

Green Belt Assessment

**BRENTWOOD ENTERPRISE PARK, GREAT  
WARLEY, ESSEX**

St. Modwen and S & J Padfield and Partners

March 2018

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EXTRACTS FROM CRESTWOOD GREEN BELT STUDY PART II: GREEN BELT PARCEL  
DEFINITION AND REVIEW, JANUARY 2018

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## 1 INTRODUCTION

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### 1.1 Context

1.1.1 This Green Belt Assessment has been prepared by Liz Lake Associates on behalf of St Modwen and S & J Padfield and Partners to provide information and guidance with regards the release of land from the Green Belt at land at Brentwood Enterprise Park, south of the A127 (the Site). The principal objectives of the study are to provide guidance on the future development potential of the Site.

1.1.2 Preferred Employment Site Allocation 101A within 2018 Brentwood Draft Local Plan Regulation 18 Preferred Site Allocations consultation identifies the established of Brentwood Enterprise Park (Former M25 Works Site at A127/M25 junction 29)<sup>1</sup>.

1.1.3 The identified areas are within the Metropolitan Green Belt, and as such are subject to specific planning protection within the National Planning Policy Framework (NPPF).

1.1.4 Liz Lake Associates has been commissioned to provide an assessment of the effect of the proposal on the Metropolitan Green Belt.

1.1.5 The Metropolitan Green Belt was formally established under the Town and Country Planning Act of 1947 and was initially implemented as a strategic function to restrict urban sprawl outwards from the capital.

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### 1.2 Methodology

1.2.1 In October 2012 Liz Lake Associates developed an Existing Green Belt Functions (EGBF) Assessment Methodology. The methodology assesses the contribution that an individual site or parcel of land makes to the functions of existing Green Belt and an

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<sup>1</sup> BBC 2018 Local Plan Regulation 18 Site allocations, <https://brentwood.jdi-consult.net/localplan/readdoc.php?docid=9&chapter=3&docelemid=d1487#d1487> last accessed 08-03-18

assessment of the likely effect on the five purposes of the Green Belt if the Site or parcel is removed from the Green Belt for development.

1.2.2 The purposes of including land in the Green Belt are set out in paragraph 80 of the NPPF. They are:

- *“to check the unrestricted sprawl of large built-up areas*
- *to prevent neighbouring towns merging into one another*
- *to assist in safeguarding the countryside from encroachment*
- *to preserve the setting and special character of historic towns*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.*<sup>2</sup>

1.2.3 The Liz Lake EGBF Assessment Methodology generally considers greenfield or near greenfield sites, unusually the Sites under consideration are developed. Paragraph 3.15 of the Council’s Preferred Options document states that ‘previously developed land in this location provides an opportunity for new employment land’. As such these existing developed areas within Green Belt are preferred to consideration of the location of employment land in areas beyond the Green Belt, currently of limited land supply within Brentwood Borough.

1.2.4 The aim of this report is to determine if the Site still serves the purposes and, if not, why it might be considered for exclusion from the Green Belt.

1.2.5 Methodologies for landscape sensitivity studies and the identification of land that might compensate for the removal of the Site proposed for exclusion from the Green Belt are not covered by this Methodology.

1.2.6 The EGBF Assessment Methodology follows five stages:

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<sup>2</sup> Department for Communities and Local Government, NPPF, (2012), Page 19 Paragraph 80

- Stage 1: Identification of the Site
  - Stage 2: Desk top analysis
  - Stage 3: Identification of a framework
  - Stage 4: Site visit
  - Stage 5: Assessment of Green Belt functions
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## 2 IDENTIFICATION OF THE SITE

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### 2.1 Green Belt Context

- 2.1.1 Central to the process of assessing the 5 purposes of Green Belt is the identification of the local Green Belt context and the establishment of parcels of land applicable to the Site. The extent of the Green Belt context is defined with consideration of the Green Belt boundary, the proximity of built up areas and Conservation Areas, and the site location within the Green Belt.
- 2.1.2 The Site is then considered and where applicable discrete areas, or parcels, within the Site are identified for assessment. The parcels are based upon published Landscape Character Assessments, land use as well as clear physical features or readily identifiable boundaries (refer section 3 Identification of a Framework).
- 2.1.3 Ordnance Survey maps and aerial photographs were initially used to identify the Green Belt context and assessment parcels, parcel boundaries were then checked on site. The NPPF states that *“When defining boundaries, local planning authorities should: define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”*.<sup>3</sup>
- 2.1.4 The proposed development areas (the Site) are identified within the Draft Brentwood Borough Local Plan Regulation 18 Preferred Site Allocations consultation 2018 as follows:
- Site ref: 101A (Land at former M25 works site, south of A127).
- 2.1.5 The proposed Green Belt context (extending approximately 3km from the Site), includes the development areas (101A), the Metropolitan Green Belt ‘edges’ and the edges of adjacent conurbations; Brentwood (approximately 2.7km to the north) and

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<sup>3</sup> NPPF (2012), Page 20 Paragraph 85

Cranham, Upminster (approximately 0.5 to the south west). Refer **Figure 1: Green Belt Context, Appendix A.**

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### 3 CONTEXT

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#### 3.1 Desk Top Analysis

3.1.1 A desk top analysis of published documentation relating to the Green Belt context was undertaken including a review of the following:

- National Planning Policy Framework (NPPF)
- Local Plans and Local Development Framework
- Landscape Character Assessments (National and Local)
- Other relevant designations e.g. Local Wildlife Sites, AONB, SSSI etc.
- Relevant local Green Belt documents and policies.

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#### 3.2 National Planning Policy Framework

3.2.1 NPPF Paragraph 79: *The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

3.2.2 NPPF Paragraph 89: *A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:*

- *buildings for agriculture and forestry;*
- *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
- *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*

- *limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*
- *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*

3.2.3 NPPF Paragraph 90: *Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:*

- *mineral extraction;*
- *engineering operations;*
- *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
- *the re-use of buildings provided that the buildings are of permanent and substantial construction; and*
- *development brought forward under a Community Right to Build Order.*

3.2.4 The Draft NPPF (March 2018) maintains strong protections of the Green Belt and retains a high bar before Green Belt land may be released.

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### 3.3 Brentwood Borough Draft Local Plan 2013 – 2033, January 2016

3.3.1 Within the January 2016 draft of the Brentwood Borough Local Plan (2013 – 2033), site ref:101A was specifically referenced under Policy 8.2: Brentwood Enterprise Park.

*'Brentwood Enterprise Park will provide new floorspace for employment development, (Use Classes B1, B2 and B8), made up of land at the former M25 works site (south of the A127, site ref:101A) and land at Codham Hall (north of the A127, site ref:101B), as set out on the Proposals Map.)*

*Development proposals should meet the following criteria:*

- a. Employment uses and jobs provided on site are consistent with the economic strategy set out within this Plan, and support the vitality and viability of Brentwood Town Centre and other Borough centres;*
- b. Development is of a high design standard, meeting aspirations to enhance this location as a key gateway into Brentwood;*
- c. Landscaping and planting should be used to create a buffer and provide improved visual amenity between the site and surrounding land, minimising any amenity impacts; and*
- d. In accordance with Policy 10.3 Sustainable Transport, proposals should be accompanied by:*
  - i. Green Travel Plan linking this site with Brentwood, Shenfield, West Horndon and Dunton Hills Garden Village, and*
  - ii. Transport Assessment.’<sup>4</sup>*

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### **3.4 Brentwood Borough Council Draft Local Plan Regulation 18 – Preferred Site Allocations Consultation 2018**

3.4.1 The preferred Site Allocations for the emerging Brentwood Borough Local Plan were released for public consultation January – March 2018.

3.4.2 In this most recent draft of the Local Plan the Site is proposed as an employment allocation with Site Ref: 101A. The preferred Site has been enlarged from previous iterations of the local development framework to include an area along the southern boundary of the Site that will only be used for strategic landscaping.<sup>5</sup>

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<sup>4</sup> BBLP Draft Local Plan, January 2016, page. 101.

<sup>5</sup> <https://brentwood.jdi-consult.net/localplan/readdoc.php?docid=9&chapter=3&docelemid=d1498#d1498> last accessed, 26.02.18

### 3.5 Brentwood Borough Council – Crestwood Environmental Report, Working Draft March 2016

3.5.1 In 2015 Brentwood Borough Council commissioned Crestwood Environmental Ltd. to undertake an ‘Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation’.

3.5.2 A Working Draft was published in March 2016. It is intended to inform part of the evidence base for the new Brentwood Local Plan.

3.5.3 Though the assessment was not a formal boundary review of the Green Belt in Brentwood, identified sites were assessed against the purposes of Green Belt outlined in the NPPF. However, Purpose 5 was not assessed.

*‘Purpose 5 has not be 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.’<sup>6</sup>*

3.5.4 The land at Brentwood Enterprise Park, site ref: 101A, was identified as a single parcel. An extract of the report, including the overall map of the identified parcels, is included in appendix B.

3.5.5 The following table summarises the overall assessment of the parcel against the Green Belt Purposes within the Working Draft of the Crestwood Report March 2016.

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<sup>6</sup> BBC Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation, Crestwood Environmental, Working Draft, March 2016, Paragraph 2.2.17

Green Belt Purpose	101A - Employment
<i>Purpose 1: to check the unrestricted sprawl of large built-up areas</i>	<i>Not Contained – No relationship to existing large built up area</i>
<i>Purpose 2: to prevent neighbouring towns merging into one another</i>	<i>Separation Reduced, but Functional (SRF). M25 is strong barrier to W of Site, yet scale of Site if development would take up a significant area of countryside between Upminster Greater London and Great Warley (hamlet) and towards West Horndon. Development would not cause towns to coalesce but may be perceived as encroachment from Greater London in to the Essex countryside east of the M25. It is noted that a large commercial development would be potentially more perceptible/visible from the M25 and from countryside east of the Site, compared to housing. Whilst not significantly reducing the gap between towns physically, commercial development is likely to have a slightly greater visual effect on the perceived openness of the green belt from further afield – particularly from the East and South. Overall, assessment level retained as SRF for employment use.</i>
<i>Purpose 3: to assist in safeguarding the countryside from encroachment</i>	<i>Mixed Functions within Countryside (MFC). Existing works and storage area for M25 works – but also southern third of Site comprises agricultural land – with some hardstanding.</i>
<i>Purpose 4: to preserve the setting and special character of historic towns</i>	<i>Limited Relationship with Historic Towns</i>
<i>Overall Contribution of Site to Green Belt Purposes</i>	<i>Moderate. Overall, the Site is not immediately related to any large built up area, falling within</i>

	<p><i>countryside east of the M25. Gaps between small hamlets &amp; settlements in Brentwood and Greater London would be reduced by introduction of new development on the Site but would not cause any towns to coalesce. Development for employment use is not considered to alter assessment compared to housing assessment, however it is noted a large commercial development would be more visually prominent in the area.</i></p>
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Full extracts of the Assessment related to these parcels are in **Appendix B** of this report.

### 3.6 Brentwood Borough Council – Crestwood Environmental Green Belt Studies

3.6.1 Overall, Brentwood Borough Council (BBC) has commissioned a series of studies and reports that will form a four-part Green Belt evidence base to inform the Brentwood Local Plan 2013-2033. Two parts of this have already been completed. Part 1 provides a high level historic and functional reviews of the London Metropolitan Green Belt. Part 2 splits the borough into large strategic parcels and provides a relative assessment of the parcels against the five purposes. Parts 3 and 4 will provide an individual site assessment and a partial review of settlement boundaries and green belt edge but are yet to be completed.

#### **Crestwood Environmental Green Belt Study Part II: Green Belt Parcel Definition and Review (January 2018)**

3.6.2 This report was released as part of the January 2018 ‘Regulation 18’ consultation of the emerging Brentwood Borough Local Plan and forms the ‘part 2’ of a series of reports that have been commissioned by Brentwood Borough Council. Parts 3 and 4 are yet to be released.

3.6.3 The Part II report assesses the level of contribution of general land areas against the Green Belt purposes on a strategic level.



- 3.6.4 The Site at Brentwood Enterprise Park falls within Parcel 24: West of Warley Street as identified within this report. Parcel 24 extends from the A127 in the north down to the railway in the south, the M25 to the west and Warley Street in the east.
- 3.6.5 Similarly, to the first Crestwood Report, the parcels within the Part II report have not been assessed against purpose 5. The reason stated for this is the same as in section 3.7 above.
- 3.6.6 The following table outlines the assessment of Parcel 4 within the Part II report and provides comments comparing the large area of Parcel 24 and the comparatively small site at Brentwood Enterprise Park.

Green Belt Purpose	Parcel 24: West of Warley Street	LLA Comments
<i>Purpose 1: to check the unrestricted sprawl of large built-up areas</i>	<i>Not Contained – Not associated with large built up area – but some industrial uses within the parcel already. Good containment by M25, A127 and the rail line.</i>	Parcel 24 constitutes a large area of land that is separate from a built up area. The Site at Brentwood Enterprise Park is further separated from the land to the south by the existing rising landform to the south of the Site.
<i>Purpose 2: to prevent neighbouring towns merging into one another</i>	<i>Minor Countryside Gap</i>	As outlined in the methodology for the Part II study, a minor countryside gap “forms minor part of wider countryside gap between towns, risk of reduction in gap not significant.” <sup>7</sup> The Site at Brentwood Enterprise Park

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<sup>7</sup> P.19 Crestwood Part II Green Belt Study, Working Draft January 2018

		forms a much smaller parcel that is not physically connected to any town or settlement and lies adjacent to large physical barriers such as the A127 and M25. As such the further development of the Site would not result in the physical or visual merging of settlements.
<i>Purpose 3: to assist in safeguarding the countryside from encroachment</i>	<i>Mixed Functions within Countryside – Industrial uses within the parcel.</i>	The industrial uses within the larger area of parcel 24 are largely concentrated within the Site at Brentwood Enterprise Park. Therefore, due to the land already being urbanised, further development would not cause further encroachment on the countryside.
<i>Purpose 4: to preserve the setting and special character of historic towns</i>	<i>Limited Relationship with Historic Town</i>	Agree
<i>Overall Contribution of Site to Green Belt Purposes</i>	<i>Moderate</i>	Parcel 24 forms a much larger parcel of land than the Site at Brentwood Enterprise Park and is intended for is intended as a strategic assessment, not Site specific. Therefore, taking into account the above comments and the assessment undertaken later in this report, it is considered that the Site at Brentwood Enterprise Park

		does not currently fulfil the purposes of the Green Belt adequately.
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### 3.7 Landscape Character Assessments

- 3.7.1 The area under consideration lies within National Character Area: NCA 111, Northern Thames Basin and is broadly located on the cusp of the London Clay Lowlands and the Essex Wooded Hills and Ridges sub-character areas. The Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment (2006) provides further detailed descriptions of the region.
- 3.7.2 Within the Brentwood district development area 101A lies within the Fenland (G) landscape character type and specifically the Horndon Fenland (G1) landscape character area.
- 3.7.3 Key characteristics of the Horndon Fenland landscape include large arable and pasture fields, a predominantly flat topography with mature hedgerow field boundaries (sometimes gappy), which contain several single mature trees. A relatively sparse settlement pattern with views to the surrounding wooded hills to the north and long-distance views of pylons to the south.

### 3.8 Other Relevant Designations

- 3.8.1 Bre66 - Hobbs Hole (1.8ha) – Lowland mixed deciduous woodland (BAP habitat) area to the south east of M25 Junction 29, lies adjacent to the western boundary of the Site. A woodland and scrub habitat of ash coppice and standards with dense blackthorn scrub and mixed quality ground flora. Areas along a small stream on the north eastern wood edge include an increased diversity of shrub layer and ground flora with Ancient woodland indicator species such as bluebell, wood anemone and moschatel.
- 3.8.2 The Great Warley Conservation Area and Warley Place Conservation Area are located to the north of the Site (approx. 1.6 km) and the Thorndon Park Conservation Area is located to the north east of the Site (approx. 3km).

### 3.8.3

Approximately 0.5km to the east of the Site the following buildings are listed within the English Heritage register:

- Hulmers (1250605), Great Warley Street (B186)
- Brick House Hotel (1263167), Great Warley Street (B186).

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## 4 IDENTIFICATION OF A FRAMEWORK

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### 4.1 Identification of Parcels

4.1.1 The Site is reviewed and where applicable discrete areas, or parcels, within the Site are identified for assessment. The parcels are based upon key characteristics identified in the published Landscape Character Assessments, land use as well as clear physical features or readily identifiable boundaries, such as urban edge, roads, railways, streams, water features, belts of trees and woodland.

4.1.2 For the purposes of this assessment the Site has been divided into three parcels as detailed below. Each parcel is assessed on its own merit and has readily identifiable boundaries and similar characteristics (refer **Figure 2 Assessment Parcels, Appendix A**).

- Parcel P1: 101A – NORTH
- Parcel P2: 101A – CENTRAL
- Parcel P3: 101A – SOUTH

4.1.3 A brief description of each parcel is detailed below.

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### 4.2 Site Visit

4.2.1 An initial site visit was carried out by Mark Flatman, Chartered Landscape Architect, in February 2017 with another one undertaken in June 2017. The weather was overcast in February and clear and bright in June. The physical features and boundaries of the identified parcels of land were reviewed and photographs taken. Refer **Figures 3 and 4: Photo Location Plan – Green Belt Review, Photographic Sheets – Green Belt Review, Appendix A**.

4.2.2 The Site visit confirmed the extent of the identified parcel areas and boundaries where reviewed.

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### 4.3 **Parcel P1: 101A – NORTH land at former M25 works site**

- 4.3.1 Parcel P1 is located to the south east of M25 Junction 29, south of the A127. The area was used as the depot for M25 construction works. The area is a mix of hard standing, compacted aggregate and scrub with portable works cabins, caravans and remnant construction materials. Several vegetated bunds edge the site to the south, east and north.
- 4.3.2 Parcel P1 is bounded to the north by the A127 trunk road and to the west by the M25 (Junction 29 slip lanes and embankments). The southern boundary of parcel P1 is defined by a small watercourse and incidental vegetation. The eastern boundary is formed by a ditch and vegetation with private small holdings beyond.
- 4.3.3 A cluster of houses and Great Warley Hall (farm) are located to the east of parcel P1 (approximately 0.1km) beyond Warley Street (B186) and the suburb of Cranham, Upminster is located to the west (approximately 0.5km) beyond the M25 orbital. To the south is Parcel P2 (refer below).

Refer **Figure 2: Assessment Parcels**.

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### 4.4 **Parcel P2: 101A – CENTRAL land at former M25 works site**

- 4.4.1 Parcel P2 adjoins Parcel P1. P2 forms part of the former M25 works depot the majority of the area is compacted aggregate and scrub with sections of bunding enclosing a central works area.
- 4.4.2 The northern boundary of Parcel P2 is formed by a small watercourse with incidental vegetation. To the eastern boundary the site extends over agricultural land to a vegetated bund. The southern boundary of Parcel P2 the edge of the agricultural field to the south rising to a local high point, a ridge running east west.
- 4.4.3 Beyond the southern boundary is further agricultural land which extends south to the railway line. To the west the Parcel is bounded by a small stream and the deciduous wood known as Hobbs Hole (Local Wildlife Site).

- 4.4.4 A cluster of houses and Great Warley Hall (farm) are located to the east of Parcel P2 (approximately 0.1km) beyond Warley Street (B186) and the suburb of Cranham, Upminster is located to the west (approximately 0.5km) beyond the M25 orbital.

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**4.5 Parcel P3: 101A – SOUTH land south of former M25 works site**

- 4.5.1 Parcel P3 adjoins P2. P3 forms part of an agricultural field, the edge of which forms the northern boundary. Its southern boundary runs along public footpath 183 that runs along a local high point forming an east-west ridge in the locality.
- 4.5.2 Beyond the southern boundary is further agricultural land which extends south to the railway line. To the west, the parcel is boundary by the deciduous woodland known as Hobbs Hole (local wildlife site) with the M25 beyond it. To the east the parcel is the B186.

Refer **Figure 2: Assessment Parcels.**

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## 5 ASSESSMENT OF GREEN BELT FUNCTIONS

### 5.1 Analysis

5.1.1 In accordance with the Liz Lake Associates Existing Green Belt Functions Assessment Methodology an analysis of each parcel has been made to determine which purposes of the Green Belt functions are being met and to what extent.

5.1.2 The analysis is described in detail for each parcel of land and a summary discussion is provided on the overall assessment.

### 5.2 Parcel P1: 101A – NORTH

5.2.1 Assessment of Parcel with regard to the five Green Belt functions:

#### *Parcel P1 101A NORTH Assessment*

<i>Purpose</i>	<i>Discussion</i>	<i>Conclusion</i>
Purpose 1: To check the unrestricted sprawl of large built-up areas	The Parcel is not contained – the majority of the Parcel is detached from large built up areas i.e. towns and established villages. Note: this Parcel is adjacent to the A127 and M25 (junction 29) which could be considered as ‘built up area’. For the purposes of this report ‘built up area’ refers to housing or built form. The extent and location of this Parcel (less than 1km from Cranham) could result in pressure to develop the area between Cranham and the M25 (within the neighbouring borough) with potential for a ‘ribbon development’ effect along the A127.	Development of the parcel could lead to ribbon development along the A127 to a moderate degree which would have moderate potential to lead to urban sprawl.
Purpose 2: To prevent neighbouring	Removal of Parcel P1 from the Green Belt would have a minor effect upon the	Development of the Parcel would not result in actual coalescence / merging of



<i>Purpose</i>	<i>Discussion</i>	<i>Conclusion</i>
towns merging into one another	adjacent areas of Green Belt in sufficiently meeting this purpose.	settlements but would reduce the Green Belt gap between Cranham and rural settlements.
Purpose 3: To assist in safeguarding the countryside from encroachment	<p>Overall the parcel displays limited countryside functions. An assessment of the Green Belt purpose is considered under four categories:</p> <p><b>Boundary strength:</b> Parcel P1 has a combination of one or more strong boundary features which are intact, well developed and durable. Boundaries are prominent in the landscape.</p> <p><b>Development coverage:</b> Parcel P1 is extensively developed. There is potential for incorporating landscape proposals along the A127 and within any proposed development which would help to 'green' the land.</p> <p><b>Land Use:</b> The majority of land use within Parcel P1 is not within a defined countryside use including those defined in paragraphs 89 and 90 of the NPPF.</p> <p><b>Development pre-Green Belt designation:</b> The majority of existing development appears to be post Green Belt designation.</p>	Development of the parcel beyond the current development status would encroach on the countryside to a minor degree.
Purpose 4: To preserve the setting and special character of historic towns	The parcel plays no part in the preservation of any setting or special character of a historic town or significant feature of historic interest.	Appropriately designed development could be added to the parcel without a significant adverse effect on any setting or special character of a historic town or significant feature of historic interest.

<i>Purpose</i>	<i>Discussion</i>	<i>Conclusion</i>
		The parcel does not fulfil this purpose.
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	<p>NPPF Paragraph 89 confirms that exceptions to inappropriate development include, " <i>limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development</i>"</p> <p>The parcel of land has been developed with buildings and structures and its redevelopment is deemed to assist in regeneration in accordance with Green Belt purpose. The development of the parcel would continue an established use on a previously developed piece of land.</p>	<p>By its very nature the redevelopment or use of brownfield land would assist in urban regeneration by making use of urban land which is already developed.</p> <p>The Parcel does fulfil this purpose.</p>

## 5.2.2

The assessment of the parcel of land under consideration to fulfil the functions of the Green Belt has established Parcel 101A NORTH does not currently fulfil the functions of Green Belt adequately, but has been assessed to fulfil purpose 5 of the functions of the Green Belt because by its very nature the redevelopment or use of brownfield land would assist in urban regeneration by making use of urban land which is already developed. Therefore, there would be no adverse effect on the Green Belt if the parcel was removed from the Green Belt.

## 5.3

### Parcel P2: 101A - CENTRAL

#### 5.3.1

Assessment of Parcel P2 101A - CENTRAL with regard to the five Green Belt functions:

#### *Parcel P2 101A - CENTRAL Assessment*

<i>Purpose</i>	<i>Discussion</i>	<i>Conclusion</i>
Purpose 1: To check the unrestricted sprawl of large built-up areas	The parcel is not contained – the majority of the parcel is detached from large built up areas i.e. towns and established villages.	Development of the Parcel would have potential to lead to unrestricted sprawl of large built up areas.  However, the strategic landscape proposals that would be located in P3 to the south would, once established, help to form a more defensible Green Belt boundary.
Purpose 2: To prevent neighbouring towns merging into one another	Removal of parcel P2 from the Green Belt would result in a moderate effect upon the adjacent areas of Green Belt in sufficiently meeting this purpose.	Development of the parcel would not result in actual coalescence / merging of settlements but would reduce the Green Belt gap between Cranham and rural settlements to a moderate degree.
Purpose 3: To assist in safeguarding the countryside from encroachment	An assessment of the Green Belt purpose is considered under four categories:  <b>Boundary strength:</b> Parcel P2 generally has weak boundary features, with poor connectivity and no prominence within the landscape.  <b>Development coverage:</b> Parcel P2 is partially developed.	Development of the parcel beyond the current development status would encroach on the countryside to a minor degree.

Purpose	Discussion	Conclusion
	<p><b>Land Use:</b> The majority of land use within Parcel P2 is not within a defined countryside use including those defined in paragraphs 89 and 90 of the NPPF.</p> <p><b>Development pre-Green Belt designation:</b> The majority of existing development (storage and compacted aggregate) appears to be post Green Belt designation.</p>	
Purpose 4: To preserve the setting and special character of historic towns	Parcel P2 plays no part in the preservation of any setting or special character of a historic town or significant feature of historic interest.	<p>Appropriately designed development could be added to the parcel without a significant adverse effect on any setting or special character of a historic town or significant feature of historic interest.</p> <p>The parcel does not fulfil this purpose.</p>
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	<p>NPPF Paragraph 89 confirms that exceptions to inappropriate development include, " <i>limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development</i>"</p> <p>The parcel of land has been developed and is deemed to assist in urban regeneration but not wholly in accordance with Green Belt purpose.</p>	<p>Further development of this parcel is deemed to encourage the recycling of derelict and other urban land within the Green Belt.</p> <p>The Parcel fulfils this purpose.</p>

5.3.2 The assessment of the parcel of land under consideration to fulfil the functions of the Green Belt has established Parcel 101A - CENTRAL currently partially fulfils the functions of the Green Belt. Therefore, there would be slight adverse effect on the Green Belt if the parcel was removed from the Green Belt.

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#### 5.4 Parcel P3: 101A - SOUTH

5.4.1 Assessment of Parcel P3 101A - SOUTH with regard to the five Green Belt functions:

##### *Parcel P3 101A - SOUTH Assessment*

<i>Purpose</i>	<i>Discussion</i>	<i>Conclusion</i>
Purpose 1: To check the unrestricted sprawl of large built-up areas	The parcel is not contained – the majority of the parcel is detached from large built up areas i.e. towns and established villages.	Development of the Parcel would have potential to lead to unrestricted sprawl of large built up areas.  However, the parcel would not be developed and only used for strategic landscaping. Once established this would help to form a more defensible Green Belt boundary to the wider employment Site (including P1 and P2).
Purpose 2: To prevent neighbouring towns merging into one another	Removal of parcel P3 from the Green Belt would result in a moderate effect upon the adjacent areas of Green Belt in sufficiently meeting this purpose.	Development of the parcel would not result in actual coalescence / merging of settlements but would reduce the Green Belt gap between Cranham and rural settlements to a moderate degree.

<i>Purpose</i>	<i>Discussion</i>	<i>Conclusion</i>
Purpose 3: To assist in safeguarding the countryside from encroachment	<p>An assessment of the Green Belt purpose is considered under four categories:</p> <p><b><u>Boundary strength:</u></b> Parcel P3 generally has weak boundary features, with poor connectivity and no prominence within the landscape.</p> <p><b><u>Development coverage:</u></b> Parcel P3 is undeveloped.</p> <p><b><u>Land Use:</u></b> The land use within P3 is within a defined countryside use including those defined in paragraphs 89 and 90 in the NPPF.</p> <p><b><u>Development pre-Green Belt designation:</u></b> The parcel is undeveloped.</p>	Development of the parcel beyond the current development status would encroach on the countryside to a moderate degree.
Purpose 4: To preserve the setting and special character of historic towns	Parcel P3 plays no part in the preservation of any setting or special character of a historic town or significant feature of historic interest.	<p>Appropriately designed development could be added to the parcel without a significant adverse effect on any setting or special character of a historic town or significant feature of historic interest.</p> <p>The parcel does not fulfil this purpose.</p>
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	The parcel of land is undeveloped and therefore development of it would not encourage urban regeneration.	<p>Further development of this parcel is would not encourage the recycling of derelict and other urban land within the Green Belt.</p> <p>The Parcel does not fulfil this purpose.</p>

5.4.2

The assessment of the parcel of land under consideration to fulfil the functions of the Green Belt has established Parcel 101A - CENTRAL currently partially fulfils the functions of the Green Belt. However, there would be no effect on the Green Belt if the parcel was removed from the Green Belt and **only used for strategic landscaping**. I.e. if it remains undeveloped.

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**5.5 Overall Assessment**

5.5.1 The two parcels of land have been analysed to establish to what extent they fulfil the five purposes of the Green Belt as specified in the NPPF. Table 6.1 illustrates the outcome graphically. Where the parcel is deemed to fulfil the identified purpose of Green Belt the box is coloured green, where failing to fulfil Green Belt purpose a red colour has been assigned.

Table 6.1 Green Belt Assessment Summary

<i>Purpose of the Green Belt</i> <sup>8</sup>	P1 - 101A NORTH	P2 - 101A CENTRAL	P3 -101A SOUTH
To check unrestricted sprawl of large built up areas	Yellow	Green	Green
To prevent neighbouring towns from merging into one another	Red	Yellow	Green
To assist in safeguarding the countryside from encroachment	Yellow	Red	Green
To preserve the setting and special characters of historic towns	Red	Red	Red
To assist in urban regeneration by encouraging the recycling of derelict and other urban land*	Green	Green	Red

\*Note: By its very nature, the redevelopment of a brownfield site meets this purpose, since its redevelopment allows regeneration of brownfield land. The development of an area of undeveloped land does not fulfil this purpose.

<b>Overall performance of the parcel to fulfil the functions of the Green Belt</b>	Red	Yellow	Yellow
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5.5.2 The assessment of the parcels of land under consideration (P1 101A NORTH, P2 101A CENTRAL and P3 101A SOUTH) to fulfil the functions of the Green Belt has

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<sup>8</sup> NPPF (2012), Page 19 Paragraph 80



established P1 101A NORTH does not currently fulfil the Green Belt functions adequately, while P2 101A CENTRAL fulfils them partially. P3 101A SOUTH currently fulfils three of the five Green Belt purposes but is not proposed to be developed but instead is proposed to be used for strategic landscaping only. Therefore, there would be no adverse effect on the Green Belt **provided it is only used for the establishment of strategic landscaping**. The analysis has been used to assess to what effect the removal of these parcels from the Green Belt would have on the functions of the Green Belt.

### 5.5.3

The two parcels of land if developed further would potentially have the following adverse effects on the function of the Green Belt within the locality:

- Parcel 1 - 101A NORTH: No adverse effect
  - Parcel 2 - 101A CENTRAL: Slight Adverse Effect
  - Parcel 3 - 101A SOUTH: No adverse effect **provided it is only used for the establishment of strategic landscaping**. Once the strategic landscaping has matured as it will form a new, more defensible Green Belt boundary to the wider employment Site.
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## 6 SUMMARY

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- 6.1.1 Within the 2018 Brentwood Draft Local Plan Regulation 18 Preferred Site Allocations consultation the Site is identified under proposed employment allocation 101A (Brentwood Enterprise Park) as being suitable for development with the south portions of the Site identified for landscaping only.
- 6.1.2 The Site is within the Metropolitan Green Belt and as such enjoys specific planning protection under the National Planning Policy Framework (NPPF). The five purposes of the Green Belt are described in the NPPF paragraph 80.
- 6.1.3 The Green Belt context, sites, identified parcels and Green Belt boundaries are shown on **Figure 1: Green Belt Context, Appendix A**. For the purposes of this report the area under consideration is divided into three parcels: P1 101A – NORTH, P2 101A – CENTRAL and P3 101A – SOUTH. Refer Figure 2: Assessment Parcels, **Appendix A**.
- 6.1.4 In its current state P1 and P2 do not currently fulfil the NPPF stated functions of the Green Belt as both have been developed to some extent. Further development of already urbanised land is supported by Brentwood Borough. It is considered that with appropriate landscape design within P3 that a defensible Green Belt boundary could be created.
- 6.1.5 Parcels P1 and P2, south of the A127, currently comprise an area of a mix of hard standing, compacted aggregate and scrub with portable works cabins, caravans and remnant construction materials as well as some areas of agricultural land of varying quality. Overall, the current developed arrangement and the potential intensification of development within these parcels would have a limited effect on the functions of the Green Belt with the incorporation of strategic landscaping to the south within P3.
- 6.1.6 P3 is currently undeveloped. There would be no adverse effect on the Green Belt if this parcel were removed **provided it is only used for the establishment of strategic landscaping**. I.e. it remains undeveloped. Once the strategic landscaping has matured as it will form a new, more defensible Green Belt boundary to the wider employment Site.

6.1.7

There are a number of potential beneficial uses in the Green Belt which could be used to 'offset' some of the adverse effects. These include enhancements to vegetated buffers along the eastern and northern boundaries as well as opportunities to enhance the buffer on the western boundary adjacent to Hobbs' Hole. Parcel 3 can be designed to form an extensive area of landscape proposals which will work to enhance the Green Belt purposes by providing a new, more defensible Green Belt boundary and mitigate any impacts on visual and physical openness resulting from the development of Parcels 1 and 2.

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