DUNTONHILLS brentwood

Representations to Brentwood Borough Council Draft Local Plan, January 2016

Green Belt and Landscape

March 2018





8th March 2018

Dunton Hills, Brentwood

Green Belt and Landscape Representations -Preferred Site Allocations, January 1018

Technical Report

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Dunton Hills, Brentwood Green Belt and Landscape Representations

Section 1 - Introduction and Purpose

- 1.1 Tyler Grange have been appointed by CEG to provide advice on landscape and Green Belt matters to support the promotion of land at Dunton Hills (the site) within the emerging Brentwood Local Plan.
- 1.2 This technical report has been prepared to support representations being made to the Regulation 18 Consultation on the Preferred Site Allocations DPD, January 2018 on behalf of CEG. The report considers the findings of the January 2018 Interim Sustainability Appraisal as well as reviewing the Green Belt and Landscape evidence base documents in relation to the preferred Strategic Allocation at Dunton Hills Garden Village (DHGV).

Previous Representations

- 1.3 In March 2016, CEG made representations to the January 2016 Draft Local Plan. These included a technical report prepared by Tyler Grange that considered the then current SA and Evidence Base¹.
- 1.4 The report concluded that development of DHGV could be delivered to limit impacts on the function of the Green Belt, whilst respecting the landscape context and reflecting the Draft Local Plan spatial strategy for sustainable development within the A127 Corridor. Release of the land at Dunton Hills would be contained and separated from the wider Green Belt, preventing urban sprawl. The A127, A128 and railway line would form the new Green Belt boundary.
- 1.5 By channelling development towards sustainable transport corridor, the spatial strategy meets the requirements of the NPPF by taking account of the need to promote sustainable patterns of development when considering the release of Green Belt land.
- 1.6 The findings of the report are summarised below:
 - As emphasised in Policy 7.1 of the Draft Local Plan, the A127, A128 and railway line provide robust, defensible boundaries to development, serving to check sprawl, maintain separation with West Horndon and prevent encroachment into the wider countryside.
 - DLP Policy 7.1 also provides for the strengthening of existing boundaries to the east to ensure physical and visual separation with Basildon.
 - Whilst the 2016 Interim Sustainability Appraisal (SA) identified the DHGV location as having the potential to have significant impacts on Green Belt and Landscape, it acknowledges that these could be remedied subject to further work.
 - The 2016 Interim SA was underpinned by the findings of the Working Draft Brentwood Green Belt Review, 2016 which identified land at Dunton Hills as making a high overall contribution to the Green Belt.
 - Tyler Grange undertook a critical review of the Green Belt evidence base and identified that it had incorrectly applied the methodology and criteria when assessing the role of the A127, A128 and railway as boundaries that provide containment and prevent urban sprawl and merging of settlements. The Review also fails to consider existing development on the site and detracting features when assessing the role of the land in protecting the countryside from encroachment.

¹ Dunton Hills, Brentwood: Green Belt and Landscape Representations – Technical Report, 22 March 2016 (report 2394_R04b_RH_LP)



- The proper application of the criteria and interpretation of the methodology may have led the Council's Green Belt Review to identify that the land at Dunton Hills does not make a high contribution to the Green Belt, being contained by strong boundaries.
- DHGV can be delivered to respect the landscape and distinctive features, incorporating
 measures that would help to mitigate the negative impacts of existing transport
 infrastructure, whilst strengthening the degraded landscape structure through
 enhancement of boundaries. This accords with published management guidelines for the
 Horndon Fenland as set-out in the Mid Essex Landscape Character Assessment that
 forms part of the Local Plan evidence base.
- 1.6 Tyler Grange's report concluded that DHGV could be delivered to address issues raised within the 2016 SA and Working Draft Green Belt Review.

Brentwood Draft Local Plan Preferred Site Allocations DPD, January 2018

- 1.7 The consultation draft Preferred Site Allocations document continues to promote the spatial strategy for higher-level strategic housing growth through the creation of a new settlement at DHGV within the A127 Corridor and sustainable urban extensions to Brentwood as set-out in the DLP.
- 1.8 The Preferred Site Allocations also include for an employment site on land south of East Horndon Hall to the west of DHGV. The site is identified as being a self-contained employment site that may be capable of being linked to the DHGV proposals, thereby potentially allowing for increased development of new homes at Dunton Hills.
- 1.9 The proposed employment site at East Horndon Hall does not prejudice the deliverability of DHGV, being contained within the Green Belt and having the potential to provide a robust new Green Belt boundary along Tilbury Lane and the A128. Furthermore, DHGV does not rely upon the release of land at East Horndon Hall in order to be acceptable in landscape and Green Belt terms. The A128 forms a robust and defensible boundary to the western edge of the Dunton Hills site.
- 1.10 The preferred allocations are supported by an updated Interim Sustainability Appraisal and Evidence Base, including a new suite of Green Belt evidence that is currently being completed, although some initial working draft elements are available for review.
- 1.11 This report includes a summary and review of the 2018 Interim SA and supporting Green Belt and landscape evidence base and considers how this relates to the DHGV development and release of Green Belt land.
- 1.12 With reference to the development principles, this report also considers how DHGV could respond to the landscape and Green Belt context, being contained within the wider Green Belt, contained and defined by robust boundaries and incorporating key landscape characteristics whilst delivering a range of benefits including provision of Gren Infrastructure and accessible green space incorporating substantial biodiversity and recreational benefits.



Section 2 – Interim Sustainability Appraisal, January 2018

- 2.1 The SA sets-out the main objectives of the Local plan, identifying the following under the theme of 'Environmental protection and enhancement':
 - Safeguard the Green Belt from inappropriate development and enhance it beneficial use;
 - Protect and enhance valuable landscapes and the natural and historic environments; and
 - Establish a rich connected network of Green Infrastructure across the Borough and reaching beyond.
- 2.2 Under the sustainability topic of 'Landscape', the SA sets-out the following issues / objectives:
 - The Borough includes highly valued rural landscapes that require protection and careful management with a view to supporting distinctiveness.
 - Urban fringe landscapes should also be a focus of careful planning.

Strategic Site Options, Appraisal of Reasonable Alternatives – Dunton Hills Garden Village

- 2.3 In relation to the 'Landscape' topic, the SA identifies that there are no nationally important designated landscapes within the Borough, although around 89% of the Borough is designated as Green Belt.
- 2.4 DHGV is the preferred Strategic Site Allocation within the A127 Corridor, with an indicative dwelling yield of 2,500 3,500 identified by the Preferred Site Allocations within the plan period.
- 2.5 Whilst the importance of the A127 corridor as providing a 'landscape gap' between West Horndon and Basildon has been highlighted by some stakeholders, the SA summarises that:

"However, work has been completed to ascertain how landscape impacts associated with Dunton Hills Garden Village could be mitigated and minimised, and West Horndon is a flat landscape that should lend itself to relatively effective screening." (paragraph 7.10.2)

2.6 Chapter 10 of the SA sets-out a number of "Outline reasons" for supporting the preferred option, presenting the response of Officers to the alternatives appraisal. In relation to DHGV, these include recognition that the Council has progressed a number of garden village principles for the site with facilitated support from design Council CABE. Some of these principles focus on the use of the landscape to help inform the future built form and need to ensure that Green Infrastructure is a central feature of the scheme. Other key matters that are highlighted by the Council are the focus upon public health, recreation and active travel, as well as the sustainability of the location in relation to transport links and employment opportunities within the A127 growth corridor.

Appraisal of the Draft Plan

2.7 At Chapter 10, the SA undertakes an appraisal of the draft plan for each of the sustainability topics.



2.8 Under the Landscape topic, the SA highlights the increased understanding of the issues and opportunities at DHGV since the 2016 Draft Plan stage, recognising at paragraph 10.10.4 that:

"One of the emerging key design principles for Dunton Hills is its focus upon 'working with the landscape' to take advantage of level differences across the site and sensitively plan for flood alleviation and new natural features."

- 2.9 Despite recognising the above, the SA still flags the risk of significant negative effects ahead of further understanding of detailed scheme layouts and site-specific policies.
- 2.10 The Appraisal Findings are also summarised in the 'Interim SA Report Non-Technical Summary' (page 12) where in relation to Landscape it is stated that the strategy clearly seeks to respond to the landscape constraints on the basis that the preferred allocations have been selected on the basis of "detailed Green Belt review findings". It also states that:

"It is also noted that detailed work is ongoing to ensure that Dunton Hills Garden Village is a 'landscape-led' scheme, which integrates onto the landscape as far as possible, and indeed delivers targeted landscape enhancements."



Section 3 – Green Belt Evidence Base

3.1 Since the publication of the 2016 working Draft Green Belt Review that supported the previous consultation on the Draft Local Plan, Brentwood Borough Council have commissioned a series of refined studies that form a four-part evidence base. These studies form part of a borough-wide assessment of the Green Belt to inform the strategic direction of the local plan and aid in identifying where additional growth may be accommodated. The new studies also represent further research and analysis that respond to the consultation representations to date and the review and updating of policies in the Draft Local Plan.

Draft Local Plan regulation 18 Consultation – Green Belt Study: Overview and Technical Note

- 3.2 The four parts of the emerging, updated Green Belt evidence base are outlined within the "Green Belt Study: Overview and Technical Note" that has been prepared to inform the Regulation 18 Consultation to the Preferred Site Allocations document.
- 3.3 The Overview Note highlights that the context against which the emerging Local Plan is being developed, with 10% of the Borough being previously developed, and 89% of the Borough comprising Green Belt. There is therefore a small amount of land available to deliver the required housing and employment growth that remains outside the Green Belt.
- 3.4 The studies are summarised in the Overview note as follows:
 - Part 1: Brentwood Green Belt in Context A high level historic and functional review of the London Metropolitan Green Bet, and the context against which the Brentwood Local Plan 2013-2033 is being developed;
 - Part 2: Green Belt Parcels Assessment A borough-wide definition and relative assessment of Green Belt parcels against the five purposes of the Green Belt;
 - Part 3: Individual Sites Assessment (HELAA sites, lesser performing GB parcels and other identified sites) – A relative assessment of potential Site Allocations against the purposes of the Green Belt. This assessment process is split into two sections, the first considering individual sites and the second reflecting on cumulative impacts of potential allocations; and
 - Part 4: Partial review of Settlement Boundaries and Green Belt edge A focussed review of existing settlement boundaries (and associated Green Belt definition) using study evidence.
- 3.5 Working Drafts of the Part 1 and Part 2 Green Belt studies have been published as part of the January 2018 Regulation 18 consultation on the Preferred Site Allocations.
- 3.6 The Part 3 and 4 Green Belt studies will continue to be progressively refined and updated to inform the site assessment process and final local plan policies. The Council intend to publish both studies in full prior to or as part of the Regulation 19 Local Plan pre-submission Consultation.
- 3.7 Although the previously published 2016 Working Draft Green Belt Review forms part of the evidence base, the Overview Note states at paragraphs 1.1.33 and 1.1.34 that:



"... the Part 3 study is intended to provide a more refined allocation and site-specific assessment of potential housing and employment sites in the Green Belt...

The Part 3 Green Belt study will comprise not only a detailed Site Assessment, but also wider cumulative considerations. "

3.8 Although the methodology of the Part 3 studies is not defined, it is stated that, given the development of the evidence base and additional work on the Sustainability Appraisal (SA), the new Part 3 Green Belt evidence:

"... will be aligned to the wider local plan site selection methodology, ensuring the evidence is underpinned by sustainable development considerations as part of any update to the methodology and the sites subject to assessment." (paragraph 1.1.35)

- 3.9 This would suggest that the new Part 3 Studies may potentially address some of the issues that Tyler Grange identified with the assessment of the Dunton Hills site within the previous Working Draft Green Belt Review. These include:
 - The need to properly consider the role of existing and potential new Green Belt boundaries and the resulting containment of the site, preventing urban sprawl and coalescence as well as limiting impacts that the development would have on the function and openness of the wider Green Belt;
 - Taking into account the influence of existing detractors (built form, electricity towers, wind turbine, railway line, A127 and A128) and the degraded nature of the landscape;
 - Allowing for consideration of how the site could be developed to respond to the landscape and Green Belt context, including a landscape-led approach incorporating substantial areas of Green Infrastructure and strategic landscaping; and
 - The sustainability of the location of the site within the A127 Corridor and opportunities to provide access and links with surrounding recreation and employment areas.
- 3.10 The Part 3 assessment should also take account of information that is available, including development principles and masterplanning when considering matters relating to the release of land associated with specific allocations and sites, including DHGV.
- 3.11 It is assumed that the Part 4 Green Belt Studies will look at settlement boundaries for urban extensions and other potential releases of Green Belt land associated with the edge of settlements, as being considered within the Draft Preferred Site Allocations Document.
- 3.12 As DHGV is the preferred Option for a strategic Release within the A127 Corridor as a standalone development, the Part 4 Studies may not be of relevance to the release of Green Belt land at Dunton Hills.
- 3.13 The published Draft Part 1 and Part 2 Green Belt Evidenced Base documents are considered below.



Working Draft Green Belt Study Part I: London Metropolitan Green Belt Overview, November 2017

- 3.14 As summarised within the Green Belt Overview Note, the Part 1 Study provides an overview of the Metropolitan Green Belt, including a review of the potential future of the Green Belt in Brentwood Borough. Given that the large majority of the Borough is designated as Green Belt, the Study recognises that the emerging local Plan is placed in the context of the Green Belt.
- 3.15 When considering the Modern-Day Context of the Metropolitan Green Belt, the Part 1 Study identifies that it has a number of multifunctional facets, including:
 - Preventing the urban sprawl of London;
 - Preventing the urban sprawl of neighbouring towns which would harm openness of intervening land and encourage settlement coalescence; and
 - Increasing recreational pressures as the population in and around London continues to grow, where there is increasing accessibility to the countryside and aspirations for recreational green space access not normally afforded in "urban" areas.
- 3.16 These facets are identified as being further complicated by competing landuse demands associated with agriculture, nature conservation and recreation.
- 3.17 The Study concludes that, with this being the context against which the new Brentwood Local Plan is being developed:

"The local plan requires a balanced approach which accounts for Objectively Assessed Housing Need, whilst protecting the function and purposes of the Green Belt." (paragraph 5.1.4)

3.18 The study also recognises that the new Brentwood Plan must accord with the requirements of the NPPF and makes reference to the Housing White Paper 2017 that reaffirms that Government proposes to:

"maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate they have fully examined all other reasonable options for meeting their identified housing requirements."

3.19 Since the Part 1 Study was written, the Consultation Draft of the revised NPPF has been published (Monday 5th March, 2018). The consultation NPPF reflects the White Paper, stating at paragraph 136 that:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;
- b) Optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and



- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."
- 3.21 The Part 1 Study considers that Purpose 5 of the Green Belt remains a critical planning consideration at the outset of the Local Plan making process through encouraging urban regeneration and the recycling of derelict and other urban land in the first instance.
- 3.22 In relation to the situation faced in Brentwood Borough, the Part 1 Study identifies the limited availability of land outside the Green Belt and highlights the importance of sustainability criteria and infrastructure requirements being considered in the balance, concluding that:

"However, options for development must also take account of various sustainability criteria, strategic priorities and infrastructure requirements, noting that around 10% of Brentwood Borough is previously developed and 89% of the borough is Green Belt. In order to strategically plan for development over the period 2013 – 2033, the emerging local plan needs to consider both the capacity of the existing settled areas to accommodate new development (including regeneration potential), as well as the wide capacity of Brentwood Borough as a whole." (paragraph 5.1.7)

- 3.23 As set out in the 2018 Interim SA, the development of DHGV would represent sustainable development within the A127 Corridor that is well connected and in close proximity to employment areas and public transport. DHGV also offers potential for the provision of substantial recreational benefits including significant areas of Green Infrastructure incorporating multi-functional accessible green space as part of a land scape-led scheme that connects with adjoining areas of landscape and wildlife.
- 3.24 In addition to this, the containment of the site by existing roads and the railway, combined with the opportunity to provide a robust landscape buffer to the eastern boundary serve to limit any urban sprawl or coalescence whilst limiting impacts on the wider Green Belt.
- 3.25 In this manner, DHGV also offers the opportunity to provide enhanced recreational and wildlife benefits. This may serve to compensate for loss of Green Belt land. Whilst not delivering these improvements to remaining Green Belt, this does go some way to reflect the aspirations of the Consultation Draft NPPF that states at paragraph 137 that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account, and:

"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and / or is well-served by public transport. They should also set out ways in which the impact or removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remining Green Belt land."



Working Draft Green Belt Study Part II: Green Belt Parcel Definition and Review, January 2018

3.26 The Part 2 Green Belt Study has been prepared to assess the level of contribution of general land areas (Green Belt Parcels) to fulfilling the purposes of the Green Belt at a strategic level.

Scope of the Study

3.27 When setting out the scope, the Study states that it is not intended to provide evidence of exceptional circumstances to revise the Green Belt boundary. Paragraphs 1.4.3 and 1.4.4 provide further clarification on the strategic nature of the study, stating that:

"This study considers land in relation to Green Belt policy only. In determining the strategic development requirements of the emerging Local Plan, Green Belt considerations need to be considered alongside and as part of wider environmental and sustainability issues.

Decisions on the strategic location of development will necessarily review a range of other environmental considerations and potential constraints, such as ecology and nature conservation, heritage and archaeology, water quality and flooding potential, etc. These environmental issues are considered separate considerations to Green Belt policy, but interact to inform judgements on the likely wider sustainability, environmental and cumulative impacts of development on a particular Parcel or in relation to strategic development decisions."

- 3.28 The supporting role of the Part 2 Study is further emphasised at paragraph 1.4.6 where it is stated that on its own the report cannot be used on its own to justify allocating or not allocating a parcel or part of a parcel that lies within the Green Belt. Furthermore, it is stated that the Council is under no obligation to follow the report's findings and recommendations in preference to other planning considerations where on balance other planning considerations outweigh Green Belt aspects.
- 3.29 The above considerations reflect the Council's position as set-out within the SA and Part 1 Green Belt Study when needing to identify land to accommodate objectively assessed development need, including considerations of sustainability and other environmental factors. As set-out above, this is in line with the approach set-out in the current and consultation draft of the NPPF.
- 3.30 The Study assumes that no one Green Belt purpose is more important than the other.

Methodology

Definition of Land Parcels

- 3.31 The Study has divided the borough into strategic land parcels that are defined by permanent and defensible boundaries (motorways, A and B roads, operational railway lines, settled extents and rivers), as well as other physical and durable boundary features (unclassified roads, watercourses, ridgelines and long-established woodland, tree belts and hedgerows).
- 3.32 The Study makes it clear that the definition of parcels does not infer any recommendations in relation to the redefining of Green Belt boundaries, particularly in relation to any strategic revision for Green Belt release (paragraph 2.4.5)



Definition of Settlements

3.33 At the local scale, large built up areas are defined as including significant villages and larger towns within Brentwood Borough.

Assessment Criteria

- 3.34 The Part 2 Study defines a range of criteria for each of the four Green Belt purposes assessed to allow for an impartial and transparent judgement to be made.
- 3.35 Given the strategic nature of the Study, the assessment has been undertaken at a relatively high level. The criteria used are not fully measurable, with a reliance upon an explanation of the findings to demonstrate how the assessment of contribution to the Green Belt has been arrived at.
- 3.36 The fifth Green Belt purpose *"to assist in urban regeneration by encouraging the recycling of derelict and other urban land"* has been excluded from the Study, as it is the local plan strategy to direct development towards land not contained in the Green Belt in the first instance.
- 3.37 The assessment criteria are set-out on tables contained within the Study. These are included in the extracts of the Part 2 Study contained at **Appendix 1** of this report.

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

- 3.38 The Study considers parcels in terms of their containment and how the parcels and associated features contain existing settled areas and prevent urban sprawl generally, including both land adjacent to existing large built-up areas or potential new built-up areas within parcels.
- 3.39 Four criteria have been used by the Study, as set-out below:
 - Containment How well the parcel relates to an existing large built-up area;
 - Development Type Either constitutes infilling, extensions to settlements or an area with limited relationship to existing built-up areas;
 - Boundary Strong boundaries (including A roads and railways, streams woodland and hedgerows) Weak boundaries (fencing, hedges, tree lines) No boundary (no distinct boundaries and does not abut existing settlement).
- 3.40 The way that these criteria are used by the Study when assessing parcels is set-out on Table 2 at **Appendix 1**.
- 3.41 Green Belt parcels that are not adjacent to or closely related to an existing large built-up area and are perceived as part of the wider open countryside are generally considered by the Study to be contributing highly to Purpose 1 as they have the potential to establish new built up areas or be perceived as increasing the area over which development exists.
- 3.42 However, this approach does not consider the potential for a land parcel that is separated from the settlement edge to contain planned development and limit any future "unrestricted sprawl". As recognised by the Study at paragraph 2.5.12 when defining the assessment criteria for Purpose 1:



"Purpose 1 refers to 'unrestricted sprawl'. This importantly differentiates planned or controlled growth of large built up areas from development that would not have a rationale / definable limit or extent."

3.43 Furthermore, whilst parcels that do not lie adjacent to large built-up areas may retain the openness of the Green Belt, they do not serve to check unrestricted sprawl of built-up areas and therefore do not strictly contribute to Purpose 1.

Purpose 2: To prevent neighbouring towns from merging into one another

When assessing the contribution of parcels to Purpose 2, the Study considers the following criteria:

- Interlying physical barriers: 'Strong' barriers include A roads and railway lines
- Views between towns; and
- Distance between towns / relative size of parcel / town coalescence risk
- 3.44 The way that these criteria are used by the Study when assessing parcels is set-out on Table 3 at **Appendix 1**.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.45 When defining whether a parcel contains "countryside", the Study sets-out a number of appropriate land uses that promote access, sports and recreation and the retention and enhancement of the landscape, visual amenity and biodiversity. These include: agriculture; forestry / woodland; land with access (Public Rights of Way, Access Land, permissive and informal access); and Outdoor sport / recreation / amenity space.
- 3.46 The Study utilises three main criteria when assessing the contribution to Purpose 3, namely:
 - Land Use To what extent is the Green Belt Parcel developed or is it typical countryside?
 - Land Cover Does the Green Belt parcel consist of buildings, hard landscaping etc. or natural features, landscaping and countryside?
 - Access What level of public access is available within the Green Belt Parcel?
- 3.47 The way that these criteria are used by the Study when assessing parcels is set-out on Table 3 at **Appendix 1**.

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

- 3.48 Whilst there are no nationally recognised historic towns within Brentwood Borough, the Study has taken a localised approach and uses Conservation Areas and Registered Parks and Gardens as land based heritage or conservation designations that may indicate an area has historical significance. The Study also takes into account the relationship of land with the Historic Town extents of Brentwood where applicable.
- 3.49 Whilst the consideration of Conservation Areas and Registered Parks and Gardens may indicate heritage significance, they do not necessarily relate to the setting and special character of historic towns which the Green Belt serves to protect.

Scoring of Parcels

3.50 Despite recognising that no one individual Green Belt purpose is more important than another, the Study places reliance upon the overall assessment ratings for parcels that combine the



assessment of contribution to each of the purposes to identify those parcels with a higher contribution to the Green Belt.

- 3.51 At paragraph 3.1.8, the Study states that the greater the number of Green Belt purposes assessed as High, the greater the contribution to the purposes of the Green Belt and the greater the likely impacts of built development on the purposes of the Green Belt can be considered.
- 3.52 As set-out on Table 6 from the Study that is included at **Appendix 1** of this report, the scoring system used by the Study which combines the assessment for purposes does not allow for a transparent or consistent understanding of how each of the parcels performs.
- 3.53 For example, a parcel could be assessed as making an overall High contribution as a result of the findings for 2 purposes, where another could also make a high contribution to 2 purposes but, by virtue of the remaining purposes be assessed as making only a Moderate of Moderate to High contribution.
- 3.54 In order to properly provide a relative assessment, parcels should be considered in relation to the contribution to individual purposes without combining them in a non-specific way that may skew the results and does not necessarily reflect how sites contribute to purposes on a like-for-like basis.
- 3.55 Furthermore, the size of parcels can result in a significant variation in the contribution that land may make to the Green Belt. Larger parcels may contain smaller areas that make a lesser contribution to the Green Belt, or which may offer the potential to provide defensible boundaries that would allow for the release of smaller parcels of land.
- 3.56 This is recognised by the Study, with the analysis at paragraph 3.1.32 recognising that proportionally, the larger parcel sizes tend to result in a higher overall score. This highlights the importance of looking at smaller parcels and individual sites when seeking to identify the contribution of land to the Green Belt in relation to potential development sites.
- 3.57 At paragraph 3.2.7 it is stated that:

"Any further sub-division of Parcels or consideration of specific Sites should also account for existing barriers, built features and other topographic boundaries, such as woodlands, etc. In some parcels urban/rural fringes may offer potential for development with fewer Green Belt conflicts. This more targeted Site led approach and forms the basis of the Part III assessment."

Further Studies

- 3.58 The Part 2 Study recognises the limitations of using "overall assessment ratings" that combine the Green Belt purposes, and that the contribution to a specific purpose may be a key spatial planning consideration in a localised area.
- 3.59 Within the Conclusions, reference is made to the Part 3 Study and further considerations that will need to be considered when assessing whether the release of land may provide potential for development and defensible new Green Belt boundaries. This may include the sub-division of parcels where areas within the larger strategic parcels assessed may make a lower contribution to Green Belt purposes.



Green Belt Evidence Base Findings

- 3.60 The Part 2 Study includes Dunton Hills within a larger Green Belt Parcel (parcel 17) that extends eastwards beyond the DHGV area to include a strip of land within Basildon Borough that bounds Lower Dunton Road. This places the parcel in closer proximity to the developed edge of Basildon than the site at Dunton Hills which separated from the settlement.
- 3.61 The assessment findings for Parcel 17 are set-out on the Assessment sheets appended to the Green Belt Study, a copy of which is included at **Appendix 2** of this report.
- 3.62 The findings of the Part 2 Study assessment are reviewed below. Consideration is given to how the smaller site area of Dunton Hills may perform. The contribution of the land is also considered in light of the potential scheme at DHGV.
- 3.63 In order to properly asses the contribution that the land at Dunton Hills makes to the Green Belt, a more focussed assessment will need to be undertaken. It is understood that this will be the focus of the Part 3 Study, which will also consider development potential and new Green Belt boundaries.

Overall Contribution of Parcels

- 3.64 Parcel 17 has been assessed as making an overall Moderate to High contribution to the Green Belt.
- 3.65 Whilst this does not indicate which purposes the Parcel contributes to and by which degree, it does indicate that the parcel has been assessed as making a high contribution to at least 2 of the 4 purposes assessed.

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

- 3.66 Parcel 17 has been assessed as making a High contribution to Purpose 1, being "Not Contained". This is despite recognising the A128, A127 and railway line as forming strong boundaries.
- 3.67 As considered above in relation to the assessment criteria, parcels that are separated from the built edge do not strictly serve to check the unrestricted sprawl of large built up areas (Green Belt purpose 1).
- 3.68 If the separation of the parcel from the built edge was considered to limit the potential of the land to contribute to checking the unrestricted sprawl of large built up areas, the containment of the parcel on three sides by strong boundaries (A127, A128 and the railway line), as well as Lower Dunton Road to the east would allow for an assessment of Moderate contribution, or the parcel being "Partly Contained".

Contribution of Dunton Hills and DHGV

3.69 In relation to the site at Dunton Hills, the DHGV scheme has the potential to establish a new robust and defensible boundary to the east of the site that provides both containment and prevents any "unrestricted sprawl" of development in this location.



- 3.70 Given the above considerations, the containment of Parcel 17 should reduce the contribution that the site makes to Purpose 1. The further separation of the Dunton Hills site from the settlement edge of Basildon further limits the potential for unrestricted sprawl of the built edge.
- 3.71 The opportunities to reinforce the eastern boundary at Dunton Hills with new woodland, tree and hedgerow planting and substantial landscape buffers will combine with the A127, A128 and railway line to provide a high degree of containment by robust binaries, limiting sprawl.

Purpose 2: To prevent neighbouring towns from merging into one another

- 3.72 Parcel 17 is assessed as making a Moderate contribution to Purpose 2 as an "Important Countryside Gap".
- 3.73 The assessment identifies that the Parcel forms part of the gap between Basildon and West Horndon, with the A128 forming a significant barrier, and the ridgeline that runs through the parcel providing level differences.
- 3.74 Despite this, the criteria assessment only recognises "interlying physical barriers" as being moderate and unsubstantial but functional. Given the presence of the A128, the assessment should be for a substantial barrier. Lower Dunton Road should also be considered as a Moderate barrier.
- 3.75 Views are also identified between towns, despite there being no clear intervisibility across the Parcel between West Horndon and Basildon due to the topographical changes.
- 3.76 Finally, the assessment identifies that the parcel forms a large proportion of the countryside gap between towns, with the potential for visual coalescence arising from the physical narrowing of the gap.

Contribution of Dunton Hills and DHGV

- 3.77 In relation to Dunton Hills, the site area forms a smaller part of the gap between settlements, performing a more limiting role in preventing coalescence.
- 3.78 There would also be the potential to incorporate landscape buffer planting to boundaries to limit any intevisibility with West Horndon and Basildon, further reducing any impact on the perceived separation of settlements.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.79 Parcel 17 is assessed as making a High contribution to this purpose, performing the role of "Functional Countryside" as defined by the assessment criteria.
- 3.80 The assessment identifies the parcel as comprising typical countryside land uses and comprising natural / landscaping land cover including agricultural and the golf course.
- 3.81 The assessment records the overall level of landscape representativeness as being mainly representative with some minor detractions. The parcel includes development associated with properties on Lower Dunton Road and the Dunton Hills golf course, including the club house, driving range, car par and access roads. Furthermore, the wind turbine and electricity pylons that cross the parcel add substantial detractors within the local area. The presence of the A128,



A128 and railway line also introduce detracting features, movement and noise into the landscape.

- 3.82 These factors combine to reduce the overall quality of the landscape in this location, as recognised by the designation in the Local Plan as a landscape improvement area. The railway line and main roads are recognised as detractors within the Horndon Fenlands Landscape Character Area as identified by the Mid Essex Landscape Character Assessment.
- 3.83 With regard to Access, the assessment identifies the parcel as having "some access" reflecting the low number of Public Rights of Way across the area. Conflicting with this, the assessment also identifies a high contribution, with access land / public areas and a high number of public Rights of Way / important routes.
- 3.84 The only area within the parcel with access over a wider area is the golf course which is not publicly accessible, and may only be used by paying customers. Whilst the golf course has obvious recreational benefits, these are not as accessible as access of common land.
- 3.85 Considering the above factors, on balance the parcel may be considered to making a Moderate contribution to this purpose.

Contribution of Dunton Hills and DHGV

- 3.86 The DHGV proposals offer the opportunity for a landscape led scheme that incorporates positive landscape features, including the watercourse, tree belts, ancient woodland and hedgerows, as well as working with the topography to provide sensitively designed development that limits landscape impacts.
- 3.87 There are also opportunities to incorporate substantial areas of multi-functional accessible green space and tree and woodland planting to reflect and strengthen the landscape character and enable the effective integration of the development into the landscape.

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

3.88 The Part 2 Study assesses Parcel 17 as making a Low contribution to this purpose and 'limited relationship with Historic Town'.

Summary

- 3.89 Having reviewed the methodology and findings of the Part 2 Green Belt Study, it is clear that it is necessary to re-asses the Dunton Hills site in more detail to allow for the consideration of how the DHGV scheme can provide development that responds to the landscape and Green Belt context. It expected that this work will be undertaken as part of the forthcoming Part 3 Study.
- 3.90 The review above also identifies that Parcel 17 may be assessed as making a lower contribution to the Green Belt purposes than the Part 2 Study has suggested, making a Moderate contribution to most purposes.
- 3.91 Notwithstanding this, the Dunton Hills Site is also considered to make a lower contribution to the Green Belt than Parcel 17 by virtue of the following factors:



- The smaller scale of the site than the larger are assessed for Parcel 17;
- The detracting influence of on-site development (buildings, car parking and roads), wind turbine, electricity pylons, roads and railway upon the landscape character and contribution to the countryside;
- Separation of Dunton Hills from the built edge and containment by the A127, A128 and railway line to prevent sprawl;
- Opportunities for the reinforcement of the eastern site boundary to provide a soft transition with the adjacent landscape and provide a visual barrier with Basildon, as well as forming a robust and defensible new Green Belt boundary; and
- Opportunities for DHGV to be develop das part of a landscape led scheme that respects the topography and positive feature son the site and provide substantial areas of green infrastructure and landscape enhancement



Section 4: Landscape Evidence Base

Mid Essex Landscape Character Assessment, 2006

- 4.1 The landscape evidence base if formed by the Mid Essex Landscape Character Assessment, 2006. This was reviewed by Tyler Grange within the previous representations made to the Draft Local Plan in March 2016.
- 4.2 As set-out in the previous Green Belt and Landscape Technical Report, Land at Dunton Hills lies within the Hordon Fenlands Landscape Character Area as identified by the LCA.
- 4.3 Key characteristics of the area include the following:
 - Large arable and pasture fields;
 - Predominantly flat topography;
 - Mature hedgerow field boundaries (sometimes gappy), which contain several single mature trees;
 - Relatively sparse settlement pattern;
 - Views to surrounding hills to the north; and
 - Long distance views to pylons and Tilbury power station to the south.
- 4.4 When summarising the overall character of the area, the LCA states that:

"This predominantly flat arable farmland is situated to the south of A127 and most of the Fenchurch Street to Southend railway line, and encompasses West Horndon settlement. Fields are generally large, with low hedgerows at field boundaries.... Sense of tranquillity within the area is disturbed by constant background traffic noise associated with the A127 and also the corridor to the south. To the north and east, a sense of general enclosure is provided by views to low wooded hills."

- 4.5 Visual characteristics of the area identified by the LCA include:
 - Long and short distance, glimpse and open views to surrounding wooded hills to the north and east; and
 - Long distance views to pylons and Tilbury power station to the south.
- 4.6 Sensitive key characteristics of the area are identified by the LCA include the following:
 - Mature hedgerow field boundaries;
 - The flat, open nature of the landscape, overlooked by wooded hills to the north and east males the landscape visually sensitive to new development; and
 - Sense of historic integrity resulting from historic field boundaries (drains) and distinctive tall hedgerows along lanes.
- 4.7 Land management guidelines identified for the Horndon Fenland LCA are to:



"Conserve and enhance the existing hedgerow network by planting hedgerow species appropriate to local landscape character;

Establish arable field margins as important nature conservation habitats;

Seek ways to mitigate the visual impact of the railway and A127 corridor through introducing new and strengthening existing parallel shelterbelts where appropriate; and Introduce new woodland planting in the form of shaws and copses, as well as hedgerow trees."

Dunton Hills Landscape Character

- 4.8 The land at Dunton Hills is separate from, and does not share the characteristic features of the flat, expansive, undeveloped and open landscape that is typical of the wider Horndon Fenland to the west and southwest. The use of the Site as a golf course, comprising a manicured, designed landscape, and including a club house, driving range, car parking and associated access roads introduce development within the site area. The bounding of the site by the busy A127, A128 and railway line serve to greatly reduce the tranquillity of the area. Tranquillity is further eroded by electricity pylons crossing the site, a wind turbine and detracting development on the edge of Basildon, including the Ford buildings.
- 4.9 The points below set-out the site-specific character and context of the Site at Dunton Hills:
 - Elevated land to the east of the area viewed in context with development on the skyline at Basildon in views from the wider countryside to the northwest, southwest and southeast;
 - Lower lying land to the west is relatively well contained within the wider landscape, including areas within the golf course that are contained by the local topography;
 - The sloping landform and ridge that crosses the site north–south forms a distinctive feature in the local landscape. Ancient Woodland and watercourse with associated riparian vegetation are also distinctive; and
 - The field pattern across much of the area is degraded, with gappy hedgerows and a loss of hedgerow trees, distinctive copses and shelterbelts.
- 4.10 Opportunities for the development of the area include the following:
 - Landscape led approach to development with significant areas of Green Infrastructure informed by the landform and character of the site;
 - Retention of the open ridge that crosses the site as a distinctive feature in the local landscape. Opportunities to incorporate publicly accessible vantage points within open space from which extensive views may be obtained;
 - Opportunities exist for the enhancement of field boundaries including planting of new characteristic woodland and hedgerow trees. This includes to the east of the area to define a new Green Belt boundary; and
 - Provision of a landscape buffer along the A128 would provide a soft edge to the development at the interface with the countryside beyond.



Section 5: Conclusions

- 5.1 The consultation draft Preferred Site Allocations document continues to promote the spatial strategy for higher-level strategic housing growth through the creation of a new settlement at Dunton Hills Garden Village (DHGV) within the A127 Corridor.
- 5.2 The preferred allocations are supported by an updated Interim Sustainability Appraisal (SA) and Evidence Base, including a new suite of Green Belt evidence that is currently being completed, although some initial working draft elements are available for review.
- 5.3 This report has undertaken a review of the 2018 Interim SA and supporting Green Belt and landscape evidence base and considers how this relates to the DHGV development and release of Green Belt land.

Interim Sustainability Appraisal 2018

- 5.4 DHGV is the preferred Strategic Site Allocation within the A127 Corridor, with an indicative dwelling yield of 2,500 3,500 identified by the Preferred Site Allocations within the plan period.
- 5.5 Under the Landscape topic, the SA highlights the increased understanding of the issues and opportunities at DHGV since the 2016 Draft Plan stage, recognising at paragraph 10.10.4 that:

"One of the emerging key design principles for Dunton Hills is its focus upon 'working with the landscape' to take advantage of level differences across the site and sensitively plan for flood alleviation and new natural features."

5.6 The 'Interim SA Report Non-technical Summary' states that the preferred allocations have been selected on the basis of "detailed Green Belt review findings" and that:

"It is also noted that detailed work is ongoing to ensure that Dunton Hills Garden Village is a 'landscape-led' scheme, which integrates onto the landscape as far as possible, and indeed delivers targeted landscape enhancements."

Green Belt Evidence Base

- 5.7 The Green Belt Evidence Base is being updated to represent further research and analysis that responds to the consultation representations to date and the review and updating of policies in the Draft Local Plan. The Green Belt evidence base comprises of 4 parts.
- 5.8 The Part 1 Study highlights the importance of sustainability criteria and infrastructure requirements being considered in the balance, and that the context against which the emerging Local Plan is being developed, with 10% of the Borough being previously developed, and 89% of the Borough comprising Green Belt. There is therefore a small amount of land available to deliver the required housing and employment growth that remains outside the Green Belt.
- 5.9 As set out in the 2018 Interim SA, the development of DHGV would represent sustainable development within the A127 Corridor that is well connected and in close proximity to employment areas and public transport. DHGV also offers potential for the provision of substantial recreational benefits including significant areas of Green Infrastructure



incorporating multi-functional accessible green space as part of a land scape-led scheme that connects with adjoining areas of landscape and wildlife.

- 5.10 The Part 2 Green Belt Study has been prepared to assess the level of contribution of general land areas (Green Belt Parcels) to fulfilling the purposes of the Green Belt at a strategic level.
- 5.11 The Part 2 Study assesses Parcel 17, which extends to covers the Dunton Hills site and land to the east of the Borough leading to Lower Dunton Road to the east as making an overall Moderate to High contribution to the Green Belt, with a High contribution to Purpose 1 (checking the unrestricted sprawl of large built-up areas) and Purpose 3 (to assist in safeguarding the countryside from encroachment). The wider parcel is assessed as fulfilling the role of an Important Countryside Gap.
- 5.12 Within this report, Tyler Grange have undertaken a comparative exercise to consider the Dunton Hills site and the design principles of the DHGV scheme and has found that the Dunton Hills Site is considered to make a lower contribution to the Green Belt by virtue of the following factors:
 - The smaller scale of the site than the larger are assessed for Parcel 17;
 - The detracting influence of on-site development (buildings, car parking and roads), wind turbine, electricity pylons, roads and railway upon the landscape character and contribution to the countryside;
 - Separation of Dunton Hills from the built edge and containment by the A127, A128 and railway line to prevent sprawl;
 - Opportunities for the reinforcement of the eastern site boundary to provide a soft transition with the adjacent landscape and provide a visual barrier with Basildon, as well as forming a robust and defensible new Green Belt boundary; and
 - Opportunities for DHGV to be develop das part of a landscape led scheme that respects the topography and positive feature son the site and provide substantial areas of green infrastructure and landscape enhancements.
- 5.13 In summary, DHGV can be delivered to respect the landscape and distinctive features, incorporating measures that would help to mitigate the negative impacts of existing transport infrastructure, whilst strengthening the degraded landscape structure through enhancement of boundaries. This accords with published management guidelines for the Horndon Fenland as set-out in the Mid Essex Landscape Character Assessment that forms part of the Local Plan evidence base.
- 5.14 As recognised by the Council within the Sustainability Appraisal, development at DHGV has the potential to be delivered as a landscape-led scheme that responds to the topography of the site, provides substantial areas of green infrastructure incorporating accessible multifunctional green space and landscape planting that respects the local character.
- 5.15 The containment of the site by the A127, A128 and railway line provide existing robust Green Belt boundaries. Tying-in with the landscape proposals, the eastern boundary can be enhanced with woodland, trees, hedgerows and landscape buffers to provide a robust and defensible new Green Belt boundary that forms a soft transition with the countryside to the east and limits intervisibility with Basildon and West Horndon.



5.16 All of the above measures will serve to limit impacts on the function and openness of the wider Green Belt, containing the site and restricting urban sprawl. Combined with the location of the site within the A127 corridor and access to the transport network and infrastructure and employment areas these factors combine to make DHGV a suitable strategic allocation that fits with the spatial strategy of the emerging Local Plan.



Dunton Hills, Brentwood Green Belt and Landscape Representations

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Appendix 1: Extract from Part 2 Green Belt Study: Assessment Criteria



Dunton Hills, Brentwood Green Belt and Landscape Representations

2394_R06_08 March 2018_RH_LP

- 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."
- 2.5.5 The NPPF does not state whether one purpose is more important than another.
- 2.5.6 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."
- 2.5.7 Paragraph 84 of the NPPF states that "When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary".
- 2.5.8 Whilst it is not the purpose of this study to assess the sustainability of land to accommodate development, it is an important strategic consideration that when promoting patterns of development, any review of the Green Belt does not impinge on the sustainability and vitality of existing settled areas by either unduly constraining sustainable growth (either directly or indirectly) or by placing undue pressure on existing settled areas through over-development.
- 2.5.9 'Purpose 5' has not been individually assessed as it has already been defined within the Local Plan Strategy that wherever practical 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, sustainability, environmental and strategic considerations.
- 2.5.10 Based on the objectives of and the opportunities provided by the Green Belt, each *purpose* was considered in turn with regard to relevant assessment criteria to establish how well the Green Belt Parcels being considered as part of the assessment fulfilled the role of the Green Belt. These criteria are set out below.

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

- 2.5.11 In general terms, a measure for this purpose would be whether a Green Belt Parcel is:
 - Located adjacent to a 'large built up area'; and
 - The degree to which it is contained by built form, the nature of this containment, linkages to the wider Green Belt and the extent to which the edge of the built up area has a strongly defined, regular or consistent boundary.
- 2.5.12 Purpose 1 refers to 'unrestricted sprawl'. This importantly differentiates planned or controlled

growth of large built up areas from development that would not have a rational/definable limit or extent.

- 2.5.13 Importantly, para 79 of the NPPF states that 'the fundamental aim of Green Belt policy is to <u>prevent</u> <u>urban sprawl by keeping land permanently open</u>'. Purpose 1 does not differentiate between existing or future large built-up areas.
- 2.5.14 In this context, with reference to Paragraph 79 of the NPPF, all land designated within the Brentwood Green Belt in considered to restrict the sprawl of large built up areas in the sense of keeping Green Belt 'open' and free from development, whether this is an urban extension or new settlement.
- 2.5.15 Therefore, the focus of the assessment for Purpose 1 is to consider the relationship of the Green Belt Parcel land areas to existing settled areas and the relative function the parcel provides at preventing 'unrestricted sprawl'.
- 2.5.16 For the purposes of the Green Belt assessment only, with reference to the above, Green Belt Parcels that were not adjacent or closely related to an existing large built-up areas (i.e. perceived as being part of the wider 'open' countryside) were generally considered to be contributing highly to Purpose 1 of the Green Belt as at a strategic level any development growth away from existing settled areas would have the potential to establish new (separate) large built up areas or be more greatly perceived as increasing the geographic over which development exists.
- 2.5.17 This would be also contrary to the principles of Paragraph 79 of the NPPF (preventing 'urban sprawl by keeping land permanently open') and potentially conflicts with the principle of checking 'the unrestricted sprawl' of large built up areas. This is in relation to the Green Belt evidence only and does not preclude wider sustainability and environmental considerations.
- 2.5.18 In order to assess Purpose 1, land has been considered in terms of 'containment', both how well the land or features within the Parcel can contain the existing settled areas and at preventing urban sprawl generally.
- 2.5.19 For example parcels close to existing settled areas may be perceived as less open (due to the presence of surrounding structures) compared to parcels separated from existing settled areas. The scale of parcel relative to the surrounding settled areas and the context of the wider locality was also considered as the larger the parcel the greater the potential for unrestricted urban sprawl or countryside encroachment (relative to the surrounding location and or settled area).
- 2.5.20 Therefore, the fundamental consideration for Purpose 1 has been about the geometric spread of existing large built up areas, the geographic relationship of parcels to the built setting in this regard, and whether the new development can be kept within the existing defined geometric limits i.e. the 'containment' is such that it doesn't increase the geometric spread overall of the existing urban area thus limiting sprawl.
- 2.5.21 For example, where a main road forms the existing settlement limit, growth beyond would be potentially be unrestricted sprawl, but where the parcel is surrounded by the settlement edge and there is another clear boundary or limit, development in the parcel would not necessarily lead to unrestricted growth (it would be controlled and definable) and would not increase the dimensions of the urban area significantly beyond the existing extents in different directions.

- 2.5.22 However, where a parcel is at the urban edge, if there are few physical limits to development (to check future sprawl) and the developable parcel clearly extends beyond the geographic urban extents over a large area, this may be considered as contributing highly to preventing sprawl in accordance with Purpose 1. Similarly, development in parts of the Green Belt where there is no existing development (i.e. countryside) increases the sprawl of urban land over a much larger extent than is currently present, which may have the potential to add significantly to the perception urban sprawl (i.e. extent of spread of urban land) within the Metropolitan Green Belt in all directions. In this regard, the assessment focuses on the ability of land and features to contain urban sprawl generally, whether this is in relation to existing large built up areas or new built up areas.
- 2.5.23 Consideration and professional judgement has been applied in deciding the relative contribution of the Parcel at preventing unrestricted urban sprawl and countryside encroachment, which relates to the relative scale of the Green Belt Parcel in relation to existing adjacent settlements.
- 2.5.24 Four criteria have been considered in term of assessing the relative contribution of the Green Belt Parcel to Purpose 1:
 - **Containment** How well the Green Belt Parcel relates to an existing large built-up areas;
 - **Development Type** Either constitutes 'infilling', an extension to a large built-up areas or a separate development area with limited relationship to an existing large built-up area;
 - **Boundary** The 'strength' of the defining boundaries of the Green Belt Parcel in relation to existing settled areas i.e. can the parcel extents or limits prevent 'unrestricted sprawl', compared to the existing physical features currently defining settlement limits.

A '<u>Strong boundary</u>' A 'Strong boundary' would consist of a sense of permanence and include the built environment such as housing, employment sites, motorways, railways (in use), or A-roads. Prominent features such as streams, woodland and hedgerows would also inform a strong boundary.

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)

<u>No boundary</u>' would be where the Green Belt Parcel is 'open' and large scale, with no distinct boundaries and/or does not abut any existing settlement.

- **Parcel Openness** This relates to the potential scale of unrestricted countryside encroachment if developed, both in terms of the scale of the Green Belt Parcel and in the context of the existing built up area such that the degree of visual interruption by built development across a landscape.
- 2.5.25 Based on the above, Green Belt Parcels were categorised as per Table 2.

Definition	Description					
Well- Contained (WC)	 Within a large built-up area. Would constitute 'Infilling'. Strong boundaries on most sides of the Green Belt Parcel that would be a barrier to unrestricted sprawl. Limited or no countryside encroachment. Limited interruption to views across the landscape or 'openness'. 					
Partly- Contained (PC)	At least two boundaries or around half of the Green Belt Parcel boundary abuts a large built-up area without containment, with Weak boundaries on remaining sides of the Green Belt Parcel, <u>or</u> ; Where a Green Belt parcel clearly abuts a large built up area and the remainder of the parcel is clearly delineated by Strong boundaries. Would form a settlement extension rather than 'infilling'. Some countryside encroachment, relative to scale of existing large built up area and some interrupted views across the landscape 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. Potential for significant or unrestricted countryside encroachment, both in terms of the physical area and relative to the existing settlement, and in relation to interrupted views across the landscape.					

Table 2Criteria for Assessment of Contribution of Purpose 1

- 2.5.26 Large built-up areas (see para 2.3.7), for the purposes of this assessment, are taken to include important settled areas, including towns and villages outside of the Green Belt. 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.
- 2.5.27 Where there is some overlap in terms of the criteria whereby a Green Belt Parcel does not wholly fall within one criteria definition, multiple criteria may be selected and sound professional judgement used to most appropriately categorise the Green Belt Parcel in relation to Purpose 1.

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

- 2.5.28 For the purposes of this assessment, Purpose 2 of the Green Belt states that it is to 'prevent neighbouring towns from merging'. The settlement pattern within Brentwood consists of centralised larger towns (e.g. Brentwood and Shenfield), with smaller towns and large villages dispersed throughout the rest of the borough. Large built up areas were defined at para 2.3.7 and these primarily fall outside of the Metropolitan Green Belt designation.
- 2.5.29 As such a localised approach has been taken to ensure the existing settlement pattern is reflected in the assessment criteria and that the definition of a 'town' for the purposes of this assessment accounts for all important settled areas in the borough where preventing these areas from merging may be a key spatial planning principle. These important settled areas include significant villages, such as Doddinghurst/Hook End, Wyatt's Green, Blackmore, Mountnessing, Stondon Massey, Ingrave, Herongate and Kelvedon Hatch, as well as the larger town settlements such as Brentwood,

Pilgrims Hatch, Shenfield/Hutton, West Horndon and Ingatestone.

- 2.5.30 The main method of assessing the contribution that a Green Belt Parcel makes with regard to fulfilling this purpose relates to the distance between neighbouring towns. The shorter the distance between towns the more susceptible the settlement pattern will be to coalescence through development.
- 2.5.31 Included in this are perceptual and visual elements in terms of how settlements spatially relate to one another. A Green Belt Parcel may be Well-Contained (see Table 2) but only a few hundred metres from another town, meaning any development may visually (if not physically) result in the merging of two towns. Additionally, over a short distance the same Green Belt Parcel 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.
- 2.5.32 Equally, a small Green Belt Parcel 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.
- 2.5.33 The assessment of scale of the Green Belt Parcel alone is also considered too simplistic, as larger Green Belt Parcels are potentially able to accommodate larger scale development over a larger geographic area that could be perceived as more visually intrusive compared to smaller, more contained Green Belt Parcels. Equally more 'open' parcels (those with few strong interlying barriers, etc.) offer more limited potential to define defensible boundaries.
- 2.5.34 A more relevant consideration is whether the Parcel forms an important area of countryside (or gap) between existing settlements and whether the maintenance of the parcel free from development may be an important consideration to preserving the existing settlement pattern. This considers the scale of the parcel in relation to the wider countryside area separating towns. This is related to the presence of definable physical features with which to define the Parcel areas.
- 2.5.35 Interlying distance between towns was therefore considered too simplistic a measure, but is a relevant consideration (along with overall size of the Green Belt Parcel) in the assessment of the selected criteria, as follows:
 - Interlying physical barriers The function of the land in terms of the 'strength' of existing interlying physical barriers within the Green Belt Parcel between settlements i.e. do the physical features provide separation between existing towns:

A '<u>Strong barrier</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). Large significant protected woodlands and large topographic features (hills/rolling landform) may also be considered a Strong barrier. <u>'Moderate barriers</u>' 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, single 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 Green Belt Parcel / town coalescence risk This is the interrelated consideration of the scale of the Parcel, its importance in terms of separating existing settlements (the parcels juxtaposition between settlements) and the relative proportion the parcel forms of the wider countryside area separating towns. This is an expression of the degree to which the Parcel helps preserve the existing settlement character in and around Brentwood borough.
- 2.5.36 Based on the above, Green Belt Parcels were categorised as indicated in Table 3.

Definition	Description
Non-Critical Gap (NCG)	 Where parcel forms insignificant part of wider large countryside gap existing between towns; no intervisibility. Large number of significant interlying features visually restrict views between towns and limits the potential 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.
Minor Countryside Gap (MCG)	Forms minor part of wider countryside gap between towns, risk of reduction in gap not significant. Development within Green Belt Parcel could 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.
Important Countryside Gap (ICG)	Moderate-sized but important gap between towns, significant reduction of countryside gap if subject to development. Urban sprawl would potentially risk future town coalescence and increased visibility between towns. Scope for some limited partial development within the Green Belt Parcel where physical and visual barriers exist without risk of towns merging (further assessment required).

Table 3 Criteria for Assessment of Contribution of Purpose 2

Critical Countryside Gap (CGP)	Green Belt Parcel entirely is the gap between two or more towns. Parcel important to preserving existing settlement pattern. High degree of existing intervisibility between towns No or few interlying physical barriers between towns – potential for unacceptable physical or perceived merging of towns.
	Detailed assessment required to establish if any areas of the Parcel can be developed without harming overall integrity of countryside gap.

- 2.5.37 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. 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.
- 2.5.38 Where effects of existing smaller settlements merging with new development would create a larger cumulative effect overall, e.g. where development of a Green Belt Parcel would merge with interlying ribbon development and would further reduce the countryside gap, then this has been noted.
- 2.5.39 This assessment has <u>not</u> considered the impact from developing one Green Belt Parcel alongside another.
- 2.5.40 Where there is some overlap in terms of the criteria whereby a Green Belt Parcel does not wholly fall within one criteria definition, multiple criteria may be selected and sound professional judgement used to most appropriately categorise the Green Belt Parcel in relation to Purpose 2.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 2.5.41 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.
- 2.5.42 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.
- 2.5.43 To consider these aspect, three main criteria have been considered:
 - Land-use To what extent is the Green Belt Parcel developed or is it typical countryside

use as outlined above?

- Land Cover Does the Green Belt Parcel 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 Green Belt Parcel, e.g. number of public rights of way (PRoW), open recreational space, permissive access and important routes such as National Trails?
- 2.5.44 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.
- 2.5.45 Based on the above, Green Belt Parcels were categorised as per Table 4.

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

Table 4Criteria for Assessment of Contribution of Purpose 3

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

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

- 2.5.47 There is no strict legal or planning definition of a 'historic town' in reference to Green Belt Purpose 4. Brentwood Borough is not considered to contain any nationally recognised 'Historic Towns'; however, this does not mean the individual settlements within Brentwood borough do not have an historic character with important aspects that have defined settlement patterns and the overall landscape character of the area. Clearly at a local level there may be important aspects that relate to the historic character of a settled area.
- 2.5.48 This requires a more 'localised' approach to ensure that the Green Belt study accounts for the historic settlement relationship of settled areas across the borough and respects the way in which areas have developed. For the purposes of assessment, 'towns' or large built up areas were

considered as defined at para 2.3.7. (i.e. significant villages, such as Doddinghurst/Hook End, Wyatt's Green, Blackmore, Mountnessing, Stondon Massey, Ingrave, Herongate and Kelvedon Hatch, as well as the larger town settlements such as Brentwood, Pilgrims Hatch, Shenfield/Hutton, West Horndon and Ingatestone.)

- 2.5.49 As a starting point, Brentwood itself was included in the regional Historic Towns in Essex Report (Historic Towns Assessment Report 1999, commissioned by Essex County Council and English Heritage). The report is an "archaeological and historical assessment of Brentwood and forms part of the Essex Historic Towns Survey". The report defined the Brentwood 'Historic Town Extent' as shown at Appendix L12.
- 2.5.50 Whilst the historic town extent was identified, this relates to various ages of development. Equally, there are caveats highlighted in the report as to the potential physical survival of historic features. The 'Historic Town Extents' shown above have also been heavily influenced or directly affected by more modern development.
- 2.5.51 As such, only the Brentwood Town High Street coincides with a locally designated Conservation Area as highlighted in the report "Most of the medieval town and some of the post-medieval town is located within the current Conservation Area". All other areas are not covered by a Conservation Area designation with only the Chapel of St Thomas of Becket designated as a Scheduled Monument. It is noted that the 1999 report is fairly old and does not reflect more up to date heritage information that provides the context for Brentwood.
- 2.5.52 Whilst the Green Belt Study should recognise the relationship of land to historic areas of Brentwood as highlighted in the 1999 report, in the absence of further protections and designations, it is not considered significant weight can be added to this aspect in Green Belt terms, with the presence of existing heritage features better considered by a specific heritage study and separate planning policy considerations.
- 2.5.53 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."
- 2.5.54 It is beyond the scope of this assessment to individually assess the historic and cultural value of various aspects in relation to the Green Belt and how these may affect the setting of a settlement.

This study does not establish the importance or heritage value of the existing settlement pattern.

- 2.5.55 However, this assessment has aimed to clarify if a Green Belt Parcel has any relationship with a nationally recognised Historic Town or, if by virtue of a land-based conservation (heritage) designation within the locality, it may have an increased sensitivity to development that may require further assessment, particularly with regard to whether housing development would potentially affect the Green Belt Parcel's contribution towards Purpose 4 of the Green Belt.
- 2.5.56 For Brentwood borough, the primary consideration here is whether the Green Belt Parcel falls within a Conservation Area or a Registered Park and Garden i.e. land based heritage or conservation designations. It is noted that all Registered Parks and Gardens as outlined in the current Brentwood Local Plan are designated Conservation Areas. At a local level, these specific land based designations are useful in determining where historic land uses or the built environment have influenced the overall historic development pattern across Brentwood borough.
- 2.5.57 These land based designations may indicate that an area has enhanced historical significance that has helped to determine not only how an individual settlement has developed, but also how land use and the overall settlement character and distribution of settlements within Brentwood Borough has been influenced by past activities. Further to this, these areas also have a high proportion of other Heritage Assets (e.g. Listed Buildings, Scheduled Monuments) that may be a pertinent consideration in relation to any development, but heritage assets in themselves will not necessarily indicate in their own right the influence a parcel may have in relation to Green Belt policy and the historic settlement character or setting of a specific area. For reference the extent of Conservation Areas within Brentwood Borough are included at Appendix L12.
- 2.5.58 For completeness, the relationship of land to the Historic Town Extents identified in the 1999 report above have also been referenced in the assessment.
- 2.5.59 Green Belt Parcels were categorised as indicated in Table 5.

Definition	Description		
Limited Relationship with Historic Town (LRHT)	The Green Belt Parcel is not adjacent to or is unlikely to affect the setting of a Historic Town. There is no or very limited potential for other land based Conservation (Heritage) Designations to be adversely affected by development.		
Moderate Relationship with Historic Town (MRHT)	Development of the Green Belt Parcel is close to or could affect the setting of a Historic Town. Parcel abuts an area containing a land based Conservation (Heritage) Designation that could be adversely affected by development; or Parcel contains a relatively small area of land designated for Conservation (Heritage) purposes e.g. a Conservation Area and/or overlaps the Brentwood Historic Town Extents.		
Strong Relationship with Historic Town (SRHT)	The Green Belt Parcel is adjacent to or influences the setting of a nationally recognised Historic Town. Potentially significant area of Parcel is covered by a land based Conservation (Heritage) Designation, e.g. Conservation Area or Registered Park and Garden, where there the Parcel is potentially important to preserving the historic character of a settlement or the historic settlement character of the borough.		

Table 5Criteria for Assessment of Contribution of Purpose 4

Purpose 5 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.5.60 '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.

Overall Assessment Rating

2.5.61 An overall contribution of the Parcel to the Purposes of the Green Belt is given at the bottom of each summary sheet, rated Low through to High – where the higher the rating the greater the contribution of the Parcel in terms of fulfilling the Purposes of the Green Belt. The overall rating is used to summarise and indicate to what <u>relative</u> extent each Parcel fulfils the assessed four Purposes of the Green Belt, to allow a comparison between the Parcels to be made. In terms of assessing the suitability of built development within a Parcel, further consideration would need to be given to the strength of each individual Green Belt purpose to the particular locality and the details of any proposed allocations (which is undertaken in subsequent parts of the study). Table 6 below outlines the overall rating criteria used.

Assessment Rating	Overall Assessment Description			
	Parcel currently fulfils few Purposes of the Green Belt or fulfils a number of Purposes to a limited level and development of the Parcel will not significantly affect its contribution to Green Belt Purposes.			
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.			
	Parcel fulfils Green Belt purposes to some degree and where development within the Parcel Moderately affects the Parcel's contributions to the Purposes of the Green Belt.			
Moderate	Three, or all, Green Belt Purposes assessed to a Moderate level; or			
Woderate	One Purpose of the Green Belt is assessed to a High level and at least two Purposes are assessed 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, Parcel fulfils Green Belt purposes to a high degree and development of the Parcel will significantly affect the Parcel'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 Parcel scale, locality and 'borderline' assessment results .

2.6 BASELINE STUDY

- 2.6.1 Requested background information and other documents required to assist in the carrying out of the study was provided by the Council; including requests for relevant information including planning applications or allocations for built development from all the Local Planning Authorities that adjoin Brentwood.
- 2.6.2 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 fieldwork verification where access to some Parcels was restricted.
- 2.6.3 Access availability within and adjacent to the Parcels 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.).
- 2.6.4 Assessment of the Parcels and their immediate surroundings were initially undertaken between January and March 2017, with regular reviews of the assessment undertaken as the methodology evolved. The work has been led and undertaken by experienced Chartered Landscape Architects.
- 2.6.5 The study has been further informed by fieldwork visit information undertaken between 2013 and 2017 (refer to the Part III Study).

2.7 PRESENTATION OF ASSESSMENT

- 2.7.1 For each Parcel, 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 Parcel meets the purposes of the Green Belt.
- 2.7.2 Key characteristics of each Parcel, 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 Parcel in relation to categorisation process.
- 2.7.3 Appendices L2, L3 and L4 contain summary tables outlining the assessment results for each Parcel in relation to the four purposes examined (Appendix L2 is arranged in assessment results order, Appendix L3 is arranged in Parcel size order and Appendix L4 is arranged in Parcel number order).
- 2.7.4 Colour coding, as shown on the individual Parcel Assessment Sheets, has been used to help indicate how far each Parcel currently meets the individual objectives of the Green Belt in relation to the four Purposes and how significantly Mixed Use Development would potentially change this.

Appendix 2: Extract from Part 2 Green Belt Study: Assessment of Land Parcel 17: Dunton



Dunton Hills, Brentwood Green Belt and Landscape Representations

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		17:	Dunton	Parcel Size	370.95ha
	I. F	18a	17	17	
Parcel- settlement relationship (Containment): Comments:	Wholly / La contained by la up area	rge built are	a L'Urban' I	ut clear ration	Distant association (visual) only or none
Predominant Landscape Scale:	Intimate	Small	Medium	Large	Expansive
Predominant level of Enclosure:	Confined	Quite Enclosed	Partial Enclosure	Quite Open	Exposed
Public Access within Parcel	Promote recrea		Open general access	Permissive general ac	cess PRoW route access
Overall level of Landscape Representativeness:	Highly representativ		aths presentative / minor detractions	Informal access Equal representative / representative	non- weakly representative degraded
Primary Land Use/Cover	Golf Course and arable Farmland				
Secondary Land Use/Cover	Small woodla	nd and farmsteads.			
Intervisibility within parcel and to the adjacent parcels				bility within parcel. The A128 w st to adjacent parcel are limited	
Does the parcel abut any neighbouring administrative area?		sildon borough to ea	ast. Thurrock to south		
	Yes (as shown) – minor extension eastwards to Lower Dunton Rd. Rail line is definitive boundary to south				

Brentwood Borough Strategic Green Belt Study ASSESSMENT OF GREEN BELT PURPOSES Purpose 1: to check the unrestricted sprawl of large built-up areas Criteria wc PC NC Comments: Parcel Within large built up area Abuts large built up area Separate from large built up area Containment: New settlement | Development Theoretical 'Infilling' 'Urban Extension' separated from large built up **Development Type:** area Note parcel has reasonably **Boundary:** Strong/Definite Weak/Degraded/Unclear None strong boundaries comprising the A128, rail Enclosed/Small Scale. Large scale 'open' countryside -Medium scale countryside -Parcel Openness: line and A127. Limited/no countryside potential for unrestricted Some encroachment potential encroachment potential encroachment **Relative contribution of Parcel to Green Belt Purpose:** Well-Contained (WC) Not Contained (NC) Partly Contained (PC) Purpose 2: to prevent neighbouring towns merging into on another Criteria NCG ICG CCG Comments: MCG Interlying physical Unsubstantial, but Substantial / strong Moderate Absent barriers: functional Part of Gap between Filtered / Obscured / Some / Distant Direct / Close Views between Towns None / Very Distant Basildon and West **Reasonably Close** Hordon – A128 is Forms large proportion of significant barrier. Forms minor part of Countryside Gap / Parcel not considered countryside gap between Forms majority of wider countryside gap **Ridgeline runs through Coalescence Risk** to form part of towns / Physical countryside gap parcel – level between towns / (Development narrowing of gap & between 'towns' / countryside gap diifferences Minor physical Sensitivity): potential visual **Coalescence Risk** between towns narrowing of gap coalescence **Relative contribution of Parcel to Green Belt Purpose:** Non-Critical Gap (NCG) Minor Countryside Gap (MCG) Important Countryside Gap (ICG) Critical Countryside Gap (CCG) Purpose 3: to assist in safeguarding the countryside from encroachment Criteria LCF MFC FC Comments: Land-use: e.g. Buildings Mixed Typical 'Countryside' uses Land-cover: e.g. Built / Hardscaping Mixed Natural / Landscaping Access Land, public area (park), high Some access (informal, permissive) No Public Access number of PRoW and important Access: or low number of PRoW routes e.g. National Trail **Relative contribution of Parcel to Green Belt Purpose:** Limited Countryside Functions (LCF) Mixed Functions within Countryside (MFC) Functional Countryside (FC) Purpose 4: to preserve the setting and special character of historic towns Criteria LRHT MRHT SRHT Historic Town No / Limited physical and/or visual Moderate physical and/or visual relationship Strong physical and/or visual relationship with relationship with Historic Town relationship: with Historic Town **Historic Town** Relative contribution of Parcel to Green Belt Purpose: Limited Relationship with Historic Town (LRHT) Moderate Relationship with Historic Town (MRHT) Strong Relationship with Historic Town (SRHT) Comments: **Overall Assessment Overall Contribution of** Parcel to Green Belt Moderate High Low Purposes Comments:

DUNTONHILLS

BRENTWOOD

