

Brentwood Draft Local Plan (to 2033) Regulation 18 Consultation - February 2018

Green Belt Study: Overview and Technical Note

Background

- 1.1.1 Brentwood Borough Council is preparing a new Local Plan ('the plan'), which will set out the long-term vision for how and where the Borough will develop over the next 15 years (to 2033) in line with its unique local character – a “borough of villages”. The purpose of the current consultation document (Preferred Site Allocations) is to set out the Council’s preferred sites for housing, specialist accommodation and employment. This document is informed by national planning policy and guidance; the accompanying sustainability appraisal; a wide range of technical evidence and the previous consultations on the Strategic Growth Options (2015) and Draft Local Plan (2016).
- 1.1.2 In time the adopted Plan will set out how the borough will change in the future through development growth. Providing the new homes and jobs that are required is challenging considering the environmental qualities that the borough enjoys. The Council’s strategy is focused upon growth in sustainable locations, such as the Brentwood Urban Area, transport corridors, and delivering a new Garden Village with supporting physical, community and green infrastructure.
- 1.1.3 Brentwood has changed a lot over the past 100 years. Development needs have been met and the borough still enjoys the best of both worlds offering excellent access to London and the countryside. In recent years there has been a significant step-change in the development needs for the country, which is being acutely felt by the south east in areas like Brentwood because of the proximity to London. This means Brentwood’s needs are significantly different from when the last Local Plan was adopted in 2005. This new Plan is a once in a generation opportunity to plan for future needs, because the plans that come after it will in some way be taking on the same strategy provided issues remain broadly the same.
- 1.1.4 This stage of public consultation known as ‘preparation’ or ‘regulation 18’ consultation is an important stage in preparing the Local Plan and while the Council is publishing its preferred land allocations they remain draft. A number of Regulation 18 consultations have taken place in the past, but this will be the final one before the Council moves forward to finalising the Local Plan (Regulation 19).
- 1.1.5 The current ‘focused consultation’ stage does not provide any further information on detailed



planning policies, which will be included in the Pre-submission Regulation 19 publication stage later this year. The policies consulted upon in the Draft Local Plan (2016) are being reviewed and updated considering consultation representations made to date. The evidence base in support of the emerging local plan has grown significantly and is evolving and this includes research and analysis on the Green Belt.

Initial Green Belt Assessment Work and Studies

- 1.1.6 Brentwood Borough is entirely located within the London Metropolitan Green Belt, northeast of Greater London. Brentwood is c. 15,312ha in area, of which c. 13,700 ha of land is currently designated as Green Belt (over 89% of the borough). Brentwood currently makes up approximately 2.83% of the overall London Metropolitan Green Belt. To meet objectively assessed need for housing, using Greenfield land, allocating land currently designated as Green Belt needed to be considered.
- 1.1.7 The Council commissioned Crestwood Environmental Ltd. in March 2013 to undertake an independent, professional **assessment of the effects of allocating Housing Sites (being considered as part of the SHLAA) within the Green Belt and their relative contribution to the purposes of the Green Belt designation.**
- 1.1.8 The original commission, in 2013, was to consider the relative contribution of individual Sites to the purposes of the Green Belt. The Sites considered were promoted to the Council through the previous 'calls for sites' and the SHLAA process (i.e. those Sites promoted to the Council for potential housing allocation).
- 1.1.9 In order to identify the criteria for assessment, the primary reference point for understanding and interpreting the aims, essential characteristics and purposes of the Green Belt are contained within the National Planning Policy Framework (NPPF) (Department for Communities and Local Government, 2012) and the Replacement Local Plan (Brentwood Borough Council, 25 August 2005 (Adopted)).
- 1.1.10 The NPPF states that *'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open'*. It also states that *'the essential characteristics of Green Belts are their openness and their permanence'*.
- 1.1.11 The NPPF states that the *"Green Belt serves five purposes:*
1. *to check the unrestricted sprawl of large built-up areas;*
 2. *to prevent neighbouring towns merging into one another;*
 3. *to assist in safeguarding the countryside from encroachment;*



4. *to preserve the setting and special character of historic towns; and*
5. *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

- 1.1.12 The NPPF does not state whether one purpose is more important than another.
- 1.1.13 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."*
- 1.1.14 There is no definitive method for carrying out an assessment of effects that potential development may have on the purposes of the Green Belt. As such, a methodology and approach had to be determined that was aimed at meeting the requirements of the Brief, drawing on other precedent studies from across the UK.
- 1.1.15 Based on the objectives of, and the opportunities provided by, the Green Belt, each *Purpose* was considered in turn with regard to relevant assessment criteria to establish how well the Sites (being considered as part of the assessment) fulfilled the role of the Green Belt.
- 1.1.16 It has always been the intention that Brentwood Borough Council will seek to direct all development, wherever practical and sustainable, towards land not designated within the London Metropolitan Green Belt in the first instance. Development on Green Belt land will only be considered where the strategic priorities of the Council 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. As such, the focus of the assessments has been in relation to the first four purposes of the Green Belt, with Purpose 5 considered more strategically and holistically as an integral part of the wider Local Development Plan process.
- 1.1.17 This should also be viewed in the context that Brentwood Borough is entirely located within the London Metropolitan Green Belt, northeast of Greater London. Whilst 89% of Brentwood Borough is Green Belt, it is also noteworthy that:
- *10% of the borough is built on (developed) – compared to a UK average of 6%;*
 - *8% of the borough is Green urban (this includes formal parks, sports pitches, golf courses, etc.) – compared to a national average of 3%;*
 - *76% of the borough is farmland – compared to a UK average of 57%; and*
 - *6% of the borough is 'natural' (e.g. woodland/nature conservation) – compared to a UK*



average of 35%.

(Source: <http://www.bbc.co.uk/news/uk-41901294?platform=hootsuite> accessed 08/11/17)

- 1.1.18 This provides the context against which the Council is developing its new Brentwood Local Plan 2013 – 2033. With around 10% of the existing borough already previously developed, and 89% of the borough comprising Green Belt, there is a finite amount of land available in which to deliver the required housing and employment growth over the new local plan period. This is a fundamental consideration for ensuring that the new Local Plan is sustainable over the plan period.
- 1.1.19 In 2011 the Council published a Strategic Housing Land Availability Assessment ('SHLAA') (Atkins, October 2011), as part of the evidence base, to provide a preliminary assessment of sites with the potential to accommodate the housing targets. The SHLAA provided the starting point for considering sites as part of the plan-making process. It aimed to identify, in a systematic manner, land likely to be suitable, available and achievable for housing development in the Borough to meet housing targets during the period 2010 to 2031.
- 1.1.20 A total of 297 areas of land were assessed in the SHLAA. These were identified from a variety of sources, including Brentwood Urban Capacity Study (Brentwood Borough Council, June 2005); records of sites with existing or previous planning consents; and land put forward through an open 'call for sites' exercise (November-December 2009) and other discussions with the Council.
- 1.1.21 The SHLAA indicated that there was an adequate amount of available land to meet the then proposed housing requirements on brownfield sites for the first 9.9 years (2010 – 2019/2020) and that the Council may need to release a minimal amount of Greenfield land during this period to provide 0.1 year's supply. *"During the second 10 years (2020 - 2030), other than a reliance on Windfall sites, the SHLAA indicated that there would be a minimal amount of Brownfield land (89 dwellings) to deliver the required housing supply"* and that Greenfield sites would be required to meet the remaining requirement.
- 1.1.22 Based on the SHLAA evidence, subsequent consultations and further 'calls for sites', a progressive systematic assessment of promoted potential allocation sites located within the Green Belt was undertaken to establish the relative function of the Green Belt land within each Site and potential effects of development on the Green Belt. This was broadly undertaken over three main periods:
- In 2013, 105 'Sites' (including individual sub-components to large sites where applicable) were assessed within the Brentwood Green Belt, comprising Sites considered as part of the SHLAA and subsequently put forward in wider Council studies.
 - In late 2014, following consultation on the 'Local Plan 2015-2030: Preferred Options',



the Council commissioned an additional 58 sites for assessment (completed in 2015). Additionally, in 2014, the assessment of potential effects on Green Belt land was broadened out to consider whether any of the sites under consideration would be assessed differently (in terms of Green Belt effects/contribution) should an allocation, or subsequent development, be made for employment or mixed-use purposes. Thirteen of the Sites were to be further considered for employment use and two sites considered for mixed use or leisure. Additionally, five previously assessed sites (from 2013) were to be further assessed: three sites for employment use and two sites for mixed use or leisure.

- In late 2015, following consultation on the 'Strategic Growth Options' document, the Council commissioned a further 36 sites for assessment for housing purposes, with assessment to be undertaken in early 2016.

1.1.23 Given the changing and enlarging scope of the Green Belt assessment work, progressive working drafts of the Green Belt evidence base were produced and the last published version formed part of the evidence base consulted on during the Draft Local Plan Consultation in March 2016 and remains as part of the wider Document Library in support of the emerging local plan.

The Emerging Green Belt Evidence Base

1.1.24 From 2013 and to 2017, the Council's Objectively Assessed (Housing) Need (OAHN) has had to be regularly reviewed in line with changing market demand and government guidance. The most recent evidence on the OAHN (Peter Brett Associates (SHMA Part 1 – January 2018)) indicates that it has increased from a requirement for 362 dwellings per annum to 380 dwellings per annum. With this increase in the OAHN, and following a technical review of the 2016 proposed allocations looking at yields, developable areas, delivery and gross / net dwelling calculations, etc. the Council concluded that there was a need to identify a wider range of sites for potential allocation and development. Further to this, Government published the Housing White Paper in February 2017: 'Fixing our broken housing market'.

1.1.25 Two key parts of the White Paper are 'Planning for the right homes in the right places' and 'Building Homes Faster'. The Government makes a number of proposals which, in summary, are considered to focus on:

- Ensuring every local authority has an up to date local plan;
- Ensuring the housing requirements of all local authority areas are fully accounted for and can be delivered;
- Ensuring land can be released for housing development;



- Ensuring both developers and local authorities can be held to account to ensure housing numbers are delivered; and
- Improving the affordability and diversity of the housing market

1.1.26 The 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 that they have fully examined all other reasonable options for meeting their identified housing requirements*”.

1.1.27 Paragraph 1.39 from the White Paper stated (***our emphasis***):

“Therefore we [the Government] propose to amend and add to national policy to make clear that:

- *authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:*
 - *making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;*
 - *the potential offered by land which is currently underused, including surplus public sector land where appropriate;*
 - *optimising the proposed density of development; and*
 - ***exploring whether other authorities can help to meet some of the identified development requirement....***

*and where land is removed from the Green Belt, **local policies should require the impact to be offset by compensatory improvements to the environmental quality or accessibility of remaining Green Belt land. We will also explore whether higher contributions can be collected from development as a consequence of land being released from the Green Belt**”.*

1.1.28 In light of the updated housing need requirements and shortage of sites to meet the assessed need, and in line with the Housing White Paper 2017 requirements, the Council undertook a further ‘call for sites’ in early 2017 and progressed a full update to the current Strategic Housing Land Availability Assessment (SHLAA) (now integrating employment sites and called a ‘Housing and Employment Land Availability Assessment’ – HELAA). The HELAA is well progressed and will be finalised in due course.

1.1.29 In addition, following consultation feedback on the Draft Local Plan (2013-33) and various ‘Duty to Cooperate’ discussions and workshops with neighbouring local authorities in 2016 and 2017, it



was decided that the Green Belt evidence base should be extended further, to enable a borough-wide assessment of the existing functions of the Green Belt to be undertaken, to help further inform the strategic direction of the Brentwood Local Plan. Past consultation exercises have highlighted the importance of Green Belt and include the following key comments:

- *2011 – ‘Protecting the Green Belt’ was selected as a first, second or third priority for the largest number of respondents (911, 58%); Protecting the Green Belt remains the top priority for majority of respondents.*
- *2014 - Suggestion of a Green Belt Review; Concerns about the integrity of the Green Belt; objections to release of Green Belt around West Horndon; Green Belt release required to meet OAHN; Concern about building on Green Belt land, and the precedent which may arise from this; Building on the Green Belt seems to contradict National Government guidance and views; Comments generally stressed the importance of the Green Belt as a buffer between Brentwood Borough and London; Some calls from developers and land owners to release parcels of Green Belt land that serve no real function; Comments regarding the Council giving Green Belt a precedent over meeting OAN.*
- *2016 - Greenfield and Green Belt release are needed to meet OAHN; Greenfield and Green Belt should be protected, there is a need to prepare a Green Belt review ... to assist with determining site allocation process; Neighbouring local authorities highlighted that Brentwood should be mindful of the approach taken by neighbouring boroughs greenbelt evidence. All agreed that the Strategic Greenbelt review boundaries must be assessed in terms of the NPPF and what is present at the time, rather than what could be created as a result of any development sites. Any additional work to build and further refine the Strategic Greenbelt review could be undertaken as part of a two staged review – addressing what role the greenbelt fulfils at the time, without development, and what roll it would fulfil if development were to occur.*

1.1.30 Overall consultation responses can be viewed in the document library and wider evidence base as part of the Reg 18 Consultation.

1.1.31 In order to provide a robust evidence base in relation to Green Belt, Brentwood Borough Council has therefore commissioned a series of refined studies and reports to form a four-part Green Belt evidence base, to inform the Brentwood Local Plan 2013-2033. These studies broadly comprise:

- **Part 1:** Brentwood Green Belt in Context - A high-level historic and functional review of the London Metropolitan Green Belt, and the context against which the Brentwood Local Plan 2013-2033 is being developed;



- **Part 2:** Green Belt Parcels Assessment - 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 focused review of existing settlement boundaries (and associated Green Belt definition) using study evidence.

- 1.1.32 Working drafts of the Part 1 and Part 2 Green Belt studies are published as part of the January 2018 'Regulation 18' consultations.
- 1.1.33 Whilst significant previous progress has been made in relation to what now comprises the Part 3 Green Belt study, with working documents previously being published as part of previous consultation periods, 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. This is in line with Figure 7 of the Brentwood LDP Regulation 18 Consultation Document, which shows the new Brentwood Strategy for Growth – Site Assessment Process (at Page 23 of the Reg 18 Consultation Document).
- 1.1.34 The Part 3 Green Belt study will comprise not only a detailed Site Assessment, which will form part of the Stage 4 Site Assessment Process (see Figure 7 of the Reg 18 Consultation Document), but also wider cumulative considerations. The previous Green Belt study undertaken in 2013 formed an extensive all-encompassing review of individual sites, but did not include a review of cumulative impacts
- 1.1.35 Given the development of the evidence base and also the 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.
- 1.1.36 Also, the emerging HELAA study process has introduced a number of potential additional allocation sites located within the Green Belt. Many of these Sites overlapped considerably with previously-assessed areas and during the time that the HELAA study process has been progressing, the borough-wide Green Belt review has been completed (the Part 2 Green Belt evidence).
- 1.1.37 At this time, and whilst the headline assessment work for the HELAA has been completed, given



**BRENTWOOD
BOROUGH COUNCIL**



the current 'Regulation 18' Consultation, the Part 3 and Part 4 Green Belt studies will continue to be progressively refined and updated. These Green Belt studies will be used to help inform the Stage 4 and Stage 5 site assessment process and strategy for growth, as well as the final local policies of the plan. The studies will be published in full prior to or as part of the 'Regulation 19' Local Plan Pre-Submission Consultation.