

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

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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 Couttie 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 SHLLAA 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.

1.2 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 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.
- 1.2.3 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).
- 1.2.4 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.
- 1.2.5 In total, 203 individual housing sites assessments have been undertaken. Occasionally, Sites have been assessed as separate land parcels where deemed appropriate. Of the 203 assessments, 21 sites have been further assessed in relation to potential allocations for employment and/or mixed use development.
- 1.2.6 The Council has commissioned the Study in order provide this information as part of the evidence

base to inform the new Brentwood Local Plan.

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, Senior Landscape Architect. Karl has over 17 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 9 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.
- 1.4.2 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.
- 1.4.3 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.
- 1.4.4 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 , in relation to potential housing development. As the scope of the evidence base in support of the LDP has broadened, 21 sites have been further assessed in relation to employment or mixed use/leisure development.
- 1.5.2 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.
- 1.5.3 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.

1.6 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 potential intervisibility with historic towns.
- 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.

2.2 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 <u>not a boundary review of the Green Belt</u> 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.

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, 2012) 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 81 of the NPPF states that "local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."

- 2.2.17 'Purpose 5' has not been assessed as it has already been outlined that development will be directed towards land not contained within the Green Belt in the first instance. Development on Green Belt land will only be considered where the strategic priorities of the Borough to accommodate new housing, employment and/or mixed use development land necessitates its release from Green Belt, accounting for all other planning, environmental and strategic considerations.
- 2.2.18 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

- 2.2.19 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.
- 2.2.20 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.
- 2.2.21 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. Sites that were not adjacent to any large built-up areas were considered to be 'not contained'.
- 2.2.22 In terms of containment, relevant consideration was also given to the scale of the Site and if wholly developed, the scale of countryside encroachment. 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.
- 2.2.23 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 '<u>Strong boundary</u>' 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 '<u>Weak boundary</u>' 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.
- 2.2.24 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)	Within a large built-up area. Would constitute 'Infilling'. Strong boundaries on most sides of the Site. Limited or no countryside encroachment.
Partly- Contained (PC)	At least two boundaries abut a large built-up area without containment. Would form an extension rather than 'infilling'. Weak boundaries on remaining sides of the Site. Some countryside encroachment may occur.
Not Contained (NC)	Not adjacent to, or would be weakly associated with, existing large built-up area. 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. Significant countryside encroachment, both in terms of the physical area and relative to the existing settlement may occur.

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

- 2.2.25 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.
- 2.2.26 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

- 2.2.27 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.
- 2.2.28 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.
- 2.2.29 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.
- 2.2.30 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 was 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 '<u>Weak barrier</u>' 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.
 - '<u>Absent barriers</u>' 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.

2.2.31 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.

- 2.2.32 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 2.2.25 above, as these are discreet settled areas. Where isolated houses, ribbon development or hamlets are at risking of merging with towns or villages, this has been highlighted in the comments in the individual assessment and justification.
- 2.2.33 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.
- 2.2.34 This assessment has <u>not</u> fully considered the impact from developing one Site alongside another and this would require further consideration in the individual Site allocations.
- 2.2.35 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

- 2.2.36 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.
- 2.2.37 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.
- 2.2.38 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?
- 2.2.39 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.
- 2.2.40 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 landuses. 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.

2.2.41 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

- 2.2.42 The Borough of Brentwood does not include any nationally recognised 'Historic Towns' and this purpose is not considered a significant constraint to development. However this does not mean the individual settlements within Brentwood do not have an historic character with important aspects that have defined settlement patterns and the overall landscape character of the area.
- 2.2.43 In the NPPF, Chapter 12: Conserving and enhancing the historic environment states that "local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:
 - The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - The desirability of new development making a positive contribution to local character and distinctiveness; and
 - Opportunities to draw on the contribution made by the historic environment to the character of a place."
- 2.2.44 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.
- 2.2.45 This assessment has aimed to clarify if a Site has any relationship with a nationally recognised Historic Town or, if by virtue of a 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 Site's contribution towards Purpose 4 of the Green Belt. For Brentwood, the primary consideration here is whether the Site falls within a Conservation Area or Historic Park or Garden. It is noted that all Historic Parks or Gardens as outlined in the current Brentwood Local Plan are designated Conservation Areas.
- 2.2.46 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 no or very limited potential for other Conservation (Heritage) Designations to be adversely affected by development.
Moderate Relationship with Historic Town (MRHT)	Development of the Site is close to or could affect the setting of a Historic Town. There is potential for other Conservation (Heritage) Designations to be adversely affected by development, e.g. a Conservation Area.
Strong Relationship with Historic Town (SRHT)	The Site is adjacent to or will affect the setting of a Historic Town.

Desk Study

- 2.2.47 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.
- 2.2.48 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.
- 2.2.49 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

2.2.50 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

- 2.2.51 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.
- 2.2.52 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).

- 2.2.53 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).
- 2.2.54 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.
- 2.2.55 Overall, every Site has been assessed with regards to housing. The purposes of the additional 21 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.
- 2.2.56 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.
- 2.2.57 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.
- 2.2.58 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.
- 2.2.59 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.
- 2.2.60 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					
	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.					
Low	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					
	One Purpose is assessed to Moderate level and all other Purposes are limited to a Low level.					
	Intermediate/borderline assessment between Low and Moderate.					
Low - Moderate	Generally , no more than one Green Belt Purpose is assessed to a High level, with all other Purposes limited to a Low level; or					
	Up to two Purposes assessed to a Moderate level and two Purposes I to a Low Level.					
	Development of the Site will Moderately affects the Site's contributions to the Purposes of the Green Belt.					
Moderate	Three, or all, Green Belt Purposes assessed to a Moderate level; or					
Moderate	One Purpose of the Green Belt is assessed to a High level and at least two Purposes are assesse to a Moderate Level; or					
	Two Purposes are assessed to a High level and the other two Purposes limited to a Low level.					
	Intermediate/borderline assessment between Moderate and High.					
Moderate - High	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).					
	Generally, development of the Site will significantly affect the Site's contribution to the Purposes of the Green Belt.					
High	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.					

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.

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 203 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, 2012) does not require Green Belt land to fulfil <u>all</u> 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 Some sites were divided and assessed as two sites (reduced area): 037C was split such that 037C covered land south of the A125 and 037D covered land north of the A125; Site 101B covered two distinct parcels of land at Codham Hall (industrial Site) and was subdivided in to 101B(West) and 101B(East). Equally, a number of Sites such as 101A, 104 and 185 have been assessed twice based on varied boundaries (either making the Site larger or specifically assessing a smaller area of a Site).
- 3.1.7 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.
- 3.1.8 Note that the 'fifth' purpose of the Green Belt has not been assessed as part of this report (see paragraph 2.2.17).

Number of High Assessment Ratings for Individual Purposes per Site

0 11
1 110
2 80
3 2
4 0

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

- 3.1.9 None of the Sites received a High assessment rating for all four individual purposes and only two Sites received three High ratings for individual purposes. It is noted that Site 192 was noted as Moderate-High for Purpose 2 with two other High assessment levels for Purposes 1 and 3. Eleven Sites failed to achieve a High assessment rating for any of the purposes. Over half of the Sites (110) received one High assessment rating.
- 3.1.10 Table 7 summarises the overall assessment results for the Sites.

Overall Assessment Rating

Low
12

Low - Moderate
38

Moderate 122

Moderate - High
23

High
8

Table 7 Summary of Overall Assessment Results

3.1.11 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.

Table 8 Summary of Combined Overall and Individual Purposes Assessment Results

Overall Assessment Rating:												
	High	High	High	Mod- High	Mod- High	Mod	Mod	Mod	Low - Mod	Low - Mod	Low	Low
No. of High assessment individual ratings:	4	3	2	2	1	2	1	0	1	0	1	0
No. of Sites:	0	2	6	23	0	51	70	1	33	5*	7	5*

3.1.12 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 this Appendix: One in an 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.

- 3.1.13 Referring to Table 7 and Table 8, twelve Sites received a **Low** overall assessment rating. Of these, five Sites (see*) did not fulfil any of the individual Green Belt purposes to a High assessment level (Sites 010, 015, 025, 063 and 085). Additionally, five Sites (see*) 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, 181, 186 and 083).
- 3.1.14 Referring to Table 7, eight Sites received a **High** overall assessment rating (028C, 028B, 155, 192, 200, 231, 241 and 270).

Purpose 1

- 3.1.15 Over half (132) 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' by existing built development areas. As a result, housing development would be considered to be beyond the settlement limit, which could be interpreted as contributing to sprawl of large built-up areas, affecting Green Belt openness.
- 3.1.16 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

- 3.1.17 Seven sites were found to directly cause towns (see paragraph 2.2.25 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, 155, 241, 270, 146 and 245.
- 3.1.18 Generally, the majority of Sites would not cause towns to coalesce or merge, although twenty-eight 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

- 3.1.19 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 135 of the 203 Sites receiving a **High** assessment rating in relation to Purpose 3. Thirty-three Sites received a **Low** assessment rating, primarily reflecting the existing use of the land as either a private garden or brownfield / previously developed land.
- 3.1.20 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.

Purpose 4

3.1.21 In terms of Purpose 4, no Site was found to adversely affect the setting of a Historic Town with none of the settlements in Brentwood Borough considered to be a 'Historic Town'. At the majority of Sites, where they abut existing residential areas, housing is post Second World War. Accordingly,

no Site was considered to fulfil Purpose 4 to a High level. Some of the Sites did fall wholly or partly within Conservation Areas, such as around Hutton Village, Blackmore and the Thorndon Park and Weald Conservation Areas. Effects on Conservation Area status were considered as part of the assessment as a broader interpretation of Purpose 4 and effects were considered significant enough to warrant eleven Sites receiving an assessment level of **Low-Moderate** or **Moderate** in relation to Purpose 4: Sites 155, 241, 202, 211, 254A, 254B, 038B, 033, 219, 249 and 181.

3.2 EMPLOYMENT AND MIXED USE/LEISURE 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 21 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:

Number of High Assessment Ratings for Individual Purposes per Site

O 1

1 12

2 8

3 0

4 0

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

- 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. Site 106 was the only Site not to receive a High assessment rating with regards to any of the four purposes, although it also has three **Moderate** ratings with regards to Purposes 1, 2 and 3.
- 3.2.6 Table 1 summarises the overall assessment results for the Sites.

Table 10 Summary of Overall Assessment Results

0	verall Asse	Number of Sites	
		Low	0
		Low - Moderate	10
		Moderate	8
		Moderate - High	2
		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.

Table 11 Summary of Combined Overall and Individual Purposes Assessment Results

Overall Assessment Rating:												
	High	High	High	Mod- High	Mod- High	Mod	Mod	Mod	Low - Mod	Low - Mod	Low	Low
No. of High assessment individual ratings:	4	3	2	2	1	2	1	0	1	0	1	0
No. of Sites:	0	0	1	2	0	5	2	1	10*	0	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 1 and Table 11, no Sites received a Low overall assessment rating. Ten Sites (see*) received a **Low-Moderate** overall assessment rating, however, all of these Sites were considered to be 'Not Contained' receiving a **High** assessment rating for Purpose 1. All other assessment ratings were **Low** for Purposes 2, 3 and 4.
- 3.2.10 Referring to Table 1, one Site received a **High** overall assessment rating (Site 200) and two Sites received a **Moderate-High** overall assessment rating (Sites 175c and 175B).

Purpose 1

3.2.11 All of the Sites were considered 'Not Contained', except Site 106 which was considered 'Partly Contained'. None of the Sites was well contained by existing built development (i.e. an urban or settled area). Thirteen Sites comprised previously (wholly or partly) developed Sites (industrial/commercial) situated away from major built up areas (see Purpose 3 results below).

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 158 and 101B(East) had the

- Purpose 2 assessment rating elevated from Separation Retained to Separation Retained/Separation Reduced, but Functional. Sites 187 and 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 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 is has been particularly noted in the assessments that whilst the other overall assessment ratings did not change, Employment or Mixed Use development at Sites 089, 106, 175B, 175C, 200, 127 and 177 would be 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 089, 106, 175B, 175C 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 Ten Sites had evidence of built development (some industrial/commercial Sites) and were considered to fulfil Purpose 3 to a **Low** level. A further three Sites were considered Mixed Functions within Countryside (089, 106 and 101A (Extended Site)). Sites 187, 177, 158, 127, 079C, 175B, 175C and 200 were all considered to fulfil Purpose 3 to a High level, being 'countryside' Sites with no evidence of previous built development.

Purpose 4

3.2.16 No Employment or Mixed Use Site was considered to adversely affect the setting of a Historic Town and were not related to any Conservation Area or Registered Park and Garden.

3.3 RECOMMENDATIONS

- 3.3.1 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. It is also the case that 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 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.
- 3.3.3 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.
- 3.3.4 On this basis, in terms of Green Belt considerations only, Housing Sites should be prioritised as per the table in Appendix L2, with:
 - Sites 024A, 035, 073, 095A, 139, 149, 182, 010, 015, 025, 063 and 085 being most highly prioritised; and
 - Sites 028C, 028B, 155, 192, 200, 231 and 270 being of lowest priority.
- 3.3.5 In terms of Green Belt considerations only, Employment and Mixed Use Sites should be prioritised as per the table in Appendix L6, with Sites 101B (East and West), 108, 109, 111, 112B, 112C, 112D, 175A and 228 being most highly prioritised. By virtue of its scale, Site 200 (Mixed Use) should be of lowest priority.
- 3.3.6 This being said, a number of Sites, in particular Sites 153, 219, 031, 032 and 022, have the potential to be re-assessed with lower assessment ratings if their boundary extents were reconfigured to fit more closely with the landscape boundaries present (e.g. mature woodland), the general alignment with the existing extent of large built up areas and existing settlement pattern.
- 3.3.7 Also, large expansive Sites such as Site 028B, 028C, 192, 200 and 231 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. For these Sites, the overall assessment rating (i.e. 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 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.
- 3.3.8 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 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.
- 3.3.9 Site 101A has been assessed twice, in both 2013 and 2015. The first assessment was based on a boundary confined to the existing developed area and received a **Low–Moderate** overall assessment rating. The boundary was extended southwards in 2014/2015, such that the Site included arable land south of the existing developed area. As such, the revised assessment for the whole Site was elevated to **Moderate**, as the assessment level for Purpose 3 was increased. As such, in terms of Green Belt considerations only, development can be more highly prioritised for the previous 2013 Site boundary as opposed to the extended 2015 boundary.

- 3.3.10 Similarly Site 185 has been assessed twice in 2013 and 2015. Again this relates to differing boundaries with the 2013 boundary covering a larger area, including a dwelling and garden, receiving a **Moderate** overall assessment rating. In 2015, the revised boundary only included a tree belt on the southern boundary of the Site (outwith the existing dwelling area). As such the Purpose 3 assessment rating was elevated from Moderate to High, resulting in an overall **Moderate-High** assessment rating.
- 3.3.11 Sites 101A and 185 illustrate how Site boundary changes can affect both the individual and overall assessment ratings. Site 104 was also assessed twice comprising a larger overall boundary in 2013 and smaller boundary 2015; the overall assessment rating was considered **Moderate**, in both cases.
- 3.3.12 In order to further understand the effects on Purpose 3 of the Green Belt (effects on countryside encroachment) from development of Sites having a High individual assessment level (prioritising lower overall assessment levels first), further assessment could be usefully used (where appropriate and where resources allow) on 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 study.
- 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:

- Brentwood Borough Council, 25 August 2005 (Adopted). Brentwood Replacement Local Plan. s.l.:s.n.
- Brentwood Borough Council, June 2005. *Brentwood Replacement Local Plan Initial Deposit Draft Urban Capacity Study*. s.l.:s.n.
- Brentwood Borough Council, October 2011. Strategic Housing Land Availability Assessment Final Report.
 s.l.:s.n.
- Department for Communities and Local Government, 2012. National Planning Policy Framework. s.l.:s.n.
- Natural England, n.d. MAGIC. [Online]
 Available at: http://www.magic.gov.uk/
 [Accessed 10 April 2013].
- Opinion Research Services and Savills, January 2010. London Commuter Belt (East)/M11 Sub-Region Strategic Housing Market Assessment 2008. s.l.:s.n.

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