted Local Plan and Alterations and the provisions of the National Planning Policy Framework.
- 3. By reason of the scale and position of the proposed housing development and nature of the junction alterations the development would be detrimental to the visual amenities of the surrounding area and harmful to the character and appearance of this rural location, contrary to policies DBE4, LL1, LL2 and LL10 of the Adopted Local Plan and Alterations and the aims and objectives of the National Planning Policy Framework
- 4. By reason of their siting in a location that is poorly served by public transport and remote from goods, services and employment opportunities, the occupants of the proposed dwellings would be over dependent on private motor vehicles. Consequently, the enabling component of the proposed development is unsustainable, contrary to

Local Plan and Alterations policies CP3 and ST1, which are consistent with the policies of the National Planning Policy Framework.

REPORT DETAIL:

This application is before this Committee since it is "large scale major" application as defined within guidance issued by the DCLG (Pursuant to The Constitution, Part Two, Article 10 (b))

Description of Site:

The application site is that of a golf and country club some mile and a half from Abridge as the crow flies. The site is within land bounded by the highways of Hobbs Cross Road to the west, Epping Lane to the south, and Mount Road to the east. The M25 motorway is to the north and adjoins a portion of the site boundary. The site has its main vehicular access, leading to the club house, off Epping Lane. There is a secondary vehicular access just serving a maintenance building. The site has an area of 100 hectares.

In very general terms the site slopes down, in a concave slope, from north to south. Beyond the southern boundary of the site the ground falls at a shallower slope towards the River Roding. Land to the west and to the east is generally flatter than the application site. Brookhouse Brook, a tributary of the Roding, adjoins the westernmost boundary of the site.

The site adjoins the curtilage of a Listed Building, Skinners Farmhouse. Near the south-western corner of the site is another Listed Building, Brook Farmhouse. To the north, on the far side of the M25, are the grounds of a Grade I Listed Building, Hill Hall, and associated Conservation Area.

The site is within the Metropolitan Green Belt.

A public footpath runs across the south-eastern corner of the site.

Description of Proposal:

In the broadest terms there are two elements to the proposal;

- (1) engineering operations to improve drainage and,
- (2) the erection of fourteen houses.

Other proposals include the erection of a maintenance shed, a machinery building would be relocated and its own vehicular access created. The existing vehicular access would be retained and junction improvement would be undertaken at this access. A "green roof" would be added to the club house.

Engineering Operations

The engineering operations are to create lakes and ponds which would act as reservoirs. No spoil would be taken off site and accordingly the excavations, for the water bodies, would be accompanied by ground re-modelling earthworks elsewhere on the site. An all weather buggy track would be created and a boardwalk provided for the public footpath across the site.

Storage/irrigation ponds 1 and 4 would be at the southwest corner of the site, to the north of Epping Lane and to the east of Theydon Mount Kennels. These ponds would involve extensive removal of vegetation but a belt of planting would be created between Epping Lane and reservoir 1 and between Theydon Mount Kennels and the western end of reservoir 1 and reservoir 4 to the north of this.

Storage/irrigation pond 2 would be to the northeast of pond 4. Excavation of pond 2 would involve extensive clearance of existing vegetation though this pond would be set within the site, some way from its boundaries. Pond 2 would have a centre some 250m north of Epping Lane and some 300m east of Hobbs Cross Road.

Pond 3 would have a centre some 150m north of Epping Lane and 250m northwest of Skinners Farmhouse.

Ponds 5, 6 and 8 would be significantly smaller ponds to the west of pond 2. Pond 8 would be formed by alterations to an existing pond to the west of the position of the northern end of pond 2.

Pond 7 would be a small pond to the north of Theydon Mount Kennels. To the south of the position of pond 7 is an existing pond that would remain.

Pond 9 is an existing pond, which would be modified, and is almost in the centre of the site, to the east of the position of pond 2.

Three smaller ponds, ponds 10, 11 and 12, would be created to the west of Skinners farm and two smaller ponds would be created at the eastern end of the site. The ponds at the eastern end would be approximately 150m north of Epping Lane and 200m west of Mount Road.

Ponds 13 and 14 would be at the eastern end of the site. Pond 13 is annotated to be a wetland habitat area and the public footpath across the site would cut across part of the northern extent of pond 13.

Pond 16 would be some 150m west of the junction of Epping Lane with Mount Road. Pond 15 is an existing pond north of the position of pond 16.

In addition to the creation of water bodies, ecological enhancements at the site would include bat boxes, bird boxes, compost areas (an egg-laying habitat for grass snakes), hibernacula (shelters to provide habitat for hibernating creatures), and existing ponds would be cleared of invasive species.

The purpose of the water bodies would be to harvest water to reduce peak flows downstream; improve water quality; and, remove the need for mains water to be used for irrigation in summer.

Fourteen Houses

Fourteen four-bedroom two-storey detached houses form part of the application. These would be set near the existing vehicular access to the club house. The access would be upgraded and two spurs from the roadway to the club house would serve the proposed houses. Four houses would be set along the western spur and ten houses along the eastern spur. The rear elevations of the houses would face south, towards Epping Lane. a landscaped belt would be set between the rear gardens and Epping Lane.

Three house types, designs would be used for the fourteen houses. House type 1 would have a side to side gable roof, a two-storey front gable end bay and a double garage linked by its roof to the house. House type 2 would have a side gable roof and a two-storey front bay with an asymmetric roof, an integral double garage and a front balcony, off the main bedroom, with views to the golf course to the north. House type 3 would have a main side gable roof and a two-storey front bay with gable end and a canopy within the corner formed by the main front elevation and the front bay.

Other Proposals

The existing public footpath across the eastern part of the site would be enhanced by boardwalks over wet areas and interpretation boards erected.

Two w.c.s for disabled persons use would be created along the course. A buggy track would be created to the course that would facilitate use by disabled golfers.

There would be a new junction created at the existing vehicular access, including vegetation/hedgerow clearance, to create an enhanced junction for use both by the golf course, as the main vehicular entrance, and the proposed houses. A new junction would be created some 200m west of the existing vehicular access to serve the maintenance area.

The maintenance area would consist of a compound 45m by 60m in extent. The compound would be enclosed by fencing and gates and would contain storage bays, a parking area for 9 cars and a storage building with conjoined workshop. The storage shed would be 35m long by 26m wide. The workshop element would be 15m long by 9m wide. This built form would have a maximum height of 6.7m and have the appearance of a standard modern agricultural building.

Waste water from the proposed houses would be treated by a sustainable process involving a reed bed fed by waste water. The reed bed would be to the west of the maintenance area, to the north of pond 1.

The application documentation refers to a junior golf academy and making the course more readily available for pay and play.

Relevant History:

No relevant planning applications. The following pre-application enquiries are relevant however:

EF\2014\ENQ\01460 - Environmental enhancement scheme embracing hydrology, conservation and access allied to enabling development to ensure delivery. Officers advised the enabling residential development is inappropriate development in the Green Belt and that while the benefits for the management of surface water drainage arising from the proposed engineering operations are material considerations they are limited and do not outweigh the harm that would be caused by the enabling development. On that basis Officers concluded that while there is no objection to the engineering operations, they cannot amount to very special circumstances in favour of the enabling development.

EF\2016\ENQ\00216 - Request for a screening opinion regarding engineering operations to improve drainage, ecology and open access with fourteen houses as enabling development in connection with the Environmental Impact Assessment Regulations. Officers concluded the development as a whole is not EIA development

and consequently there is no need for an Environmental Statement to be included with this application.

Policies Applied:

Epping Forest District Local Plan and Alterations

CP1 – Achieving Sustainable Development Object

CP2 - Protecting the Quality of the Rural and Built Environment

CP3 – New Development

CP6 – Achieving Sustainable Urban Development Patterns

CP7 - Urban Form and Quality

GB2A – Development in the Green Belt

GB7A - Conspicuous Development

HC1 – Scheduled Monuments and Other Archaeological Sites

HC6 - Character, Appearance and Setting of Conservation Areas

HC12 - Development affecting the setting of Listed Buildings

RP3 – Water Quality

H3A – Housing Density

H4A – Dwelling Mix

H5A - Provision for Affordable Housing

H6A – Site Thresholds for Affordable Housing

H7A – Levels of Affordable Housing

H8A - Availability of Affordable Housing in Perpetuity

H9A – Lifetime Homes

RST18 - Pay and Play/Simple Golf Courses

RST19 – Design, Layout and Landscaping of Golf Courses

RST20 – New Buildings for Golf Courses

DBE1 – Design of New Buildings

DBE2 – Effect on Neighbouring Properties

DBE4 – Design in the Green Belt

DBE6 - Car Parking in New Development

DBE8 - Private Amenity Space

DBE9 – Loss of Amenity

LL1 - Rural Landscape

LL2 – Inappropriate Rural Development

LL10 – Provision for Landscape Retention

LL11 – Landscaping Scheme

ST1 – Location of Development

ST4 - Road Safety

ST6 - Vehicle Parking

11A - Planning Obligations

The National Planning Policy Framework (NPPF) has been adopted as national policy since March 2012. Paragraph 215 states that due weight should be given to relevant policies in existing plans according to their degree of consistency with the framework. The above policies are broadly consistent with the NPPF and should therefore be given appropriate weight.

Summary of Representations:

THEYDON MOUNT PARISH COUNCIL: Theydon Mount Parish Council strongly objects to this proposal with its purpose to create dwellings in the Green Belt. There is no objection in principle to ground remodelling and land drainage, nor to the provision of bird boxes or bat boxes, but proposed dwellings are unacceptable.

Theydon Garnon Parish Council and Lambourne Parish Council were consulted but no reply has been received.

17 Neighbours consulted and a site notices erected:

135 letters of SUPPORT, most of a pro forma nature with a signature and address added, have been received.

Summary of support: flood alleviation would help reduce flooding, water for irrigation, cleaning of polluted water from M25, wildlife enhancement, environment preservation and enhancement, development to enable club to be 'all inclusive' by providing a junior academy and disabled facilities, 14 houses to fund the project although within the Green Belt the benefits to the area far outweigh this issue.

1 letter of OBJECTION has been received.

THEYDON BOIS ACTION GROUP: Summary of strong objection: 'trojan horse' to build detached houses on virgin Green Belt land, contrary to chapter 9 of NPPF as well as policies GB2A and GB7A of the Local Plan, no very special circumstances, location along a very rural medieval lane is unsustainable and would rely on use of motor car, highly visible from public view points along the Roding valley and planting would not mitigate this urban development, inappropriate in the Green Belt, if as claimed drainage problems caused by 4th carriageway of M25 then matter be taken up with Highways Agency.

Issues and Considerations:

The main issue that arises with this application is whether there are public benefits of sufficient weight or merit to overcome a principle of new housing development in the Green Belt being inappropriate.

A secondary issue is Affordable Housing provision. Other considerations are whether the appearance of the houses would be acceptable, impact to heritage assets, highway considerations, whether the houses would offer sufficient residential amenity, and whether the proposals, particularly with regard to the relocation of the maintenance building, would materially affect neighbours.

Green Belt

The engineering operations at the golf course, the creation of water bodies and other changes to the course, would maintain the openness of the Green Belt and are acceptable in principle. However, an integral part of the proposal is the erection of fourteen houses in the Green Belt. Officers are given to understand that the houses would be necessary to fund the engineering works to create the sustainable drainage.

Policy GB2A of the Local Plan and Alterations states that planning permission will not be granted for the construction of new buildings unless it is appropriate in that it is a form of development listed in the policy. The proposed housing would not meet any circumstance listed and would therefore be inappropriate development in the Green Belt.

The National Planning Policy Framework (NPPF) states, at paragraph 87, that as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The argument presented by the applicant's agent is that the public benefits represent

very special circumstances. The wider ranging benefits presented in the application will therefore be considered below.

Flood risk alleviation

A planning statement, submitted with the application, refers to storm water flowing off the M25 to a watercourse that flows through the golf course. It is stated that runoff has increased significantly since the widening of the M25. The proposals would enable the harvest of water: reducing peak flows downstream; improve water quality; and, provide water for irrigation in summer.

The proposed water bodies would create a scheme of sustainable drainage. Storm water would be stored after heavy rainfall and released at a controlled rate or used for irrigation. It is argued that this would benefit properties in Abridge and further afield downstream along the Roding valley.

As the Lead Local Flood Authority (LLFA) Essex County Council provides advice on Sustainable Drainage Systems (SuDS). Essex County Council has been the statutory consultee on surface water since April 2015. ECC, Flood and Water Management has written to state that the LLFA position is that it does not object to the granting of planning permission.

The Environment Agency was consulted on the application and initially objected (9 March 2016) on the basis that there was insufficient information on the treatment of effluent. Further information was submitted and the Environment Agency removed its objection (4 May 2016).

The Engineering, Drainage and Water Team is sceptical of the consultants assumptions relating to the surface water run off from the M25. The applicants/their consultants should take this up with Highways England. The application appears to overstate the "benefits" that addressing this run off will bring to the wider vicinity, including the impact on areas downstream, which by and large are within the River Roding natural floodplain. However, this does not detract from the positive improvements to surface water management, albeit these are only likely to be of significance to the site itself as any tangible benefits in the vicinity have not as yet been sufficiently detailed/proven.

Moreover, if it is true that additional surface run-off from the M25 is causing drainage problems on the golf course, that is a private matter between the Applicant and Highways England. Guidance to LPA's makes clear that the planning system does not exist to further the private interests of any party therefore the private concerns of the Applicant are only relevant to the extent that they are also matters of public interest. That is not demonstrated by this application.

In the absence of any positive endorsement of the scheme, it would seem that the benefit of flood risk alleviation is uncertain and very likely to be confined to the application site. It is therefore concluded that the benefits in terms of managing surface water drainage and reducing flood risk are not of an order that clearly outweighs the harm that would be caused by the enabling residential development.

Enhancing the natural environment

In addition to the creation of the water bodies, which would have ecological benefits in themselves, a number of ecological improvement works would be undertaken as

part of the proposals. These would include wild flower seeding, management of existing woodland, clearing invasive species, installation of bird and bat boxes, and creation of habitats for grass snakes and great crested newts, protected species identified as being present on the site. Pipistrelle bats have also been identified on the site and the creation of water bodies would assist this protected species be encouraging insects, a food source for the bats.

The Council's Countrycare Manager has recommended that the decision be to accept with conditions.

The ecological benefits are therefore recognised, however, they are not of an order that is sufficient to outweigh harm caused by the enabling residential development.

Other

A planning statement, submitted as part of the application, refers to the re-modelling of the golf course as part of the proposals enabling creation of a buggy track, to assist disabled people, and a junior golf academy. No objection is raised to those relatively minor and secondary components of the overall proposal.

Sport England is supportive of the principle of the proposals. Such support is recognised and understood as relating to the potential improvements to an existing sporting facility. But this does not outweigh in this case the in principle harm to the Green Belt and the visual amenities of the locality.

Affordable Housing Provision

Under Policy H6A of the Council's Local Plan, in settlements with a population of 3,000 population or less, the Council will seek affordable housing on developments comprising 2 or more dwellings on a greenfield site (subject to the site area being 0.1Ha or larger) or 3 or more dwellings on a previously developed (i.e. "brownfield") site (subject to the site area being 0.2Ha or larger).

On such sites, under Policy H7A of the Local Plan, 50% of the total number of dwellings will be sought as affordable housing on either greenfield or brownfield sites (or 33% where there is a total of only 3 dwellings).

Since this proposal is for a development on a greenfield site, in excess of 0.1Ha, in Stapleford Tawney- which is a settlement with a population of less than 3,000 - the applicant should provide at least 50% of the overall number of homes as affordable housing, unless it can be demonstrated that such amount of provision would be unviable, in which case the applicant would be need to assess and demonstrate the amount of affordable housing that could be provided.

No affordable housing is proposed, on the basis that this an "enabling development" with the purpose of generating funding for flood control and other environmental works which it is claimed will create significant benefits for the wider community through flood alleviation. The applicant has expressed the view that it would not be viable to provide any affordable housing as part of the development. However, no Viability Appraisal has been submitted to demonstrate that it would not be viable to provide affordable housing on site.

Because the applicant believes that the proposed development would be unviable with the inclusion of affordable housing, the applicant needs to submit a detailed

Viability Assessment - in an acceptable form and accompanied with supporting documentary evidence – demonstrating that the scheme would become unviable if the level of affordable housing required by the Local Plan were provided.

The generally accepted industry approach taken to the undertaking of Viability Assessments in order to meet the requirements within the National Planning Policy Framework's associated Planning Practice Guidance on Viability is to use an economic appraisal tool, such as the Homes & Communities Agency 's (HCA's) Development Appraisal Tool (DAT), or the Three Dragons Appraisal Tool. Both of these generate a residual value, which can then be compared to the Benchmark Value (i.e. the Existing Use Value) of the development site.

In such circumstances, the Council would need to arrange for the Viability Assessment to be formally validated by its affordable housing consultant, the cost of which the Council would require the applicant to meet.

Alternatively, the Council would be prepared to consider a request from the applicant for the Council to appoint its affordable housing consultant on the basis that the consultant undertakes the required Viability Assessment themselves, jointly on behalf of both the Council and the applicant. If this were the case, the Council would be prepared to be guided by the Viability Assessment, without the need for any further validation. Although the cost to the applicant would be greater than the cost to them of the consultant validating the applicant's own Viability Assessment, it is likely that the cost to the applicant overall would be much lower - since they would not need to incur the cost of appointing their own viability consultant as well. Furthermore, it would remove the possibility of any disagreements between the Council and our consultant and the applicant and their consultant.

The current situation is that the agent has been informed of the cost of carrying out the validation but the agent has indicated that the applicant is not prepared to pay.

What they did submit though was an estate agent estimations and calculations to the effect that the land for the houses could be sold for £7 million. A Magnitude of Cost Estimate has been submitted which balances this figure. Nevertheless, the viability information provided so far is inadequate. Therefore the absence of Affordable Housing forms a reason for refusal.

Visual Amenity

In terms of the impact of the proposals on the landscape, the water bodies would not look out of place and tree screening would occur from nearly all views into the site.

The Trees and Landscape Team has commented that there are few concerns regarding the environmental enhancements proposed. However, there is a strong objection to the enabling development of fourteen houses, and it is this aspect on which the following assessment for landscape is based.

It is acknowledged that the housing would be limited to a small section of the overall site, however, the character and nature of the landscape would be permanently altered which is considered would negatively impact the landscape as a whole.

The EFDC Landscape Character Assessment (Chris Blandford Associates 2010) places this site with the 'Wooded Ridges and Valleys – G2 Theydon Garnon', the land directly to the south falling within 'River Valley – B4 Lower Roding'. G2 key characteristic include -

☐ Strongly undulating topography in places as a result of the series of ridges and
slopes;
□ A patchwork of arable and pastoral farmland, often lined with mature hedgerows
containing hedgerow trees;
□ A network of minor roads crosses the area;
□ Settlement pattern comprises a series of small, linear, historic hamlets, such as
Fiddler's Hamlet.

The overall character of the area is described as 'adjacent to the road corridors, a patchwork of arable and pastoral fields is lined with mature hedgerows which provide a sense of enclosure within views across the landscape. Settlement pattern is small scale and incorporates several small, linear hamlets and isolated farmstead.

The sensitive key characteristics and landscape elements within this Landscape Character Area include hedges, hedgerow trees, field trees and historic small-scale settlements. Open views across this area are visually sensitive to potential new development, particularly large-scale or tall vertical elements. As a result of the above factors, overall this Landscape Character Area is considered to have low to moderate sensitivity to change. However, the suggested landscape planning guidelines are to 'ensure that any new development within the farmland is small scale, responding to historic settlement pattern of small scale villages, hamlets and scattered farmsteads, landscape setting and locally distinctive building styles; maintain characteristic open views across the area.'

The area contains significant remnants of the original historic landscape. The historic settlement pattern in this area is dispersed, comprising church / hall complexes, manorial centres, individual isolated farmstead, small hamlets, as well as the village of Abridge. This is particularly notable when driving along Epping Lane, and when Epping Lane is viewed from, for example, either the Ongar Road or the public rights of way which lead from the ex Crowthers Nurseries site north east and north west. Epping Lane is a rural, ancient lane running parallel with one of the higher river terraces, as such when viewed from across the valley, it is considered that the whole area has a high visual sensitivity to change - the houses / maintenance building will be visible, and will appear incongruous with the existing buildings along the road, the majority (of not all of which) are located at sites that have historically been developed. Officers consider that the historic sense of the Epping Lane will be detrimentally impacted upon by the highways improvement that will be required. The road side hedges and trees would have developed over the centuries, and to suggest that replanting will take place, whilst welcomed, would not replace the haphazard species mix and form that develop naturally over hundreds of years.

It is therefore concluded that this proposal would have a detrimental impact on the landscape, contrary to Local Plan policies LL1, LL2 and LL10.

Impact to Heritage Assets

The Conservation and Design Team have commented that the development would be within a sensitive context with the site is bounded to the north by the grounds of the Grade I statutory Listed Building, Hill Hall and associated Conservation Area. To the south, along Epping Lane are the two Grade II statutory Listed Buildings, Brook Farmhouse and Skinners Farmhouse.

To establish whether the proposals are acceptable in principle, an assessment of the potential impact on the setting of the heritage assets (most particularly the site of Hill Hall) and measures taken to mitigate this, should have been submitted with the

application. Without this assessment it is not possible for specialist advisors to fully assess the proposals and provide any detailed response.

Specialist archaeological advice has been given as follows, echoing the point made above.

To the immediate north of the development is the nationally important site of Hill Hall, with the former parkland extent forming the boundary with the development. To the south of the Golf Club are a number of cropmark complexes, including a large circular enclosure of probable prehistoric date and field boundaries.

When consulted on the pre-application submission Essex County Council's advice was given that there should be a desk-based assessment of the impact on the historic environment, including identifying the extent of previous disturbance to the site. No archaeological desk-based assessment was submitted with the current planning application, nor has there been any assessment of the potential impact of the proposed development on the designated monuments, most particularly the nationally important site of Hill Hall.

A site visit has established that the visual impact to the area associated with Hill Hall would be almost none. The M25, an embankment on the northern side of the M25 and a line of electricity pylons form a distinct break between the site and the setting of Hill Hall.

Notwithstanding specialist advice, in the opinion of officers sufficient landscaping would be retained around Skinners Farmhouse with the nearest proposed new house some 150m away. Brook Farmhouse is some 150m away from the nearest boundary to the site at which part a storage/irrigation water body is proposed, pond 1, with a margin of proposed planting facing the direction of Brook Farmhouse. Accordingly, it is officers' opinion that any adverse impact to heritage assets should not form a reason for refusal.

Sustainability

By reason of their siting in a location that is poorly served by public transport and remote from goods, services and employment opportunities, the occupants of the proposed dwellings would be over dependent on private motor vehicles. Local Plan policies CP3 and ST1 make clear that the Council requires development to be accessible by existing, committed or planned sustainable means of transport. It also makes clear that proposals for development in unsustainable locations will be refused. That policy position is supported by the National Planning Policy Framework. As discussed above, the benefits of the proposed development are unclear and likely to primarily be for the golf course. There certainly is no wider flooding problem to be solved in the locality that the proposal would deal with. It is therefore concluded there is no planning justification for allowing the proposed enabling development

Other matters

No objection has been raised in relation to highway considerations. The improved and replacement vehicular access would however contribute somewhat to an adverse affect to this rural setting.

The detached four-bedroom houses would offer ample residential amenity. The siting of the houses would make them sufficiently distant from existing properties such that no material adverse impact would result to any neighbour.

The replacement maintenance building would be distanced from Theydon Mount Kennels and from Taw Lodge by the extent of pond 1 and so it is considered that this element of the proposals would result in non material adverse impact to neighbours.

Conclusion:

The proposal involves the erection of fourteen houses in the Green Belt. This is fundamentally contrary to policy and it is considered that the benefits of the proposals as a whole are not sufficient to overcome the principle of new housing in the Green Belt being inappropriate as well as causing clear harm to openness and the rural character and appearance of the locality. It is recommended that planning permission be refused.