



Green Belt Study Part II: Green Belt Parcel Definition and Review

10 November 2017

SUMMARY NOTE OF WORKING DRAFT

**As extracted by Brentwood Borough Council
Full report produced by Crestwood Environmental Ltd.**

1. INTRODUCTION

- 1.1.1 In 2016, following consultation on the 'Draft Local Plan 2013-2033' Brentwood Borough Council (the Council) commissioned Crestwood Environmental Ltd. to undertake a Borough wide Green Belt review to be considered as part of the evidence base to inform the new Local Plan.
- 1.1.2 Overall, the Council has commissioned a series of studies and reports that will form a four part Green Belt evidence base to inform the Brentwood Local Plan 2013 – 2033. All of these studies have evolved over time and comprise:
- Part 1: Brentwood Green Belt in Context – High level historic and functional review of the London Metropolitan Green Belt, and the context against which the Brentwood Local Plan 2013-2033 is being developed;
 - Part 2: Green Belt Parcels Assessment - Borough-wide definition and relative assessment of Green Belt parcels against the five purposes of the Green Belt;
 - Part 3: Individual Sites Assessment (HELAA sites, lesser performing GB parcels and other identified sites) – A relative assessment of potential Site Allocations against the five purposes of the Green Belt. This assessment process is split into two sections, the first considering individual sites and the second reflecting on cumulative impacts of potential allocations;
 - Part 4: Partial review of Settlement Boundaries and Green Belt edge – focused review of existing settlement boundaries (and associated Green Belt definition) using study evidence.
- 1.1.3 This note provides a summary of emerging findings from the working draft Stage 2: Green Belt Review; as extracted by Brentwood Borough Council from the working draft report produced by Crestwood Environmental Ltd. (November 2017).

THE BRIEF

- 1.1.4 The brief is to assess the level of contribution of general land areas (referred to as 'Green Belt Parcels') adjacent to the existing Green Belt boundary within Brentwood Borough, to fulfilling the purposes of the Green Belt on a strategic level to provide sufficient evidence for Brentwood Borough Council to determine preferred Green Belt boundaries and areas in the Local Plan.

2. METHODOLOGY AND PROCESS

GUIDANCE

- 2.1.1 There is no definitive method for carrying out an assessment of effects that potential development may have on the purposes of the Green Belt. As such, a bespoke methodology has been designed that is aimed at meeting the requirements of the Brief and is based on other precedent studies published from across the UK.

2.1.2 As far as practical, the process is periodically reviewed in light of other published methodologies and the outcomes of other local plan reviews and ‘Examinations’ and will be fed in to the final submission reports.

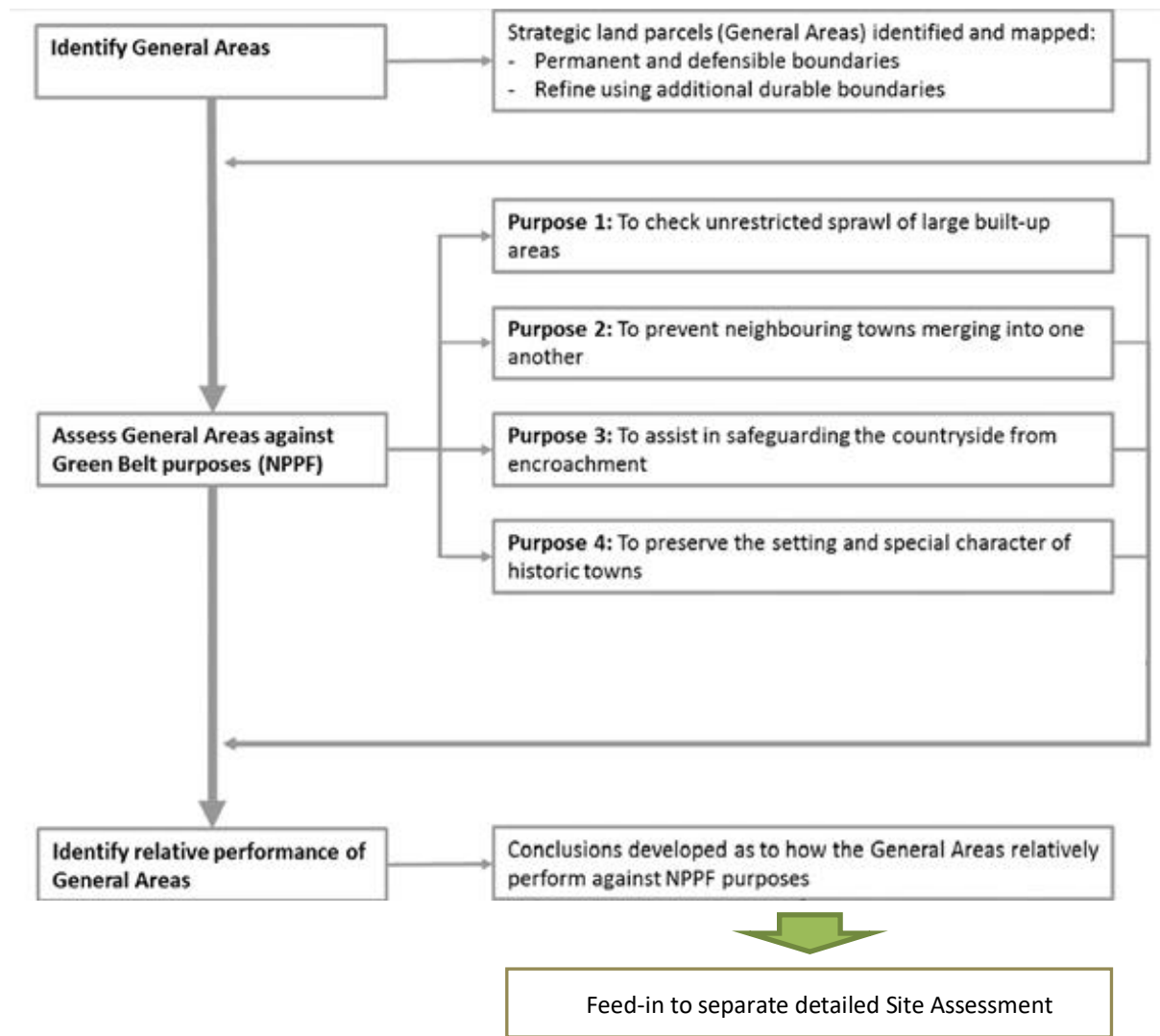
PROCESS OVERVIEW

2.1.3 As the assessment is intended to be strategic, the methodology and assessment process is intended to be able to be adopted by adjacent authorities and to be used as a basis for further detailed analysis.

2.1.4 The Assessment process is undertaken in two main (but iterative) stages:

1. Identifying and assessing Green Belt Parcels; followed by
2. More detailed assessment of sub-Parcels (as appropriate to the findings of stage 1).

2.1.5 A systematic process was undertaken, using the stages shown below, in order to complete the assessment:



2.1.6 For the purposes of the parcel assessment, Purpose 5 has not been considered to require detailed or further assessment as it is assumed that all Green Belt land fulfils the purpose and the principle of the Brentwood Local Plan 2013-2033 is that in the first instance all

development be directed to non-Green Belt land in the first instance, in accordance with national planning policy.

2.1.7 The assessment process is undertaken in the following key stages:

1. Determine the precise methodology, criteria and definitions with input from Brentwood Borough Council;
2. Distribute the methodology and approach to the adjacent authorities for comment and discuss at a subsequent stakeholder meeting;
3. Establish the initial broad Green Belt Parcels within Brentwood Borough for assessment;
4. Assess the Green Belt Parcels against set criteria in relation to the purposes of the Green Belt in a way which would allow comparison and inform the parallel individual site assessment (the Part 3 study); and
5. Disseminate the initial results and advise on any further detailed analysis requirements (e.g. refining the Green Belt Parcel size, or splitting into sub-Parcels) and refining the assessment as required.

2.1.8 Additionally, the assessment process and parcels will be refined to consider the potential extent of Green Belt parcels beyond the Brentwood Borough Boundary. Whilst Brentwood can only define Green Belt within its own administrative area, in some locations, the land or parcel forms part of a wider area of Green Belt falling between settlements in Brentwood and neighbouring boroughs. It is also the case that in places the existing Brentwood Borough Boundary does not form a defensible Green Belt boundary. Whilst reference may be paid to cross-boundary issues in the initial assessment, this can be reviewed in light of parcel definition where appropriate, immediately outside the Brentwood borough boundary.

2.1.9 The final Green Belt Parcel Assessment will account for these considerations in a proportionate way, accounting for any stakeholder engagement with neighbouring authorities, in accordance with requirements under Duty to Cooperate.

IDENTIFICATION OF GREEN BELT PARCELS

2.1.10 Any potential alterations to the Green Belt must be based on a new permanent and defensible boundary; thus, permanent man-made and natural features were selected as the initial basis of criteria for the identification of the Green Belt Parcels. In particular, the boundaries of the general areas were primarily based on the features that were either motorways, A and B Roads, operational railway lines or rivers.

2.1.11 Given the extremes of urban and rural found in the study area from the semi-urban fringes to the relatively open countryside, a more flexible approach to the identification of Green Belt Parcels for assessment was necessary. This was achieved through the further division of some Green Belt Parcels using additional durable boundary features such as:

- Unclassified public roads and private roads;
- Smaller water features, including streams, canals and other watercourses;

- Prominent physical features (e.g. ridgelines);
- Existing development with strongly established, regular or consistent boundaries; and
- Protected woodland or hedgerows.

2.1.12 Any Green Belt Parcels whose existing physical boundaries were not considered to be 'permanent and defensible', would be reviewed through the iterative overall process, such that a suitable revision to the Green Belt boundary could be proposed.

DETERMINATION OF THE ASSESSMENT CRITERIA

2.1.13 In order to identify the criteria for assessment, the primary reference point for understanding and interpreting the aims, essential characteristics and purposes of the Green Belt are contained within the National Planning Policy Framework (NPPF) (Department for Communities and Local Government, 2012) and the Replacement Local Plan (Brentwood Borough Council, 25 August 2005 (Adopted)).

2.1.14 The NPPF states that *'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open'*.

2.1.15 It also states that *'the essential characteristics of Green Belts are their openness and their permanence'*.

2.1.16 The NPPF states that the *"Green Belt serves five purposes:*

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

2.1.17 The NPPF does not state whether one purpose is more important than another.

2.1.18 Paragraph 81 of the NPPF states that *"local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."*

2.1.19 'Purpose 5' has not been assessed as it has already been outlined that development will be directed towards land not contained within the Green Belt in the first instance. Development on Green Belt land will only be considered where the strategic priorities of the Borough to accommodate new housing, employment and/or mixed use development land necessitates its release from Green Belt, accounting for all other planning, environmental and strategic considerations.

2.1.20 Based on the objectives of and the opportunities provided by the Green Belt, each *purpose* was considered in turn with regard to relevant assessment criteria to establish how well

the Green Belt Parcels being considered as part of the assessment fulfilled the role of the Green Belt. These criteria are set out below:

Purpose 1: To check the unrestricted sprawl of large built-up areas

2.1.21 In general terms, a measure for this purpose would be whether a Green Belt Parcel is:

- Located adjacent to a ‘large built up area’; and
- The degree to which it is contained by built form, the nature of this containment, linkages to the wider Green Belt and the extent to which the edge of the built up area has a strongly defined, regular or consistent boundary

Definition	Description
Well-Contained (WC)	<p>Within a large built-up area.</p> <p>Would constitute ‘Infilling’.</p> <p>Strong settlement boundaries on most sides of the Green Belt Parcel, in combination with other Strong boundaries.</p> <p>Limited or no countryside encroachment or interrupted views across the landscape.</p>
Partly-Contained (PC)	<p>At least two boundaries or around half of the Green Belt Parcel boundary abuts a large built-up area without containment, with Weak boundaries on remaining sides of the Green Belt Parcel, <u>or</u>;</p> <p>Where a Green Belt parcel clearly abuts a large built up area and the remainder of the parcel is clearly delineated by Strong boundaries.</p> <p>Would form a settlement extension rather than ‘infilling’.</p> <p>Some countryside encroachment, relative to scale of existing large built up area and some interrupted views across the landscape may occur.</p>
Not Contained (NC)	<p>Not adjacent to, or would be weakly associated with, existing large built-up area.</p> <p>Substantial physical separation of new settlement/housing/employment/mixed use development from large built up area. Areas separated from the natural edge of a large built-up area by Strong boundary – i.e. would be beyond the pre-existing natural development limits of the large built-up area.</p> <p>Significant countryside encroachment, both in terms of the physical area and relative to the existing settlement may occur, and in relation to interrupted views across the landscape.</p>

2.1.22 Where there is some overlap in terms of the criteria whereby a Green Belt Parcel does not wholly fall within one criteria definition, multiple criteria may be selected and sound professional judgement used to most appropriately categorise the Green Belt Parcel in relation to Purpose 1.

Purpose 2: To prevent neighbouring towns merging in to one another

2.1.23 The main method of assessing the contribution that a Green Belt Parcel makes with regard to fulfilling this purpose relates to the distance between neighbouring towns. The shorter the distance between towns the more susceptible the settlement pattern will be to coalescence through development.

Definition	Description
<p>Separation Retained (SR)</p>	<p>Where very large countryside gaps exist between towns; no intervisibility. Large number of significant interlying features visually restrict perceived impacts from development. Development will not lead to merging of towns or significantly reduce the countryside 'gap'. NB: Development may lead to isolated houses becoming part of or closer to the town.</p>
<p>Separation Reduced, but Functional (SRF)</p>	<p>Significant countryside gaps exist between towns, risk of reduction not significant. Green Belt Parcel development would narrow gap between towns without (visual or physical) merging. Existing interlying barriers can be maintained; scope to mitigate perceived merging of settlements. NB: Development may lead to isolated houses becoming part of or closer to the town.</p>
<p>Significant Separation Reduction (SSR)</p>	<p>Moderate-sized but important gap between towns, significant reduction of countryside gap. Gap reduction such that potential risk for future town coalescence high. Potential increased visibility between towns. Scope for some limited partial development of the Green Belt Parcel where visual barriers exist without risk of towns merging.</p>
<p>Negligible or No Separation (NNS)</p>	<p>Green Belt Parcel entirely (or almost) is the gap between two or more towns. Unacceptable physical merging of towns or distance between towns decreased to a very short distance. No or few visual barriers between towns such that development would visually merge settlements.</p>
<p>Not Applicable (N/A)</p>	<p>Green Belt Parcel (likely to be small), is contained within an existing town (e.g. infilling) and would not lead to a reduction in the distance between two or more distinct towns.</p>

2.1.24 Where there is some overlap in terms of the criteria whereby a Green Belt Parcel does not wholly fall within one criteria definition, multiple criteria may be selected and sound professional judgement used to most appropriately categorise the Green Belt Parcel in relation to Purpose 2.

Purpose 3: To assist in safeguarding the countryside from encroachment

2.1.25 The primary assessment in relation to Purpose 3 relates to the appropriateness of the land use in relation to what would be considered to be countryside.

2.1.26 Whilst the NPPF does not outline what appropriate land uses should be within the countryside and Green Belt, appropriate land uses are considered to be ones which promote access, outdoor sports and recreation and retention and enhancement of the landscape, visual amenity and biodiversity in accordance with the five purposes of the Green Belt. For the purposes of this report, the following land uses, activities or functions are considered to be suitable for the countryside and so loss of these to other development in areas of countryside would be considered to be encroachment:

- Agriculture.
- Forestry/Woodland.
- Dunes.
- Access (Access land, land with PRow's, permissive and informal access).
- Cemeteries.
- Equine Uses.
- Parkland.
- Former landfill/mineral sites where used for agriculture, nature and/or recreational uses.
- Nature (nationally/locally designated Sites and non-designated 'wild' sites).
- Outdoor Sport/Recreation/Amenity Space (taken to be open air activities without the need for large build development).
- Open Land occupied by the MoD, e.g. airfields.

Definition	Description
<p style="text-align: center;">Limited Countryside Functions (LCF)</p>	<p>Green Belt Parcels where the majority of the existing land use is considered an inappropriate land use with regard to Green Belt policy and which do not contribute to the functional countryside.</p> <p>Limited or no public access.</p>
<p style="text-align: center;">Mixed Functions within Countryside (MFC)</p>	<p>Where the Green Belt Parcel contains some appropriate land uses but also some inappropriate elements, land use or development and where countryside functions are provided alongside other land-uses.</p> <p>Some public access afforded.</p>
<p style="text-align: center;">Functional Countryside (FC)</p>	<p>Green Belt Parcels where the majority of the existing land use is considered an appropriate land use with regard to Green Belt policy and which contribute strongly to the functional countryside.</p> <p>High degree or important public access.</p>

2.1.27 In general terms, Green Belt Parcels with appropriate countryside land uses may be desirable to be protected from development in order to fulfil the objective of Purpose 3. The purpose of this element of the assessment has not been to rate the quality of the individual landscape elements, just to define whether the land-use and character would change from that considered consistent with functional countryside.

Purpose 4: To preserve the setting and special character of historic towns

2.1.28 In the NPPF, Chapter 12: Conserving and enhancing the historic environment states that *“local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:*

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *The desirability of new development making a positive contribution to local character and distinctiveness; and*
- *Opportunities to draw on the contribution made by the historic environment to the character of a place.”*

As such Green Belt Parcels were categorised as indicated below:

Definition	Description
Limited Relationship with Historic Town (LRHT)	The Green Belt Parcel is not adjacent to or is unlikely to affect the setting of a Historic Town. There is no or very limited potential for other Conservation (Heritage) Designations to be adversely affected by development.
Moderate Relationship with Historic Town (MRHT)	Development of the Green Belt Parcel is close to or could affect the setting of a Historic Town. There is potential for other Conservation (Heritage) Designations to be adversely affected by development, e.g. a Conservation Area.
Strong Relationship with Historic Town (SRHT)	The Green Belt Parcel is adjacent to or will affect the setting of a Historic Town.

Overall Assessment Rating

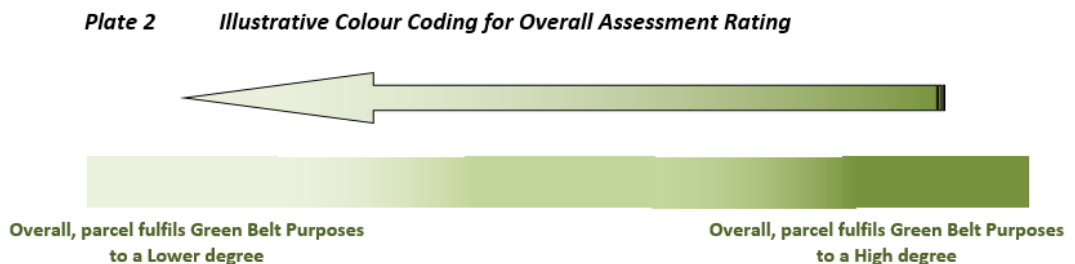
2.1.29 An overall contribution of the Parcel to the Purposes of the Green Belt is given at the bottom of each summary sheet, rated Low through to High – where the higher the rating the greater the contribution of the Parcel in terms of fulfilling the Purposes of the Green Belt. The overall rating is not intended to convey whether the land is valuable Green Belt land or not, it is an overall rating to indicate to what relative extent each Site fulfils the assessed four Purposes of the Green Belt, to allow a comparison between the Parcels to be made. In terms of assessing the suitability of built development within a Parcel, further consideration would need to be given to the strength of each individual Green Belt purpose to the particular locality. Table 6 below outlines the overall rating criteria used.

Table 1 Overall Assessment Rating

Assessment Rating	Overall Assessment Description
Low	<p>Parcel currently fulfils few Purposes of the Green Belt or fulfils a number of Purposes to a limited level and development of the Parcel will not significantly affect its contribution to Green Belt Purposes.</p> <p>No more than one High assessment level received, where Purpose 2 is not currently fulfilled at all (e.g. development would constitute infilling within a town) and other Purposes limited to a Low level; or</p> <p>One Purpose is assessed to Moderate level and all other Purposes are limited to a Low level.</p>
Low - Moderate	<p>Intermediate/borderline assessment between Low and Moderate.</p> <p>Generally , no more than one Green Belt Purpose is assessed to a High level, with all other Purposes limited to a Low level; or</p> <p>Up to two Purposes assessed to a Moderate level and two Purposes l to a Low Level.</p>
Moderate	<p>Development of the Parcel will Moderately affects the Parcel’s contributions to the Purposes of the Green Belt.</p> <p>Three, or all, Green Belt Purposes assessed to a Moderate level; or</p> <p>One Purpose of the Green Belt is assessed to a High level and at least two Purposes are assessed to a Moderate Level; or</p> <p>Two Purposes are assessed to a High level and the other two Purposes limited to a Low level.</p>
Moderate - High	<p>Intermediate/borderline assessment between Moderate and High.</p> <p>Where two Purposes of the Green Belt are assessed to a High level and no more than one Purpose is assessed to a Moderate level (with the other Purpose being limited to a Low level).</p>
High	<p>Generally, development of the Parcel will significantly affect the Parcel’s contribution to the Purposes of the Green Belt.</p> <p>At least three Purposes of the Green Belt have been assessed to a High level, or where two purposes are assessed at a High level (with another purpose assessed at a Moderate level) and professional judgement has been used in the overall assessment rating by virtue of Parcel scale, locality and ‘borderline’ assessment results .</p>

3. PRESENTATION OF FINAL ASSESSMENT

- 3.1.1 For each Parcel, the full report will contain a detailed assessment sheet pro forma, used to illustrate the key findings from the Desk Study and Fieldwork and the assessment of how far the Parcel meets the purposes of the Green Belt.
- 3.1.2 Key characteristics of each Parcel, including size, land use, access, will be recorded in the full report. The four purposes of the Green Belt are raised as questions, with a description of the judgement made in relation to the relevant criteria, as outlined above, alongside the record of the assessment rating for the Parcel in relation to categorisation process.
- 3.1.3 It is noted that some Parcels will highly fulfil one purpose but other purposes may not be fulfilled to the same level. Each purpose is considered to be equally important in terms of the functions of the Green Belt. The assessment rating for each purpose assesses the relative importance or 'contribution' of the Parcel to fulfilling a specific purpose of the Green Belt according to the assessment criteria.
- 3.1.4 Detailed assessment of parcel results is to be included in the full report together with recommendations. For the purposes of this summary note and in presenting a summary of emerging findings, the 'Overall Contribution of Parcels to Green Belt Purposes Plan' has been extracted from the full working draft report (refer to Figure 2, Appendix 1).
- 3.1.5 For Figure 2, the darker the green the greater the contribution the parcel makes to fulfilling Green Belt purposes.



- 3.1.6 It has not been the objective of this assessment to make an overall judgement in relation to Green Belt policy, nor assess the relative importance of each purpose. Each purpose is assumed to be as important as each other. The assessment is to guide the housing strategy of the developing Brentwood LDP in relation to potential effects on the purposes of the Green Belt.
- 3.1.7 Where there is any ambiguity in the assessment levels, a precautionary or 'worst-case' approach has been adopted.