

# F8 Green Belt Topic Paper

## September 2020

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## 1. Introduction

1.1 This Topic Paper seeks to explain the reasons for:

- proposing release of Green Belt for development, through the Brentwood Local Plan; and
- the proposed spatial approach to Green Belt release across the Borough.

1.2 This topic paper is structured as follows:

- Section 2 - introduces the Brentwood Green Belt;
- Section 3 - explains why it is necessary to release Green Belt;
- Section 4 - explains how the spatial strategy serves to minimise harm to the GB as far as reasonably possible;
- Section 5 - considers additional specific matters; and
- Section 6 - presents conclusions.

## 2. The Brentwood Green Belt

### Overview

2.1 The Borough falls within London's Metropolitan Green Belt, with almost all land outside of settlements comprising Green Belt. Green Belt covers 89% of the Borough, with the remaining 11% predominantly built up land.

## Washed over built-up areas

- 2.2 There are a small number of villages in the Borough that are washed over by the Green Belt. These villages are considered to be associated with an open character that makes that makes a contribution to the overall openness of the Green Belt, and hence it is not proposed to remove these settlements from the Green Belt through the Local Plan (or, in other words, the proposal is *not* to draw new Green Belt 'inset' boundaries around these settlements).

## Washed over employment sites

- 2.3 There are four existing employment sites that are washed over by the Green Belt; however, two now have now (subsequent to submission of the Local Plan) been granted permission for residential use. Focusing on the remaining two - Upminster Trading Park (2.6 ha) and the Perri Site (5.4 ha) - the Local Plan does not propose releasing these sites from the Green Belt on the basis that the Green Belt designation is not seen as a constraint to ongoing employment uses at these sites. The sites are operating effectively at the current time, and no future changes that might lead to a conflict with the purposes of the Green Belt can be foreseen. See further discussion within the Employment Paper (document F5H).

## Washed over Gypsies and Travellers sites

- 2.4 There are two existing sites in the Green Belt: one at Oaktree Farm (Greenacres) consisting of seven Gypsy and Traveller pitches; and one at Hunters Green (Navestock) consisting of one Gypsy and Traveller pitch. The Local Plan proposes to formally allocate both sites; however, the proposal is that these sites should remain washed over by the Green Belt. This is because both are small sites with an open character that make a contribution to the overall openness of the Green Belt. See further discussion within the Gypsies, Travellers and Travelling Showpeople Topic Paper (document F5F).

## 3. Exceptional circumstances 1

- 3.1 The aim here is to explain why there are exceptional circumstances to justify the release of Green Belt for development through the Local Plan. In order to do so, there is a need to consider:
- housing and employment land requirements; and
  - supply of housing and employment land from non-Green Belt locations.

## Housing and employment land requirements

### Housing

3.2 There is a requirement for the Local Plan to identify a supply of land sufficient to provide for Local Housing Need (LHN), which is 456 dwellings per annum, or 7,752 new homes in total over the 17-year plan period (see further discussion within the Housing Need Topic Paper). Whilst the NPPF (paragraph 11b) leaves open the option of not providing for housing needs in full, this option was ruled-out as unreasonable in 2018, when finalising the Local Plan for publication, for the reasons set out at paragraph 5.2.8 of the SA Report; in short, because there is no potential to export unmet needs to any of the Borough's neighbouring authorities. Options involving not providing for needs in full were explored earlier in the plan-making process (notably at the 2013 Preferred Options stage; see pages 14 and 15 of the consultation document); however, the Council has been committed to providing for housing needs in full since the 2015 Strategic Growth Options stage (see page 6 of the consultation document).

### Employment land

3.3 The Council has evidenced a substantial need to provide for new employment land through allocations within the Local Plan. This matter is discussed in detail in the Employment Paper (document F5H).

## Non-Green Belt supply

### Housing

3.4 A starting point for all work in respect of developing the Local Plan spatial strategy was a need to maximise the supply of homes at non-Green Belt locations, which, in practice, means locations within existing settlements. This matter is explored in detail in the Spatial Strategy Topic Paper; however, in short:

- the Housing and Economic Land Availability Assessment (HELAA; 2018) identified 16 non-Green Belt sites as either deliverable or developable for housing uses, and assigned each a housing yield figure (on the basis of the methodology presented across pages 14 and 15 of the HELAA); and then
- the decision was taken to allocate all 16 sites through the Local Plan, with most sites assigned a yield in-line with the HELAA.<sup>1</sup>

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<sup>1</sup> At two sites the Local Plan assigns a yield below that identified as suitable by the HELAA due to detailed site-specific considerations highlighted (including through consultation) subsequent to publication of the HELAA. Specifically, at Land at Priest Lane, Shenfield (a greenfield site within the main urban area), the proposal is for the site to yield 45 homes – 50 homes fewer than the suggested HELAA yield of 95 homes; and at Land off Crescent Drive, Shenfield the proposal is for the site to yield around 35 homes – 20 homes fewer than the suggested HELAA yield of 55 homes.

- 3.5 These 16 HELAA sites equate to 13 allocations within the Local Plan.<sup>2</sup> 12 of these are found within the main urban area (11 brownfield and one greenfield), whilst one is located within the West Horndon urban area. Together these sites will supply 1,807 homes, as set out in Table 4.2 of the Local Plan.<sup>3</sup>
- 3.6 Additionally, some supply at non-Green Belt locations will come forward at windfall sites, i.e. sites not allocated through the Local Plan. As set out in Table 4.2 of the Local Plan, the 'windfall allowance' is 410 homes in total.<sup>3</sup>

## Employment land

- 3.7 The HELAA (page 63) identifies nine sites as suitable, available and achievable, all of which are within the Green Belt, i.e. there are no reasonable employment site options outside of the Green Belt.

## Conclusion

- 3.8 In respect of housing, Table 4.2 in the Local Plan sets out the total supply of homes from sites already built since the start of the plan period (363 homes), sites with planning permission (926 homes) and allocations outside of the Green Belt (1,807 homes, see above).<sup>3</sup> The total supply from these non-Green Belt sources is 3,096 homes,<sup>3</sup> which falls well short of LHN (7,752 new homes, see above) which, in turn, constitutes the housing requirement for the Local Plan, given a history of undersupply, poor affordability and an inability to export unmet need. To accommodate the level of housing required, Green Belt land must therefore be released. This clearly indicates that exceptional circumstances exist to justify the release of Green Belt land through the Local Plan.
- 3.9 In respect of employment, there is an established need to provide for a significant amount of new employment land through allocations within the Local Plan, whilst all reasonable options for allocation are within the Green Belt. This also serves to indicate that exceptional circumstances exist to justify Green Belt release through the Local Plan.

## 4. Exceptional circumstances 2

- 4.1 The aim here is to explain how the spatial strategy, including all of its component site allocations, was selected in order to minimise harm to the Green Belt as far as reasonably possible. Spatial strategy is considered for housing and employment land in turn.

<sup>2</sup> Specifically, allocations R02, 04, 05, 07, 10, 11, 12, 13, 14, 15, 18, 19 and 20

<sup>3</sup> At the current time the proposal is to update Table 4.2 of the plan to reflect latest monitoring data (April 2020). Also, the proposal is to adjust the windfall figure. See further discussion in the Housing Supply Paper (document F5D).

## Housing spatial strategy

- 4.2 In order to demonstrate that sites were selected for allocation in order to minimise harm to the Green Belt as far as reasonably possible, there is a need to consider the evidence provided by the Green Belt Study and SA Report.
- 4.3 The Green Belt Study is presented in three parts, with attention focusing here on Part 3, which examines a shortlist of site options considered (in 2018) to be reasonably in contention for allocation, namely most (all but 12) of the Green Belt sites listed as being either deliverable or developable within Appendix 7 of the HELAA.
- 4.4 The Study concludes by assigning each assessed site a score according to the overall contribution that the site makes to the purposes of the Green Belt. All sites are assigned one of the following scores: Low contribution; Low to moderate contribution; Moderate contribution; Moderate to high contribution; High contribution.
- 4.5 Discussion under the headings below scrutinises site selection within each category in turn.

### Green Belt category 1: Unknown contribution

- 4.6 The table below lists the 12 deliverable or developable sites not examined by the Green Belt study. These sites were examined through the SA process in 2018 when seeking to establish spatial strategy reasonable alternatives, as reported in Section 5 of the SA report and supporting appendices.
- 4.7 In each case the decision was taken not to include the site in the reasonable alternatives on the basis of planning / sustainability reasons. Two of the sites (173 and 179) are notable for only being subjected to quantitative GIS analysis in Appendix III of the SA Report, as opposed to more detailed qualitative analysis (as per that set out in Section 5 and Appendices IV and V of the SA Report); however, in both cases the sites can be ruled out for clear cut reasons. Specifically, Site 173 comprises a BP Garage & M&S Food store on the A1023 Chelmsford Road (A12 J12) that was determined to be non-developable subsequent to the HELAA; whilst Site 179 is ruled-out on flood risk grounds.
- 4.8 In turn, none of the 12 sites were proposed for allocation.

Ref	Allocated?	Where is evidence primarily provided within the SA Report?
036	No	Appendix V
070	No	Appendix V
073	No	Appendix V
143	No	Appendix V
173	No	Appendix III
179	No	Appendix III

Ref	Allocated?	Where is evidence primarily provided within the SA Report?
278	No	Appendix V
317	No	Appendix IV
319	No	Appendix V
288A	No	Paragraph 5.5.31
291A	No	Table 5.2
291B	No	Table 5.2

### Green Belt category 2: Low contribution

- 4.9 The Green Belt Study found just three sites to make a low contribution to Green Belt purposes. These sites were examined through the SA process in 2018 when seeking to establish spatial strategy reasonable alternatives, as reported in Section 5 of the SA report and supporting appendices – see table below.
- 4.10 In two cases the decision was taken to include the site in the reasonable alternatives, and in one case the site was then taken forward as an allocation within the Local Plan. Whilst attention naturally focuses on the decision not to allocate two sites that make a lower contribution to Green Belt purposes than a number of the proposed allocations (see discussion below), this approach was taken following due consideration, and for clear planning and sustainability reasons.

Ref	Housing allocation?	Where is evidence primarily provided within the SA Report?
010	Yes	This site, which comprises the Sow and Grow Nursery, has been a proposed allocation since the 2016 Draft Plan stage (with an assigned yield as per the HELAA), with no concerns raised within the draft plan appraisal in the SA Report (Section 9).
024A	No	This site (Sawyers Hall Farm) was scrutinised through the appraisal of reasonable alternatives (Table 5.5 / Section 6 / Section 7 of the SA Report).
085B	No	This site was a proposed allocation prior to being removed from the plan at the 8th November 2018 Extraordinary Council as development would involve destruction of a long-established playing field, administered by Trustees as a vital integral asset of the adjoining community hall.

### Green Belt category 3: Low to moderate contribution

- 4.11 The Green Belt Study found ten deliverable or developable housing sites to make a low to moderate contribution to Green Belt purposes. These sites were examined through the SA process in 2018 when seeking to establish spatial strategy reasonable alternatives, as reported in Section 5 of the SA report and supporting appendices – see table below.
- 4.12 In five cases the decision was taken to include the site in the reasonable alternatives, and, in four cases, the site was then taken forward as an allocation within the Local Plan. Whilst attention naturally focuses on the decision not to allocate six sites that make a lower contribution to Green Belt purposes than a number of the proposed allocations, this approach was taken following due consideration, and for clear planning and sustainability reasons.

Ref	Housing allocation?	Where is evidence primarily provided within the SA Report?
027	Yes	All these sites have been proposed allocations since the 2018 Preferred Site Allocations stage, such that all have now been subject to at least two rounds of appraisal and consultation, and two have been proposed allocations since the 2016 Draft Plan consultation stage (three rounds of consultation).
128	Yes	
186	Yes	
079A	Yes	The draft plan appraisal of the SA Report (Section 9) does not highlight any significant concerns in respect of any of these sites, although paragraph 5.5.29 does note that site 079a (at Ingatestone) is adjacent to the A12, which potentially gives rise to a challenge in respect of avoiding/mitigating noise and air pollution.
022	No	This site (Honeypot Lane) was scrutinised through the appraisal of reasonable alternatives (Table 5.5 / Section 6 / Section 7 of the SA Report).
180	No	Appendix IV
225	No	Para 5.5.31
239	No	Appendix V
294	No	Appendix V
095B	No	Appendix V

### Green Belt category 4: Moderate contribution

- 4.13 The majority of deliverable or developable housing sites examined by the Green Belt Study were found to make a moderate contribution to Green Belt purposes. These sites were examined through the SA process in 2018 when seeking to establish spatial strategy reasonable alternatives, as reported in Section 5 of the SA report and supporting appendices – see table below.

4.14 In 19 cases the decision was taken to include the site in the reasonable alternatives, and in 15 cases the site was then taken forward as an allocation within the Local Plan. Whilst attention naturally focuses on the decision not to allocate 30 sites that make a lower contribution to Green Belt purposes than one of the proposed allocations (discussed below), this approach was taken following due consideration, and for clear planning and sustainability reasons.

Ref	Housing allocation?	Where is evidence primarily provided within the SA Report?
032	Yes	<p>All these sites have been proposed allocations since the 2018 Preferred Site Allocations stage, such that all have now been subject to at least two rounds of appraisal and consultation, and around half of these sites have been proposed allocations since the 2016 Draft Plan consultation stage (three rounds of consultation).</p> <p>The SA process has served to highlight certain issues/constraints associated with certain of these sites, for example site 032 not ideally located in respect of accessing Brentwood town centre (see paras 5.5.8 and 9.5.5 of the SA Report); however, all of these sites are supported by the Council on balance.</p>
034	Yes	
076	Yes	
077	Yes	
083	Yes	
087	Yes	
106	Yes	
158	Yes	
194	Yes	
235	Yes	
263	Yes	
276	Yes	
023A	Yes	
023B	Yes	
075B	Yes	
029	No	Appendix IV
031	No	Appendix IV
074	No	Appendix V

Ref	Housing allocation?	Where is evidence primarily provided within the SA Report?
078	No	Para 5.5.31
117a	No	The decision was taken to allocate only that part of this site (Allocation R04: Ford Offices, Warley – southern site) that falls outside of the Green Belt.
126	No	This site (West Horndon East) was scrutinised through the appraisal of reasonable alternatives (Table 5.5 / Section 6 / Section 7 of the SA Report).
153	No	Para 5.5.31
159	No	Appendix IV
168	No	Appendix V
188	No	Appendix V
199	No	Appendix V
220	No	Appendix IV
243	No	Para 5.5.31
261	No	Appendix IV
284	No	Appendix IV
285	No	Appendix V
299	No	This site (St. Faiths) was scrutinised through the appraisal of reasonable alternatives (Table 5.5 / Section 6 / Section 7 of the SA Report).
309	No	Appendix V
313	No	Appendix V
315	No	Appendix IV
320	No	Appendix IV
011B	No	Appendix IV
011C	No	Appendix IV
030A	No	Appendix IV

Ref	Housing allocation?	Where is evidence primarily provided within the SA Report?
037D	No	This site (West of West Horndon) was scrutinised through the appraisal of reasonable alternatives (Table 5.5 / Section 6 / Section 7 of the SA Report).
038A	No	
053B	No	Appendix IV
067A	No	Appendix V
067B	No	Appendix V
156A	No	Appendix IV
156B	No	Appendix IV

### Green Belt category 5: Moderate to high contribution

- 4.15 The Green Belt Study found 14 deliverable or developable housing sites to make a moderate-high contribution to Green Belt purposes. These sites were examined through the SA process in 2018 when seeking to establish spatial strategy reasonable alternatives, as reported in Section 5 of the SA report and supporting appendices – see table below.
- 4.16 In three cases the decision was taken to include the site in the reasonable alternatives, and, in one case, the site was then taken forward as an allocation within the Local Plan. Whilst attention naturally focuses on the decision to allocate this site, given that there are numerous omission sites that make a lower contribution to Green Belt purposes, this approach was taken following due consideration, and for clear planning and sustainability reasons.

Ref	Housing allocation?	Where is evidence primarily provided within the SA Report?
200	Yes	Dunton Hills Garden Village was explored closely through the appraisal of reasonable alternatives presented within the SA Report (Table 5.5 / Section 6 / Section 7) and through the Draft Plan Appraisal (Section 9). It was also closely scrutinised at earlier Regulation 18 stages of the Local Plan / SA process, and reasons for allocation are discussed further within Spatial Strategy, SA and DHGV Topic Papers.
146	No	Appendix V
185	No	Appendix V
219	No	Appendix IV
244	No	Appendix V

Ref	Housing allocation?	Where is evidence primarily provided within the SA Report?
262	No	Appendix V
316	No	Appendix V
024B	No	This site (Sawyers Hall Farm) was scrutinised through the appraisal of reasonable alternatives (Table 5.5 / Section 6 / Section 7 of the SA Report).
028A	No	Appendix IV
038B	No	This site (West Horndon East) was scrutinised through the appraisal of reasonable alternatives (Table 5.5 / Section 6 / Section 7 of the SA Report).
175B	No	Appendix IV
202B	No	Appendix V
218A	No	Appendix IV
277A	No	Appendix V

### Green Belt category 6: High contribution

- 4.17 The Green Belt Study found one deliverable or developable site to make a high contribution to Green Belt purposes. This site (302c, West of Ongar Road) was examined through the SA process in 2018, including through the appraisal of spatial strategy reasonable alternatives, but ultimately not proposed for allocation.

### Conclusion on the housing spatial strategy

- 4.18 In conclusion, the starting point was a need to take a sequential approach to allocation in accordance with the findings of the Green Belt study; however, there was a need to depart from the sequential approach in certain respects for planning and sustainability reasons.
- 4.19 Attention naturally focuses on the decision to allocate Dunton Hills Garden Village (DHGV), which makes a 'moderate-high' contribution to Green Belt purposes, in place of a package of smaller omission sites that (at least individually) make a lower contribution to Green Belt purposes. However, detailed work undertaken through the SA process, as well as evidence gathered through consultation and technical evidence gathered over several years (as reported in the Spatial Strategy and Dunton Hills Garden Village topic papers) serves to justify this approach.

- 4.20 There are clear benefits to allocating Dunton Hills Garden Village, whilst all of the omission sites in question have been found to be associated with notable drawbacks when examined in isolation and/or (in the case of the better performing omission sites) in combination.
- 4.21 On this basis, exceptional circumstances exist to justify the spatial approach taken to Green Belt release for housing (or, more specifically, residential-led schemes) within the Local Plan.

## Employment land spatial strategy

- 4.22 The situation here is relatively straightforward, in that the decision was taken to allocate all of the site options identified as suitable, available and achievable bar one site (175B), which is the site found to contribute most to Green Belt purposes, being assigned a 'moderate to high' score by the Green Belt study.
- 4.23 Four of the proposed allocations contribute to Green Belt purposes to a moderate extent, whilst two contribute to a low extent, and one was not assessed by the Green Belt Study. Whilst there could feasibly be the option of not allocating one or more of the sites that contribute to Green Belt purposes to a relatively high (i.e. moderate) extent, this option is not supported by the Council as this would lead to a significant shortfall of supply against the established need for new employment land. With regards to the one site not assessed by the Green Belt study, this comprises the western extent of the Codham Hall Farm allocation (E10), which is proposed for landscaping.
- 4.24 On this basis, exceptional circumstances exist to justify the spatial approach taken to Green Belt release for employment land within the Local Plan.

## 5. Additional points

- 5.1 The aim of this section is to provide additional commentary on:
- Enhancing the Green Belt
  - Maximising density through policy
  - Safeguarding land
  - Establishing new Green Belt boundaries

## Enhancing the Green Belt

- 5.2 Paragraph 138 of the NPPF states that, where it is necessary to release Green Belt land for development, Local Plans should *“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.”* Also, Paragraph 141 of the NPPF

states that, once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use.

- 5.3 The Local Plan seeks to ensure beneficial use of the Green Belt through Policy NE10(B), which states: *“The Council will encourage the beneficial use of the Green Belt, through opportunities to improve access, outdoor sport and recreation; retain and enhance landscapes, visual amenity and biodiversity; or improve damaged and derelict land.”*
- 5.4 Site specific policy R01 (Dunton Hills Garden Village) also notably requires: *“a green infrastructure buffer / wedge on the eastern boundary with Basildon Borough to achieve visual separation to help significantly improve the landscaped and habitat value thus reinforcing the beneficial purpose and use of the green belt in that zone.”*

## Optimising density

- 5.5 At four sites, the Local Plan assigns a yield below that identified as suitable by the HELAA due to detailed site-specific considerations highlighted (including through consultation) subsequent to publication of the HELAA. Specifically:
- Land at Priest Lane, Shenfield - the proposal is for the site to yield 45 homes, which is 50 homes fewer than the yield figure suggested by the HELAA;
  - Land off Crescent Drive, Shenfield - the proposal is for the site to yield around 35 homes, which is 20 homes fewer than the yield figure suggested by HELAA (N.B. this site now has planning permission);
  - Land north of Woollard Way, Blackmore - the proposal is for the site to yield around 30 homes, which is 26 homes fewer than the yield figure suggested by HELAA; and
  - Land south of Redrose Lane, north of Orchard Piece, Blackmore - the proposal is for the site to yield around 20 homes, which is 20 homes fewer than the yield figure suggested by HELAA.
- 5.6 However, at one site the proposal is to assign a yield in excess of the HELAA figure. Specifically, DHGV is allocated to deliver 2,770, which is 270 homes more than the yield figure suggested by the HELAA.
- 5.7 Finally, it is important to note that Policy HP03 (Residential Density) emphasises the need to optimise densities to make efficient use of land and expects higher densities in designated retail centres and locations with good public transport connections.

## Safeguarding land

- 5.8 The proposal is not to safeguard land to meet longer term development needs stretching beyond the plan period, as DHGV will continue to deliver homes beyond the plan period. Another important consideration is the parallel Joint Strategic Partnership work, which is working towards identifying regional need in the South Essex Area. It is considered

necessary to allow this process to take its course and determine whether additional need exists and what might be required in the future.

## Establishing new Green Belt boundaries

- 5.9 In accordance with NPPF paragraph 136, Policy NE13 (Site Allocations in the Green Belt) formally sets out the need for changes to Green Belt boundaries, stating:

*“A. Sites allocated to meet housing needs in the Green Belt will be expected to provide significant community benefits, both for surrounding existing communities and those moving into new homes on site.*

*B. These sites will be de-allocated from the Green Belt to allow development to take place and provide new defensible boundaries to protect the open countryside for future generations. Site boundaries to form the new Green Belt boundaries are set out on relevant sites in Appendix 2.”*

- 5.10 The detailed boundary amendments around each allocation site are presented in **Appendix I** of this Topic Paper. In most instances the new Green Belt boundary follows the site allocation boundary precisely; however, in some instances this approach would result in a small area of leftover space, in which case the approach taken is to set the new boundary along distinguishable and permanent features in the landscape, such as a road or field boundary. This is to ensure that boundaries are ‘defensible’ against future alterations. This has resulted in only a negligible increase in Green Belt release over and above the fixed allocation land boundary.

## 6. Conclusion

- 6.1 The discussion above serves to demonstrate that exceptional circumstances exist to justify the Local Plan’s proposed approach to the alteration of Green Belt boundaries. Whilst it has been established for several years that there is no realistic potential to avoid or minimise harm to the Green Belt by ‘exporting’ housing needs to any of the Borough’s neighbouring local authorities, a focus of the Local Plan-making process has been on seeking to minimise the need to release Green Belt by identifying sources of housing supply outside of the Green Belt, and by giving careful consideration to optimising development densities. Furthermore, a major focus of the Local Plan-making process has been on selecting sites for allocation in the Green Belt that contribute to Green Belt purposes to a relatively limited extent as far as possible, balancing Green Belt considerations with the need to promote sustainable patterns of development. This involved detailed work to examine site options in isolation as well as in combination (‘spatial strategy’ options), including through the SA process, which took account of the HELAA, Green Belt Study and wide-ranging other sources of evidence. Having identified sites to release from the Green Belt, the final steps were then to establish defensible new Green Belt boundaries, establish site specific policy to ensure high quality development and also consider compensatory improvements to the remaining Green Belt land. The headline outcome is a proposal to release 435.5 ha of land from the Green Belt, which amounts to 3.2% of the current Green Belt. **Appendix II** presents a map showing the proposed areas of Green Belt release.

## Appendix I: Site allocation maps

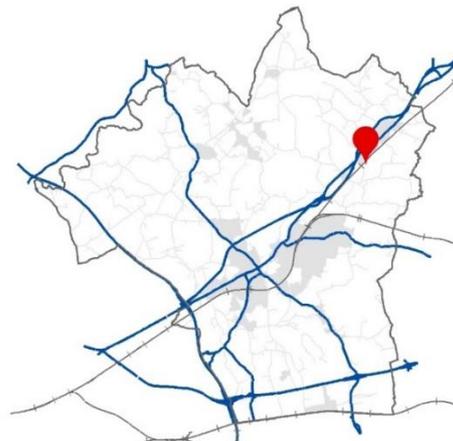
The following series of maps illustrate the proposed Green Belt boundary changes. These maps are mapped to Ordnance Survey (OS) scale 1:1250 mastermap, superseding the coarser and less precise scale maps previously drawn and presented as evidence document A8 – Proposed Changes to Maps.

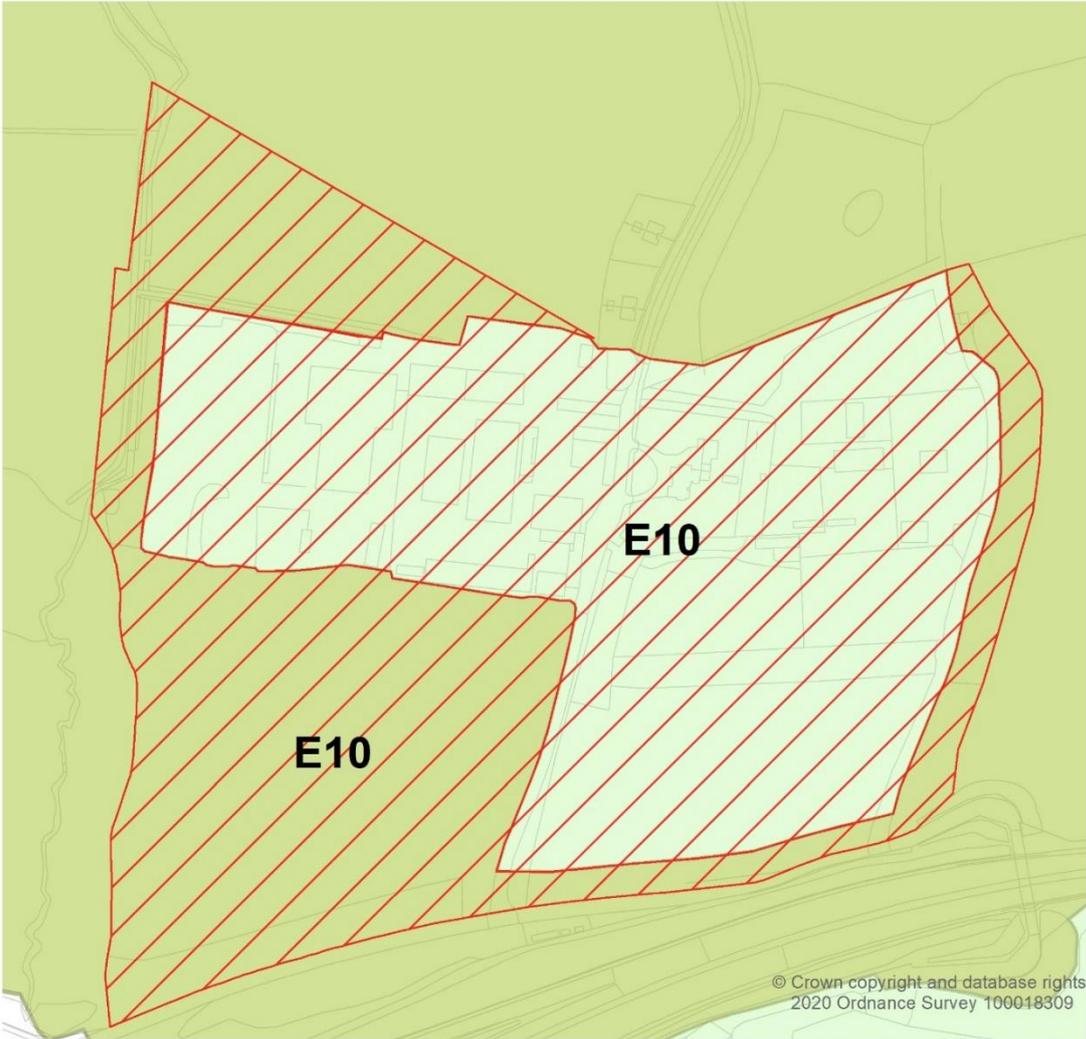


**E08 - Land adjacent to Ingatestone by-pass**

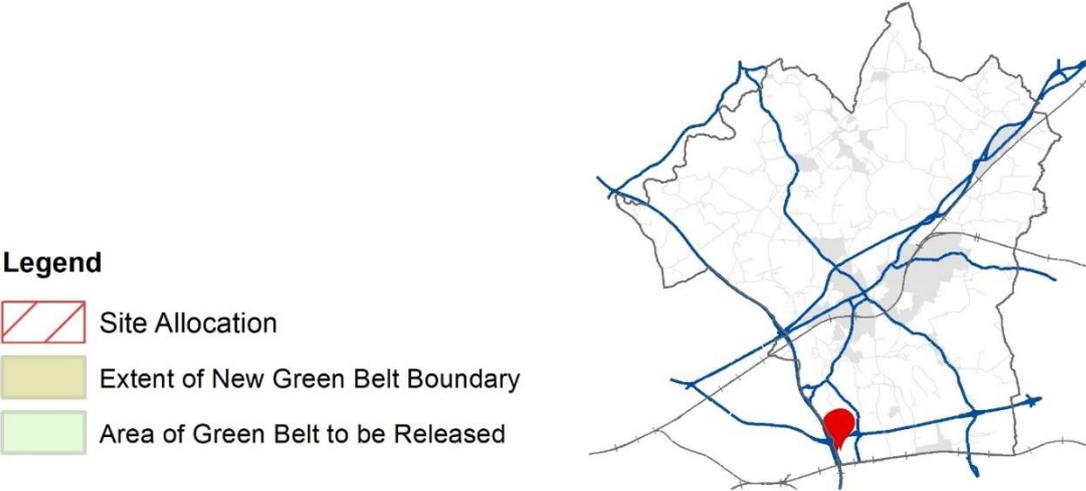
**Legend**

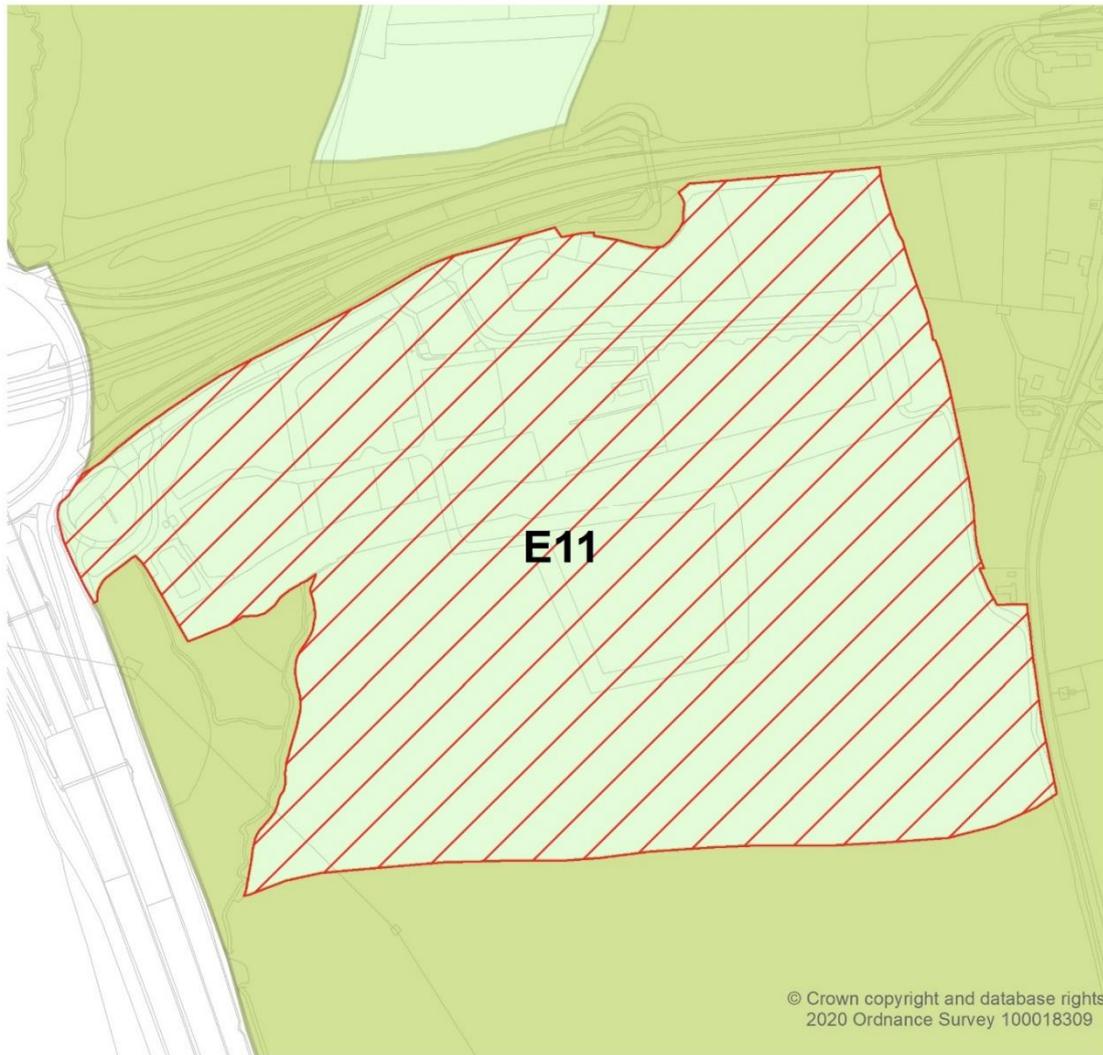
-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released





**E10 - Codham Hall Farm (and associated landscaping)**

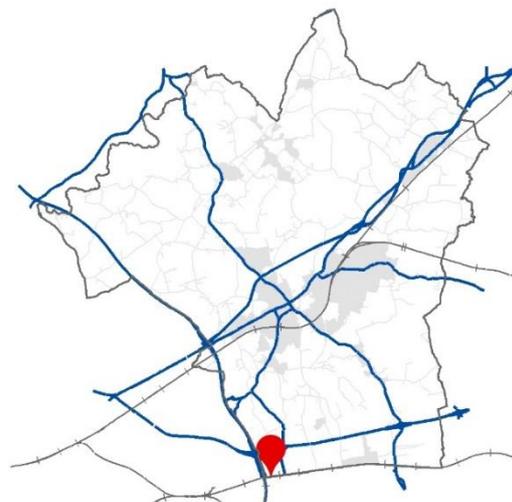


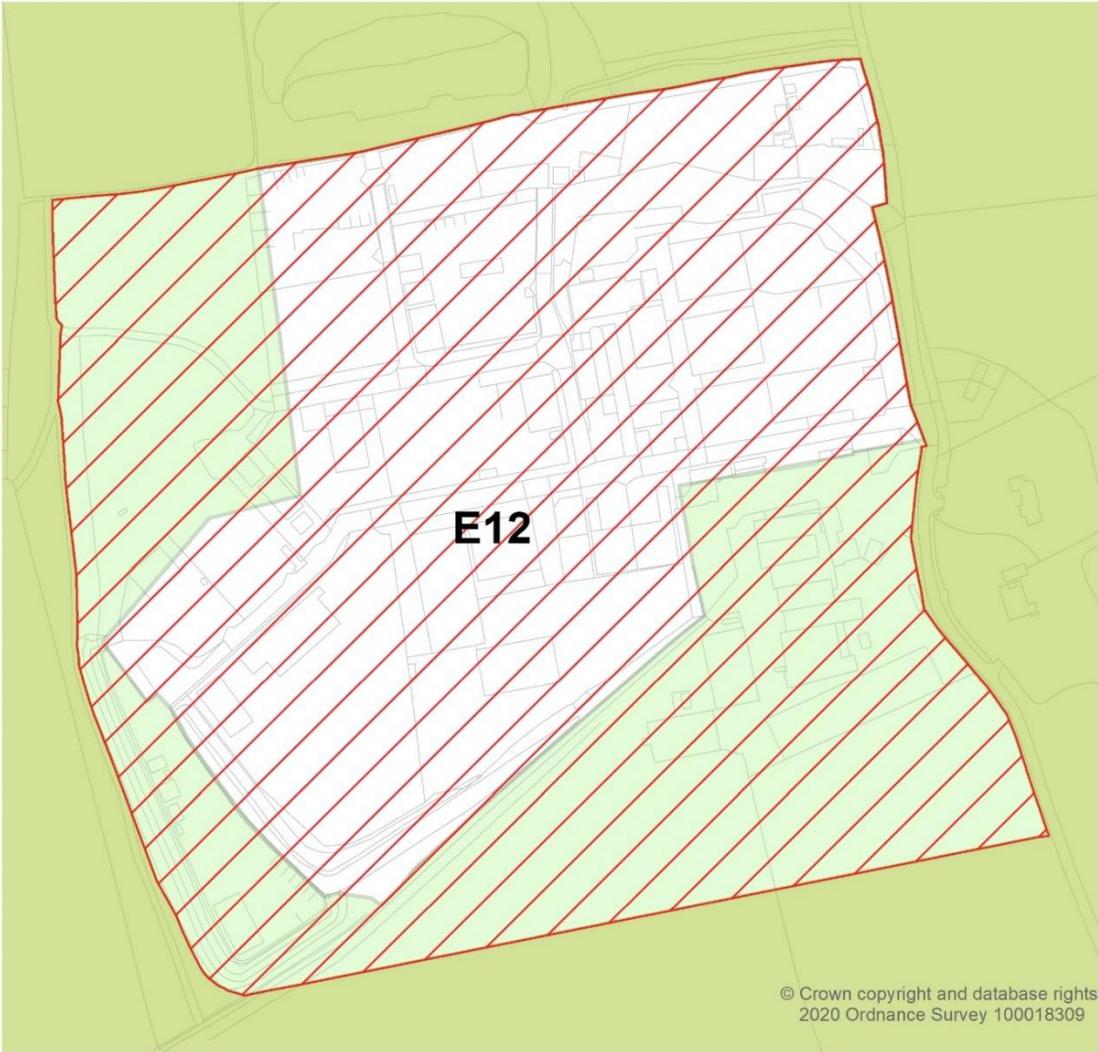


### E11 - Brentwood Enterprise Park

**Legend**

-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released

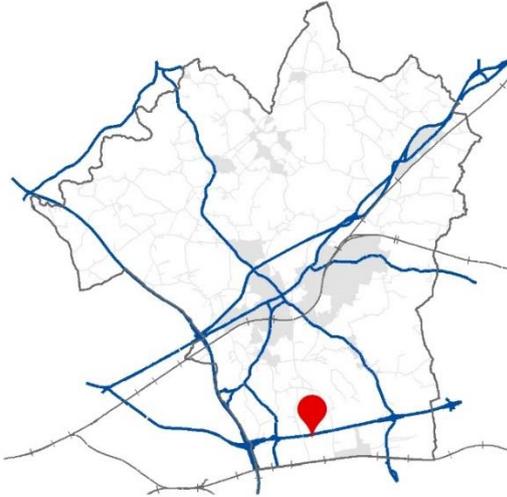




### E12 - Childerditch Industrial Estate

**Legend**

-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released

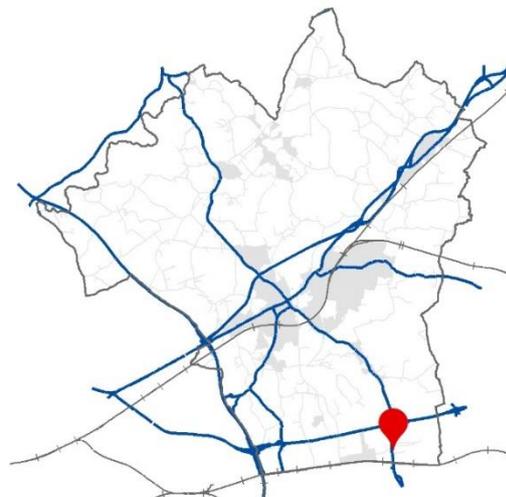


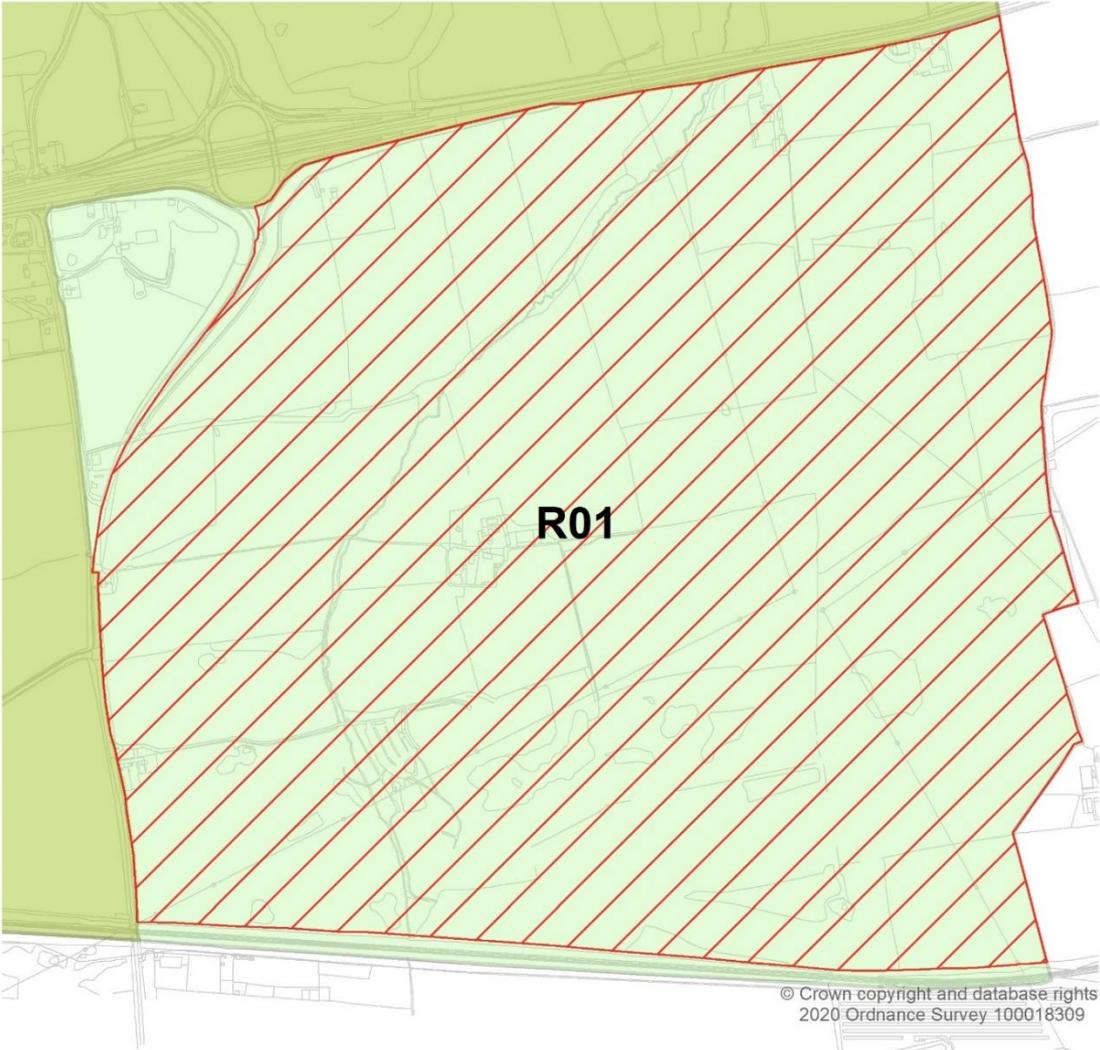


### E13 - Land at East Horndon Hall

**Legend**

-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released

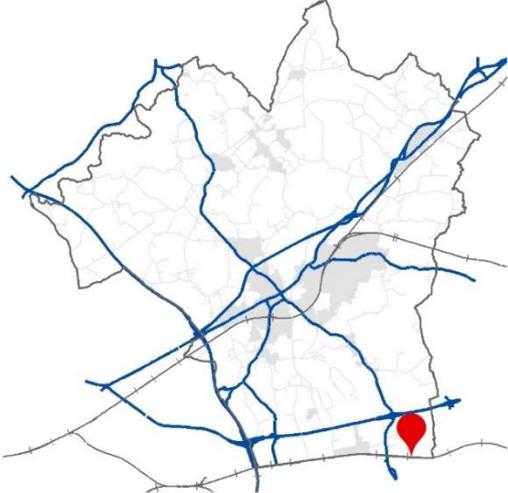


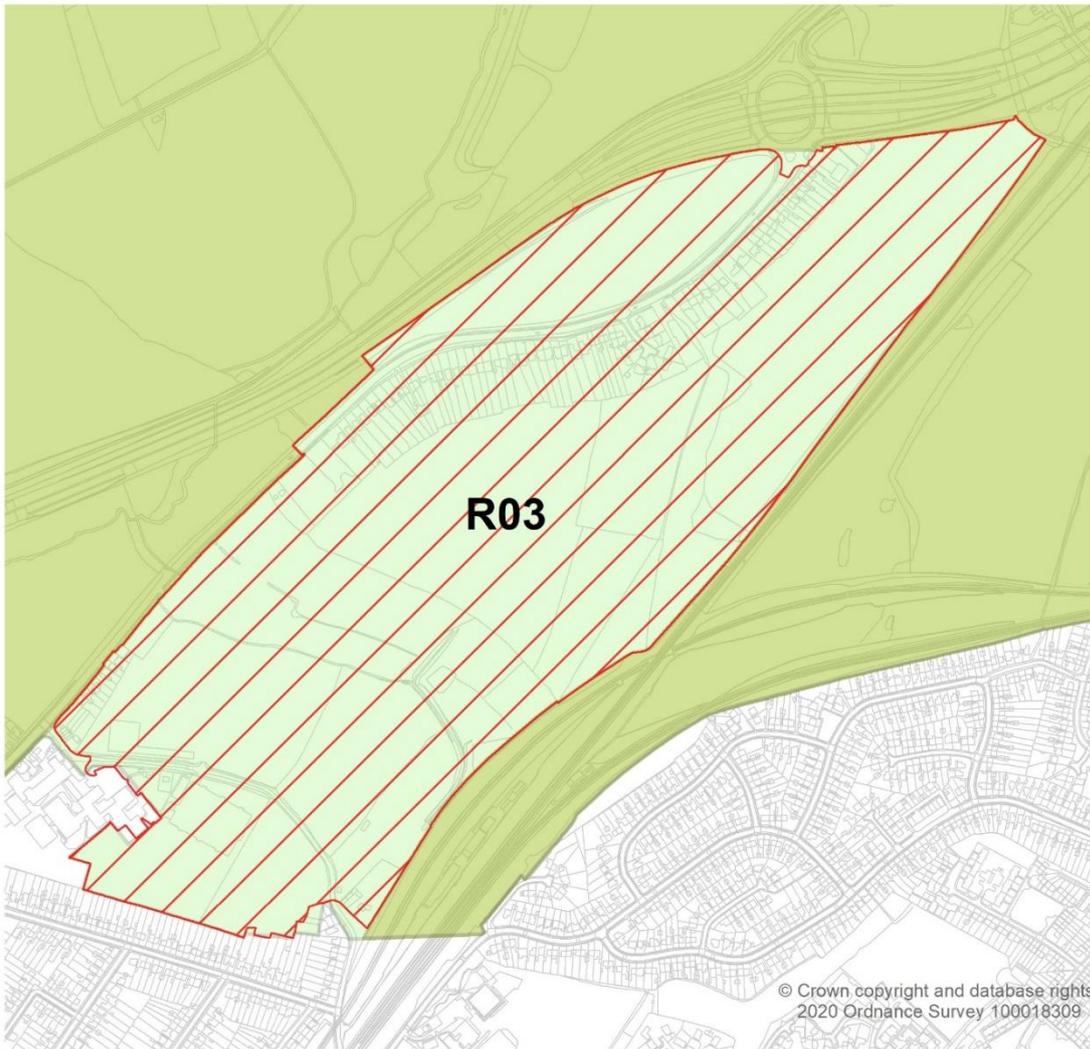


**R01 - Dunton Hills Garden Village**

**Legend**

-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released

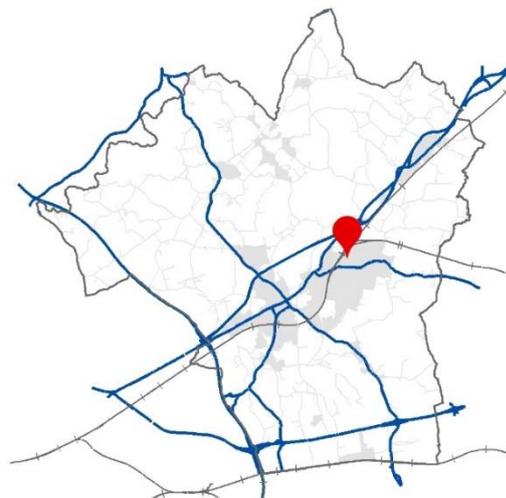


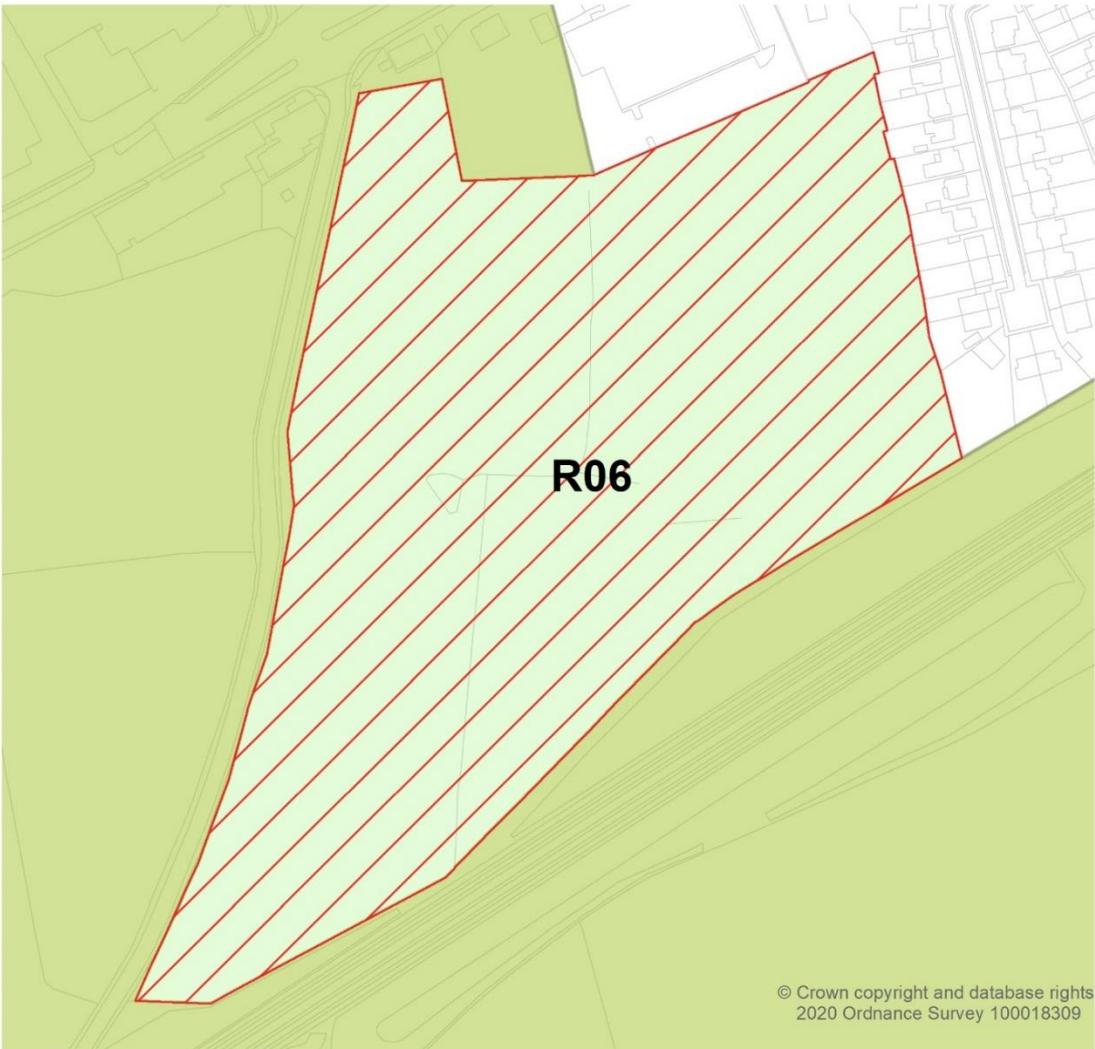


### R03 - Land north of Shenfield

**Legend**

-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released

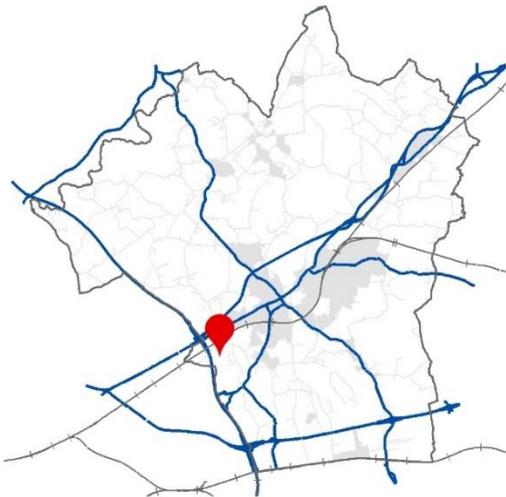


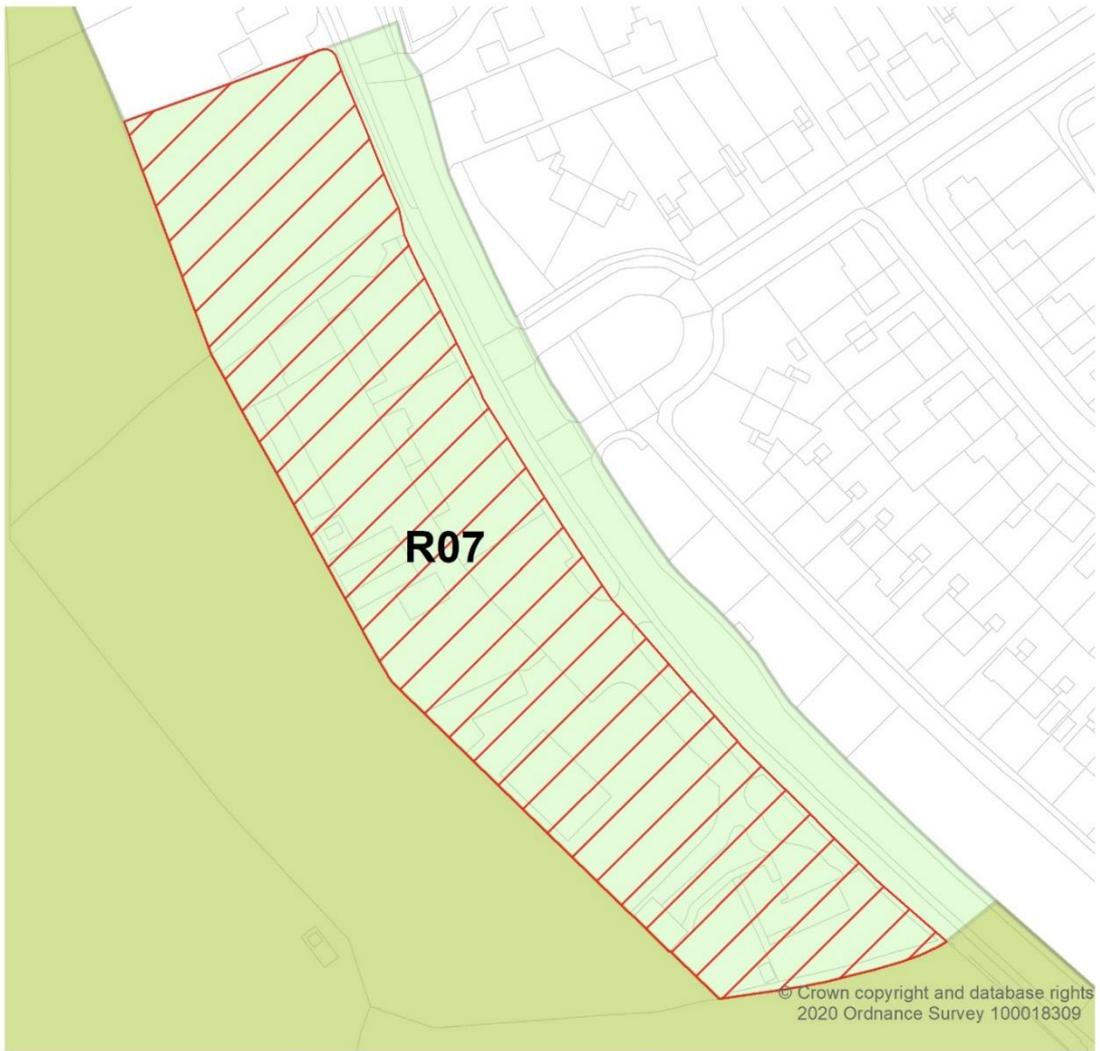


**R06 - Land east of Nags Head Lane**

**Legend**

-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released

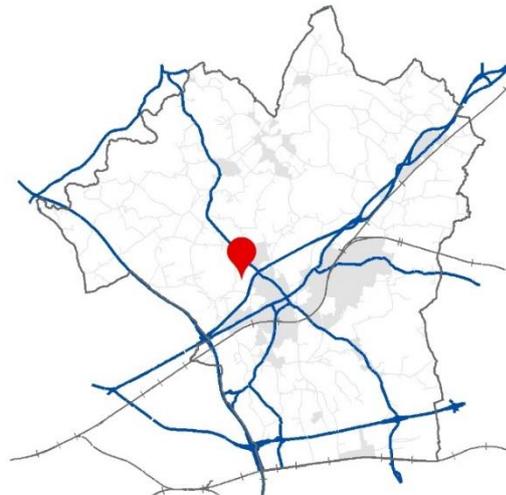


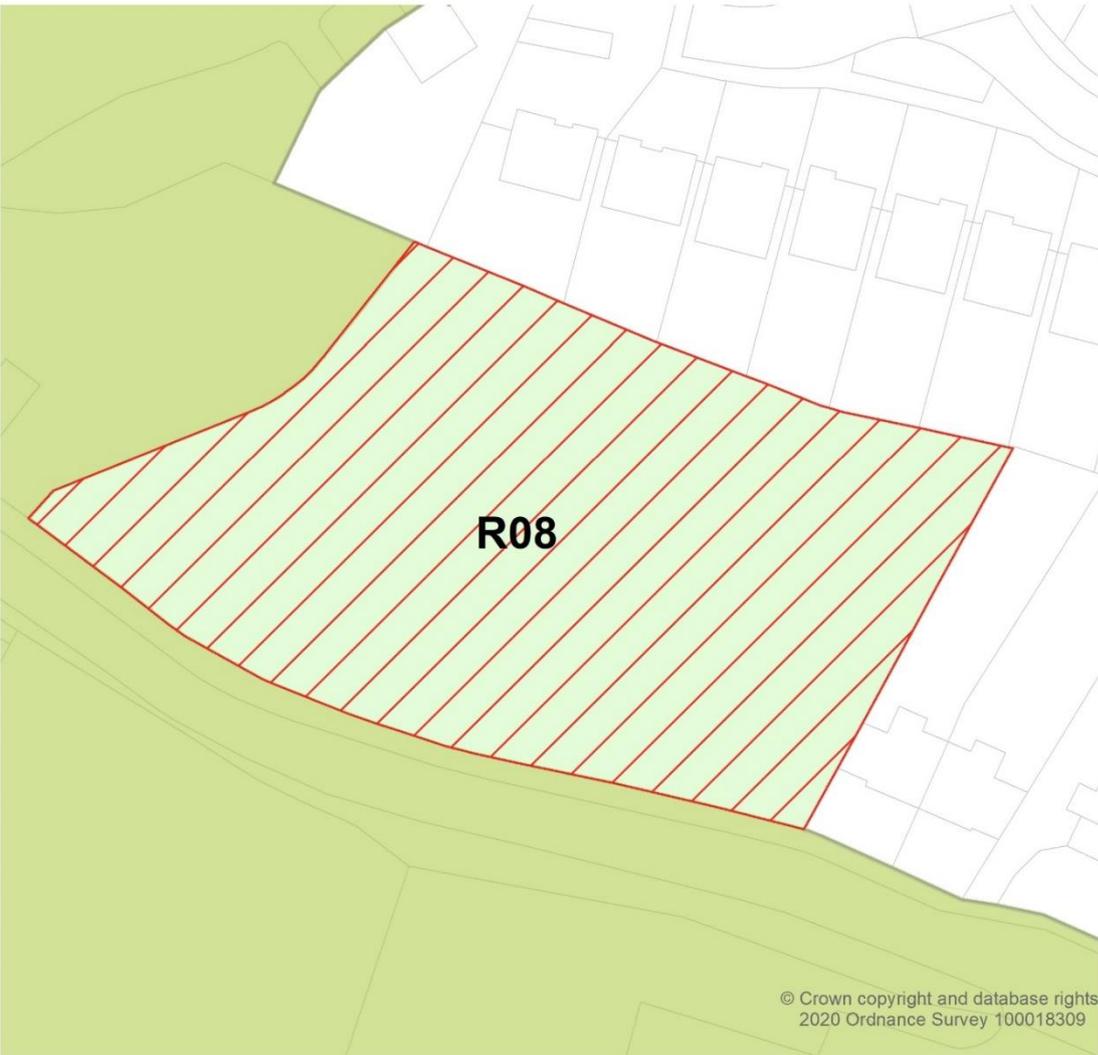


### R07 - Sow & Grow Nursery, Pilgrims Hatch

**Legend**

-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released

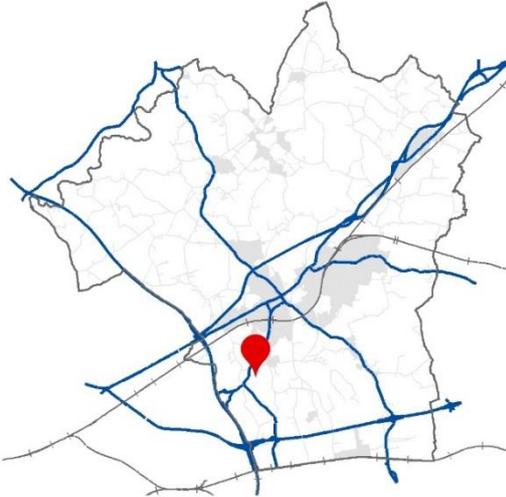


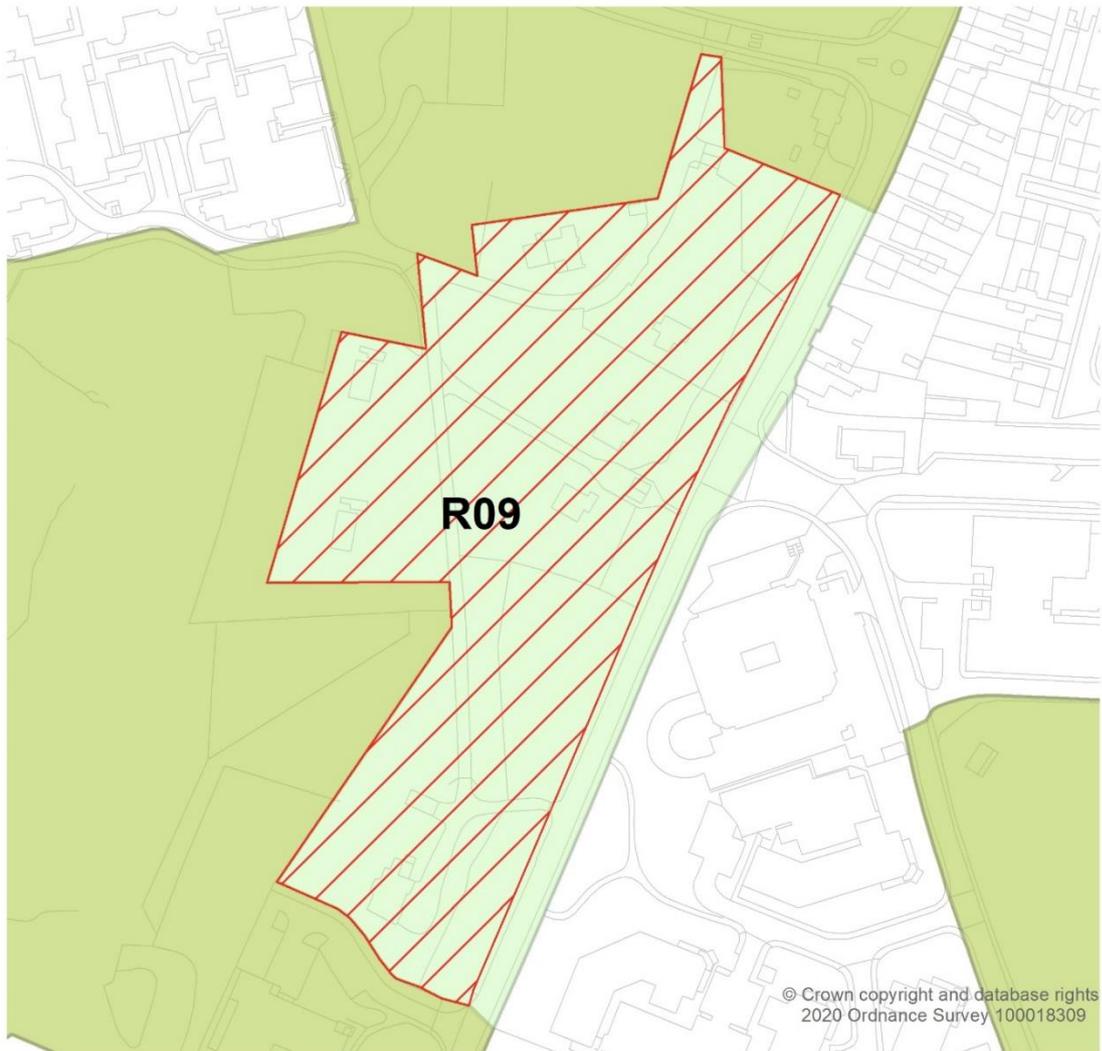


**R08 - Land at Mascalls Lane**

**Legend**

-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released

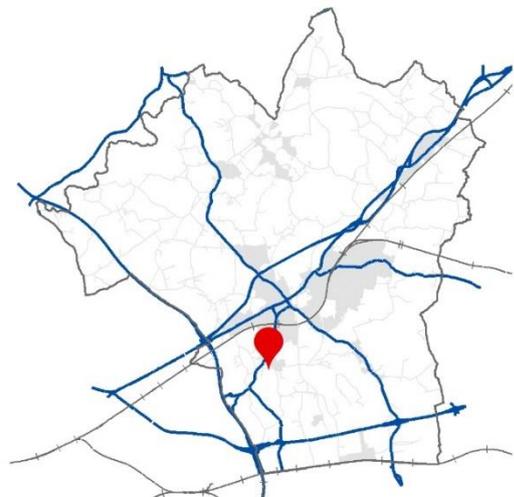


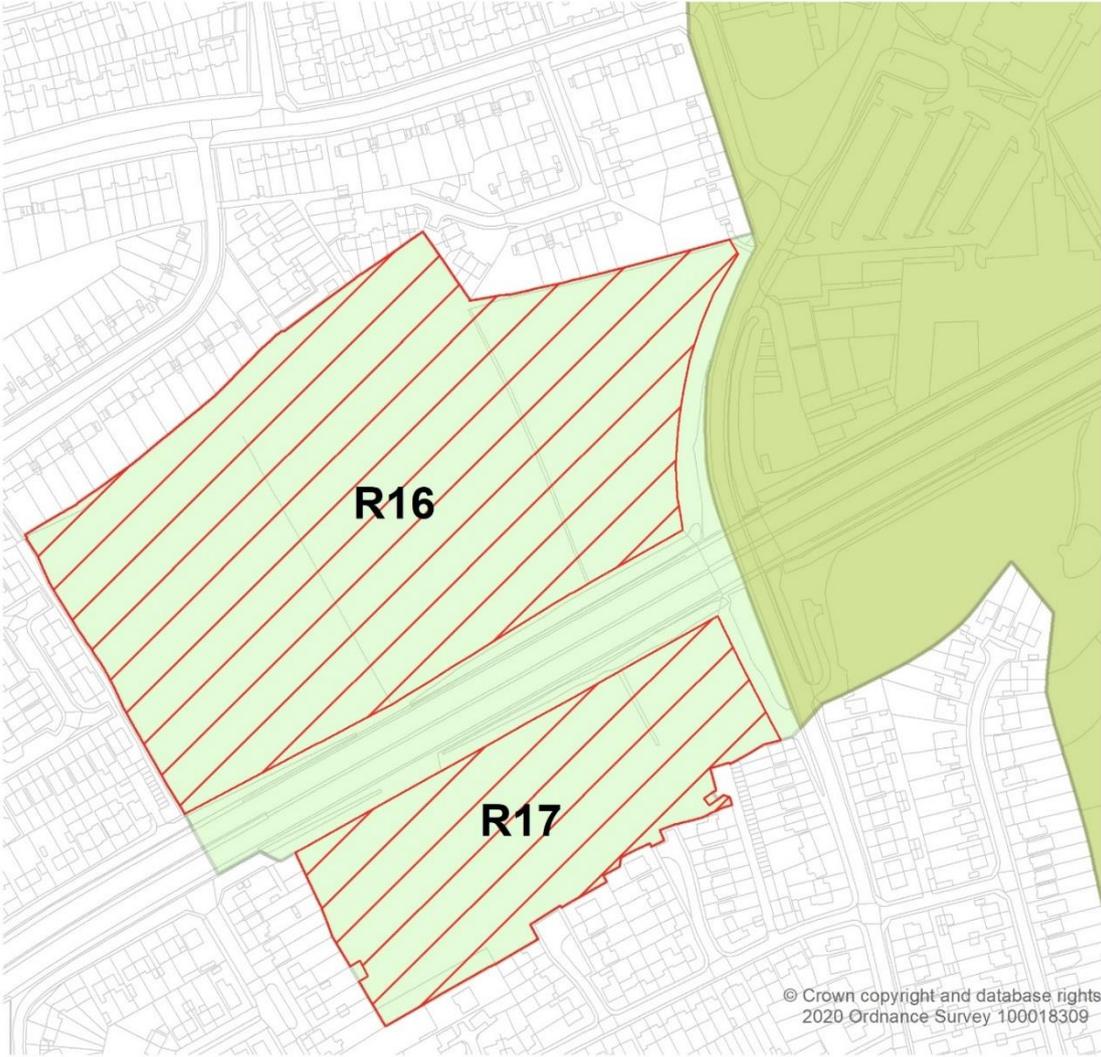


### R09 - Land west of Warley Hill

**Legend**

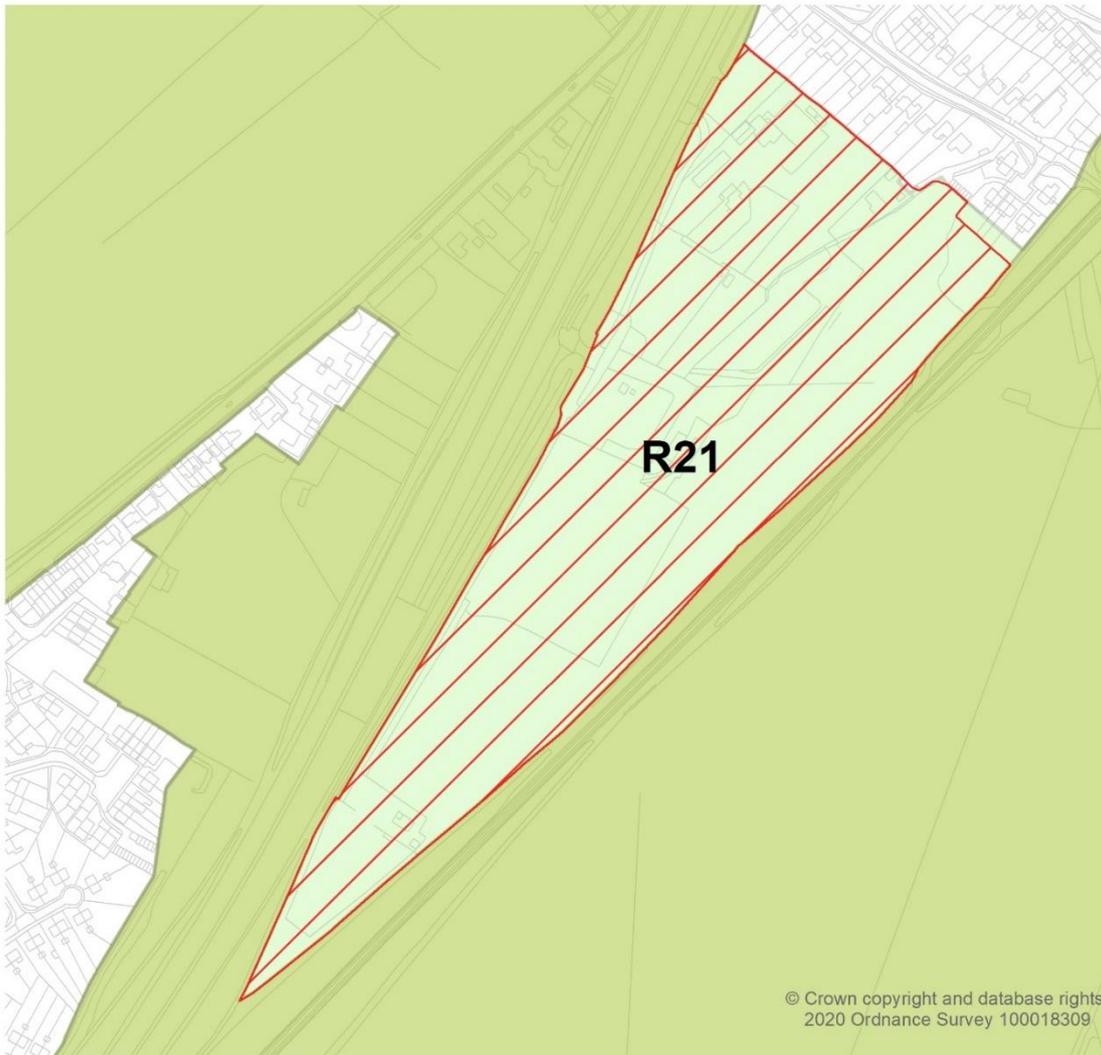
-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released





**R16 & R17 - Land off Doddinghurst Road**

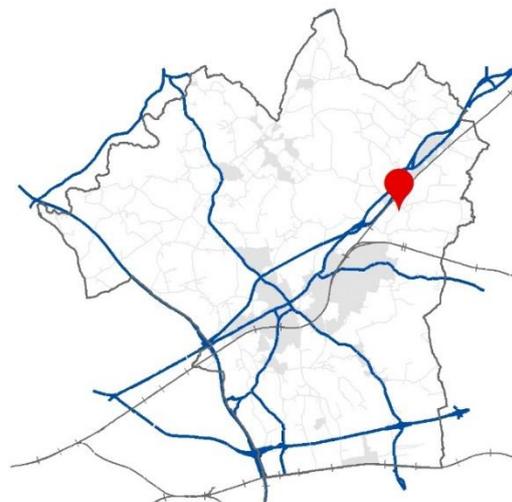




### R21 - Land South of Ingatstone

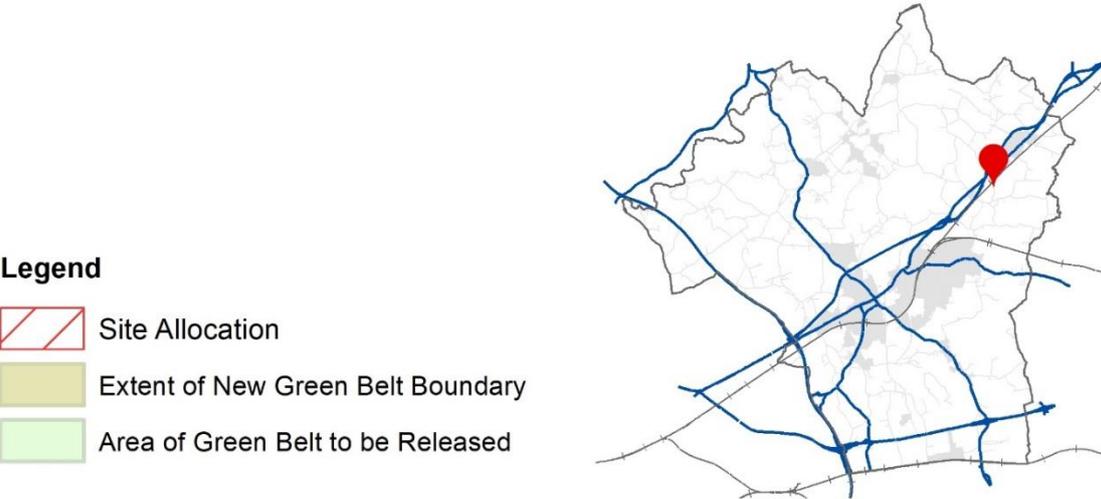
**Legend**

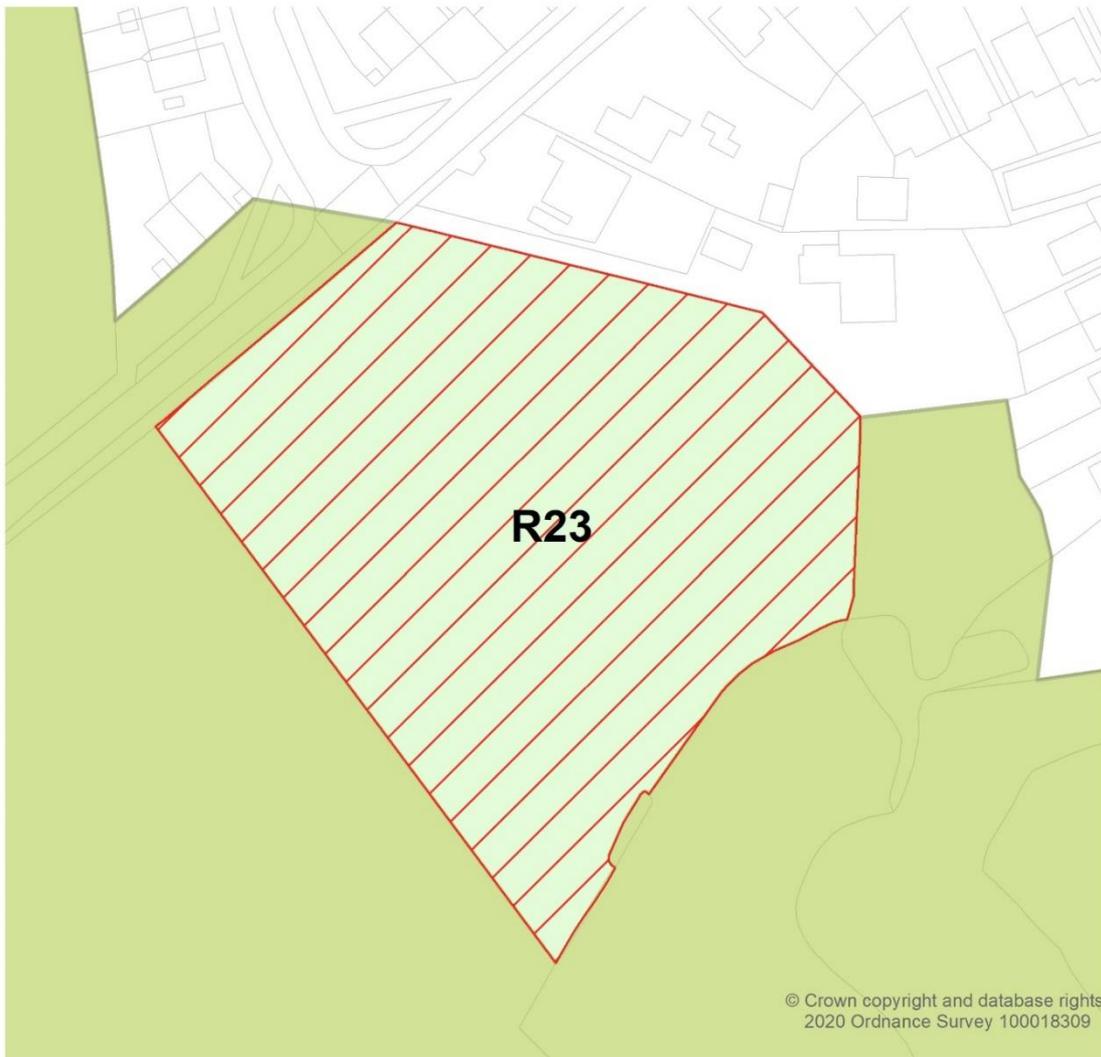
-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released





**R22 - Land adjacent to Ingatestone by-pass**

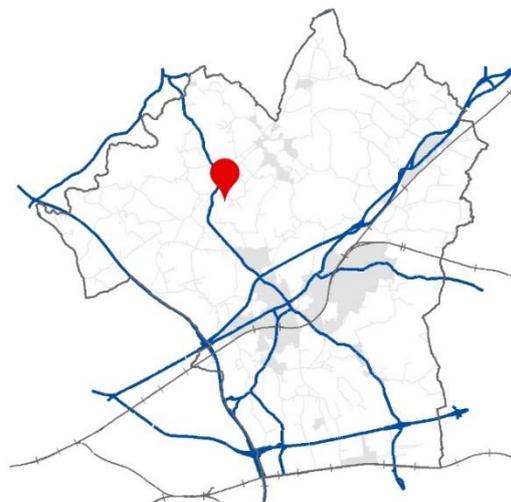




### R23 - Brizes Corner Field, Kelvedon Hatch

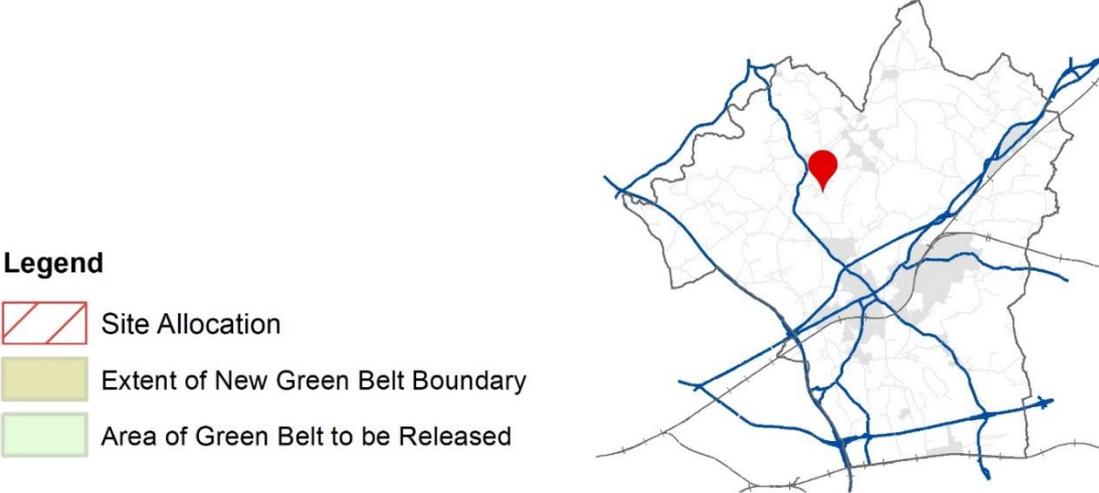
**Legend**

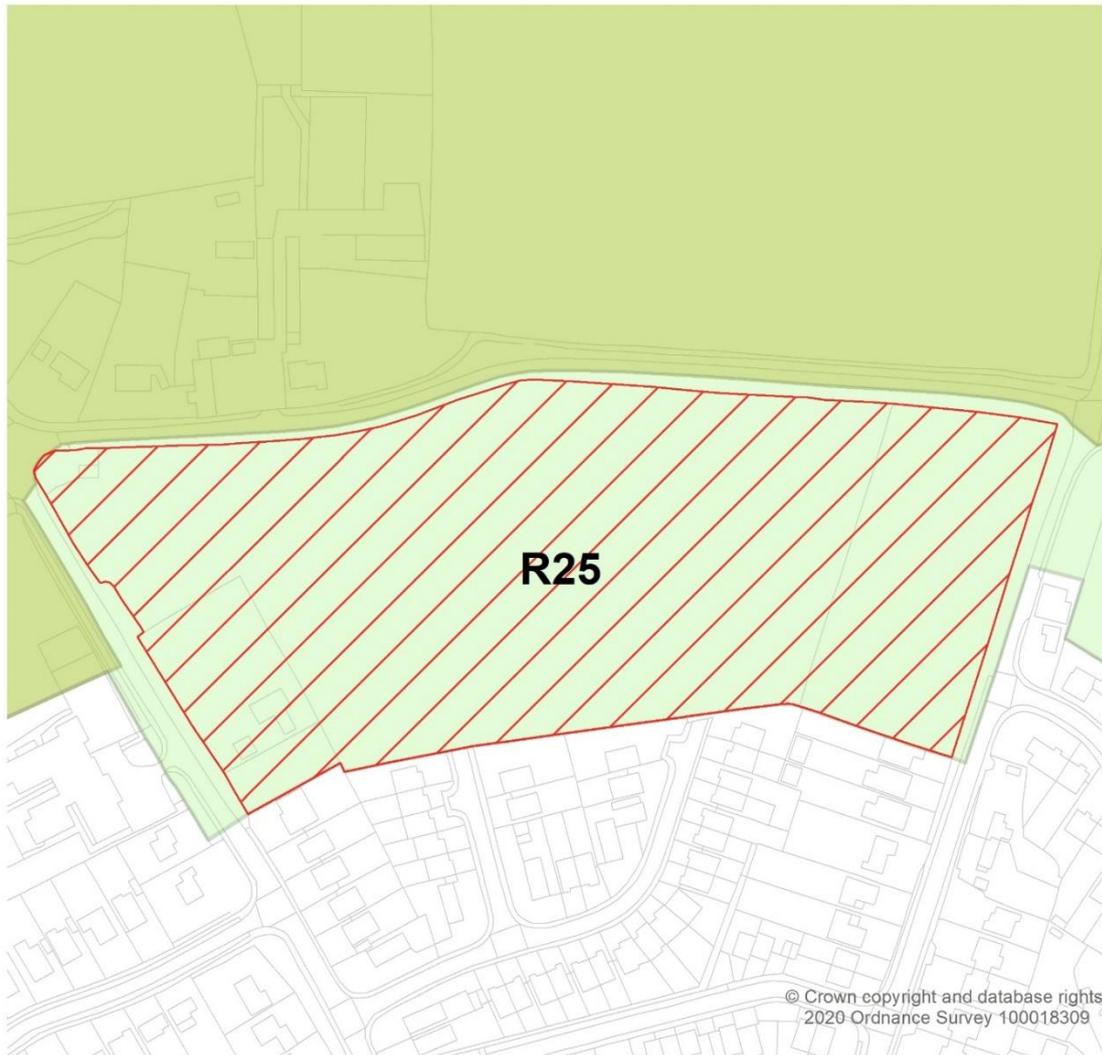
-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released





**R24 - Land off Stocks Lane, Kelvedon Hatch**

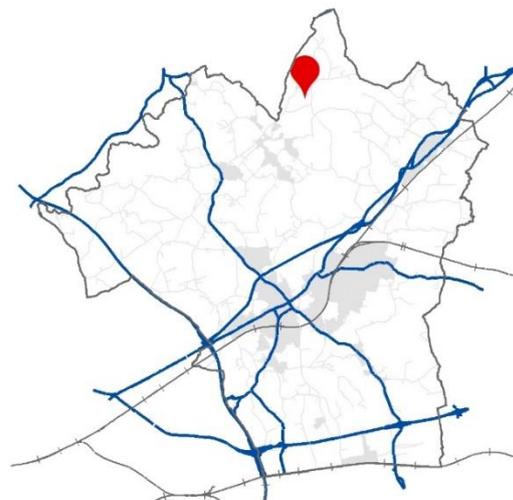




### R25 - Land south of Redrose Lane, Blackmore

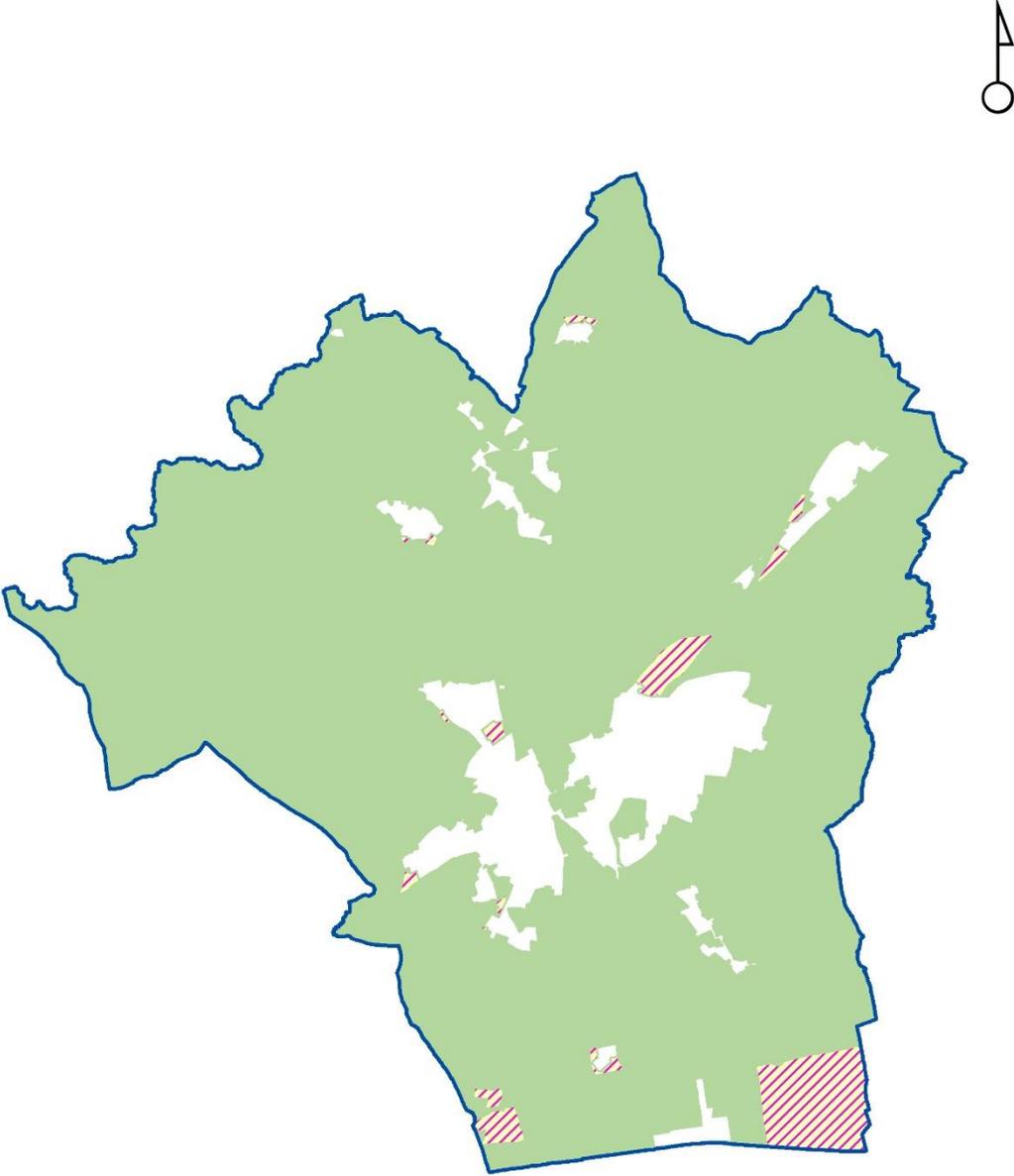
#### Legend

-  Site Allocation
-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released



# Appendix II: Borough-wide map

Figure A: Composite map of Green Belt release areas



**Legend**

-  Extent of New Green Belt Boundary
-  Area of Green Belt to be Released

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