



**BRENTWOOD
BOROUGH COUNCIL**

**Green Belt Study Part III:
Assessment of Potential Housing, Employment
and Mixed Use Sites in the Green Belt and their
Relative Contribution to the Purposes of the
Green Belt Designation**

Reg 19 Pre-Submission

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CONTENTS

1	INTRODUCTION	4
1.1	BACKGROUND.....	4
1.2	THE BRIEF.....	5
1.3	CRESTWOOD ENVIRONMENTAL.....	7
1.4	DOCUMENT STRUCTURE.....	7
1.5	SCOPE.....	8
1.6	ASSUMPTIONS	8
2	METHODOLOGY AND APPROACH	10
2.1	GUIDANCE.....	10
2.2	PROCESS OVERVIEW	11
3	SUMMARY OF ASSESSMENT RESULTS & RECOMMENDATIONS	25
3.1	HOUSING ASSESSMENT RESULTS.....	25
3.2	EMPLOYMENT AND MIXED USE ASSESSMENT RESULTS	28
3.3	RECOMMENDATIONS	31

LIST OF APPENDICES:

Appendix L1	Site Assessment Sheet Pro forma
Appendix L2	Summary of Housing Assessment Results – Assessment Results Order
Appendix L3	Summary of Housing Assessment Results – Site Reference Order
Appendix L4	Detailed Site Housing Assessment Sheets
Appendix L5	Figure 1 – Overall Contribution of Sites to Green Belt Purposes – Housing Assessment
Appendix L6	Summary of Employment/Mixed Use Assessment Results – Assessment Results Order
Appendix L7	Detailed Site Employment/Mixed Use Assessment Sheets
Appendix L8	Figure 2 – Overall Contribution of Sites to Green Belt Purposes – Employment/Mixed Use Assessment

LIST OF TABLES:

Table 1	Criteria for Assessment of Contribution of Purpose 1.....	15
Table 2	Criteria for Assessment of Contribution of Purpose 2.....	17
Table 3	Criteria for Assessment of Contribution of Purpose 3.....	18
Table 4	Criteria for Assessment of Contribution of Purpose 4.....	21
Table 5	Overall Assessment Rating.....	23
Table 6	Number of High Assessment Ratings of Individual Purposes Received Per Site	26
Table 7	Summary of Overall Assessment Results.....	26
Table 8	Summary of Combined Overall and Individual Purposes Assessment Results.....	26
Table 9	Number of High Assessment Ratings of Individual Purposes Received Per Site	28
Table 10	Summary of Overall Assessment Results.....	29
Table 11	Summary of Combined Overall and Individual Purposes Assessment Results.....	29

1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1 Brentwood Borough Council (the Council) is in the process of preparing a new Local Development Plan (LDP) for the Borough which, once adopted, will supersede saved policies in the current Replacement Local Plan (Brentwood Borough Council, June 2005). The Brentwood LDP will set out strategic priorities for the Borough, including policies to deliver housing.
- 1.1.2 In 2012 the Coalition Government introduced a new planning system. Under the new system, instead of producing separate development plan documents, such as a Core Strategy, planning authorities can now produce a single local plan if they wish to. Brentwood Borough Council has chosen to do this. The Council published its preferred options document for consultation in 2013, the 'Local Plan 2015-2030: Preferred Options' set out the long term vision for how the Council proposed the Borough should develop by 2030 and the draft strategy and policies for achieving that vision.
- 1.1.3 Following the conclusion of the consultation in 2013 it became apparent to the Council that several issues needed to be reconsidered, specifically regarding meeting full objectively assessed development needs. Consequently the Council published its 'Strategic Growth Options' document for consultation in January 2015, which set out all sites suggested to the Council to meet development needs and information on some key issues to consider as part of assessing sites, such as transport infrastructure, local services, and the environment.
- 1.1.4 To inform the preparation of the new Brentwood Local Plan, an evidence base is required. In 2014 the Council published a Strategic Housing Market Assessment (SHMA) (David Coultie Associates, December 2013), to form part of the evidence base, to assess future housing need and demand and inform housing targets. An update to the 2014 SHMA is currently being undertaken by the Council in light of subsequent amendments in national policy guidance.
- 1.1.5 In 2011 the Council published a Strategic Housing Land Availability Assessment (SHLAA) (Atkins, October 2011), as part of the evidence base, to provide a preliminary assessment of sites with the potential to accommodate the housing targets. The SHLAA provided the starting point for considering sites as part of the plan making process. It aimed to identify, in a systematic manner, land likely to be suitable, available and achievable for housing development in the Borough to meet housing targets during the period 2010 to 2031.
- 1.1.6 A total of 297 areas of land were assessed in the SHLAA. These were identified from a variety of sources, including Brentwood Urban Capacity Study (Brentwood Borough Council, June 2005); records of sites with existing or previous planning consents; and land put forward through an open 'Call for Sites' exercise (November-December 2009) or other discussions with the Council.
- 1.1.7 The SHLAA indicated that there was an adequate amount of available land to meet the then proposed housing requirements on brownfield sites for the first 9.9 years (2010 – 2019/2020) and that the Council may need to release a minimal amount of Greenfield land during this period to provide 0.1 years supply. *"During the second 10 years (2020 - 2030), other than a reliance on Windfall sites, the SHLAA indicated that there would be a minimal amount of Brownfield land (89 dwellings) to deliver the required housing supply"* and that Greenfield sites would be required to

meet the remaining requirement (of which there were sufficient sites available).

1.1.8 The SHLAA recommended that the potential Greenfield release which may be required during the assessment period should be done through a detailed assessment of potential housing sites through the Council's Site Allocations and should build upon the work done to date in the SHLAA. Subsequent to the SHLAA, a number of other Sites have been brought to the attention of Brentwood Borough Council as having potential for housing. this has resulted in the SHLAA being supplemented by other sources and more up to date information where possible, such as:

- sites submitted by landowners and developers;
- sites proposed by parish councils and members of the public; and
- other sites known or owned by the Council.

1.1.9 As part of the evidence base, an assessment of the potential effects on Green Belt land from allocation for, and development of, new residential areas (housing) within these areas has been identified as being required by the Council.

1.1.10 Additionally, in 2014, the assessment of potential effects on Green Belt land was broadened out to consider whether any of the sites under consideration would be assessed differently (in terms of Green Belt effects/contribution) should an allocation, or subsequent development, be made for employment or mixed-use purposes.

1.1.11 In 2016, following consultation on the 'Draft Local Plan 2013-2033' and consultation with neighboring authorities, the Council commissioned a Borough wide study of the strategic function of Green Belt designated land, to form part of the emerging the evidence base to inform the new Local Plan. This formed Part 2 of the Green Belt evidence base.

1.1.12 Whilst work on the draft Local Plan progressed, in 2017 Brentwood commissioned an updated and Housing and Economic Land Availability Assessment (HELAA) to review the previous SHLAA baseline and in accordance with requirements of the National Planning Policy Framework (NPPF). As part of this review a number of additional sites were put forward for consideration as housing and employment land.

1.1.13 Following publication of the Strategic borough-wide Green Belt Assessment and compilation of HELAA data throughout 2018, the scope of the site specific Green Belt evidence base has been refined to reflect the wider consideration of the Local Plan evidence base and Sustainability Appraisal considerations, as discussed below.

1.1.14 This document will be published in support of the new Brentwood Local Plan Regulation 19 Pre-Submission Consultation. Should this process highlight any further considerations or comments requiring clarification, this document may be subsequently amended to account for the consultation period prior to submission of the Brentwood Local Plan to the Planning Inspectorate.

1.2 THE BRIEF

1.2.1 Brentwood Borough Council (the Council) commissioned Crestwood Environmental Ltd. in March 2013 to undertake an independent, professional **assessment of Housing Sites (being considered as part of the SHLAA) within the Green Belt and their relative contribution to the purposes of the**

Green Belt designation.

- 1.2.2 Overall, Brentwood Borough 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 (from HELAA Assessment work) - A relative assessment of potential Site Allocations against the purposes of the Green Belt. The assessment is focused on an individual sites basis and will be supplemented by an addendum covering cumulative aspects as appropriate.
- 1.2.3 This report forms Part 3 of the Green Belt evidence base and is a Site Specific assessment considering not only Green Belt functions, but the potential impacts from development on the purposes of the Green Belt.
- 1.2.4 In 2013, 105 'Sites' (including individual sub-components to large sites where applicable) were assessed within the Brentwood Green Belt, comprising Sites considered as part of the SHLAA and subsequently put forward in wider Council studies.
- 1.2.5 In late 2014, following consultation on the 'Local Plan 2015-2030: Preferred Options', the Council commissioned an additional 58 sites for assessment in 2015, 13 of which were to be further considered for employment use and 2 for mixed use or leisure. Additionally, 5 previously assessed sites (from 2013) were to be further assessed for employment use (3 sites) and mixed use or leisure (2 sites).
- 1.2.6 In late 2015, following consultation on the 'Strategic Growth Options' document, the Council commissioned a further 36 sites for assessment for housing purposes, with assessment to be undertaken in early 2016.
- 1.2.7 The Council undertook a further 'call for sites' in early 2017 and a full update to the current Strategic Housing Land Availability Assessment (SHLAA) (now integrating employment sites and called a 'Housing and Employment Land Availability Assessment' – HELAA). The HELAA is well progressed and will be finalised in due course. This study introduced a number of potential additional sites. Many of the sites overlapped considerably with previously assessed areas and during this time the borough wide Green Belt review has been completed (the Part II Green Belt evidence) which has further informed the selection of Sites.
- 1.2.8 At this stage, and based on the progressive findings of the HELAA and wider evidence base, a selective approach to the assessment of additional has been undertaken. Overall, Sites (located within the Green Belt) which have been discounted for other environmental or strategic reasons (i.e. too small to form a strategic allocation), were not considered for further assessment.
- 1.2.9 This is considered in compliance with NPPF and that the Green belt is permanent and in accordance with paragraph 136 *"once established, Green Belt boundaries should only be altered where*

exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans”.

- 1.2.10 As such, any Site discounted for other material strategic planning reasons is not considered to need a Site specific Green Belt appraisal, as the Site would only be potentially suitable for development where other criteria have been met. Further to this, the Part II Green Belt Study is a material part of the evidence base and has informed spatial considerations for the developing Local Plan.
- 1.2.11 As a result, the list of sites has been refined since January 2018 to account for sites that did not pass Stage 1 of the HELAA test or have been discounted for other strategic planning or SA considerations. Duplicate or overlapping sites have also been discounted or assessed on a worst-case basis.
- 1.2.12 In total, 92 individual housing sites assessments have been undertaken. Occasionally, Sites have been assessed as separate land parcels where deemed appropriate. Of the 92 assessments, 23 sites have been further assessed in relation to potential allocations for employment and/or mixed use development.

1.3 CRESTWOOD ENVIRONMENTAL

- 1.3.1 Crestwood Environmental Ltd. is an independent environmental consultancy and a Registered Practice of the Landscape Institute, employing landscape architects, planners and environmental consultants with extensive experience in land use planning and impact assessments.
- 1.3.2 This study has been led by Karl Jones BSc (Dual Hons.) CMLI CEnv MIAgrM AIEMA, Director and Principal Landscape Architect and Adam Collinge BSc (Hons) PGDipLA MA CMLI AMIEnvSci, Associate Director and Principal Landscape Architect.
- 1.3.3 Karl has over 20 years’ experience in landscape design, assessment and management, has acted as an Expert Witness on landscape and visual matters at Public Inquiry and has been a member of the Technical Committee of the Landscape Institute since 2011. Adam has over 10 years’ experience in landscape architecture and planning in both public and private sector and has also provided evidence and acted as an Expert Witness at Public Inquiry in relation to Development Plans and planning appeals.

1.4 DOCUMENT STRUCTURE

- 1.4.1 This report is divided into further sections as described below.
- Section 2 (Methodology and Process) describes the basis for the methods used to undertake the assessment and describes the terminology, criteria used to determine and describe the potential effects of the Sites on the purposes of Green Belt designation.
 - Section 3 (Assessment Results and Recommendations) presents the summarised results of the individual assessments (detailed site-by-site housing assessments are provided in Appendix L4, with employment/mixed use assessments provide in Appendix L7).

Recommendations are given to prioritise Sites and to guide the direction of the future growth in housing within Brentwood Borough, in terms of effects on the purposes of the Green Belt designation only.

- 1.4.2 At the end of the report a Glossary (providing a description of the intended use/meaning of the terms used in this assessment) and References are provided. Figures and other documents that are referred to are located in the Appendices.

1.5 SCOPE

- 1.5.1 This study assesses Green Belt considerations primarily in relation to potential housing sites ('Sites') as considered as part of the SHLAA and as put forward during further consultation on the emerging Local Plan. As the scope of the evidence base in support of the LDP has broadened, 23 sites have been further assessed in relation to employment or mixed use/leisure development.
- 1.5.2 Whilst the Part II Green Belt Review focused primarily on the existing function of Green Belt Parcels (or broad areas), this Part III study is a hybrid assessment that considers both the relative contribution of land to the Green Belt (at a Site level) but also the potential impacts housing, employment or mixed-use development would have in relation to Green Belt purposes. This is reflected in the hybrid methodology, which has subtle differences for the Part III Study, compared to the Part II study, which is able to consider a range of Site typologies, locations and scales on a relative basis.
- 1.5.3 Only Sites situated within the Green Belt have been considered as part of this study. It is understood that a number of SHLAA sites (and others proposed during subsequent consultation) are located outside of land designated as Green Belt, and in relation to Green Belt policy, these sites (particularly those that are brownfield sites) would be prioritised over Sites located within the Green Belt.
- 1.5.4 The effect of developing the Sites on the purposes of the Green Belt is only one of many areas to be considered in preparation of the Council's LDP. The Council is under no obligation to follow this Report's findings and recommendations in preference to other planning considerations, where on balance other planning considerations outweigh Green Belt aspects. On its own, this report cannot be used to justify the granting or refusing of planning permission or allocating, or not allocating, a Site that lies within the Green Belt.
- 1.5.5 A range of other environmental considerations may need to be taken into account, such as ecology and nature conservation, heritage and archaeology, water quality and flooding potential etc. by others to determine the potential wider environmental and cumulative impacts of development on a particular Site.

1.6 ASSUMPTIONS

- 1.6.1 The following assumptions have been made in order to provide a baseline from which professional judgement and consideration can be applied to the potential or perceived effects from housing, employment and mixed use development on the 'openness' of the Green Belt and the individual purposes of the Green Belt.
- 1.6.2 The main built development forms are assumed to be:

- **For Housing**, predominantly 2 storey, circa 6-7m maximum height, residential buildings. This does not mean that higher buildings would be inappropriate at the Sites, only that the study for this type of development has not considered buildings of predominantly larger height than these.
- **For Employment and Mixed Use/Leisure**, predominantly 3 storey buildings, potentially comprising warehouse, industrial and/or commercial (including office, leisure, retail. etc.) style buildings, average height c. 10m-15m. This does not mean that higher buildings would be inappropriate at the Sites, only that the study for this type of development has not considered buildings of predominantly larger height than these.

- 1.6.3 It is recognised that Employment or Mixed Use allocations are likely to lead to very different land-uses, however, for the purposes of this study, it is assumed that the relative heights, scale, footprint, density, etc. would be similar to one another in terms of assessing effects on Green Belt purposes. Whilst Mixed Use developments generally comprise areas of housing, relatively more appreciable effects on Green Belt are likely to relate to surrounding larger commercial, industrial or warehouse buildings as with any Employment based development.
- 1.6.4 These assumptions are important in order to understand whether potentially larger scale buildings would have a more appreciable effect within the Green Belt with regards to Employment/Mixed Use allocations compared to the Housing assessments.
- 1.6.5 It is assumed that any buildings would be well-designed and would use traditional or other appropriate building techniques, styles and materials appropriate to the buildings use and surroundings. It is also assumed that the development would include a strong framework of structural landscaping including ground modelling, where appropriate, and tree planting of appropriate scale, area, design and species composition to ensure that the development achieves a good fit in the landscape.

2 METHODOLOGY AND APPROACH

2.1 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 methodology has been designed that is aimed at meeting the requirements of the Brief and is based on other precedent studies from across the UK.

2.1.2 Such precedent and background information includes (but are not limited to):

- Planning on the Doorstep: The Big Issues – Green Belt (Planning Advisory Service, February 2015);
- Plan-Making Case Law Update - Main Issue 4: Green Belt (Planning Advisory Service, November 2014);
- Guidance for Green Belt Assessment (Planning Advisory Service, January 2014);
- Briefing Paper Number 00934: Green Belt, (Louise Smith for House of Commons Library, January 2016);
- A 21st Century Metropolitan Green Belt (LSE, 2016);
- Green Belt Assessment Methodology (Sevenoaks District Council, 27 September 2016);
- Buckinghamshire Green Belt Assessment Report: Methodology and Assessment of General Areas (Arup, 7 March 2016);
- Joint Green Belt Study: Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council (Stage 1 Report Prepared by LUC, June 2015); and
- Staffordshire Moorlands District Council Green Belt Review Study (Amec Foster Wheeler, November 2015).

2.1.3 The current context of Green Belt Policy and Government Guidance is set out in the preceding Part 1 Study. The Bespoke methodology designed for this assessment has evolved over time to account for not only national and regional guidance and precedent studies, but also the local context within Brentwood Borough.

2.1.4 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.

2.1.5 A number of Local Plan Reviews and Examinations provide useful reference points and guidance in relation to the consideration of Green Belt policy, assessments and strategic development planning:

- *Green Belt studies should be "fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations" and should be comprehensive rather than selective (Inspectors Report (A Thickett) to Leeds Council, September 2014);*

- *Green Belt studies should be clear “how the assessment of ‘importance to Green Belt’ has been derived” as part of the assessment process and in relation to the individual purposes of Green Belt. This should form the basis in relation to any justification for the release of land from Green Belt. (Inspectors Interim Findings (H Stephens) to Durham City Council, November 2014); and*
- *Green Belt studies should “take account of the need to promote sustainable patterns of development, as required by paragraph 84 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process.” (Inspectors Letter (L Graham to Cambridge City and South Cambridgeshire Councils, May 2015).*

2.1.6 The above list is not exhaustive but provides a context for key principles in the assessment process.

2.2 PROCESS OVERVIEW

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

1. Define the Brief and Scope of the Assessment;
2. Determine the Assessment Method;
3. Determine the Assessment Criteria;
4. Desk Study;
5. Fieldwork;
6. Undertake the Assessment of the Sites in relation to Green Belt purposes;
7. Produce recommendations; and
8. Present the Assessment.

Define the Brief and Scope of the Assessment

2.2.2 A request from the Council for an initial scope of works was requested and provided in January 2013.

2.2.3 An Inception Meeting was held on 5th March 2013 at Crestwood Environmental Ltd.’s offices, attended by Bill Newman (Interim Planning Policy Manager for Brentwood Borough Council), Philip Drane (Planning Officer for Brentwood Borough Council), Karl Jones (Direct and Principal Landscape Architect for Crestwood Environmental Ltd.) and Adam Collinge (Senior Landscape Architect for Crestwood Environmental Ltd.).

2.2.4 At the Inception Meeting the requirements of the work was discussed in more detail and the scope of works refined and agreed. Various documents were passed to Crestwood Environmental Ltd. providing further information about the Housing Sites. Further meetings and conference calls have been held at regular intervals in the subsequent years, particularly where the number of Sites or scope of the assessments has changed.

2.2.5 The Brief and Scope of the assessment are clearly set out in the project brief as described in Sections 1.1.4 and 1.5 above.

- 2.2.6 In absolute policy terms, new housing, employment or mixed use development would generally be considered to be inappropriate in the Green Belt. This was acknowledged at the Brief stage and made clear that the Study was not to assess the appropriateness of the location of the Green Belt boundary or suitability of the land within. The emphasis of the Brief and Scope was on assessing the potential effects of developing the Sites on the purposes of the Green Belt.
- 2.2.7 It is also acknowledged that the vast majority of Sites, if not all, will fulfil the purposes of the Green Belt to some degree. This assessment is being undertaken to establish the relative scale of the contribution of the Sites to the purposes of the Green Belt, thereby allowing for a comparison of Sites to be made in relation to this whilst contributing to a wider evidence base which, overall, will advise on the preferential location of new housing, employment and/or mixed use development.
- 2.2.8 This assessment is not a boundary review of the Green Belt in Brentwood, which is considered to be functional and forms a critical component of the 'character' of Brentwood.

Determine the Assessment Method

- 2.2.9 The information given in Section 2.1 forms the basis for the methodology and has been used to design a bespoke assessment methodology that applies to Brentwood borough.

Determination of the Assessment Criteria

- 2.2.10 Definition of appropriate criteria is required such that these can be applied in a systematic way with impartial and transparent judgement and such that the conclusions of the assessment can be summarised into meaningful recommendations.
- 2.2.11 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, 2018) and the Replacement Local Plan (Brentwood Borough Council, 25 August 2005 (Adopted)).
- 2.2.12 The NPPF states that *'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open'*.
- 2.2.13 It also states that *'the essential characteristics of Green Belts are their openness and their permanence'*.
- 2.2.14 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."*
- 2.2.15 The NPPF does not state whether one purpose is more important than another.

- 2.2.16 Paragraph 141 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.”*
- 2.2.17 Paragraph 138 of the NPPF states that *“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.*
- 2.2.18 Whilst it is not the purpose of this study to assess the sustainability of land to accommodate development, it is an important strategic consideration that when promoting patterns of development, any review of the Green Belt does not impinge on the sustainability and vitality of existing settled areas by either unduly constraining sustainable growth (either directly or indirectly) or by placing undue pressure on existing settled areas through over-development.
- 2.2.19 ‘Purpose 5’ has not been assessed in detail as it has already been outlined, through the Local Plan, that development will be maximised and directed towards land not contained within the Green Belt in the first instance, as an integral part of the plan-making process for Brentwood. 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.
- 2.2.20 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 Sites 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

- 2.2.21 Compared to the Part II Green Belt Review, Purpose 1 has been adapted to apply at Site specific level. As with the Part II study, large built-up areas, for the purposes of this assessment, are taken to include important settled areas, including significant villages, such as Doddinghurst/Hook End, Wyatt’s Green, Blackmore, Mountnessing, Stondon Massey, Ingrave, Herongate and Kelvedon Hatch, as well as the larger town settlements such as Brentwood, Pilgrims Hatch, Shenfield/Hutton, West Horndon and Ingatestone. Small hamlets, ribbon development and sparse housing, e.g. small numbers of dwellings along a rural road, are not considered to be part of a large built-up area.
- 2.2.22 In general terms, a measure for this purpose would be the degree to which a Site is already developed and is comprised of buildings. Whilst directing development to previously developed Sites, i.e. Brownfield land, would be broadly in accordance with Green Belt policy, determining how well a Site meets the objectives of Purpose 1 based on this was deemed too simplistic for the

following reasons:

- The majority of Sites contained no built development;
- Built development such as agricultural buildings may be an integral part of the character of the area and Green Belt in the locality;
- Some Sites had elements of built development but were separated from large built-up areas; and
- There would be no measure of containment of the development and its relationship to the wider setting and large built-up areas.

2.2.23 It was decided that a more appropriate measure was to consider whether development of the Site could be 'contained'. This would measure whether the presence of strong physical and / or visual features would act as a logical boundary to use to restrict development and not lead to 'unrestricted sprawl of large built-up areas' into adjoining parcels of land.

2.2.24 The Sites were therefore assessed in terms of how 'contained' each was, by one or more large built-up areas. This could apply wholly or partially to a Site. As with the Part II Green Belt Reviews, Sites that were not adjacent to any large built-up areas were generally considered to be 'not contained' (i.e. not within the confines of existing settlement limits), in accordance with the principles of para 133 of the NPPF that '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*' (refer to Part II report for further information).

2.2.25 In terms of containment, relevant consideration was also given to the scale of the Site and if wholly developed, the scale of countryside encroachment (i.e. the extent to which a large built up area would sprawl outwards beyond the existing settlement limits). Consideration and professional judgement has been applied in deciding the scale of countryside encroachment, which will also relate to the relative scale of the Site in relation to existing adjacent settlements.

2.2.26 Four criteria have been considered in term of assessing the relative contribution of the Site to Purpose 1:

- **Containment** – How well the Site relates to an existing large built-up area;
- **Development Type** – Either constitutes 'infilling', an extension to a large built-up areas or a separate housing area with limited relationship to an existing large built-up area;
- **Boundary** – The 'strength' of the existing 'settlement boundary' adjacent to the Site.
 - A 'Strong boundary' would have a strong physical presence and may be relatively permanent and immovable and could consist of housing (or similar built development) or existing significant civil infrastructure (e.g. Motorway, A-road or railway).
 - A 'Weak boundary' would have less physical presence and may be considered less permanent/immovable (e.g. fencing, hedges, tree lines or minor roads).
 - 'No boundary' would be where the Site is open with no distinct boundaries and or does not abut any existing settlement.
- **Effects on Openness** – This relates to the scale of countryside encroachment if developed, both in terms of the scale of the Site and in the context of the existing built up area.

2.2.27 Based on the above, Sites were categorised as per Table 1.

Table 1 Criteria for Assessment of Contribution of Purpose 1

Definition	Description
Well-Contained (WC)	<p>Within a large built-up area.</p> <p>Would constitute 'Infilling'.</p> <p>Strong boundaries on most sides of the Site.</p> <p>Limited or no countryside encroachment. Limited effects on the perception of openness around a large built up area.</p>
Partly-Contained (PC)	<p>At least two boundaries about a large built-up area without containment.</p> <p>Would form an extension rather than 'infilling'.</p> <p>Weak boundaries on remaining sides of the Site.</p> <p>Some countryside encroachment may occur or where the perception of openness around a large built up area may be adversely affected.</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. Significant reduction in the perception of 'openness'.</p>

N.B. Site may be 'Not Contained' but if it is Brownfield there may be no countryside encroachment

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

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

2.2.29 The Part II assessment primarily considered the degree to which a Green Belt parcel formed part of a strategic countryside gap separating towns. This is considered too simplistic an approach at a Site level as the perception of and scale development could be considered to have lesser or greater effects at reducing the perceived gap between towns in comparison to the scale of the Site or countryside area considered on a standalone basis. Additionally, the Part II study primarily considered large expansive areas of countryside, whereas the majority of potential development Sites are generally of a much smaller scale.

2.2.30 As with the Part II study, 'towns', for the purposes of this assessment, are taken to include important settled areas, including significant villages, such as Doddinghurst/Hook End, Wyatt's Green, Blackmore, Mountnessing, Stondon Massey, Ingrave, Herongate and Kelvedon Hatch, as well as the larger town settlements such as Brentwood, Pilgrims Hatch, Shenfield/Hutton, West Horndon and Ingatestone.

2.2.31 Building on the Part II study, a key consideration at a Site specific level is the degree to which development would encroach in to an intervening gap between towns. Therefore, the main method of assessing the contribution that a Site makes with regard to fulfilling this purpose relates to the distance between towns. The shorter the distance between towns the more susceptible the settlement pattern will be to coalescence through development.

- 2.2.32 Included in this are perceptual and visual elements in terms of how settlements spatially relate to one another. A Site may be Well-Contained (see Table 1) but only a few hundred metres from another town, meaning its development may visually (if not physically) result in the merging of two towns. Additionally, over a short distance the same Site may be separated from another town or contained by a large wooded area, a railway/major road embankment, interlying topography etc. such that, visually, the towns would still be distinct and separately defined.
- 2.2.33 Equally, a small Site, perhaps a potential extension to a town, is on a slope facing towards another town that is over 1km away. There may be no interlying features with expansive views offered between the settlements. Visually, any development could be perceived as large-scale encroachment in to the countryside and the perceived distance between the towns could be diminished beyond what the actual geographical separation may be. Whilst not resulting in the physical merging of two towns, this gradual degradation of the desirable characteristics of separation may degrade the reasoning for retention of the separation into the future.
- 2.2.34 The size of the Site is also a factor, with larger Sites potentially more visually intrusive than smaller Sites. As such, interlying distance between towns alone is considered too simplistic a measure, but is a relevant consideration (along with overall size of the Site) in the assessment of the selected criteria, as follows:
- **Interlying physical barriers** – The ‘strength’ of existing interlying physical barriers:
 - A ‘Strong barrier’ would have a strong physical presence and may be relatively permanent and immovable and could consist of housing (or similar built development) or existing significant civil infrastructure (e.g. Motorway, A-road or railway). Large significant protected woodlands and large topographic features (hills/rolling landform) may also be considered a Strong barrier.
 - ‘Moderate barriers’ would have less physical presence and may be considered less permanent/immovable (e.g. minor roads, small, plantation and/or commercial woodlands or multiple intervening tree belts/hedgerows). Semi-permanent or well vegetated mounds, bunds or levees may also be considered Moderate barriers.
 - A ‘Weak barrier’ would have even less physical presence and may be considered at risk, removable or subject to change (e.g. fencing, hedges, tree lines, minor copses or access tracks). Temporary mounding or bunds may also be considered a Weak barrier.
 - ‘Absent barriers’ would be relatively open intervening land with no distinct barriers or landscape features that would prevent physical and/or perceptions of encroachment or settlement coalescence.
 - **Views between towns** – This is the consideration of views between settlements and whether development would encroach in to these views.
 - **Distance between towns / relative size of Site / town coalescence** – This is consideration of whether development would lead to towns physically or visually merging or the degree to which the interlying countryside gap would be reduced by development.
- 2.2.35 Based on the above, Sites were categorised as indicated in Table 2.

Table 2 Criteria for Assessment of Contribution of Purpose 2

Definition	Description
Separation Retained (SR)	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.
Separation Reduced, but Functional (SRF)	Significant countryside gaps exist between towns, risk of reduction not significant. Site 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.
Significant Separation Reduction (SSR)	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 Site where visual barriers exist without risk of towns merging.
Negligible or No Separation (NNS)	Site 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.
Not Applicable (N/A)	Site (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.

2.2.36 For the purposes of this assessment, Purpose 2 of the Green Belt states that it is to '*prevent neighbouring towns from merging*'. Based on this, the assessment has not considered the effects of ribbon development or hamlets merging, for example, with the large built-up area, as this would not be considered to be the merging of towns. The assessment has, however, considered significant villages, as outlined in paragraph 2.2.30 above, as these are discreet settled areas. Where isolated houses, ribbon development or hamlets are at risk of merging with towns or villages, this has been highlighted in the comments in the individual assessment and justification.

2.2.37 Where effects of existing smaller settlements merging with new development would create a larger cumulative effect overall, e.g. where development of a Site would merge with interlying ribbon development and would further reduce the countryside gap, then this has been noted.

2.2.38 This assessment has not fully considered the impact from developing one Site alongside another and this would require further consideration in the individual Site allocations.

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

Purpose 3: To assist in safeguarding the countryside from encroachment

2.2.40 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.

2.2.41 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.

2.2.42 To consider these aspect, three main criteria have been considered:

- **Land-use** – Is the Site developed or is it typical countryside use as outlined above?
- **Land Cover** – Does the Site consist of buildings, hard landscaping etc. or natural features, landscaping and countryside (inclusive of agricultural land)?
- **Access** – What level of public access is available within the Site, e.g. number of public rights of way (PRoW), open recreational space, permissive access and important routes such as National Trails?

2.2.43 It is noted that Private gardens (attached to residences) are generally not considered to be a countryside use. In the assessment, only very large established gardens are considered potentially an appropriate part of the countryside.

2.2.44 Based on the above, Sites were categorised as per Table 3.

Table 3 Criteria for Assessment of Contribution of Purpose 3

Definition	Description
Limited Countryside Functions (LCF)	Sites 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. Limited or no public access.
Mixed Functions within Countryside (MFC)	Where the Site contains some appropriate land uses but also some inappropriate elements, land use or development and where countryside functions are provided alongside other land-uses. Some public access afforded.
Functional Countryside (FC)	Sites 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. High degree or important public access.

2.2.45 In general terms, Sites 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

- 2.2.46 Again the assessment of this purpose builds on the assessment undertaken in the Part II Green Belt Review, yet has been refined to be more Site specific.
- 2.2.47 There is no strict legal or planning definition of a ‘historic town’ in reference to Green Belt Purpose 4. Brentwood Borough is not considered to contain any nationally recognised ‘Historic Towns’; however, this does not mean the individual settlements within Brentwood borough do not have an historic character with important aspects that have defined settlement patterns and the overall landscape character of the area. Clearly at a local level there may be important aspects that relate to the historic character of a settled area.
- 2.2.48 This requires a more ‘localised’ approach to ensure that the Green Belt study accounts for the historic settlement relationship of settled areas across the borough and respects the way in which areas have developed. For the purposes of assessment, ‘towns’ or large built up areas were considered as defined at para 2.2.21 (i.e. significant villages, such as Doddinghurst/Hook End, Wyatt’s Green, Blackmore, Mountnessing, Stondon Massey, Ingrave, Herongate and Kelvedon Hatch, as well as the larger town settlements such as Brentwood, Pilgrims Hatch, Shenfield/Hutton, West Horndon and Ingatestone.)
- 2.2.49 As a starting point, Brentwood itself was included in the regional Historic Towns in Essex Report (Historic Towns Assessment Report 1999, commissioned by Essex County Council and English Heritage). The report is an “archaeological and historical assessment of Brentwood and forms part of the Essex Historic Towns Survey”. The report defined the Brentwood ‘Historic Town Extent’ as shown at Appendix L12 of the Part II Green Belt Review.
- 2.2.50 Whilst the historic town extent was identified, this relates to various ages of development. Equally, there are caveats highlighted in the report as to the potential physical survival of historic features. The ‘Historic Town Extents’ as identified have also been heavily influenced or directly affected by more modern development.
- 2.2.51 As such, only the Brentwood Town High Street coincides with a locally designated Conservation Area as highlighted in the report *“Most of the medieval town and some of the post-medieval town is located within the current Conservation Area”*. All other areas are not covered by a Conservation Area designation with only the Chapel of St Thomas of Becket designated as a Scheduled Monument. It is noted that the 1999 report is fairly old and does not reflect more up to date heritage information that provides the context for Brentwood.
- 2.2.52 Whilst the Green Belt Study should recognise the relationship of land to historic areas of Brentwood as highlighted in the 1999 report, in the absence of further protections and designations, it is not considered significant weight can be added to this aspect in Green Belt terms, with the presence of existing heritage features better considered by a specific heritage study and separate planning policy considerations.
- 2.2.53 In the NPPF, Chapter 16: Conserving and enhancing the historic environment states that *“plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy 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.”*

- 2.2.54 It is beyond the scope of this assessment to individually assess the historic and cultural value of various aspects in relation to the Green Belt and how these may affect the setting of a settlement. This study does not establish the importance or heritage value of the existing settlement pattern.
- 2.2.55 However, this assessment has aimed to clarify if a Site has any relationship with a nationally recognised Historic Town or, if by virtue of a land-based conservation (heritage) designation within the locality, it may have an increased sensitivity to development that may require further assessment, particularly with regard to whether housing development would potentially affect the Green Belt Parcel’s contribution towards Purpose 4 of the Green Belt.
- 2.2.56 For Brentwood borough, the primary consideration here is whether the Site falls within a Conservation Area or a Registered Park and Garden i.e. land based heritage or conservation designations. It is noted that all Registered Parks and Gardens as outlined in the current Brentwood Local Plan are designated Conservation Areas. At a local level, these specific land based designations are useful in determining where historic land uses or the built environment have influenced the overall historic development pattern across Brentwood borough.
- 2.2.57 These land based designations may indicate that an area has enhanced historical significance that has helped to determine not only how an individual settlement has developed, but also how land use and the overall settlement character and distribution of settlements within Brentwood Borough has been influenced by past activities. Further to this, these areas also have a high proportion of other Heritage Assets (e.g. Listed Buildings, Scheduled Monuments) that may be a pertinent consideration in relation to any development, but heritage assets in themselves will not necessarily indicate in their own right the influence a parcel may have in relation to Green Belt policy and the historic settlement character or setting of a specific area. For reference the extent of Conservation Areas within Brentwood Borough are included at Appendix L12 of the Part II Green Belt Review.
- 2.2.58 For completeness, the relationship of a Site to the Historic Town Extents identified in the 1999 report above have also been referenced in the assessment (also refer to Appendix L12 of the Part II Green Belt Review).
- 2.2.59 Sites were categorised as indicated in Table 4.

Table 4 Criteria for Assessment of Contribution of Purpose 4

Definition	Description
Limited Relationship with Historic Town (LRHT)	The Site is not adjacent to or is unlikely to affect the setting of a Historic Town. There is limited potential for other land based Conservation (Heritage) Designations to be adversely affected by development. A Site abuts a Conservation Area, but the juxtaposition is not considered important to the setting of a town or settled area or to influenced pre-existing settlement pattern.
Moderate Relationship with Historic Town (MRHT)	Development of the Site is close to or could affect the setting of a Historic Town. Site abuts or surrounds a significant proportion of an area containing a land based Conservation (Heritage) Designation that could be adversely affected by development; or Site contains a relatively small area of land designated for Conservation (Heritage) purposes, which may be considered important to protecting the historic character of a town or pre-existing settlement pattern (e.g. a Conservation Area or Registered Park and Garden) and/or abuts or overlaps the Brentwood Historic Town Extents.
Strong Relationship with Historic Town (SRHT)	The Site is adjacent to or influences the setting of a nationally recognised Historic Town. Site falls entirely within a land based Conservation (Heritage) Designation, e.g. Conservation Area or Registered Park and Garden, where the Site is potentially important to preserving the historic character of a settlement or the historic settlement character of the borough.

Desk Study

- 2.2.60 Requested background information and other documents required to assist in the carrying out of the study was provided by the Council; other material was obtained from the Council's website. This enabled a desk study of published and unpublished material to begin immediately.
- 2.2.61 Other data was provided, including information held on the Council's GIS system, such as OS base tiles, to enable study mapping to be provided in compatible electronic format. Satellite mapping from Google (including Street View) and Bing Maps (Birds Eye View) was used to gain an appreciation of landscape and settlement character prior to the fieldwork and where access to the Housing Sites was restricted.
- 2.2.62 Access availability within and adjacent to the Sites was determined through checking of 1:25,000 OS Explorer mapping (showing public rights of way and access land) and on websites such as MAGIC (Natural England, n.d.) and checked in the field.

Fieldwork

- 2.2.63 Surveys of the Sites and their immediate surroundings were initially undertaken in April and May 2013 and, following further instruction, in January and March 2015. Further fieldwork visits were undertaken in January 2016. The work has been led and undertaken by experienced Landscape Architects. Field notes were made and digital photographs were taken to record elements of relevance to the assessment criteria. Public footpaths across the Sites were walked; otherwise the assessment was carried out from surrounding paths or other routes.

Presentation of Assessment

- 2.2.64 For each Site, a detailed assessment sheet pro forma (See Appendix L1) was used to illustrate the key findings from the Desk Study and Fieldwork and the assessment of how far the Site meets the purposes of the Green Belt.

- 2.2.65 Key characteristics of each Site, including size, land use, access, are recorded on the sheet. 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 Site in relation to categorisation process. These are provided in Appendix L4 (Housing assessments) and Appendix L7 (Employment/Mixed Use assessments).
- 2.2.66 Appendices L2 and L3 contain summary tables outlining the housing assessment results for each Site in relation to the four purposes examined (Appendix L2 is arranged in assessment results order and Appendix L3 is arranged in Site reference order). A further summary table is found at Appendix L6 with regards to Employment/Mixed Use assessment (arranged in results order).
- 2.2.67 Colour coding, as shown on the individual Site Assessment Sheets, has been used to help indicate how far each Site currently meets the individual objectives of the Green Belt in relation to the four Purposes and how significantly development would potentially change this.
- 2.2.68 Overall, every Site has been assessed with regards to housing. The purposes of the additional 23 employment or mixed use assessments was to confirm if any of the assessment ratings were considered different from those assessed during the wider housing assessments.
- 2.2.69 It is noted that some Sites 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 Site to fulfilling a specific purpose of the Green Belt according to the assessment criteria. For example, a large site may be situated in the middle of the countryside separated from any 'town' meaning that development would constitute new development and potentially unrestricted sprawl in to the countryside and the Green Belt – meaning the site would contribute to or fulfil Purpose 1 to a High level. Equally, due to the Site's location away from towns, development may not lead to towns coalescing physically or visually and based on these assessment criteria, the Site would contribute to, or fulfil Purpose 2 of the Green Belt to a lower level.
- 2.2.70 An overall contribution of the Site 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 Site 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 Housing Sites to be made. In terms of assessing the suitability of housing, employment or mixed use development at a Site, further consideration would need to be given to the strength of each individual Green Belt purpose to the particular locality. Table 5 (overleaf) outlines the overall rating criteria used.
- 2.2.71 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.
- 2.2.72 For a small number of specific Sites, sound professional judgement may be used to establish the overall assessment rating of a Site. This is used where various criteria results may be borderline or arguable to a higher or lower level, or where the Site cannot wholly be categorized under any one definition or criteria. Equally, depending on the scale, locality and existing function of a Site, a

number of unique Sites may be judged to have been marginally under or over assessed in terms of overall Green Belt contribution. Any professional judgement can only vary the overall assessment rating to an adjacent assessment level i.e. from Moderate – High to High. A Moderate assessment level cannot by professional judgement be adapted to a Low overall assessment level.

- 2.2.73 Where there is any ambiguity in the assessment levels, a precautionary or ‘worst-case’ approach has been adopted.

Table 5 Overall Assessment Rating

Assessment Rating	Overall Assessment Description
Low	<p>Site currently fulfils few Purposes of the Green Belt or fulfils a number of Purposes to a limited level and development of the Site 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 to a Low Level.</p>
Moderate	<p>Development of the Site will Moderately affect the Site’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 Site will significantly affect the Site’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 Site scale, locality and ‘borderline’ assessment results .</p>

NB: Sound professional judgement may be applied in specific cases where it is deemed the assessments may have marginally under or over assessed the overall rating when accounting for Site specific details or criteria.

- 2.2.74 The information has been used to produce plans of the ‘Overall Contribution of Sites to Green Belt Purposes’ in relation to both Housing and Employment/Mixed-Use Development Sites (see Figures 1 and 2, Appendix G5 and G8).

Plate 1 **Illustrative Colour Coding for Overall Assessment Rating**



Overall, Site fulfils Green Belt Purposes to Low degree – Lower potential impacts of Built Development on the Green Belt (or less conflicts) predicted relative to other Sites

Overall, Site fulfils Green Belt Purposes to Higher degree – Greater potential impacts of Built Development on the Green Belt (or less conflicts) predicted relative to other Sites

3 SUMMARY OF ASSESSMENT RESULTS & RECOMMENDATIONS

3.1 HOUSING ASSESSMENT RESULTS

Summary

- 3.1.1 Using the methods described in Section 2, and the colour-coded tables within, for ease of reference, the results for the 170 individual Site assessment are given:
- In detail in **Appendix L4**;
 - Summarised in **Appendices L2 and L3**; and
 - Shown on plan at **Appendix L5**.
- 3.1.2 The results are further summarised below.
- 3.1.3 In interpreting the results below it should be remembered that all of the Sites assessed fall within the Green Belt and the policy relating to this applies equally, irrespective of the assessed level of contribution to the purposes of the Green Belt shown below. Also, the NPPF (Department for Communities and Local Government, 2018) does not require Green Belt land to fulfil all the purposes listed.
- 3.1.4 It is noted that all of the Sites assessed provided at least some degree of contribution to the purposes of the Green Belt. This study provides an indication of comparative contribution of each Site to the purposes of the Green Belt and the likely degree to which this would change were each Site to be developed with new housing.
- 3.1.5 Generally, the higher the number of High assessment ratings received for individual purposes by a Site, the higher the overall assessment rating. Higher overall assessment ratings can also be achieved through combinations of intermediate assessment levels of individual purposes, with fewer individual High assessment ratings. **The results for assessment of individual purposes should therefore be read in conjunction with the overall assessment results.**
- 3.1.6 Table 6 summarises the results of the assessment of Sites in terms of contribution to the four individual assessed purposes of the Green Belt to a **High** assessment rating, i.e. how many purposes of the Green Belt were fulfilled to a High assessment rating by how many Sites. The greater the number of Green Belt purposes fulfilled to a High assessment rating, the greater the contribution of the Site to the purposes of the Green Belt and the greater the likely impacts of housing development on the purposes of the Green Belt can be considered to be, making the Site less appropriate as a Housing Site allocation.
- 3.1.7 Note that the 'fifth' purpose of the Green Belt has not been assessed as part of this report (see paragraph 2.2.19).

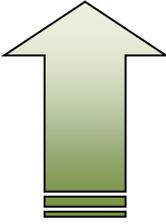
Table 6 *Number of High Assessment Ratings of Individual Purposes Received Per Site*

Number of High Assessment Ratings for Individual Purposes per Site	Number of Parcels
0	7
1	42
2	39
3	4
4	0

3.1.8 None of the Sites received a High assessment rating for all four individual purposes and only four Sites received three High ratings for individual purposes. Seven Sites failed to achieve a High assessment rating for any of the purposes. Around 45% of the Sites (42) received one High assessment rating.

3.1.9 Table 7 summarises the overall assessment results for the Sites.

Table 7 *Summary of Overall Assessment Results*

Overall Assessment Rating	Number of Sites	
	Low	3
	Low - Moderate	17
	Moderate	49
	Moderate - High	18
	High	5

3.1.10 Table 8 summarises the combined results of the assessment ratings for the individual purposes and the overall assessment ratings and gives an indication of the split of numbers in the hierarchy of Sites and their relative contribution towards the purposes of the Green Belt. For example, a Site may be rated **High** overall, but this does not necessarily mean each individual purpose was assessed to a High level. A **High** overall rating may have been assessed where either four, three or two purposes were rated High individually. Depending on other individual purpose assessments, a Site could receive either a **High, Moderate to High** or **Moderate** overall rating, but in either case two individual purposes could have been assessed to High level.

Table 8 *Summary of Combined Overall and Individual Purposes Assessment Results*

Overall Assessment Rating:											
	High	High	High	Mod-High	Mod	Mod	Mod	Low - Mod	Low - Mod	Low	Low
No. of High assessment individual ratings:	4	3	2	2	2	1	0	1	0	1	0
No. of Sites:	0	4	1	18	20	27	2	14	3	1	2*

3.1.11 The Site references that relate to these numbers are provided in the tables in Appendices L2 and

L3. Two arrangements of the results have been given in the Appendices: One in a hierarchal 'assessment results' order, based on overall and individual assessment results, and one in Site reference order, for ease of reference. These are also shown in plan form in Appendix L5.

- 3.1.12 Referring to Table 7 and Table 8, three Sites received a **Low** overall assessment rating. Of these, two Sites (see*) did not fulfil any of the individual Green Belt purposes to a High assessment level (Sites 010 and 085B). Additionally, three Sites received a **Low-Moderate** overall assessment rating and did not fulfil any of the individual Green Belt purposes to a High assessment level (Sites 128, 180 and 186).
- 3.1.13 Referring to Table 7, five Sites received a **High** overall assessment rating (028C, 028B, 211, 241 and 302C).

Purpose 1

- 3.1.14 Over half (48) of the Sites were assessed to have a High assessment level in relation to Purpose 1 of the Green Belt, i.e. the Sites were 'Not Contained'. As a result, housing development would be considered to be beyond the existing settlement limits, which could be interpreted as contributing to sprawl of large built-up areas (existing or new), affecting Green Belt openness.
- 3.1.15 Purpose 1 and Purpose 3 have combined to be the largest contributing factors to the majority of the Sites being given at least a **Moderate** overall assessment rating, where Purpose 3 was rated highly, despite other purposes perhaps not being highly fulfilled.

Purpose 2

- 3.1.16 Five sites were found to directly cause towns (see paragraph 2.2.21 for which settlements were considered to be included in this assessment) to coalesce (or such that the intervening gap was negligible) contrary to Purpose 2: Site 028C, 028B, 146, 241 and 316.
- 3.1.17 Generally, the majority of Sites would not cause towns to coalesce or merge, although twelve Sites were found to lead to a significant separation reduction in the countryside gap between towns potentially encouraging future coalescence which would be contrary to Purpose 2 of the Green Belt.

Purpose 3

- 3.1.18 The assessment in relation to Purpose 3 considered whether the Site contribution to functional countryside would be adversely affected. Generally, the majority of Sites fulfilled some countryside function. The majority of the Sites being grassland/pasture, arable, woodland/scrub or open space. This is reflected by 74 of the 92 Sites receiving a **High** assessment rating in relation to Purpose 3. Nine Sites received a **Low** assessment rating, primarily reflecting the existing use of the land as either a private garden or brownfield / previously developed land.
- 3.1.19 Purpose 3 and Purpose 1 have combined to be the largest contributing factors to the majority of the Sites being given at least a **Moderate** overall assessment rating, where Purpose 3 was rated highly, despite other purposes perhaps not being highly fulfilled.
- 3.1.20 It is noted that for Site 117A (Part) the assessment focuses on the area of land to the east of the

existing 'Ford' Offices which is Green Belt land. The other part of the proposed allocation covers the existing office development on non-Green Belt land and as such has not been considered in relation to the specific potential extension in to the Green Belt area.

Purpose 4

3.1.21 In terms of Purpose 4, a number of Sites were wholly located within Conservation Areas and/or, the Sites may be considered important at preserving the historic character of nearby towns or settlement pattern. In total, five Sites were considered to be located such that they may be considered to have a High assessment rating in relation to Purpose 4: Sites 241, 211, 202B, 219, and 286.

3.1.22 Eighty Sites were considered to have no or limited contribution to preserving the setting of an Historic Town or the historic character of Brentwood by virtue of any land based heritage designation.

3.2 EMPLOYMENT AND MIXED USE ASSESSMENT RESULTS

Summary

3.2.1 Using the methods described in Section 2, and the colour-coded tables within, for ease of reference, the results for the 23 individual Site assessment are given:

- In detail in **Appendix L7**;
- Summarised in **Appendices L6**; and
- Shown on plan at **Appendix L8**.

3.2.2 The results are further summarised below.

3.2.3 The overall assessment levels of the Employment and Mixed Use assessments remain unchanged from the individual Site Housing assessment results. There was no assessment difference between Purpose 1, 3 or 4 when comparing the housing and employment/mixed use assessments. Four Sites had minor changes with regards to Purpose 2 as described below.

3.2.4 Overall, as per the Housing Assessment results, the Employment/Mixed Use assessments have been further broken down in the following tables:

Table 9 Number of High Assessment Ratings of Individual Purposes Received Per Site

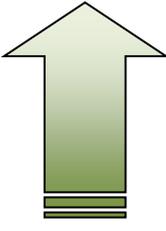
Number of High Assessment Ratings for Individual Purposes per Site	Number of Parcels
0	2
1	14
2	7
3	0
4	0

3.2.5 None of the Sites received a High assessment rating for all four individual purposes and no Sites

received three High ratings for individual purposes. Sites 106 and 180 were the only Sites not to receive a High assessment rating with regards to any of the four purposes, although Site 106 three **Moderate** ratings with regards to Purposes 1, 2 and 3 and Site 180 had a **Moderate** rating in respect of Purpose 2 and 3.

3.2.6 Table 10 summarises the overall assessment results for the Sites.

Table 10 Summary of Overall Assessment Results

Overall Assessment Rating		Number of Sites
	Low	1
	Low - Moderate	6
	Moderate	11
	Moderate - High	4
	High	1

3.2.7 Table 11 summarises the combined results of the assessment ratings for the individual purposes and the overall assessment ratings and gives an indication of the split of numbers in the hierarchy of Sites and their relative contribution towards the purposes of the Green Belt. For example, a Site may be rated **High** overall, but this does not necessarily mean each individual purpose was assessed to a High level. A **High** overall rating may have been assessed where either four, three or two purposes were rated High individually. Depending on other individual purpose assessments, a Site could receive either a **High, Moderate to High** or **Moderate** overall rating, but in either case two individual purposes could have been assessed to High level.

Table 11 Summary of Combined Overall and Individual Purposes Assessment Results

Overall Assessment Rating:											
	High	High	High	Mod-High	Mod	Mod	Mod	Low - Mod	Low - Mod	Low	Low
No. of High assessment individual ratings:	4	3	2	2	2	1	0	1	0	1	0
No. of Sites:	0	0	1	4	2	8	1	6	1	0	0

3.2.8 The Site references that relate to these numbers are provided in the tables in Appendices L6, arranged in a hierarchal 'assessment results' order, based on overall and individual assessment results. These are also shown in plan form in Appendix L8.

3.2.9 Referring to Table 10 and Table 11, one Site received a Low overall assessment rating (Site 024A). Six Sites received a **Low-Moderate** overall assessment rating, however, five of these Sites were considered to be 'Not Contained' receiving a **High** assessment rating for Purpose 1 (i.e. they were all in Green Belt locations away from large built up areas), with Site 180 considered 'Partly Contained'. It is noted that some Sites do have a large amount of existing development present.

3.2.10 Referring to Table 10, four Sites received a **Moderate-High** overall assessment rating (Sites 024B, 038B, 106, 175B and 200). Site 302C received a **High** overall assessment rating

Purpose 1

- 3.2.11 Fourteen of the Sites were considered 'Not Contained'. Two of the Sites are considered 'well contained' by existing built development (i.e. an urban or settled area) and would constitute expanded growth from the settled area in Green Belt locations (Sites 024A and 299). The scale of growth was considered relative to the existing adjacent settled areas.

Purpose 2

- 3.2.12 The assessment level of four Sites was marginally elevated (compared to the previous housing assessments), which did not change the overall assessment rating. Sites 101C, 158 and 112E had the Purpose 2 assessment rating elevated from Separation Retained to Separation Retained/Separation Reduced, but Functional. Site 228 had Purpose 2 assessment ratings increased from Separation Retained to Separation Reduced, but Functional.
- 3.2.13 These assessment level changes were considered to be due to the likely higher massing of larger buildings at the Sites (over and above the existing situation) which would potentially, perceptually reduce the apparent separation between towns/'built up' areas due to potential increased visibility compared to Housing development. In no cases was this assessed as potentially leading to visual or physical coalescence.
- 3.2.14 It has been noted in the assessments that whilst the overall assessment ratings did not change, Employment or Mixed Use development at Sites 024B, 037D, 038B, 038A, 126, 106, 112E, 101C, 175B, 200 and 302C would be potentially visually more intrusive or perceptible compared to housing development, adding to any perception of separation reduction between towns. However, in terms of the assessment criteria, the change was not considered sufficient to elevate the individual assessment ratings further. Of these Sites it is noted that Sites 024B, 106, 175B, 302C and 200 were already previously assessed (in the housing assessments) as meeting Purpose 2 to a Moderate level and development would lead to Significant Separation Reduction, between towns.

Purpose 3

- 3.2.15 Five Sites had evidence of built development (some industrial/commercial Sites) and were considered to fulfil Purpose 3 to a **Low** level. A further five Sites were considered Mixed Functions within Countryside. Sites 024A, 024B, 037D, 038B, 038A, 079C, 117A, 126, 158, 175B, 200, 299 and 302C were all considered to fulfil Purpose 3 to a High level, being 'countryside' Sites with no evidence of previous or extensive built development.
- 3.2.16 It is noted that for Site 117A (Part) the assessment focuses on the area of land to the east of the existing 'Ford' Offices which is Green Belt land. The other part of the proposed allocation covers the existing office development on non-Green Belt land and as such has not been considered in relation to the specific potential extension in to the Green Belt area.

Purpose 4

- 3.2.17 Three Sites have been identified as having potential for Moderate effects in relation to Purpose 4: Sites 038B (owing to the small Conservation Area designation, 299 (being adjacent to an 'Historic Core' of Brentwood) and 302C (being adjacent to the South Weald Conservation Area and

Registered Park and Garden).

3.3 RECOMMENDATIONS

- 3.3.1 All development should be directed to brownfield and non-Green Belt land where available and practically achievable, as any housing development in the Green Belt is likely to be contrary to Green Belt policy.
- 3.3.2 The scope of this study did not extend to the identification of Sites that should be prioritised for allocation for housing, employment or mixed use allocation/development in the Brentwood LDP; a number of other factors will be important in determining these allocations. For example, a Site that is considered to fulfil Green Belt purposes to a lower level may have other significant constraints to development, be unsustainable or be unable to make a strategic contribution to housing supply. Equally, another Site considered to fulfil purposes to a higher level may indicate substantial conflicts with Green Belt policy but may be more developable due to fewer environmental or sustainability constraints and would be able to fulfil a greater proportion of any strategic housing or employment land delivery.
- 3.3.3 With regard to considerations from this study to take forward in formulating the Housing Allocations and Employment/Mixed Use Allocations for Brentwood Borough LDP, where Green Belt land is required to accommodate the required development and anticipated population over the life of the plan, (i.e. no non-Green Belt land is available) the following recommendations are made in relation to Green Belt aspects only.
- 3.3.4 As no one purpose of the Green Belt has priority over another, the overall assessment level should be the first consideration and then the individual assessment against each purpose considered to provide sub-division of those with the same overall assessment rating.
- 3.3.5 On this basis, in terms of Green Belt considerations only, Housing Sites should be prioritised for consideration as per the table in Appendix L2, with:
- Sites 010, 024A and 085B being most highly prioritised; and
 - Sites 028C, 028B, 211, 241 and 302C being of lowest priority.
- 3.3.6 It is also noted that three of the largest Sites considered were also rated either Moderate-High (Sites 038B and 200) or High overall (Site 302C).
- 3.3.7 In terms of Green Belt considerations only, Employment and Mixed Use Sites should be prioritised for consideration as per the table in Appendix L6, with Sites 024A, 101C, 111, 112D, 175A, 180 and 228 being most highly prioritised. Relative to other Sites, Sites 024B (Mixed Use), 038B (Mixed Use), 175B (Mixed Use), 200 (Mixed Use) and 302C (Mixed Use) should be of lower priority (i.e. all received a High or Moderate to High overall assessment rating).
- 3.3.8 Also, large expansive Sites (for example Site 028B, 028C, 038B, 200 and 302C) may have received a Moderate-High or High assessment rating, yet have been assessed as a single large Site (i.e. as a whole), assuming the Site is wholly developed. Within these Sites, areas may have a lower contribution to Green Belt purposes and/or be more closely associated with existing built up areas.
- 3.3.9 For these Sites, the overall assessment rating (i.e. Moderate-High or High) is also linked to the

comparative scale of the Sites in the Green Belt (and other locality based criteria) in comparison to other Sites, the existing settled area and the relative likely effects with regards to Green Belt purposes, which in some cases has led to professional judgements being made. It should be considered whether such Sites can be sub-divided in to separate parcels of land that can differentiate Green Belt assessment levels between areas. Any sub-division of Sites should also account for existing barriers, built features and other topographic boundaries, such as woodlands etc. Green Infrastructure, existing or proposed, may contribute towards a reduction in perceived Green Belt effects, depending on developable areas.

- 3.3.10 Site 023 is an unusual Site in that it fits the description of countryside, but is ‘well-contained’ and is heavily influenced on the periphery by built development. It is also split into two areas by the A12 road; the area to the north lies in the southern part of Pilgrims Hatch and the area to the south lies in the northern part of Brentwood. The Site received a Moderate overall assessment rating. Given the townscape/landscape context of this Site it would be considered appropriate for the Site to be considered as a higher priority Site out of those receiving a Moderate overall assessment rating, as the two individual areas are surrounded by existing built development either side of the A12, which both Pilgrim’s Hatch and Brentwood directly border. The A12 is the only feature physically separating the two settled areas.
- 3.3.11 It is noted a number of Sites have amalgamated or expanded; this report considers the final composite proposed land allocation area or submission from the ‘Call for Sites’ process. Changes to boundaries of Sites have in some cases altered assessment ratings, primarily in relation to the scale of the land and countryside function.
- 3.3.12 In order to further understand the effects in relation to Purpose 3 of the Green Belt (noting the large number of Sites receiving High assessment ratings against this Purpose), further assessment could be useful (where appropriate and where resources allow) to consider the contribution made to landscape character and amenity value in relation to ‘countryside’ by each Site. This would be the subject of a separate assessment
- 3.3.13 When overall Housing, Employment or Mixed Use Allocations are being made, assessment of the cumulative impact of development in relation to impacts on the Green Belt, e.g. where two Sites are close to each other, or would develop in each other’s direction (falling within the same countryside gap), should be made, as this is beyond the scope of this individual study. An addendum to this report covering cumulative impacts is advised where necessary, once proposed allocation options have been fully defined and consulted on.
- 3.3.14 It is also noted that whilst Housing and Employment/Mixed Use assessments still received the same overall assessment rating, in terms of Green Belt purposes, Employment/Mixed Use development has higher potential than Housing development (as defined in this study) to lead to large scale encroachment and/or settlement coalesce due to the potential scale of buildings and actual or perceived intervisibility. This is noted in the individual Site assessments, albeit only four Sites had varied assessment levels for Purpose 2 compared to the Housing assessments.

REFERENCES:

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APPENDICES:

Appendix L1	Site Assessment Sheet Pro forma
Appendix L2	Summary of Housing Assessment Results – Assessment Results Order
Appendix L3	Summary of Housing Assessment Results – Site Reference Order
Appendix L4	Detailed Site Housing Assessment Sheets
Appendix L5	Figure 1 – Overall Contribution of Sites to Green Belt Purposes – Housing Assessment
Appendix L6	Summary of Employment/Mixed Use Assessment Results – Assessment Results Order
Appendix L7	Detailed Site Employment/Mixed Use Assessment Sheets
Appendix L8	Figure 2 – Overall Contribution of Sites to Green Belt Purposes – Employment/Mixed Use Assessment

APPENDIX L1:

Site Assessment Sheet Pro forma

APPENDIX L2:

Summary of Assessment Results – Assessment Results Order

APPENDIX L3:

Summary of Assessment Results – Site Reference Order

APPENDIX L4:

Detailed Site Assessment Sheets

APPENDIX L5:

Figure 1 – Overall Contribution of Sites to Green Belt Purposes

APPENDIX L6:

Summary of Employment/Mixed Use Assessment Results – Assessment Results Order

APPENDIX L7:

Detailed Site Employment/Mixed Use Assessment Sheets

APPENDIX L8:

Figure 2 – Overall Contribution of Sites to Green Belt Purposes – Employment/Mixed Use Assessment