

Green Belt Purposes Assessment Methodology
Consultation Draft
September 2018

1 Introduction

- 1.1 Bromsgrove District Council has commenced a District Plan Review. A plan review is necessary to:
- Identify land to accommodate the remainder of the adopted Bromsgrove District Plan (BDP) housing requirement to 2030;
 - Help to deliver the unmet housing needs of the Greater Birmingham area and;
 - Look beyond 2030 to identify land needed to deliver the full range of needs for the District over the longer term.
- 1.2 In line with the adopted BDP¹, the Council has committed to undertake a full review of the Green Belt. This methodology is the first step in this process, setting out how the Council thinks the review should be undertaken. This is a consultation draft and we welcome comments to shape our approach on this hugely important piece of work.
- 1.3 The Green Belt Purposes Assessment work will not be undertaken until all the consultation responses have been considered and the methodology refined where appropriate. A draft Site Selection Methodology is also being consulted on which will have a close relationship with the Assessment. It is highly likely that the majority of sites needed to meet the District's future development needs will fall within the current Green Belt boundary.

Context and history of Bromsgrove's Green Belt

- 1.4 Bromsgrove District is located to the south of Birmingham, within the West Midlands Green Belt. The District comprises the main town of Bromsgrove and a number of large and small settlements, some of which are inset from the Green Belt whilst others are washed over and lie within it. The Green Belt in Bromsgrove District covers 19,301ha of land, which is approximately 90% of the District². The current extent of the Green Belt within Bromsgrove District and the surrounding local planning authorities is shown in Figure 1.
- 1.5 The proposal for a West Midlands Metropolitan Green Belt was put forward in 1955 and was formally approved in 1975. The Green Belt surrounds the urban areas of Birmingham, Solihull, Coventry and the Black Country. The West Midlands Green Belt was established to stop major urban areas from merging together, as well as preventing the merging of smaller towns and cities on the periphery of the Green Belt. Within the Green Belt itself, south of the conurbation, there are a number of towns, including Bromsgrove, Redditch and Kidderminster.
- 1.6 Prior to the adoption of the Bromsgrove District Local Plan in 2004 (the predecessor to the current BDP), Green Belt boundaries were confirmed in adopted local plans for Belbroughton, Wythall and Hagley/Cient; the remainder of the District relied on boundaries

¹ Policy BDP4 – Green Belt. Specifically BDP4.2

² 19,301 hectares of Green Belt land in 2017. Total land area 21,714 hectares.

which were originally proposed in the County Development Plan for Worcestershire (1957) and confirmed generally in the County Structure Plans since 1975.

- 1.7 In recent years, the BDP included a partial review of the Green Belt around Redditch, which resulted in 179 hectares being removed from the Green Belt to accommodate the strategic allocations known as Foxlydiate and Brockhill East. This represented a 1% reduction in the total land designated as Green Belt in the District at that time.

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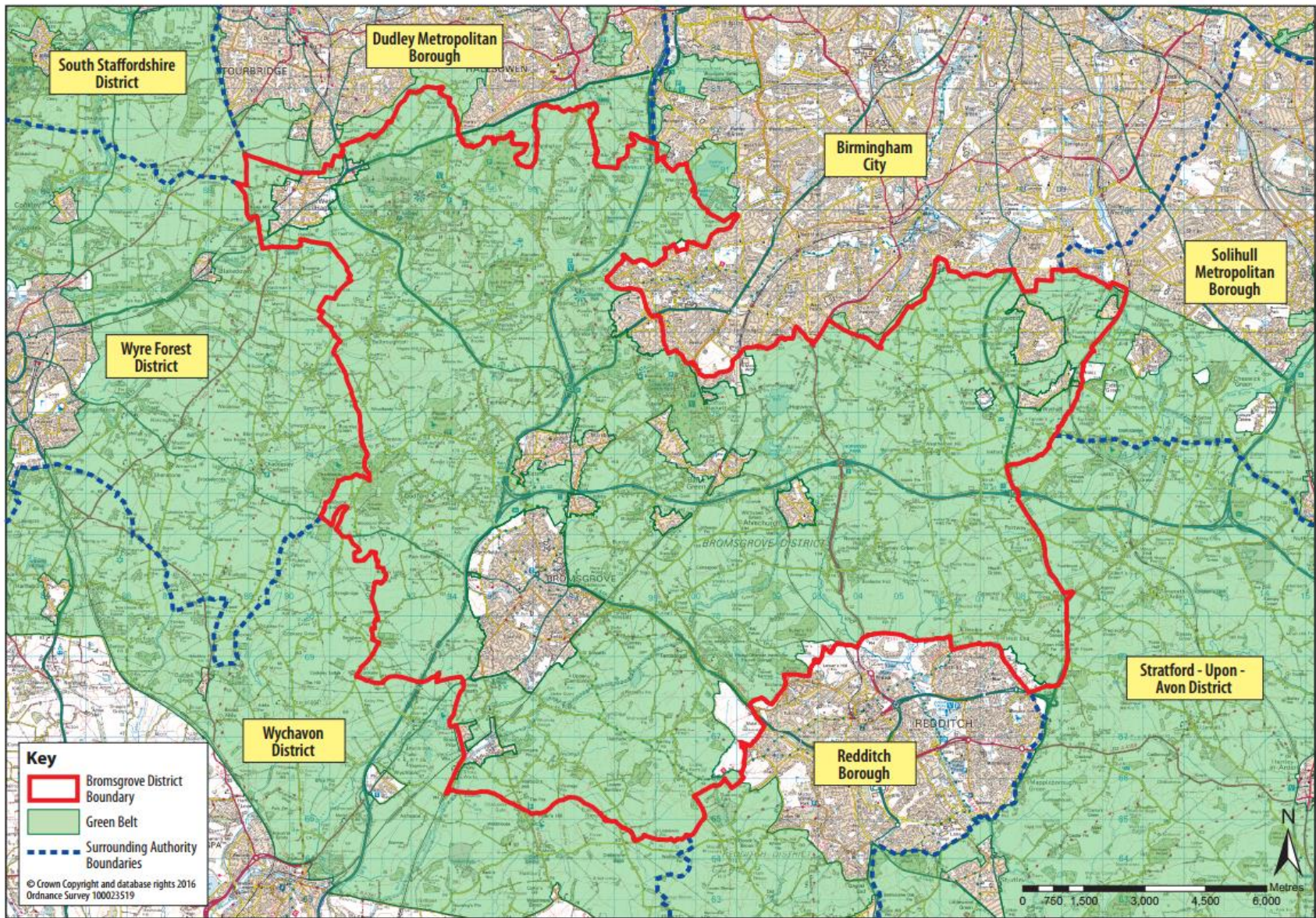


Figure 1: Extent of Green Belt within and surrounding Bromsgrove District

National Policy

1.8 Government stance on Green Belt has remained unchanged for a number of years, with Government manifestos and White Papers committed to its high level protection. The National Planning Policy Framework makes clear that Green Belt is among the areas where development should be restricted. Para 133 states: “The fundamental aim of Green Belt is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”³. Notwithstanding the general stance on the protection of the Green Belt, the NPPF is also clear that Green Belt boundaries can be altered, but only in exceptional circumstances and that this process can only be undertaken through the preparation or review of the Local Plan.

1.9 Paragraph 134 of the NPPF states that the Green Belt serves five purposes:

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

These purposes and the extent to which Green Belt land continues to meet them is a fundamental element of any assessment.

Aims of the Green Belt Purposes Assessment

1.10 The term Green Belt Review can be misleading, with a common misconception being that the final study will recommend which land should be removed from the Green Belt and commence the de-designation/ reallocation of this land. This is not the case. A Green Belt Review is purely that; a review of the existing Green Belt against the purposes set out in the NPPF. It will identify whether the land continues to fulfil one or more of the Green Belt purposes, but it will not allocate land for another use. To avoid confusion, the Council has decided to use the term “**Green Belt Purposes Assessment**” to more accurately describe what this piece of work will achieve.

1.11 The NPPF is clear. Green Belt Boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.⁴ Alongside other factors, the BDP housing targets are considered to be an important contributory factor in demonstrating the exceptional circumstances for the Green Belt to be reviewed. That is, because Bromsgrove town and the large settlements⁵ are tightly bounded by the Green Belt, there is nowhere else for future development to go. Policy BDP4.2 commits the Council to a full review of the Green Belt and this approach was tested and found to be sound at the examination⁶ into the BDP. The release of land from the Green Belt is therefore necessary to meet the requirements of the current plan, even before consideration has been given to the needs of the District Plan Review for the duration of its plan period.

³ National Planning Framework (2018) Paragraph 133

⁴ National Planning Framework (2018) Paragraph 136

⁵ Defined in the BDP (2017) at Policy BDP2 as Alvechurch, Barnt Green (including Lickey), Catshill, Hagley, Rubery, Wythall (including Drakes Cross, Grimes Hill and Hollywood)

⁶ BDP Inspector’s Report – December 2016. www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/the-bromsgrove-district-plan-2011-30/inspectors-report.aspx

1.12 Once exceptional circumstances have been established, the place to set out de-designation of Green Belt land, allocation for other uses (including safeguarding for future development) and detailed boundary changes is the District Plan Review DPD itself, which must be taken through the formal production process and ultimately examined by a Government appointed Planning Inspector.

1.13 This Green Belt Purposes Assessment is the first step in providing evidence for a sound and robust District Plan Review. This Green Belt Purposes Assessment will not suggest any alterations to the existing Green Belt boundaries, but will assess its current extent and identify how areas perform against the defined purposes that Green Belt land should serve. Table 1 summarises what the assessment will and will not do.

Green Belt Purposes Assessment – at a glance	
What it will do	What it will not do
Strategically assess the existing land designated as Green Belt in Bromsgrove District against the five Green Belt purposes	Recommend which land should be removed from the Green Belt
Identify parcels of land which perform strongest and weakest against each of the five Green Belt purposes	Amend the Green Belt boundary
At the second stage, assess the strength of the Green Belt in specific sites	Assess or recommend the suitability of land for development
	Allocate land for development

Table 1: Green Belt Purposes Assessment – at a glance

Process

1.14 Given the scale of the task to assess the 19,000 hectares of Green Belt in Bromsgrove District, it is proposed to split the assessment process into two parts.

Part 1 – Strategic Assessment of the Green Belt

In preparation for the Part 1 Assessment, the District’s Green Belt has been split into 60 strategic land parcels. These parcels have been defined using Ordnance Survey maps and aerial photography and use clear physical features such as motorways, A roads, B roads, some minor roads, railways and canals. The parcels vary in size dependent on the existence of these permanent physical features. The strategic parcels will then be assessed against the Green Belt purposes, through a commentary on their character and analysis of how they perform against the NPPF Green Belt purposes. The output will be a detailed commentary on how each parcel of land performs against the purposes, an assessment of its contribution to Green Belt, with a summary of all parcels comparing performance.

Part 2 – Detailed Assessment of Green Belt sites

Once a high level review of the Green Belt is complete, the District Plan Review process will be moving forward, with a spatial strategy emerging from both other evidence and consultation responses. It is the intention to appraise a selection of sites in more detail that form part of this strategy to assess how they perform against the five Green Belt purposes. There will be a filtering process which will focus the detailed assessment on those sites which form part of the spatial strategy and which are free from significant constraints. The output from the Part 2 will be an assessment of how these sites fulfil the Green Belt purposes and the level of likely harm to the Green Belt that would be caused should the site be released and put forward for development.

Questions

1a. Do you agree with a two part process for assessing Bromsgrove's Green Belt?

- 1.15 Further detail on the proposed methodology for both parts of the Assessment is in Section 2.
- 1.16 The conclusions from both parts of the Green Belt Purposes Assessment will then be taken forward alongside the Site Selection Analysis⁷ and other evidence to determine the most appropriate and sustainable locations for housing and employment growth in the District. Figure 2 below sets out how the two Parts of the Green Belt Purposes Assessment will be undertaken and how this part of the evidence base will link with the wider District Plan Review process.

⁷ Site Selection Analysis is a separate process which will be shaped by the Site Selection Methodology, also available as a consultation draft.

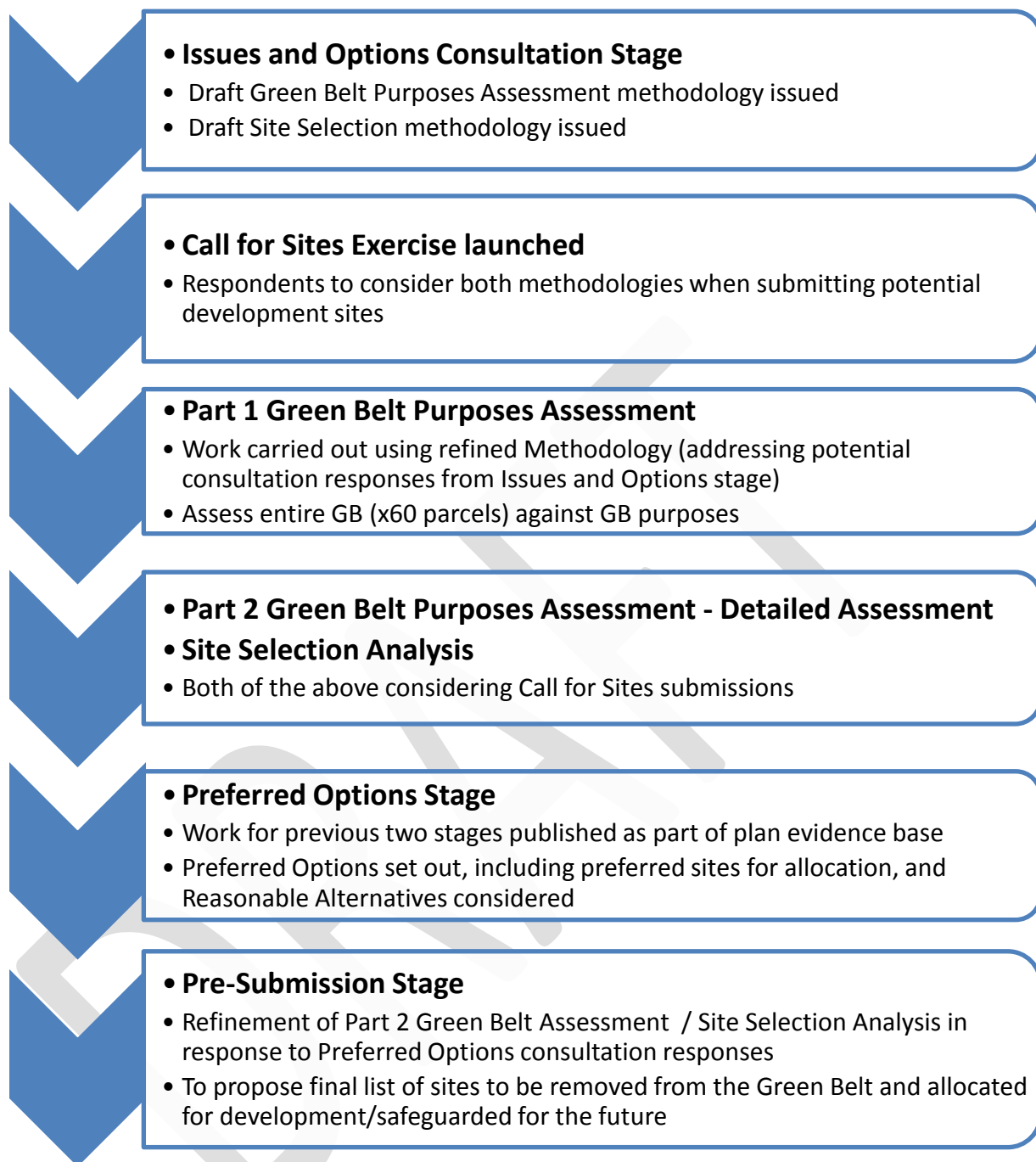


Figure 2: Green Belt Assessment Process and key Local Plan Review stages

2 PART 1 – STRATEGIC ASSESSMENT OF THE GREEN BELT

Overview

2.1 There is no national guidance on exactly how a Green Belt Assessment or Review should be undertaken. Green Belt Review and Assessment Methodologies from other Local Planning Authorities have been considered when devising the methodology for this Green Belt Assessment for Bromsgrove District. The purpose of this consultation draft methodology is to seek views on the proposed approach, refine the methodology and gain endorsement of the process.

Stage 1 - Defining the study area and land parcels

2.2 It is proposed that for the initial review against the Green Belt purposes, the District should be divided into medium to large parcels to establish the character of these areas and how they perform against the defined purposes. Given the scale of the Green Belt in Bromsgrove and the significant role it plays in shaping the pattern and nature of the built form in the District, it is felt important to consider the District in its entirety at this stage.

2.3 Figure 3 illustrates the draft land parcels that it is proposed will be used to conduct the assessment. Land parcels for the purpose of an assessment have been defined using a logical approach to parcel definition, based on permanent features such as physical features such as motorways, A roads, B roads, minor roads, railways and canals. In certain instances, boundaries have been drawn in a straight line between two physical features. These land parcels will then be used to help describe the character of the Green Belt and to assess their contribution to the function of the Green Belt. The parcels do not represent development boundaries and bear no relationship to sites where there is development interest, as identified in the SHLAA⁸.

2.4 The parcels do not extend beyond the Bromsgrove District Council administrative boundary, and as such no areas of Green Belt outside of the District will be assessed. Although there is some alignment with railways and major roads, the administrative boundary frequently diverges from strong physical features which are visible on the ground. Therefore consideration will need to be given at a later stage to the presence of defensible boundaries potentially beyond the District's boundary.

Questions

2a. Do you agree with the 60 proposed parcels for conducting the Part 1 of the Green Belt Purposes Assessment?

⁸ Strategic Housing Land Availability Assessment

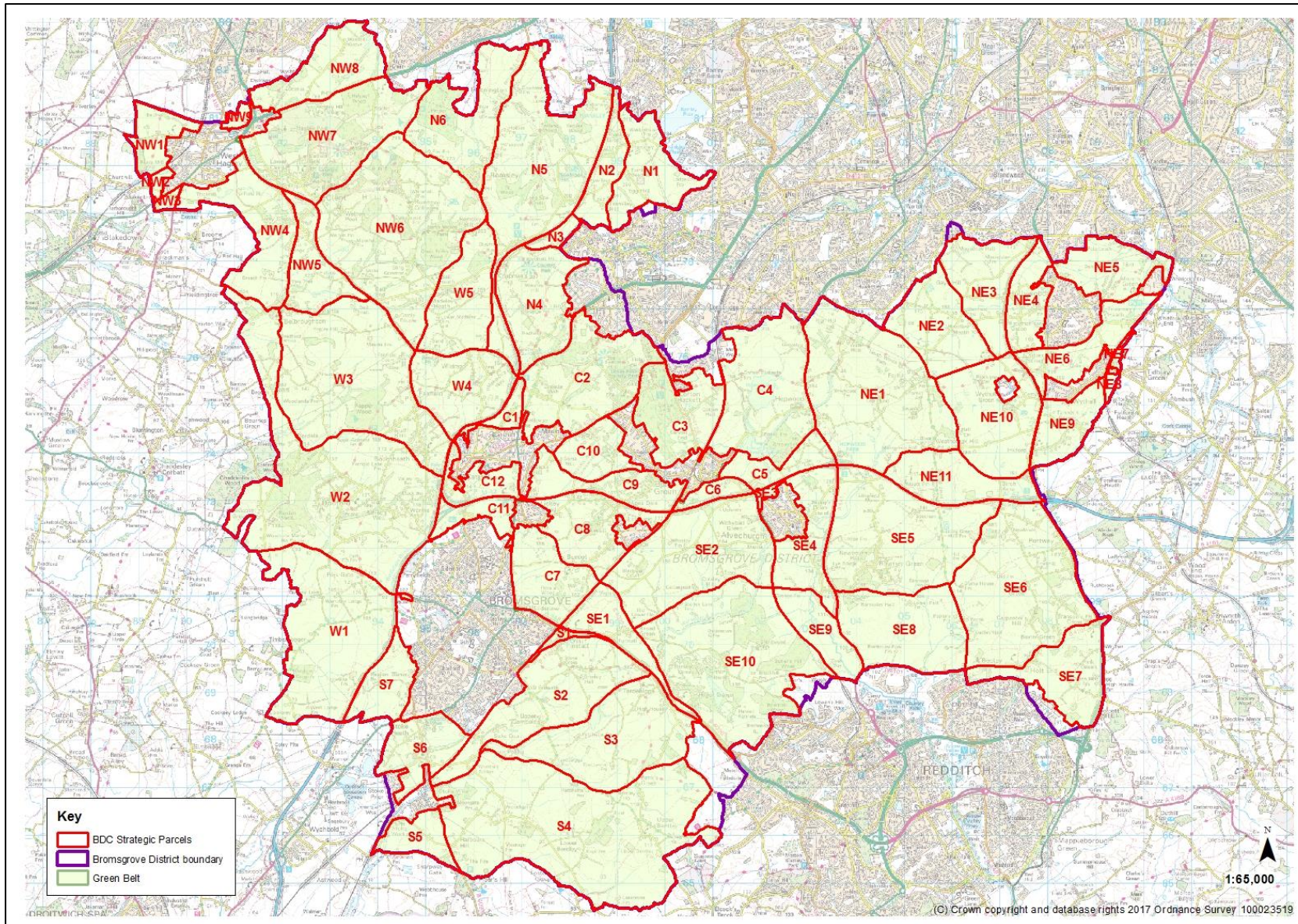


Figure 3: Proposed Strategic Green Belt Parcels

Stage 2: Assessment against Green Belt Purposes

2.5 Paragraph 134 of the NPPF sets out the five purposes of the Green Belt. It is helpful to consider what the terms within the purposes actually mean and how the purposes can be differentiated from each other.

	NPPF Green Belt Purposes	Dictionary Definition of Terms / Further detail / Application in BDC	
1	To check the unrestricted sprawl of large built-up areas	Definition	Sprawl – spread out over a large area in an untidy or irregular way. (Oxford Dictionary Online) Large built-up areas - Built-up areas are defined as land which is ‘irreversibly urban in character’, meaning that they are characteristic of a village, town or city. (ONS, 2011 Census). Large built-up areas are therefore taken to be towns and cities.
		Further detail	Evidence of sprawl could include ribbon development along main roads leading out of towns or villages or the existence of urban features.
		BDC	For the purpose of this assessment, large built-up areas are to be defined as those nearby towns and cities which are part of the Birmingham conurbation, plus any other nearby freestanding towns.
2	To prevent neighbouring towns from merging	Definition	Towns – a built-up area with a name, defined boundaries, and local government, that is larger than a village and generally smaller than a city. (Oxford Dictionary Online) Merging – the physical or visual linking of two settlements or areas of built form.
		Further detail	Key to the assessment of this purpose will be consideration of the existing pattern of development and the need to protect key gaps. Existing ribbon development along main roads will also be relevant to the consideration of this purpose.
		BDC	No national policy guidance is given on what might constitute a ‘town’. For the purpose of this assessment, towns are to be defined as the settlements currently excluded from the Green Belt within Bromsgrove District, plus settlements of a similar size (or larger) in close proximity to the District boundary, where there appears to be a relationship with Bromsgrove District.
3	To assist in safeguarding the countryside from encroachment	Definition	Countryside – open land with an absence of built development and urbanising influences, and characterised by rural land uses including agriculture and forestry. Encroachment – a gradual advance beyond usual or acceptable limits. (Oxford Dictionary Online)
		Further detail	Key to the countryside is the sense of openness, which can be defined as the absence of built development or other urbanising elements (i.e. not openness in a landscape character sense which concerns topography and woodland / hedgerow cover).
		BDC	N/A

	NPPF Green Belt Purposes	Dictionary Definition of Terms / Further detail / Application in BDC	
4	To preserve the setting and special character of historic towns	Definition	Historic town – settlement or place with historic features identified in local policy or through Conservation Area or other historic designation(s).
		Further detail	An example of the Green Belt serving this purpose would be a settlement where the historic area or centre is contextualised by rural features, such as views around properties within the historic area. The Green Belt around the cities of Oxford and Cambridge provides a very good example of where this purpose is strongly fulfilled.
		BDC	Although the Planning Advisory Service (PAS) Guidance ⁹ suggests that this purpose would relate to very few settlements in practice, the Council has taken a wider view and included all settlements in the District with a designated Conservation Area plus Conservation Areas relating to settlements which lie close to the District boundary. We acknowledge through this approach that not all of them would be recognised as historic ‘towns’. Only the relationship between the Conservation Area and the Green Belt will be considered in the context of this purpose, and where applicable, not the wider, undesignated area of settlement.
5	To assist in urban regeneration by encouraging the recycling of derelict and other urban land	Definition	Urban regeneration – the process of improving derelict or dilapidated districts of a city, typically through redevelopment. (Oxford Dictionary Online).
		Further detail	An example of the Green Belt serving this role could be where development in the Green Belt is likely to make nearby brownfield land unattractive to develop. Regeneration initiatives in the vicinity would be relevant considerations.
		BDC	N/A

Table 2: Green Belt Purposes - Explanation

2.6 There has been much consideration across the country as to whether there is value in performing an assessment against the fifth purpose listed above. PAS Guidance suggests that if the process has been properly followed, the ability to accommodate development within the urban area will have been fully explored prior to considering land within the Green Belt. It goes on to say that if this is the case, then it could be said that all Green Belt achieves this purpose to the same extent. Many studies choose to omit this purpose as they conclude that every parcel would perform the same when measured against it, therefore adding no value to the overall assessment.

2.7 In the case of the West Midlands Green Belt, although the Green Belt was established to stop major urban areas and also smaller towns and cities from merging together, it has clearly played a key role in assisting the urban regeneration of the Birmingham conurbation and the reuse of brownfield land outside of the Green Belt elsewhere. Ultimately, it will be difficult to establish the role of one specific parcel within Bromsgrove District over another in assisting urban regeneration, or to attribute specific evidence to this. For this purpose, the parcels could all be rated equally or not at all, but neither approach would provide any real analysis. Therefore, whilst the Council acknowledges the value of the fifth purpose when

⁹ PAS (2015) Planning on the Doorstep: The Big Issues – Green Belt

considering the Green Belt as a whole, the Bromsgrove Green Belt will not be assessed against Purpose 5 in this Study.

Questions

2b. Do you agree with the decision not to assess Bromsgrove's Green Belt parcels against Purpose 5:

“To assist in urban regeneration by encouraging the recycling of derelict and other urban land”?

How will the assessment be undertaken?

- 2.8 The Part 1 Strategic Green Belt Purposes Assessment will be undertaken by Planning Officers using a combination of:
- Desk-top research and analysis - using aerial photography, Street View[®] images, Ordnance Survey mapping and topography data, and
 - Site Visits - to explore the nature of the parcel, the strength of boundaries, its relationship with settlements and views into and out of 'historic towns'. These are likely to involve a minimum of two planning officers per parcel, with multiple points visited around each parcel.
- 2.9 Notes about the key features and land use of the parcel will be recorded and a commentary against how the parcel performs against each Green Belt purpose will be provided in the Part 1 report.
- 2.10 Following desktop analysis and site visits, there may be the potential for the parcel boundaries to be altered. This may be where a current parcel boundary appears weak or poorly defined and a stronger boundary can be identified on site, or where additional boundaries can be identified which would allow for a finer grained analysis of large parcels. Officers will record their reasoning for such changes when undertaking the assessments and the parcels remapped accordingly.
- 2.11 The following table sets out how an assessment against each of the Green Belt Purposes will actually be carried out, including considering the wording of the purpose in the context of Bromsgrove District and the criteria that will be used to rate each parcel against the purposes. Most of the Assessment Considerations would require a response in the affirmative to indicate that the parcel makes a positive contribution; however some of the Assessment Considerations cover the presence of more detrimental features, which if in existence, would lessen the contribution the parcel makes to the Green Belt purpose. The negative considerations are shown in **red**.

	NPPF Green Belt Purpose	Context in Bromsgrove District	Assessment Considerations	Strength of Contribution		
1	To check the unrestricted sprawl of large built-up areas	“Large Built-up areas”	<p>The extent to which the land prevents the uncontrolled spread of the built-up area.</p> <p>The sense of openness.</p> <p>The strength of the existing boundary features or presence of an alternative boundary within the parcel.</p> <p>The presence of existing development which constitutes sprawl, such as ribbon development along key routes or other sporadic development.</p>	Strong	Parcel is immediately adjacent to a large built-up area, is largely free from development and has a strong sense of openness. There is a strong defensible boundary.	
		Within Bromsgrove District				In Neighbouring Local Authorities
		Bromsgrove Town		Birmingham (Birmingham CC)	Moderate	Parcel is adjacent to a large built-up area, is mostly free from development which could constitute sprawl and has a fairly strong sense of openness. There is a complete or partial defensible boundary.
		Cofton Hackett/ Longbridge (as part of the conurbation)		Solihull (Solihull MBC)		
		Rubery (as part of the conurbation)		Halesowen (Dudley MBC)	Weak	Parcel is adjacent to a large built-up area but shows evidence of urban sprawl, limiting the openness of the parcel. There is only a partial or in some cases no defensible boundary.
				Stourbridge (Dudley MBC)		
	Redditch (Redditch BC)					
2	To prevent neighbouring towns from merging	“Neighbouring towns”	<p>The degree to which the land prevents the merging (visual or physical) of settlements.</p> <p>The sense of openness.</p> <p>Character of the settlements concerned – are there existing features or patterns of development which mean they are at risk of merging?</p> <p>Consider the evidence of ribbon and</p>	Strong	Parcel constitutes all or most of a gap between settlements. Loss of openness in this parcel would cause visual or physical merging or substantially reduce the existing gap.	
		Within Bromsgrove District				In Neighbouring Local Authorities
		Bromsgrove Town		Birmingham (Birmingham CC)	Moderate	Parcel constitutes the majority of a gap between settlements (or does so in conjunction with another parcel). Loss of openness would either physically or visually have a negative impact on the existing gap.
		Alvechurch		Solihull (Solihull MBC)		
		Barnt Green		Halesowen (Dudley MBC)	Weak	Parcel is not pivotal in providing a gap between settlements. Loss of openness in this parcel would not cause a significant visual or physical sense of merging.
		Blackwell		Stourbridge		

NPPF Green Belt Purpose		Context in Bromsgrove District		Assessment Considerations	Strength of Contribution	
			(Dudley MBC)	sporadic development.	No Contribution	Parcel does not play a role in preventing the merging of settlements.
	Catshill		Kidderminster (Wyre Forest BC)			
	Cofton Hackett		Redditch (Redditch BC)			
	Hagley		Dickens Heath (Solihull MBC)			
	Lickey End					
	Rubery					
	Stoke Prior					
	Wythall (inc Hollywood/Drakes Cross and Major's Green)					
3	To assist in safeguarding the countryside from encroachment	Not applicable		<p>The rural sense of the area, including consideration of development and other urbanising features.</p> <p>Countryside characteristics – an open landscape, which is natural, semi-natural or farmed.</p> <p>Topography and land uses.</p> <p>Is the parcel urban fringe or open countryside? If urban fringe, the parcel's strength will be lessened.</p> <p>Evidence of existing encroachment eg. urban features such as street lights, extensive pavements, floodlights or</p>	<p>Strong</p> <p>Moderate</p> <p>Weak</p> <p>No Contribution</p>	<p>Parcel has a very strong rural sense, is largely open and exhibits many countryside characteristics.</p> <p>Parcel has a rural sense and exhibits countryside characteristics but there may be some urban features affecting openness.</p> <p>Parcel has a limited rural sense and exhibits few countryside characteristics. Parcel also contains urban features which have a negative impact on openness.</p> <p>Parcel lacks countryside characteristics and contains many urban features.</p>

	NPPF Green Belt Purpose	Context in Bromsgrove District	Assessment Considerations	Strength of Contribution		
			areas of hard standing.			
4	To preserve the setting and special character of historic towns	“Historic Towns”	<p>The degree to which the parcel contributes to the setting of a Historic Settlement</p> <p>Does the parcel contain or is it adjacent to a Conservation Area associated with a Historic Settlement?</p> <p>Does the parcel offer views into the historic core of a Historic Settlement and/or vice versa?</p> <p>What elements/areas that are important to the setting and special character of a historic town would be affected by loss of openness?</p>	<p>Strong</p> <p>Moderate</p> <p>Weak</p> <p>No Contribution</p>	<p>Parcel contains or is immediately adjacent to a historic settlement and therefore has a significant role in its setting and/or special character.</p> <p>Parcel has a moderate role in the setting and/or special character of a historic settlement. This may be through important views to or from the historic element of the settlement.</p> <p>Parcel has a weak role in the setting and/or special character of a historic settlement. There may be some limited views to or from the historic element of the settlement.</p> <p>Parcel has no role in relation to a historic settlement.</p>	
		Within Bromsgrove District				In Neighbouring Local Authorities
		Belbroughton				Broome (Wyre Forest DC)
		Beoley				Chaddesley Corbett (Wyre Forest DC)
		Clent				Tanworth in Arden (Stratford on Avon DC)
		Dodford				
		Alvechurch (Core)				
		Hagley (Core)				
		Holy Cross				
		Barnt Green (Core)				
Bromsgrove Town (Core)						

Table 3: Assessment Criteria

Questions

2c. Do you agree with the settlements that have been identified under Purposes 1, 2 and 4 to consider in the Bromsgrove context? And specifically;

- Under Purpose 1, do you agree with including Rubery and Cofton Hackett as part of the “Large Built-up-area” of the Greater Birmingham conurbation?
- Under Purpose 2, do you agree with assessing all settlements excluded from the Green Belt in Bromsgrove in the context of

preventing merging?

- Under Purpose 4, do you agree with the “Historic Towns” (c.f. settlements) identified in neighbouring authorities which lie close the border with BDC?

2d. Do you agree with the Assessment Criteria set out under each purpose?

2e. Do you agree with the proposed measures for assessing the Strength of Contribution?

2f. Do you have any specific suggestions as to how the relationship of the surrounding Green Belt parcels (specifically S3, S4, SE9 and SE10) to planned development areas now excluded from the Green Belt (namely Foxlydiate and Brockhill East to the north of Redditch), should be considered in the assessment? Until development commences, these areas still exhibit some of the characteristics of Green Belt land.

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Overall Contribution of each parcel

- 2.12 Paragraph 134 of the NPPF does not state or infer that one purpose is more important than another. The five purposes should therefore be afforded equal weight when drawing together the overall conclusions. Assigning numeric 'scores' to the individual purposes for each of the parcels, to give an aggregate overall contribution will be avoided. Given that the location of the parcel in proximity to a large built-up area or town or historic town will determine its strength for Purposes 1, 2 and 4, it could be considered that only Purpose 3 can provide a truly comparable assessment of all parcels against each other. This highlights the downside of aggregating the strength of contribution from all four (or five) purposes, when some parcels will score poorly purely because they are remote from the large built-up area, for instance. Additionally, because of the variation in the size of parcels, this may lead to uneven comparisons between the strengths of each parcel.
- 2.13 As such, no overall contribution will be drawn on the strength of each parcel. Rather, the commentary and strength of contribution will form the core of the analysis.

Questions

2g. Do you agree that an overall conclusion on the strength of each Green Belt parcel should not be drawn?

Stage 3: Final evaluation and 'sense check'

- 2.14 Once all of the parcels have been assessed, it is anticipated that officers involved in the process will sit down and discuss their findings. This will help to ensure that the assessment criteria have been applied consistently by all officers and to identify any anomalous results. The purpose of this exercise will not be to compare one parcel against another, but to take an overview of all the results. Strength of Contribution conclusions may be altered at this stage in response to this checking process.
- 2.15 The outputs from the Part 1 Assessment are anticipated to be:
- Individual completed pro formas for each Strategic Parcel
 - Tabulated results showing Strength of Contribution by each Purpose, for all Parcels
 - Choropleth maps¹⁰ of the District showing Strength of Contribution by each Purpose

Wider considerations

Emerging policy changes

- 2.16 The Government published the Revised National Planning Policy Framework in July 2018. This maintains the strong protection of the Green Belt, but does implement a number of changes from the 2017 Housing White Paper. The key changes can be summarised as follows:
- 2.17 Neighbourhood plans (para 136) – where a need for changes to Green Belt boundaries has been demonstrated through a strategic plan, detailed amendments to the boundaries can be made through neighbourhood plans.

¹⁰ Maps coloured by region to represent different variables

- 2.18 Exceptional circumstances (para 137) – in order to satisfy that exceptional circumstances exist to warrant changes to Green Belt boundaries, LPAs should have firstly examined all other reasonable alternative options for meeting its identified need for development. This would need to include:
- Making as much use as possible of suitable brownfield sites and underutilised land;
 - Optimising 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
 - Holding discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground
- 2.19 Sustainable patterns of development (para 138) – where it is necessary to release Green Belt land, plans should give first consideration to land which has been previously developed and/or is well served by public transport. Plans should also set out ways that the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Positive use of the Green Belt

- 2.20 Paragraph 138 of the NPPF seeks to improve the environmental quality or accessibility of remaining Green Belt land. The potential for more positive use of the District's Green Belt, such as through access improvements and linkages to the existing Green Infrastructure network will need to be explored further at later stages of the plan making process. However, notes on potential access improvements could be recorded when undertaking site visits of the parcels.

New Green Belt

- 2.21 Para 135 of the NPPF sets out the exceptional circumstances for when new Green Belt could be established, for example when planning for larger scale development such as new settlements or major urban extensions. At present, the scale and nature of potential future development in the District is unknown. Notwithstanding this, the extent of the Green Belt coverage in Bromsgrove, combined with the remainder of the developed District outside of the Green Belt, rules out any potential to designate new areas of Green Belt to compensate for that which could be potentially lost.

Safeguarded Land

- 2.22 Para 139 c) and d) of the NPPF encourage Local Planning Authorities to identify areas of 'safeguarded land' where necessary. These should be areas located between the urban area and the Green Belt, and be utilised to meet longer term development needs beyond the plan period. No further guidance is provided on the designation of safeguarded land, although in the context of para 136, Green Belt boundaries should have a permanence into the long term, so that they endure beyond the plan period.
- 2.23 A situation should be avoided whereby Bromsgrove's Green Belt is assessed and reviewed as part of this Plan Review, only to be reviewed again in the subsequent plan period. It will

be extremely difficult to accurately project development needs forward beyond the end of the plan period in order to predict further land which may need to be released from the Green Belt. Therefore the Council will be guided by the Green Belt Purposes Assessment to identify where land is no longer fulfilling its Green Belt function, and should be de-designated. Should there be surplus land for current requirements; land no longer meeting the Green Belt Purposes will be considered as Safeguarded Land for future needs. If land is given this designation, it would not have the same level of protection as the current Green Belt.

Status of settlements in the Green Belt and detailed boundary changes

- 2.24 As part of the Local Plan Review process, it will be timely to consider the status of the settlements in Bromsgrove's villages, including:
- Inset settlements (where the settlement is excluded from the Green Belt)
 - Washed-over settlements (where the settlement is within the Green Belt and Green Belt policies continue to apply)
- 2.25 Additionally, the boundaries of both inset settlements and the boundary with other built-up areas will need to be considered to see if there are sections where an extension to existing settlements could be beneficial, in response to anomalies or incursions from development.
- 2.26 In Part 1 of the Assessment, the presence of washed over or inset settlements within each parcel will be discussed in the commentary, but no detailed analysis of the appropriateness of the boundaries will be carried out. This will emerge alongside the detailed work at Part 2, and any detailed boundary amendments taken forward through the District Plan Review, where the extent of the Green Belt will be set out on the Policies Map. The justification and evidence to support detailed boundary changes around existing settlements will be presented in due course.

GBHMA Strategic Growth Study

Background

- 2.27 As part of the 2018 Greater Birmingham and Black Country Housing Market Area (GBHMA) Strategic Growth Study by GL Hearn and Wood plc¹¹, a strategic review of the West Midlands Green Belt within the HMA was undertaken. This study analysed the form and strategic function of the Green Belt against the purposes set out in the NPPF.
- 2.28 The Green Belt in the study area was split into 120 large/very large parcels, with boundaries determined by motorways/trunk roads, A-roads and railways, to keep the analysis to a manageable level. To reflect the geography of the area, the study area was split into five Sectors (West, North, North East, South East and South) with Bromsgrove District predominantly falling within the South Sector, with a few parcels in the West Sector around Hagley. Some parcels extend beyond Bromsgrove District's administrative boundary.

¹¹ www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/greater-birmingham-housing-market-area-strategic-growth-study.aspx

2.29 Professional judgement was used to identify where the four Green Belt purposes¹² were being fulfilled, using Ordnance Survey mapping and aerial photography. No site visits were undertaken because of the scale of the study area and the size of the parcels involved. Given the context of assessing the whole of the West Midlands Green Belt, the purposes of greatest importance were determined to be:

- To check the unrestricted sprawl of large built-up areas; and
- To prevent neighbouring towns from merging

The outcome of the assessment against these two purposes were combined to determine those areas which make a **Principal Contribution** to the Green Belt, with all other areas shown as making a **Supporting Contribution**. This allowed the overall contribution to the Green Belt of the strategic parcels to be shown.

Relationship with the Bromsgrove Green Belt Purposes Assessment

2.30 The use of permanent physical features to determine the boundaries of the parcels means there is some alignment between the boundaries of these parcels and those proposed in Figure 3 above for this Bromsgrove-specific study.

2.31 Given the scale of the parcels used in the study (the largest being over 6400ha), the overall conclusions that the study draws are very broad. When the parcels from this study are divided up to form the proposed parcels for the Bromsgrove District study, it is likely that the smaller parcels might perform differently against the purposes, due to differing boundaries and assessment criteria. Additionally, the contribution of the Green Belt parcels will be assessed in a different, more local context, rather than in their role within the West Midlands Green Belt as a whole. This highlights that the two studies may come to different conclusions about the strength of the Green Belt in Bromsgrove District, which would be wholly expected when both different sized parcels and different professional judgements are involved.

2.32 The GBHMA Strategic Growth Study is an independently prepared, objective study which the Council will need to consider and respond to as part of the evidence base for the District Plan Review. The correct approach is therefore felt to be to examine Bromsgrove's Green Belt against the Council's own assessment criteria and to test the potential development areas in the Green Belt arising from the GBHMA Strategic Growth Study in a consistent and rigorous way as a later part of the process.

Questions

2h. Are there areas that the study could focus on, where the existing Green Belt could be used more positively, such as improved public access, without impinging its essential characteristics?

2i. Do you feel that there is any scope to designate new land as Green Belt in Bromsgrove District?

2j. Do you have any thoughts on the proposal that the detailed review of boundaries around existing settlements and the status of washed-over settlements, is carried out as a separate exercise to the assessment of the identified Green Belt parcels against the NPPF purposes?

¹² The study excluded analysis against the fifth purpose "To assist in urban regeneration by encouraging the recycling of derelict and other urban land" which was taken to apply to the Green Belt as a whole

2k. Do you agree with the proposed relationship between Bromsgrove's Green Belt Purposes Assessment and the Strategic Green Belt Review contained within the GBHMA Strategic Growth Study?

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3 PART 2 – DETAILED ASSESSMENT OF THE GREEN BELT – SITE ANALYSIS

- 3.1 For Part 2 of the Assessment, a range of more detailed sites will be considered against the Green Belt Purposes. The Assessment will be carried out in much the same way as for Part 1, but with a stronger focus on the strength of boundaries of the sites in question. Further refinement of the Assessment Criteria may be required and this will be given further consideration at a later point in the process.
- 3.2 **It should be emphasised at this early stage that there will inevitably be differences in how the parcels perform against the Green Belt Purposes at the strategic stage in Part 1 of the assessment, versus how individual sites within those parcels perform at the detailed assessment stage in Part 2.** This is because the scale of the Part 2 assessment will mean sites within strategic parcels will be considered in a more localised and focused manner.

Stage 1 – Filtering Green Belt sites to assess

- 3.3 The sites to be assessed in Part 2 will emerge from the concurrent Site Selection process, where sites suggested to the Council (through the Call for Sites process) and those identified from other parts of the evidence base will be filtered to produce a shortlist of sites. These sites will be free from significant constraints and will fit with the spatial strategy for the District, as it emerges as the District Plan Review progresses. A comprehensive list of the constraints we consider to be significant are listed in the Draft Site Selection Methodology, and include:
- Nature Conservation designations such as SSSI and Local Nature Reserves
 - Historic Environment designations such as Scheduled Monuments and Registered Parks & Gardens
 - Functional Floodplains (Flood Zone 3b)

Stage 2 - Assessment of the site against Green Belt Purposes

- 3.4 It is envisaged that the process for assessing specific sites within the Green Belt will follow much the same steps as those set out for the Part 1 assessment. However, greater consideration will need to be given to some more detailed matters.

Site Boundaries

- 3.5 With regard to site boundaries, the NPPF states that when considering Green Belt boundaries, local planning authorities should define these using physical features which are readily recognisable and likely to be permanent¹³. A robust boundary will make a stronger contribution to preventing sprawl compared to a weaker boundary. Readily recognisable boundaries which are likely to be permanent include built features such as roads, railways, canals, the edges of settlements, rivers, streams, woodland. Examples of weaker boundaries which may lack durability are field boundaries and tree lines/hedgerows.
- 3.6 Specific questions about the permanence of the site boundaries will be needed to determine their appropriateness. Such questions could include:

¹³ NPPF (2012) Para 139 f)

- How strong are the proposed boundaries, or are there features nearby which would form a better boundary?
- Are the site boundaries logical?
- Is there an opportunity to improve the site boundary, for instance to incorporate an area of existing development?

Positive use of the Green Belt

3.7 As briefly mentioned in para 2.21, there will also be merit in considering the wider function of the Green Belt and any additional positive benefits the site plays, as outlined in para 141 of the NPPF. Aspects to be covered are as follows:

- Public Access – how accessible is the Green Belt site at present?
- Outdoor sport and recreation – are there any existing facilities or proposals for such facilities?
- Landscapes, visual amenity and biodiversity – is the site part of sensitive landscape area? Are there any biodiversity designations or priority habitats?
- Damaged and derelict land – is there any derelict land within the site? Are there any other ways that the land could be improved, other than through development?

Sites close to the District boundary

3.8 Where the shortlisted site falls on or very close to the District boundary, consideration will need to be given as to whether a more appropriate, defensible boundary exists outside of the District. This would need to be in conjunction with the relevant adjoining local authority, giving consideration to any Green Belt Review work that has been undertaken for the area concerned.

Stage 3 - Overall contribution of the site to the Green Belt

3.9 It is foreseen that an overall rating will be given at site level as the conclusion to Part 2 of the Assessment. This will allow conclusions to be drawn on the overall contribution of the site to the Green Belt, and conversely, the harm to the Green Belt that the site would cause if de-designated and hence potentially released for development. The report will not make recommendations as to which sites should be removed from the Green Belt, as other evidence, particularly from the Site Selection work, will need to be considered in order to make this decision in a holistic way.

3.10 As part of drawing conclusions on the site, potential alternative site boundaries which may offer more permanent and robust limits to the Green Belt will be considered. Similarly, it may be beneficial to reduce the size of the site which could be removed from the Green Belt, because of the potential harm that would be caused by releasing a particular segment of the site.

Stage 4 - Demonstrating exceptional circumstances to justify the release of sites from the Green Belt

3.11 There is no definition as to what constitutes the ‘exceptional circumstances’ under which Green Belt boundaries can be altered, as stated by para 136 of the NPPF. There has been significant case law on this point, with the general conclusion being that it is a matter of planning judgement.

- 3.12 One particular case at the High Court is often cited in this regard, as it identified a number of matters that should be considered to ascertain whether exceptional circumstances exist which justify the release of land through the Local Plan process. Mr Justice Jay in the **Calverton Parish Council v Greater Nottingham Councils 2015 High Court Judgement**¹⁴ sets out at para 51 of his judgement, the following five matters, where the objectively assessed housing need has already been determined:
- i. the acuteness/intensity of the objectively assessed need;
 - ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
 - iii. the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
 - iv. the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
 - v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.
- 3.13 Subject to national policy and emerging case law, it will be pertinent to use these five matters when looking to demonstrate the existence of exceptional circumstances which warrant the alteration of Green Belt boundaries.

Questions

3a. Do you have any thoughts on the broad methodology for Part 2 of the Green Belt Purposes Assessment?

3b. Do you have any views on what the Council should be considering when it is looking to define Green Belt boundaries for specific sites?

3c. Do you agree that it is important to consider the additional positive benefits that sites within the Green Belt play at this stage of the study?

¹⁴ EWHC [2015] 1078 (Admin)

4 CONSULTATION AND NEXT STEPS

- 4.1 Comments are invited on this draft Green Belt Purposes Assessment Methodology as part of the wider Bromsgrove District Plan Review Issues and Options consultation. Comments are welcome on the whole document, but we would particularly invite your views on the specific consultation questions that are posed throughout the document.
- 4.2 As part of the Duty to Cooperate, this methodology will be shared with Bromsgrove District's neighbouring authorities and their views sought.
- 4.3 After the consultation period has closed, any comments received will be considered and the methodology revised as appropriate. Work will then progress onto Part 1 of the Green Belt Purposes Assessment, where, subject to any amendments, the 60 strategic parcels will be assessed against the Green Belt purposes. It is envisaged that the process for Part 2 of the assessment will be outlined in more detail as the Green Belt Assessment moves forward.

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