

**Bromsgrove District Council**

# **Part Two Green Belt Study Report**

**Final report**

Prepared by LUC

June 2022



## Bromsgrove District Council

### Part Two Green Belt Study Report

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# Chapter 1

## Introduction

**1.1** LUC was commissioned by Bromsgrove District Council (BDC) to undertake an independent assessment of the 'harm' of releasing land from the Green Belt for development. This Part Two Green Belt Assessment will form part of the evidence base for the Council's District Plan Review and will inform the process of identifying and proposing sites for allocation.

**1.2** This report sets out the context, methodology and findings of the assessment of Green Belt harm.

### Study aims and scope

**1.3** The study provides an independent, robust and transparent assessment of the potential harm of releasing Green Belt land within Bromsgrove District in line with national policy, guidance and case law.

**1.4** The National Planning Policy Framework (NPPF) states in paragraph 138 that Green Belts serve five purposes:

#### The Purposes of Green Belt

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

**1.5** The NPPF also states in paragraphs 139 and 140 that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

**1.6** Legal case law, as established in *Calverton Parish Council v Greater Nottingham Councils & others* (2015), indicates that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and '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’.

**1.7** This study assesses all of the Green Belt land within Bromsgrove District and identifies variations in relative harm to the Green Belt purposes that would result from the release of land for development. In most cases the assessment considers the harm of releasing land as an expansion of an existing settlement – either one that is already ‘inset’ from the Green Belt (ie is not designated as Green Belt) or one that is ‘washed-over’ by it (ie does lie within the Green Belt). The exception is areas in the vicinity of motorway junctions that BDC requested be assessed as potential new inset development locations.

**1.8** The Green Belt Purposes Part One Assessment: ‘Strategic Assessment of the Green Belt Purposes’ (BDC, 2019) assessed the strength of contribution that various land parcels make to each Green Belt purpose. The key distinction between the concepts of ‘contribution’ to the Green Belt purposes and ‘harm’ to those purposes relates to the impact that release of land for development would have on the integrity of remaining Green Belt land. An assessment of contribution considers the role that land plays now, whereas an assessment of harm considers how the loss of contribution of released land, together with any weakening of the remaining Green Belt, combine to diminish the strength of the Green Belt.

**1.9** This Part Two Green Belt provides an assessment of the potential harm of releasing land from the Green Belt for development. The outputs, alongside wider evidence relating to other environmental/sustainability considerations, will inform decisions regarding the relative merits of meeting the Council’s development needs in different locations.

**1.10** The purpose of the study is **not** to identify land that is suitable for development, or to set out the exceptional circumstances for releasing land from the Green Belt. That will require the consideration of other issues (eg landscape, heritage, traffic, ecology) which lie beyond the scope of this study.

## Method statement consultation

**1.11** Local Planning Authorities have a duty to cooperate<sup>1</sup> with neighbouring authorities, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Paragraph 20 of the NPPF sets out the strategic topics for which Local Plan strategic policies should be prepared, including population and economic growth and associated development and infrastructure and facilities, climate change and the conservation and enhancement of the

natural, built and historic environment. All these topics either have a direct or indirect link to land designated as Green Belt or other local countryside designations. Consequently, a method statement was prepared for consultation with the stakeholders with whom the Council has a duty to cooperate. This included:

- The eight neighbouring local planning authorities: Birmingham City Council, Dudley Metropolitan Borough Council, Redditch Borough Council, Solihull Metropolitan Borough Council, Stratford Upon Avon District Council, South Staffordshire District Council, Wychavon District Council and Wyre Forest District Council.
- Worcestershire County Council.
- Historic England.

**1.12** The method statement consultation provided an opportunity for the Councils’ duty to cooperate partners to review and comment on the proposed approach to the study, prior to the assessment being undertaken.

**1.13** Only one consultee, Dudley Council, had any comments on the methodology, and these were minor factual points relating to the summary of Green Belt work carried out in Dudley – subsequently corrected – rather than any queries or concerns relating to the proposed assessment.

## Report authors

**1.14** This report has been prepared by LUC on behalf of BDC. LUC has completed Green Belt studies at a range of scales for over 50 English local planning authorities in the past five years, including several planning authorities in the West Midlands. All of LUC’s studies that have been tested at Local Plan Examination have been found to be sound.

## Method statement structure

**1.15** The remainder of this report is structured as follows:

- **Chapter 2** sets out the national, regional and local context for Green Belt policy;
- **Chapter 3** outlines the methodology used to undertake the Green Belt harm assessment;
- **Chapter 4** summarises the assessment findings; and
- **Chapter 5** summarises the next steps to be considered by Bromsgrove District Council if they decide to make alterations to the Green Belt boundaries.

**1.16** The main body of the report is supported by appendices which contain the individual Green Belt assessment proforma – one for each Green Belt parcel defined through the

<sup>1</sup> Section 110 of the Localism Act (2011)



assessment process. Each assessment proforma includes maps and sets out the potential harm to the Green Belt if land within the parcel was developed.

**1.17 Appendix A** contains the parcel outputs for the assessment of harm to the Green Belt purposes from the release of land which would expand existing settlements.

**Appendix B** contains the assessments for land adjacent to motorway junctions that could potentially be considered for release as new inset employment areas.

## Chapter 2

### Study Context

**2.1** This chapter sets out the study context. This includes a description of the District's Green Belt and the wider West Midlands Green Belt. It also includes a summary of national and local Green Belt policy and an overview of the previous Bromsgrove Green Belt study (Green Belt Purposes Part One Assessment – Strategic Assessment of the Green Belt Purposes, 2019) and assessments undertaken by neighbouring authorities.

#### Bromsgrove District's Green Belt

**2.2** Bromsgrove District is situated in north Worcestershire and covers approximately 21,700 hectares. The Bromsgrove Green Belt forms part of the wider West Midlands Metropolitan Green Belt to the south-west of Birmingham (see **Figure 2.1**).

**2.3** A total of 19,300ha of the Bromsgrove District is designated as Green Belt. This represents approximately 89% of the total area of the District, approximately 8.3% of the total area of the West Midlands Metropolitan Green Belt and approximately 1.2% of the total area of Green Belt land in England.

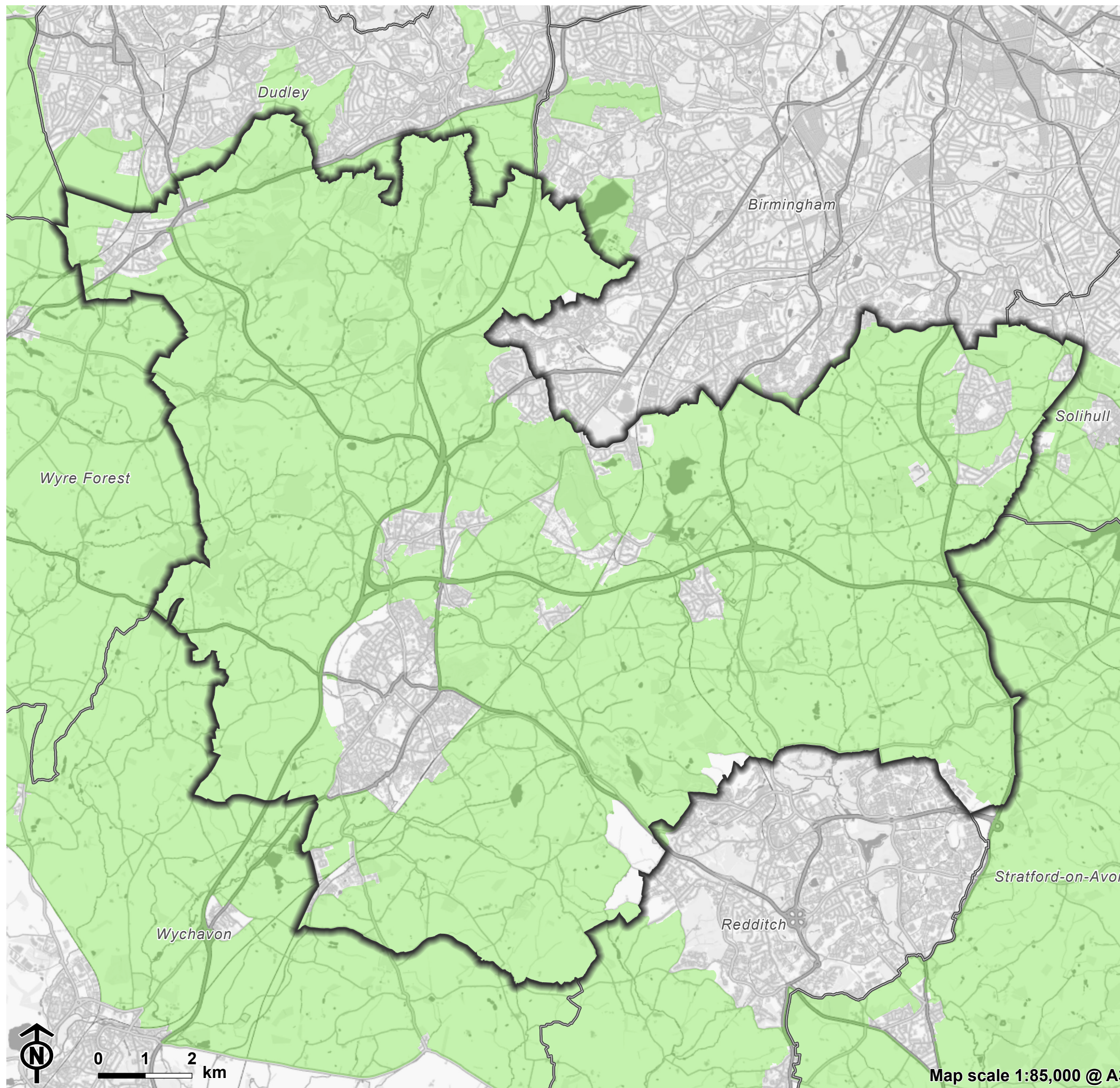
**2.4** The Green Belt within Bromsgrove District includes a variety of designations, including Sites of Special Scientific Interest, Country Parks, Nature Reserves, areas of Common Land, Registered Parks and Gardens, Scheduled Monuments and numerous Listed Buildings.




**2.5** Several settlements are inset within the Green Belt within the District, including Bromsgrove town, Alvechurch, Barnt Green, Blackwell, Catshill and Marlbrook, Coton Hackett, Hagley, Lickey, Rubery, Stoke Prior and Wythall<sup>2</sup>.

<sup>2</sup> 'Wythall' as a placename, has generally been used by the Council as an all-encompassing reference to the three separate non-Green Belt settlements of Wythall, Hollywood and Major's Green.



**Figure 2.1: Existing Green Belt within Bromsgrove District**



-  Bromsgrove District
-  Neighbouring authority
-  Green Belt

Map scale 1:85,000 @ A3



## The West Midlands Green Belt

**2.6** Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955<sup>3</sup> as a means of preventing the outward expansion of the West Midlands towns and cities into open countryside and in particular towards the towns and villages surrounding the main West Midlands conurbation.

**2.7** Draft Green Belt boundaries were initially identified in the 1960's. The proposal to establish the Green Belt and to define its detailed boundaries took many years to be formally approved through the preparation of Local Plans. The Green Belt was not formally approved by the Secretary of State until 1975.

**2.8** Today the Green Belt covers approximately 231,290ha, surrounding the Black Country, Coventry, Birmingham and Solihull, with its outer edge lying between 10 and 25 kilometres from the built-up area of the conurbation.

**2.9** The Green Belt has remained relatively successful in checking the sprawl of Birmingham, the City of Wolverhampton, and Coventry; preventing the merging of settlements; preventing encroachment into the surrounding countryside; and helping to preserve the setting and special character of the historic urban areas. At a strategic level, the Green Belt, tightly drawn around settlements, has helped to encourage regeneration by directing development to brownfield sites within the major urban areas. However, some pockets of Green Belt at the urban fringe have been compromised and degraded by infrastructure projects such as roads and power lines, and other urban developments.

## Green Belt policy

### Before the publication of the National Planning Policy Framework (2012)

**2.10** The essential characteristic of Green Belts as permanent and with boundaries only to be amended in exceptional circumstances was established in 1984 through Government Circular 14/84.

**2.11** In January 1988 PPG (Planning Policy Guidance Note) 2, Green Belts (subsequently replaced in 1995 and further amended in 2001) explicitly extended the original purposes of the Green Belt to add:

- to safeguard the surrounding countryside from further encroachment; and
- to assist in urban regeneration.

**2.12** PPG2 also formally emphasised the need for Local Planning Authorities to use Green Belt policy to promote sustainable patterns of development.

**2.13** In 2012, the Government replaced PPG2 with Chapter 13 of a new National Planning Policy Framework (NPPF). This has since been periodically edited with the latest version published in 2021<sup>4</sup> and supplemented by relevant National Planning Practice Guidance (PPG).

### National Green Belt Policy

**2.14** Government policy on the Green Belt is set out in chapter 13 of the NPPF<sup>5</sup> 'Protecting Green Belt land'.

**2.15** Paragraph 137 of the NPPF states that *"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"*.

**2.16** This is elaborated in NPPF paragraph 138, which states that Green Belts serve five purposes, as set out below.

#### The purposes of Green Belt

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

**2.17** The NPPF emphasises in paragraphs 139 and 140 that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans.

**2.18** Paragraph 140 goes on to say that *"once established, Green Belt boundaries should only be altered where*

<sup>3</sup> Campaign to protect Rural England: West Midlands (June 2007) What Price West Midlands Green Belts? Available at: [www.cprewm.org.uk/resources/housing-and-planning/green-belts/item/2220-what-price-west-midlands-green-belts](http://www.cprewm.org.uk/resources/housing-and-planning/green-belts/item/2220-what-price-west-midlands-green-belts).

<sup>4</sup> Ministry of Housing, Communities and Local Government published an edited version of the National Planning Policy Framework for consultation on the 30<sup>th</sup> January 2021 with minor edits. Available at:

<https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals>

<sup>5</sup> Ministry of Housing, Communities and Local Government published a revised version of the National Planning Policy on the 20<sup>th</sup> July 2021. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

*exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period.”*

**2.19** When defining Green Belt boundaries NPPF paragraph 143 states Local Plans should:

- demonstrate consistency with Local Plan strategy, most notably achieving sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, safeguard enough non-Green Belt land to meet development needs beyond the plan period;
- demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

**2.20** Current planning guidance makes it clear that the Green Belt is a strategic planning policy constraint designed primarily to prevent the spread of built development and the coalescence of urban areas. The NPPF goes on to state that *“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, 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”* (paragraph 145).

**2.21** It is important to note, however, that these positive roles should be sought for the Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by keeping land permanently open. Openness is not synonymous with landscape character or quality.

**2.22** Paragraphs 147 and 148 state that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm..., is clearly outweighed by other considerations.”*

**2.23** New buildings are inappropriate in the Green Belt. There are exceptions to this which are set out in two closed lists. The first is in paragraph 149 which sets out the following exceptions:

- *“buildings for agriculture and forestry;*

- *the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do 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;*
- *limited affordable housing for local community needs under policies set out in the development plan; and*
- *limited infilling or the partial or complete redevelopment of previously developed 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, or*
  - *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*

**2.24** Paragraph 150 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the 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;*
- *material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and*
- *development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.”*

## Planning Practice Guidance

**2.25** The NPPF's Green Belt policies are supplemented by National Planning Practice Guidance (NPPG). The guidance sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations borne out by specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects<sup>6</sup>. Other circumstances which have the potential to affect judgements on the impact of development on openness include:

- the duration of development and its remediability to the original or to an equivalent (or improved) state of, openness<sup>7</sup>; and
- the degree of activity likely to be generated by development, such as traffic generation.

**2.26** The guidance also elaborates on paragraph 145 of the NPPF which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreational need evidence to identify appropriate compensatory improvements, including:

- *“new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*
- *improved access to new, enhanced or existing recreational and playing field provision.”<sup>8</sup>*

**2.27** Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of

works and identifying a means of funding their design, construction and maintenance through planning conditions, Section 106 obligations and/or the Community Infrastructure Levy<sup>9</sup>.

## Local Green Belt policy

### Bromsgrove District Plan

**2.28** The Bromsgrove District Plan (BDP) (2011-2030) was adopted in January 2017. Policy BDP4: Green Belt states that the Green Belt will be maintained, but that a Local Plan Review (including a full Review of the Green Belt) will be undertaken in advance of 2023 to identify:

- *‘Sufficient land in sustainable locations to deliver approximately 2,300 homes in the period up to 2030 to deliver the objectively assessed housing requirement for Bromsgrove District.*
- *Safeguarded land for the period 2030-40 to meet the development needs of Bromsgrove District and adjacent authorities based on the latest evidence; and*
- *Land to help deliver the objectively assessed housing requirements of the West Midlands conurbation within the current plan period ie up to 2030.’*

**2.29** It states that the outcomes of the Green Belt Review will be incorporated into the Local Plan Review and that, where appropriate, settlement boundaries and village envelopes on the Policies Map will be revised to accommodate development.

**2.30** The supporting text for this policy notes that in view of the urgency to have an adopted up-to-date District Plan, the Council progressed the Plan with sufficient land to deliver only 4,700 of the 7,000 requirement without altering Green Belt boundaries. It also notes that the remaining 2,300 homes cannot be delivered without altering Green Belt boundaries and therefore a Green Belt Review will be undertaken. It states that following a Local Plan Review, sufficient land will be removed from the Green Belt to deliver the required homes (as well as address the longer term development needs of Bromsgrove District and adjacent authorities).

**2.31** The Local Plan notes that the amount of development required in relation to the adjoining conurbation is uncertain, and is dependent on the latest evidence available in the next Local Plan review. However it states that to meet the

<sup>6</sup> Two important Planning Appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect. However, in February 2020 the Supreme Court overturned the Court of Appeal Ruling on the case of Sam Smith v North Yorkshire County Council and Darrington Quarries Ltd (2018),

and in doing so asserted that openness does not imply freedom from all forms of potential development and that visual impact is not an obligatory consideration when assessing Green Belt openness.

<sup>7</sup> NPPG Paragraph: 001 Reference ID: 64-001-20190722

<sup>8</sup> NPPG Paragraph: 002 Reference ID: 64-002-20190722

<sup>9</sup> NPPG Paragraph: 003 Reference ID: 64-003-20190722



development needs in Bromsgrove, the total amount of land required will be approximately 320ha.

**2.32** In addition, Policy RCBD1: Redditch Cross Boundary Development made provision for two mixed use urban extensions. The supporting text for this policy states that these sites are currently designated as Green Belt, however exceptional circumstances exist to allocate these sites to meet development needs. The August 2019 'Green Belt Purposes Assessment Methodology' document (see above) states that to bring forward these sites in the Local Plan, the Plan 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. This represented a 1% reduction in the total land in the District designated as Green Belt.

### Bromsgrove District Plan Review

**2.33** The BDP Review is well underway. The Council is taking the opportunity to review the District Plan in its entirety and to extend the Plan period to 2040 whilst also considering the need to identify safeguarded land for longer term growth post 2040. The Council also recognises its duty to consider whether there are any realistic options to assist local authorities in the West Midlands conurbation in meeting their current housing shortfall.

**2.34** An Issues and Options Consultation took place between September and November 2018, which included the invitation to comment on a draft Green Belt Purposes Assessment Methodology.

**2.35** A second BDP Review consultation was undertaken in Autumn 2019, which included a Call for Sites exercise, the publication of the revised Green Belt Purposes Assessment Methodology and the Part One Green Belt Purposes Assessment.

**2.36** 441 sites (344 promoted through the 'Call for Sites' and 97 remaining from the Council's existing Strategic Housing Land Availability Assessment (SHLAA) work) were assessed through a Housing and Economic Land Availability Assessment (HELAA).

### Bromsgrove Part One Green Belt Assessment: strategic assessment of the Green Belt purposes

**2.37** In August 2018, the Council published the 'Green Belt Purposes Assessment Methodology' for consultation alongside the Issues and Options consultation. The Council used the term 'Green Belt Purposes Assessment' for their analysis of the performance of the existing Green Belt in Bromsgrove District, in order to stress the point that it was not recommending land for release. Following its consultation, the

methodology was updated to reflect changes based on the comments received. This was published in August 2019, along with the 'Green Belt Purposes Part One Assessment – Strategic Assessment of the Green Belt Purposes'.

**2.38** As the name suggests, the Part One assessment was a high-level study and assessed the entire Bromsgrove District Green Belt against the five purposes of the Green Belt (as set out in the NPPF). It split the District's Green Belt into 60 relatively large land parcels. These were defined using physical features such as motorways, A roads, B roads, some minor roads, railways and canals. The Council recognises that this has resulted in some of the identified land parcels being larger than others and that due to this, the character within land parcels can vary.

**2.39** The second step was to assess each land parcel against the NPPF defined Green Belt purposes. The assessment was undertaken by a combination of desktop research and analysis, as well as site visits. Notes about the key features and land use within parcels were recorded and a commentary against how each land parcel performs against each Green Belt purpose was provided.

**2.40** The assessment was based on explanations of each of the Green Belt purposes, including the 'Bromsgrove District Council' definitions related to these, and set criteria for each purpose. The strength of the contribution land parcels make to each purpose was provided using a four-point scale (strong / moderate / weak / no contribution). The assessment did not make overall conclusions of the strength of each parcel as a whole, in order to reflect the absence of any inference in the NPPF that any one purpose is more or less important than any other.

**2.41** The final step of the Part One assessment included a concluding evaluation and sense check, to review the consistency in the application of the assessment criteria against land parcels.

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

**2.42** The assessment defined evidence of sprawl as including ribbon development along main roads leading out of towns or villages, or the existence of urban features. It also defined the following settlements as large built-up areas: Birmingham, Bromsgrove Town, Cofton Hackett/Longbridge (as part of the conurbation), Halesowen, Redditch, Rubery (as part of the conurbation), Solihull and Stourbridge.

**2.43** The criteria for assessing the contribution of land to Purpose 1 included:

- The extent to which the land prevents the uncontrolled spread of the built-up area.

- The level of openness (defined as the absence of built development or other urbanising elements).
- The strength of the existing boundary features or presence of an alternative boundary within the land parcel.
- The presence of existing development which constitutes sprawl, such as ribbon development along key routes or other sporadic development.

#### **Purpose 2: To prevent neighbouring towns from merging**

**2.44** The study stated that the key to the assessment of this purpose was the consideration of the existing pattern of development and the need to protect key gaps between towns and other settlements. It also stated that existing ribbon development along main roads is relevant to the consideration of this purpose as this can form links between towns.

**2.45** The assessment defined the following settlements as towns: Alvechurch, Barnt Green (inc. Lickey), Birmingham, Blackwell, Blakedown, Bromsgrove Town, Catshill, Cofton Hackett (inc. Longbridge), Dickens Heath, Droitwich Spa, Hagley, Halesowen, Hollywood, Kidderminster, Lickey End, Major's Green, Redditch, Rubery, Solihull, Stoke Prior, Stourbridge, Wychbold and Wythall.

**2.46** The criteria for assessing the contribution of land to Purpose 2 included:

- The degree to which the land prevents the merging (visual or physical) of settlements.
- The level of openness (defined as the absence of built development or other urbanising elements).
- Character of the settlements, covering existing features or patterns of development which mean they are at risk of merging.
- Consideration of the evidence of ribbon and sporadic development.

#### **Purpose 3: To assist in safeguarding the countryside from encroachment**

**2.47** The assessment stated that the key to the assessment of Purpose 3 is the sense of openness. The assessment defined openness to be the absence of built development or other urbanising elements (ie not openness in a landscape character sense which concerns topography and woodland/hedgerow cover).

**2.48** The criteria for assessing the contribution of land to Purpose 3 included:

- The rural sense of the area, including consideration of development and other urbanising features.

- Countryside characteristics – an open landscape, which is natural, semi-natural or farmed.
- Topography and land uses.
- Evidence of existing encroachment eg urban features such as streetlights, extensive pavements, floodlights or areas of hard standing.

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

**2.49** The assessment acknowledged there are many Conservation Areas within the Bromsgrove District Green Belt and in neighbouring districts. However, it stated that these are not classed as 'historic towns' and therefore the only area within Bromsgrove District that this criterion would relate to is the historic core of Bromsgrove town, located in the Town Centre.

**2.50** The assessment noted that there is a considerable amount of development located between the historic core of the Bromsgrove Town Centre and St John's Conservation Areas and the Green Belt, and therefore it was considered that in reality this purpose would have very little relevance when assessing the land parcels.

**2.51** As such, Purpose 4 was not considered within the assessment.

#### **Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

**2.52** The assessment stated that it is difficult to establish the role of one specific land parcel within Bromsgrove District over another in assisting urban regeneration, or to attribute specific evidence to this. The assessment considered that every land parcel would perform the same when measured against Purpose 5 and therefore, whilst the Council acknowledges the value of the fifth purpose when considering the Green Belt across the country, Purpose 5 was not considered within the assessment.

#### **Findings**

**2.53** The assessment concluded that all land parcels make at least a weak contribution to at least two of the Green Belt purposes (Purpose 2 and Purpose 3), with the vast majority of Green Belt land making a strong contribution to at least one Green Belt purpose.

**2.54** The 'Green Belt Purposes Assessment Methodology' document emphasised that there will inevitably be differences in how the land parcels perform against the Green Belt purposes at the strategic stage in Part One of the Purposes Assessment and Detailed Assessment stage in Part Two. The

document stated that the Part Two Assessment will consider the other elements of Green Belt planning policy. The document did not define the criteria to be used to determine the overall contribution the sites make to the Green Belt purposes, or their potential harm from release.

**Neighbouring authority Green Belt studies**

**2.55** The following table summarises the Green Belt Studies that have been prepared by authorities neighbouring Bromsgrove District.



**Table 2.1: Neighbouring authorities' Green Belt studies**

Authority	Study
Birmingham City Council	<p>Birmingham City Council undertook a Green Belt Assessment in 2013<sup>10</sup> to inform the preparation of the Birmingham Development Plan, determining permanent Green Belt boundaries that can endure for the long term, and setting the framework for Green Belt and settlement policy. The assessment was conducted in three stages: stage 1) a preliminary analysis; stage 2) a detailed analysis of option areas; and stage 3) scoring of shortlisted areas. The purpose of the assessment was to enable the Council to understand how the City's Green Belt land contributes to the fundamental aim, characteristics and purposes of the Green Belt.</p> <p>The preliminary analysis of the City's Green Belt considered four different approaches to meet the growth requirements of Birmingham. These were: a) one large urban extension (around 5,000 homes); b) two large urban extensions (5,000 homes each); c) one large urban extension (around 5,000 homes) and other smaller developments; and d) several smaller dispersed settlements. Of these options, the Council opted for the 'one sustainable urban extension approach' option to allow for housing, community infrastructure and supporting infrastructure during the plan period.</p> <p>Stage two of the assessment provided a detailed assessment of the Green Belt Option Areas, resulting in a shortlist of areas that were progressed for further consideration in Stage 3.</p> <p>Stage three scored the shortlisted areas against a range of criteria and concluded by identifying a number of sites for further consideration for development as a sustainable urban extension.</p>
Wolverhampton, Dudley, Sandwell and Walsall, (together comprising the Black Country) and South Staffordshire	<p>The Black Country Green Belt Study Stage 1 and 2 Report (2019)<sup>11</sup> provided an assessment of the harm of Green Belt release for the City of Wolverhampton, the Metropolitan Boroughs of Dudley, Sandwell and Walsall (together comprising the Black Country), and South Staffordshire. The Study formed an important piece of evidence for the review of the Black Country Core Strategy (the Black Country Plan) and the strategic site allocations and individual development plans of the Black Country Authorities and South Staffordshire. Stage 1 considered strategic variations in the 'contribution' of Green Belt land to the Green Belt purposes as defined in the NPPF; and Stage 2 included a more focused assessment of the potential 'harm' of removing land from the Green Belt.</p>
Redditch Borough Council	<p>'A Study of Green Belt Land &amp; Areas of Development Restraint within Redditch Borough' (2008)<sup>12</sup> was undertaken as part of the preparation for the Borough of Redditch Core Strategy and was later used as an evidence base document for the subsequent Local Plan (adopted in 2017). It was originally produced in response to the emerging West Midlands Regional Spatial Strategy (RSS) allocating a housing target of 6600 dwellings for the Borough. The objective of the study was to demonstrate the acute sensitivities of the Redditch Green Belt and the various constraints and drawbacks it poses for development. It concluded that the Green Belt south-west of Redditch urban area and west of Astwood Bank are wholly inappropriate for development and no part of these areas should be excluded from the Green Belt. It also concluded that development in the Green Belt at Brockhill would be inappropriate, but that future studies may be necessary to revisit the role that the land in this area could play as part of a comprehensive and detailed study for future growth.</p>

<sup>10</sup> Birmingham City Council (October 2013) Birmingham Development Plan 2031, Green Belt Assessment. Available at: [https://www.birmingham.gov.uk/downloads/file/1763/pg1\\_green\\_belt\\_assessment\\_2013pdf](https://www.birmingham.gov.uk/downloads/file/1763/pg1_green_belt_assessment_2013pdf)

<sup>11</sup> LUC (September 2019) Black Country Green Belt Study Stage 1 and 2 Report. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4i/>

<sup>12</sup> Redditch Borough Council (October 2008) A Study of Green Belt Land & Areas of Development Restraint within Redditch Borough: Borough of Redditch Core Strategy Background Document. Available at: <https://www.redditchbc.gov.uk/media/994423/CDR512-A-Study-of-Green-Belt-Land-and-Areas-of-Development-Restraint-Within-Redditch-Borough.pdf>

Authority	Study
	<p>'Redditch Green Belt Release to Meet Growth Needs' (2013)<sup>13</sup> was prepared to explore the potential release of Green Belt land in order to meet Redditch's development needs. In particular the focus of this study was to examine the two Green Belt areas in the north of the Borough. The study identified a number of land parcels that could be fully released in their entirety from the Green Belt to contribute towards meeting development needs. These were in the Brockhill East and Brockhill West areas of the Borough.</p>
Solihull Metropolitan Borough Council (SMBC)	<p>The 'Solihull Strategic Green Belt Assessment' (2016)<sup>14</sup> was undertaken as part of the evidence base for an early review of the Solihull Local Plan by December 2017. The need for this was in part due to the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the Black Country Authorities Strategic Housing Needs Study finding that there is a significant shortfall in housing supply across the Greater Birmingham Housing Market Area. This, alongside the growth associated with the planned HS2 Interchange, would further add to pressure for significant future development within the Borough over the lifetime of the Plan.</p> <p>The core purpose of this study was to assess the extent to which the land designated as Green Belt within SMBC fulfils the essential characteristics and purposes of Green Belt land as set out in the NPPF. It is stated that this was to form the basis for more detailed assessment of Green Belt land within Solihull.</p> <p>A total of 89 Refined Parcels and five Broad Areas were assessed. The study demonstrated that the performance and character of Green Belt land within SMBC varies greatly across the Borough when considered against the first four purposes. The majority of the land was assessed as 'higher performing' against at least one of the first four purposes, and most of the remainder was 'moderately performing' against at least one purpose. Only six refined parcels were identified as not performing against any of the first four purposes.</p>
Stratford Upon Avon District Council	<p>The Green Belt was assessed in 2016 as part of a comprehensive assessment of Green Belt land within the administrative areas of Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council. The study<sup>15</sup> assessed the Green Belt against the five purposes of Green Belts, as set out in the NPPF.</p> <p>A total of 93 parcels and six broad areas were identified in the overall study, including 34 parcels and three 'broad areas' wholly or partially within Stratford-on-Avon District. The study demonstrated that the majority of the Green Belt in North Warwickshire and Stratford-on-Avon districts continues to serve its purposes very well. In particular it helps to maintain the identity of this part of the West Midlands and to provide opportunities for residents to enjoy the countryside close at hand. However, variations in contribution to the Green Belt purposes were identified and the study concluded that the lowest performing parcels, or parts of them, could be considered for removal from the Green Belt. It was concluded that development in significant proportions of these parcels would effectively be 'infill' and would be well contained by existing significant features and the landscape.</p>
South Staffordshire District Council	<p>The South Staffordshire Partial Green Belt Review (2014)<sup>16</sup> provided a partial Green Belt review of 15 of the 16 Main and Local Service Villages and the four free standing Strategic Employment Sites. The review assesses parcels of land against the five purposes of the Green Belt set out in the NPPF. The review formed part of the evidence base for the preparation of the Local Plan and informed the decision making and appraisal process of potential development sites within the Green Belt. It assessed 89 parcels of land against the five purposes of the Green Belt set out in the NPPF.</p>

<sup>13</sup> Redditch Borough Council (January 2013) Redditch Green Belt Release to Meet Growth Needs. Available at: <https://www.redditchbc.gov.uk/media/994405/CDR56-Redditch-Green-Belt-Release-to-Meet-Growth-Needs.pdf>

<sup>14</sup> Atkins Limited (July 2016) Solihull Strategic Green Belt Assessment. Available at: <https://www.solihull.gov.uk/sites/default/files/2020-12/Green-Belt-Assessment-Report-2016.pdf>

<sup>15</sup> LUC (April 2016) Coventry & Warwickshire Joint Green Belt Study: Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council, Stage 2 Final Report for North Warwickshire Borough Council and Stratford-on-Avon District Council. Available at: <https://www.stratford.gov.uk/planning-building/green-belt.cfm>

<sup>16</sup> LUC (January 2014) South Staffordshire Partial Green Belt Review. Available at: <https://www.sstaffs.gov.uk/planning/the-evidence-base.cfm>

Authority	Study
	<p>The 'South Staffordshire Partial Green Belt Review' (2016)<sup>17</sup> provided updates to the original Green Belt Review in response to representations received by the Council with regards to the South Staffordshire Site Allocations Document (SAD) Preferred Options Consultation.</p> <p>A revised Stage 1 and Stage 2 South Staffordshire Green Belt Assessment was undertaken in 2019 with neighbouring authorities in the Black Country – see details above.</p>
Wychavon District Council (WDC)	<p>South Worcestershire Green Belt Assessment: Part 1: Strategic Assessment of Green Belt Purposes (2018)<sup>18</sup> was produced to provide the South Worcestershire Councils (WDC, Malvern Hills District Council and Worcester City Council) with robust evidence to inform the production of a review of the South Worcester Development Plan. The Part 1 Strategic Assessment assesses the form and function of the Green Belt in respect of the fulfilment of the five purposes set out in the NPPF.</p> <p>The study concluded that the Green Belt is performing its strategic function overall as part of the outer edge of the West Midlands Green Belt, and in respect of more localised roles. The Green Belt plays a significant role strategically in terms of maintaining the separation between the local towns, notably between Bromsgrove, Droitwich Spa and Worcester, and also more generally in preventing the incremental urbanisation of the wider countryside, both in the immediate vicinity of large built-up areas and more widely. The majority of the Green Belt in the study area is judged to overall make a Contribution to Green Belt purposes, reflecting the broadly open countryside character of the land which is relatively remote from built-up areas.</p> <p>The Green Belt Assessment: Part 2: Site Assessments (2019)<sup>19</sup> considered the likely effect on the Green Belt of sites which were put forward as part of the Strategic Housing and Employment Land Availability Assessment 'Call for Sites'. It used the Part 1 Strategic Assessment to help determine the likely effects of the development of sites on the Green Belt, both individually and cumulatively.</p>
Wyre Forest District Council	<p>The Wyre Forest District Council Green Belt Review: Strategic Analysis (2016)<sup>20</sup> tested Green Belt land against the five purposes set for it in national policy to determine the extent to which it is contributing to those purposes. The study concluded that the Green Belt is overall and within specific parcels making a Contribution or Significant Contribution to Green Belt purposes. It also found that whilst there is inevitable variability amongst the degree of contributions to specific purposes, no land was identified as making such a Limited Contribution to Green Belt purposes as to warrant removal from the Green Belt, although two parcels were identified as making an overall Limited Contribution, reflecting their particular geographies.</p> <p>The Wyre Forest District Council Green Belt Review: Part II – Site Analysis (2018)<sup>21</sup> considered the relationship between several potential development sites and the Green Belt, determining the likely impact of site development on Green Belt purposes, its openness and permanence. It concluded that the overall effect of this scale of development on the purposes of Green Belt within Wyre Forest District is judged to not be significant, although there are localised instances of development having an unacceptable effect on openness, both for large and smaller scale sites.</p>

<sup>17</sup> LUC (November 2016) South Staffordshire Partial Green Belt Review. Available at: <https://www.sstaffs.gov.uk/planning/the-evidence-base.cfm>

<sup>18</sup> Wood Environment & Infrastructure Solutions UK Limited (October 2018) South Worcestershire Green Belt Assessment Part 1: Strategic Assessment of Green Belt Purposes. Available at: <https://www.swdevelopmentplan.org/swdp-review/swdp-review-evidence-base/green-belt-study>

<sup>19</sup> Wood Environment & Infrastructure Solutions UK Limited (May 2019) South Worcestershire Green Belt Assessment Part 2: Site Assessments. Available at: <https://www.swdevelopmentplan.org/swdp-review/swdp-review-evidence-base/green-belt-study>

<sup>20</sup> Amec Foster Wheeler (September 2016) Wyre Forest District Council Green Belt Review: Strategic Analysis. Available at: <http://archive.wyreforestdc.gov.uk/local-plan-review-evidence-base/local-plan-review-evidence-base-green-belt.aspx>

<sup>21</sup> Amec Foster Wheeler (May 2018) Wyre Forest District Council Green Belt Review: Part II – Site Analysis. Available at: <http://archive.wyreforestdc.gov.uk/local-plan-review-evidence-base/local-plan-review-evidence-base-green-belt.aspx>

## Chapter 3

### Methodology

**3.1** This chapter outlines the methodology used to undertake the assessment of Green Belt harm. There is no defined approach set out in National Planning Policy or guidance as to how Green Belt assessments should be undertaken. The approach is based on LUC's extensive experience of undertaking Green Belt assessments for over 50 local authorities. The relevant policy, guidance and case law that has informed the methodology is referenced where appropriate.

**3.2** The method is broadly consistent with the Council's published Part One Green Belt Assessment (2018), with a few exceptions which are explained in more detail below. As noted above, the Part One Assessment considered the strength of contribution that land makes to each Green Belt purpose now, whereas this Part Two Assessment considers how the loss of contribution of released land, together with any weakening of the remaining Green Belt, would combine to diminish the strength of the Green Belt.

#### Extent of study area

**3.3** Land covered by an 'absolute' constraint to development – ie an area within which development would not be permitted has been excluded from the assessment process. The designations listed below, and shown on **Figure 3.1**, have been treated as absolute constraints to development within Bromsgrove District:

- Sites of Special Scientific Interest.
- Ancient Woodland.
- Scheduled Monuments.
- Registered Parks and Gardens.
- Common Land.
- Local Nature Reserves.
- Local Wildlife Sites.
- Local Geological Sites.
- Country Parks.
- Flood Zone 3.

**3.4** It is important to note that, although these constrained areas have not been assessed for harm, the function they perform as areas of open land and/or as boundary features –



can have a bearing on the assessment of harm that would be caused from the release of adjacent unconstrained Green Belt land.

**3.5** Land with designations that might represent a constraint to development but that were not considered 'absolute', such as Listed Buildings and Conservation Areas, have been included in the assessment.

#### **Exclusion of constrained land**

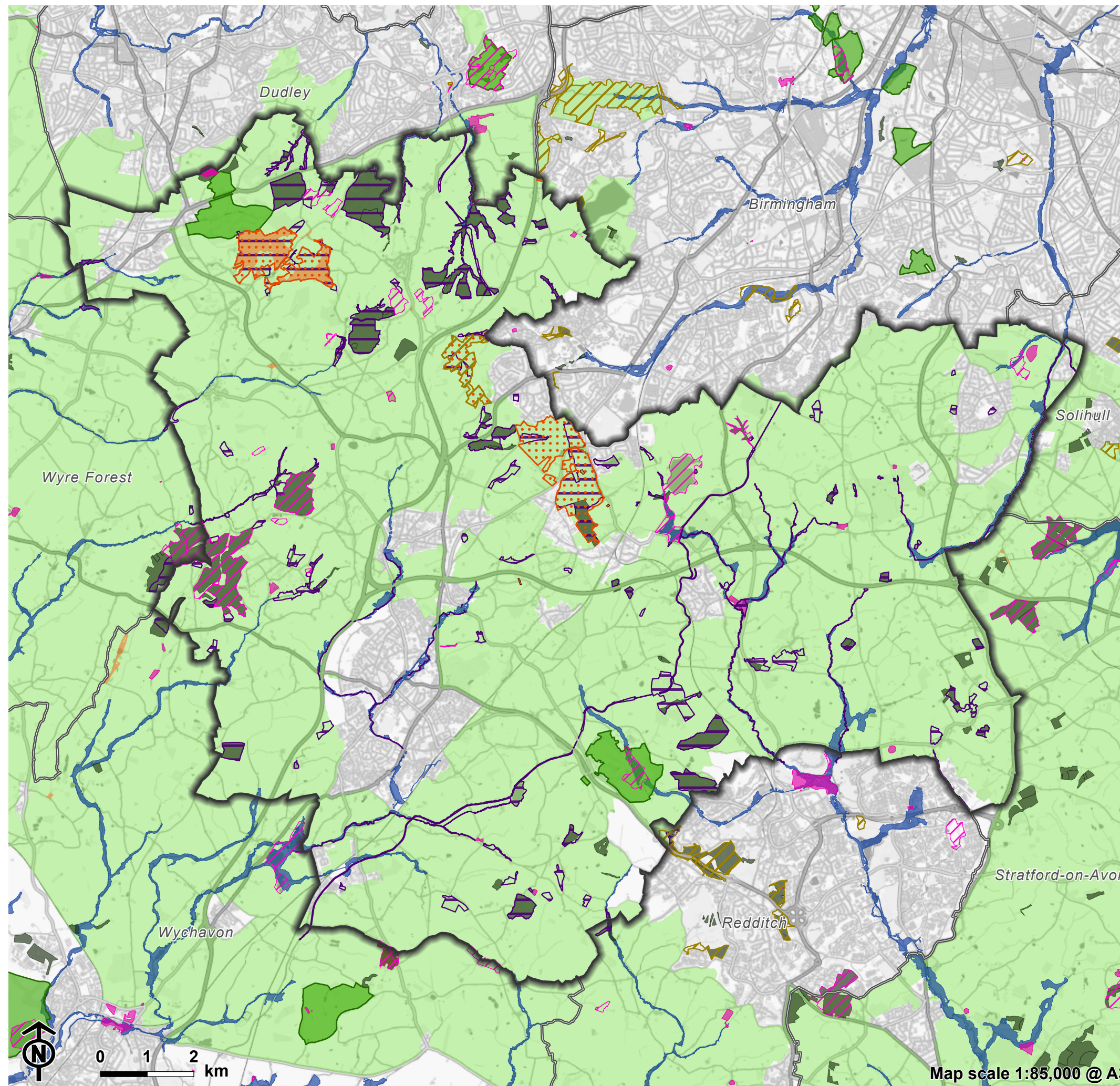
The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) noted that there is no need to assess land that is unlikely to ever be developed:

*"There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites however they are defined."*

For this reason, this study does not assess the harm of releasing land where development would not be permitted – ie land subject to an absolute constraint.



**Figure 3.1: Absolute constraints within Bromsgrove District**



- Bromsgrove District
- Neighbouring authority
- Green Belt
- Absolute constraints**
- Site of Special Scientific Interest
- Local Wildlife Site
- Local Nature Reserve
- Local Geological Site
- Ancient woodland
- Registered Parks and Gardens
- Scheduled monument
- Country park
- Common land
- Flood zone 3



## Assessment approach

### Green Belt harm

**3.6** The assessment provides an analysis of likely harm to the Green Belt purposes (see paragraph 1.6) that would result from the release of land within the assessment parcel area. Ratings of harm are provided for each Green Belt purpose and summarised into an overall harm rating for the parcel as a whole. Supporting text is provided justifying the ratings.

**3.7** An assessment of 'harm' provides a fuller analysis than an assessment of the 'contribution' of land to the Green Belt purposes, as the latter focuses exclusively on the performance of existing Green Belt. An assessment of harm also considers how the release of a particular piece of land affects the strength and function of the remaining adjacent Green Belt.

**3.8** This analysis can be used to help inform decisions regarding the release of land from the Green Belt, meeting the requirement of the Calverton case to consider the nature and extent of harm.

### Parcelling process

**3.9** The areas of land or parcels for which harm was assessed were not predefined. Parcels were defined to reflect variations in harm to Green Belt purposes across all of the Bromsgrove District Green Belt. This was achieved using a systematic approach in which a series of steps identified variations in the different elements that are relevant to an assessment of harm.

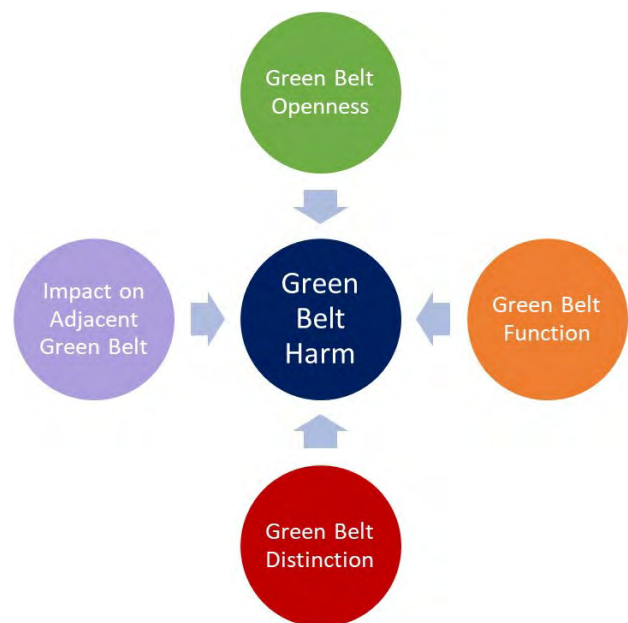
**3.10** The analysis was carried out without any consideration of specific development proposals, but with the assumption that openness would be lost if land were to be released. This approach provides a 'level playing field', in cases where there are different levels of detail and certainty associated with different site proposals. Having defined parcels to reflect the identified variations in harm, the boundaries of promoted sites can be overlaid to facilitate easy identification of likely harm associated with any particular site.

**3.11** Although the study did not consider specific development proposals, the general assumption was made that any release of land would be as an extension to an existing inset settlement, or would be associated with the inseting of a washed-over settlement of sufficient size and development density to be considered to make no significant contribution to Green Belt openness. Making this assumption enabled an assessment of the progressive harm of releasing Green Belt land with increasing distance out from an inset settlement (or washed-over but developed area). An exception to this approach was for the assessment of land at motorway junctions – see paragraphs 3.85-3.86 below – which were considered as potential new inset development areas.

**3.12** If BDC wishes to understand the harm of creating new inset development, separate from existing inset areas, this will be considered in a separate analysis.

### Assessment factors informing Green Belt harm

**3.13** Four factors were considered to assess the harm of releasing Green Belt land, as set out in the diagram below:



**3.14** In identifying variations, a guideline minimum size limit of 3 hectare (ha) was applied. Variations below this threshold were considered to be too detailed for a District-wide study of a strategic designation.

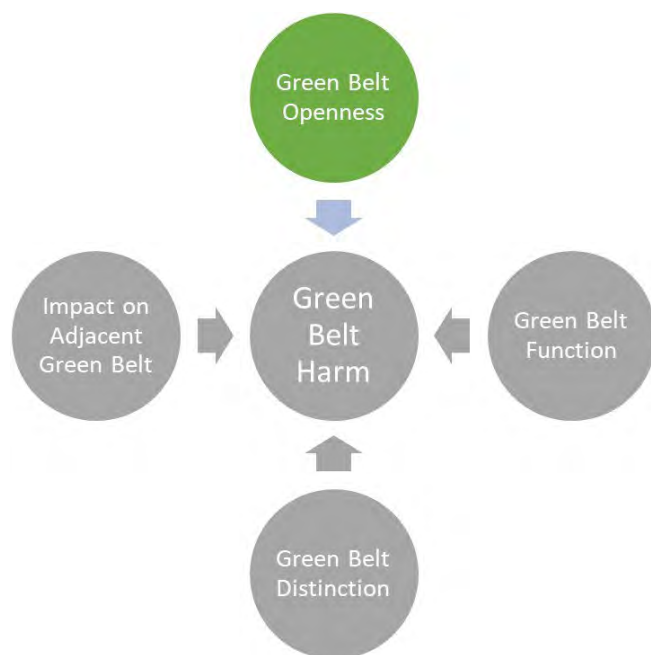
**3.15** A scale of four harm ratings ranging from *low/no* through to *very high* were used but it should be noted that there are no absolute definitions associated with these stated levels of Green Belt harm. Instead the ratings provide a means of relative comparison, and whilst it is clearly desirable to minimise harm levels it may be that in some instances a parcel associated with a high level of Green Belt harm may still, taking other factors into consideration, represent the most sustainable development option.

**3.16** An overall harm rating has been given for each parcel identified. This overall harm rating reflects the highest harm rating for any individual purpose. For example, if a parcel's release results in very high harm to any one purpose, the overall harm rating is *very high*. This provides an indication of the potential overall harm of releasing the Green Belt parcel but there are likely to be gradations of harm within the rating bands. Where a parcel's release results in a high level of harm to two Green Belt purposes, it may typically be assumed that this would constitute higher overall harm than the release

of a parcel that would cause high harm to only one purpose. At the top end of the harm scale, however, there may be instances where a high harm rating against a single purpose could be significant enough to match or outweigh another parcel's high harm ratings against two or more purposes.

**3.17** The following sections consider each of the assessment factors in more detail, and provide benchmark examples for harm ratings.

## Factor 1: Green Belt openness



**3.18** The NPPF identifies openness as an 'essential characteristic' of Green Belt land, rather than a function or purpose. Land which is fully developed cannot, therefore, be considered to contribute to the purposes of the Green Belt, but land which still retains some openness may do so. As such development will already be harming the Green Belt purposes, the additional level of harm that would result from the release of land will be diminished.

**3.19** Case law<sup>22</sup> makes it clear that Green Belt openness relates to a lack of 'inappropriate development' rather than to visual openness, thus both undeveloped land which is screened from view by landscape elements (e.g. tree cover) and land with development which is not considered 'inappropriate' and are still 'open' in Green Belt terms.

**3.20** The definitions of appropriate development contained within the closed lists in paragraphs 149 and 150 of the NPPF have been used to determine whether openness can be

considered to be affected, but caution has been exercised in such judgements. It is not within the scope of this assessment to review each form of development within a Green Belt parcel and ascertain whether it was permitted as appropriate development or not, unless it is clear cut. For example, buildings for agriculture and forestry are deemed to be appropriate development regardless of whether they preserve openness, or conflict with Green Belt purposes in this regard.

**3.21** What is deemed to be appropriate development in the NPPF has to be carefully considered, as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriate as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Such judgements will be more precisely made by the Local Planning Authority in response to planning applications.

**3.22** The extent to which loss of openness affects the harm that would result from the release of land will depend on the extent, scale, form, density and location of the inappropriate development.

**3.23** The consideration of openness does not extend to the consideration of the urbanising influence of development that lies outside of the assessment parcel. This is considered separately below.

**3.24** If an area of Green Belt is judged to be too developed, and too large, for any remaining open land within it to contribute to the openness of the Green Belt, it has been defined as a parcel that can be released with low/no Green Belt harm.

### Assessment of Openness

Does land contain development which is likely to be inappropriate?

How does the extent, scale, form, density and location of this development affect perceived openness?

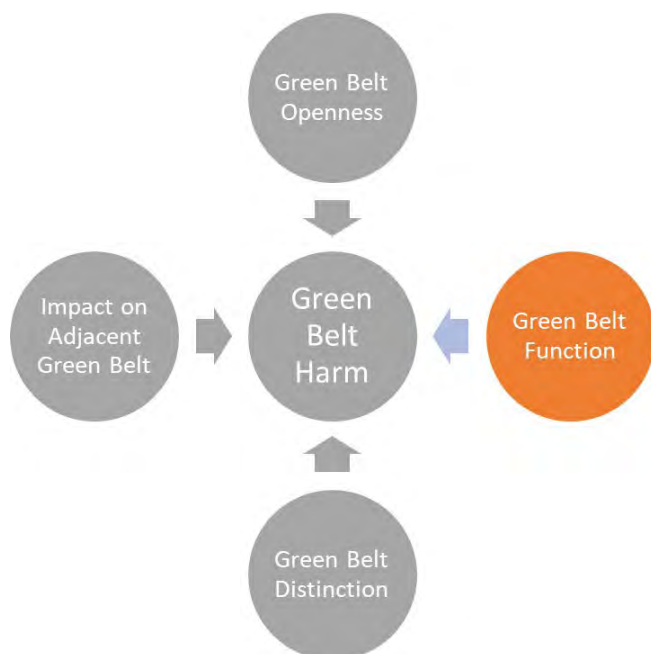
Higher potential harm to the purposes	Land is 'open' in Green Belt terms.
Lower potential harm to the purposes	Land has development which diminishes Green Belt openness.

<sup>22</sup> The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the

judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.



## Factor 2: spatial variations in Green Belt function



**3.25** Each Green Belt purpose targets a different aspect of the relationship between urban areas and Green Belt land. The applicability of each of the Green Belt purposes to any given area of land will depend on the nature of the urban area with which that land is associated, with reference to the reasons for the establishment of the West Midlands Metropolitan Green Belt.

**3.26** For Purpose 1 (preventing the sprawl of large built-up areas) we have defined what settlements make up the 'large built-up area'; for Purpose 2 (preventing the coalescence of towns) we define which settlements are 'towns'; for Purpose 3 (safeguarding the countryside from encroachment) we define 'countryside'; and for Purpose 4 (preserving the setting and special character of historic towns) we define which settlements constitute 'historic towns'.

### Purpose 1: preventing the sprawl of large built-up areas

**3.27** Green Belt Purpose 1 aims "to check the unrestricted sprawl of large built-up areas". It is possible to argue that all land within the Green Belt prevents the unrestricted sprawl of large built-up urban areas, because that is its principal purpose as a strategic planning designation. However, the study requires the definition of variations in the extent to which land performs this purpose. This requires an area-based assessment against this strategic purpose.

**3.28** There is no definition provided in the NPPF for a large built-up area. Green Belt studies in different locations have ranged from considering the large built-up area as just the

principal settlement around which the Green Belt was defined, to considering all inset settlement to be large built-up areas.

**3.29** The West Midlands Metropolitan Green Belt was created to prevent the sprawl of the West Midlands conurbation. Therefore, settlements and areas forming the West Midlands conurbation (including Stourbridge, Halesowen, Woodgate, Shenley Fields, Rubery, Longbridge, West Heath, Hawkesley, Walker's Heath, Highters Heath and Solihull Lodge) are the only areas considered to form part of the large built-up area in relation to Bromsgrove District. This area is shown on **Figure 3.2**.

**3.30** This approach of defining the large built-up area to reflect the core reason for the definition of the Green Belt is consistent with the standard approach that LUC adopts in Green Belt Assessments, although it differs from that used in the Green Belt Purposes Part One Assessment (2019), in which Bromsgrove town and Redditch's urban area were also treated as large built-up areas. It enables us to draw a distinction between the function of Purpose 1 and the function of Purpose 3 (protecting the countryside from encroachment). Land adjacent to a large built-up area may be subject to stronger urban influence than land adjacent to a smaller inset settlement (e.g. a village), but treating Purpose 1 as relevant to the former and not to the latter recognises the Green Belt's role in constraining the growth of the central urban area even if adjacent land is less rural in character than land further afield.

**3.31** Whilst definitions of 'sprawl' vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the impact of releasing land in the context of a strategic Green Belt assessment, no assumptions about the form of possible future development can be made, so the role an area of land plays is dependent on its relationship with a large built-up area.

#### Assessment of Purpose 1 Function

Does land have an association with the West Midlands conurbation, rather than with a separate settlement, or with the wider countryside?

Potential harm to the purpose	Land is associated with the West Midlands conurbation, and its development would represent some degree of expansion of the urban area.
No potential harm to the purpose	Land is associated with a settlement that is distinct from the West Midlands conurbation, or lies in the countryside remote from any inset settlement.

## Purpose 2: preventing the coalescence of towns

**3.32** Green Belt Purpose 2 aims “to prevent neighbouring towns merging into one another”. The concept of what constitutes a ‘town’ has been widely interpreted in different Green Belt studies, ranging from settlements classified as towns in Local Plan settlement hierarchies to all urban areas inset from the Green Belt regardless of size.

**3.33** This study considers only the West Midlands conurbation, the ‘main towns’ and ‘large settlements’ listed within Policy BDP2 (Settlement Hierarchy) of the BDP, and adjacent areas as ‘towns’ for Purpose 2. This approach contrasts slightly from that adopted within the Green Belt Purposes Part One Assessment (2019), which considered all settlements inset from the Green Belt to be ‘towns’, despite some of these being too small to be included within the settlement hierarchy for this Part Two assessment. The settlements considered within this assessment to be ‘towns’ for Purpose 2, as shown on **Figure 3.2**, are:

- The West Midlands conurbation;
- Rubery<sup>23</sup>;
- Halesowen<sup>24</sup>;
- Bromsgrove;
- Redditch;
- Kidderminster;
- Droitwich;
- Alvechurch;
- Barnt Green (including Lickey);
- Catshill;
- Hagley; and
- Hollywood<sup>25</sup>.

**3.34** Regardless of whether a particular settlement is large enough to realistically be considered a town, it can be acknowledged that smaller settlements may lie in between larger ones. In these cases, loss of separation between them may in turn have a significant impact on the overall separation between larger ‘towns’.

**3.35** The concept of ‘merging’ is clearer but assessing the extent to which land between towns contributes to preventing this is less so. However, it is generally acknowledged that the role open land plays in preventing the merging of towns is more than a product of the size of the gap between them<sup>26</sup>. Assessments therefore usually consider both the physical and visual role that intervening Green Belt land plays in preventing the merging of settlements.

**3.36** Both built and natural landscape elements can act to either decrease or increase perceived separation. For example, intervisibility, a direct connecting road or rail link, or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation.

**3.37** Land that is juxtaposed between towns is relevant to this purpose, and the stronger the relationship between the towns. Physical proximity is the initial consideration; however, where settlements are very close, a judgement is made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns (i.e. that the characteristics of the open land relate more to the towns’ areas themselves than to the open land in between). Where this is the case, the impact of release of land for development on Purpose 2 may be reduced.

<sup>23</sup> Although part of the West Midlands conurbation, Rubery will also be treated as a town when considering the role of Green Belt land in preserving separation from Halesowen.

<sup>24</sup> Although part of the West Midlands conurbation, Halesowen will also be treated as a town when considering the role of Green Belt land in preserving separation from Rubery.

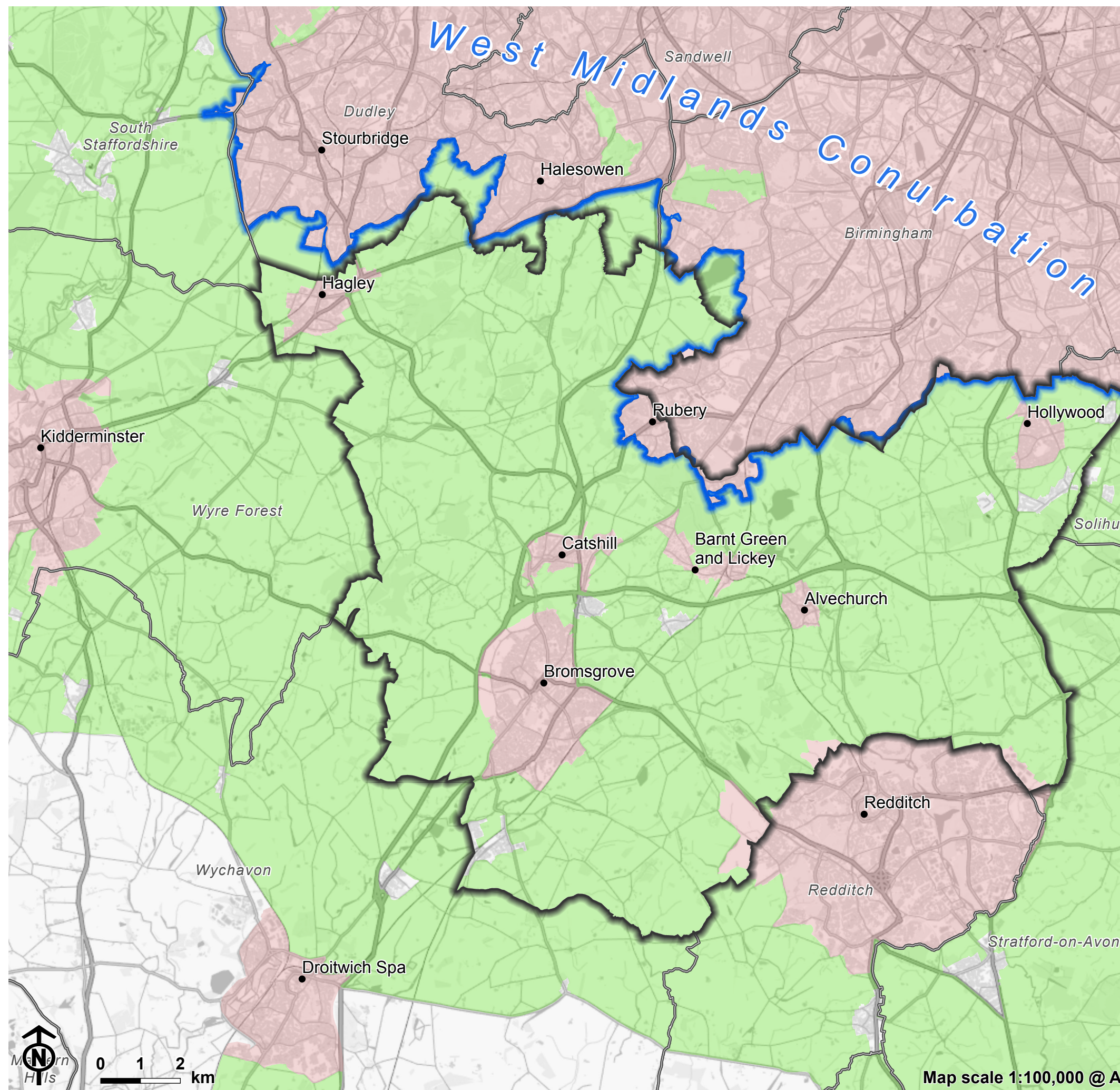
<sup>25</sup> It is recognised that Hollywood is commonly considered, along with Major’s Green, as part of Wythall. However, both Wythall and Major’s Green are separated from the larger settlement of Hollywood by

Green Belt gaps; so only Hollywood is treated as a ‘town’ for the purposes of this study.

<sup>26</sup> PAS guidance (Planning on the Doorstep), which is commonly referenced in Green Belt studies, states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. The PAS guidance also refers to settlement character and the character of land in between as being relevant considerations when looking at retaining separate identities



**Figure 3.2: Settlement classification for assessment of Green Belt purposes**



- Bromsgrove District
- Neighbouring authority
- Purpose 1 large built up area
- Purpose 2 town
- Green Belt



Assessment of Purpose 2 Function	
Does the land lie in a gap between towns?	
How wide is the gap, in relation to the size of the towns?	
Are the towns already to an extent linked?	
Are there physical landscape elements, such as hills or woodland, that increase the perceived size of the gap?	
Are there physical landscape elements, such as connecting main roads or railways, or intervening urbanising development, that reduce the perceived size of the gap?	
Higher potential harm to the purpose	Land is in a narrow but distinct gap between settlements, with no strong separating features.
Lower potential harm to the purpose	Land is in a wide gap between towns, with significant landscape elements to increased perceived separation.

### Purpose 3: preventing encroachment on the countryside

**3.38** Green Belt Purpose 3 aims “to assist in safeguarding the countryside from encroachment”. An assessment of Purpose 3 requires consideration of the extent to which land constitutes ‘countryside’ on the basis of its usage.

**3.39** Some open land may, through its usage, have a stronger relationship with the adjacent urban area and, as a result, not be considered ‘countryside’ to the same degree as other open land. Equally, some land may be largely contained by urban development but may nonetheless retain, as a result of its usage and its size, a countryside character.

**3.40** Development that is rural in form may often not be considered to detract from countryside character. The presence of urban development within the assessment parcel will clearly have an impact on the degree to which land is considered to be countryside, but it will also have an impact on other Green Belt purposes and so is set out separately in the assessment process (see function 3 definition).

**3.41** It is important for the purposes of the assessment not to stray into assessing landscape character, sensitivity or value<sup>27</sup>; whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land has not been taken into consideration: any Green Belt land found to be in poor condition may perform well in its fundamental

role of preventing encroachment by keeping land permanently open.

Assessment of Purpose 3 Function	
Does land lie adjacent to an urban area and have a use which diminishes the extent to which it can be considered ‘countryside’?	
If largely contained by urban development, is the area of a size that enables it to retain a countryside character?	
Higher potential harm to the purpose	Land is ‘countryside’.
Lower potential harm to the purpose	Land has a use which, although potentially ‘open’ in Green Belt terms, diminishes the extent to which it is considered to be ‘countryside’.

### Purpose 4: preserving the setting and special character of historic towns

**3.42** Green Belt Purpose 4 aims “to preserve the setting and special character of historic towns”. This purpose makes specific reference to ‘historic towns’, not to individual historic assets or smaller settlements such as villages and hamlets.

**3.43** An extract from Hansard in 1988 clarifies which historic settlements in England were certainly considered ‘historic towns’ in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge<sup>28</sup>. Durham has since been added to this list.

**3.44** Purpose 4 is sometimes interpreted more widely to encompass smaller settlements with evident historic characteristics, but to do so risks challenge. The PAS guidance (Planning on the Doorstep 2015) notes that “this purpose is generally accepted as relating to very few settlements in practice.”

**3.45** In consultation responses Historic England do not always consider the list of towns quoted in Parliament to necessarily be exclusive, and in some cases may request that a Green Belt assessment seeks to establish the purpose(s) for which a Green Belt was first designated. From our review of relevant literature it is clear that there was no specific reference to ‘historic towns’ when justifying the original designation of the West Midlands Metropolitan Green Belt (as

<sup>27</sup> These considerations fall within a separate study carried out by White Consultants.

<sup>28</sup> Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.

noted above, it was devised principally as a means of preventing the outward expansion of the built up area of the West Midlands conurbation into open countryside and of preventing towns and cities from coalescing and losing their separate identities).

**3.46** It is acknowledged that there are historic aspects to towns and smaller settlements within the study area, with several 'towns' having designated conservation areas, but for Green Belt land to contribute to this purpose it needs to have a significant relationship with historic aspects of a settlement's setting, such that some degree of special character results.

**3.47** In the case of Bromsgrove Town, a considerable amount of intervening modern development separates the town's historic core from the surrounding Green Belt. This reduces the physical relationship between the historic area of the town and the Green Belt, such that any visual connection with the Green Belt countryside is incidental rather than contributing to any special character. Barnt Green's Conservation Area is principally associated with protecting the character of its pre-WW2 low-density residential areas, and in Hagley it is the Victorian and Edwardian character of the Station Road area that is the focus.

**3.48** Alvechurch's special character is likewise associated with its historic buildings, which include a number of Georgian properties and several medieval survivals, and the visual containment of its historic core from modern development, rather than from any strong association with its landscape setting. Although the Conservation Area includes some Green Belt land, this is associated principally with the site of the medieval palace of the Bishops of Worcester, rather than any role in forming a landscape setting to the historic settlement core, and the Scheduled Monument designation of part of this area already conveys statutory protection from development.

**3.49** On this basis, Purpose 4 is considered to have very little relevance to the Bromsgrove District Green Belt, and no further assessment of harm to this Green Belt purpose will be carried out. This approach is consistent with that adopted within the Green Belt Purposes Part One Assessment (2019).

**3.50** However, it should be stressed that the wider consideration of historic character and the significance of heritage assets are important considerations for the development of any land, regardless of whether it is designated as Green Belt. These factors will be considered by the Council in its review of the most suitable locations for development in the District.

**3.51** It should also be noted that this assessment does consider Scheduled Monuments and Registered Parks and Gardens as 'absolute constraints' (ie these areas have been excluded from assessment as it is assumed that development will not be possible within these areas). Whether development

within the setting of these areas would be appropriate or inappropriate would need to be determined by a setting assessment, which is beyond the remit of this study.

### **Purpose 5: assisting in urban regeneration by encouraging the recycling of derelict and other urban land**

**3.52** Green Belt Purpose 5 aims "to assist in urban regeneration by encouraging the recycling of derelict and other urban land". Most Green Belt studies do not assess individual Green Belt land parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that the release of one parcel of Green Belt land has a greater impact on encouraging re-use of urban land than another.

#### **Equal contribution of Green Belt to Purpose 5**

The PAS guidance states:

*"...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose"*

In other words, it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative impact of discrete parcels of Green Belt land on Purpose 5. – PAS Planning on the Doorstep.

The Inspector's report (D Smith) to the London Borough of Redbridge (January 2018) notes that with regards to Purpose 5 "*this purpose applies to most land*" but that "*it does not form a particularly useful means of evaluating sites*" – File reference: PINS/W5780/429/10

However, the examination reports of some planning inspectors, eg Cheshire East Council's Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting.

**3.53** Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Assent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development. In addition, the NPPF requires that local planning authorities prepare an assessment of land which is suitable, available



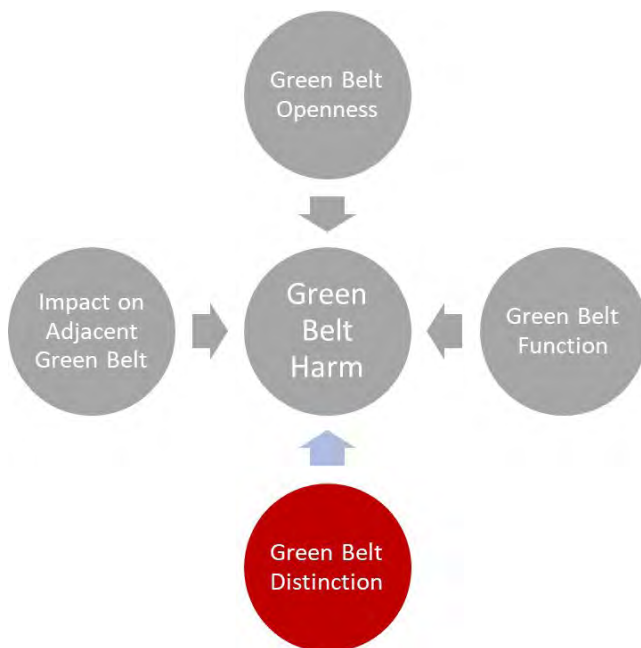
and achievable for housing and economic development. Together, these evidence bases provide an accurate and up-to-date position of available brownfield land within individual settlements, which can be used to calculate the proportion of available brownfield land relative to the size of each settlement.

**3.54** Using these evidence bases to inform meaningful judgements on the relative contribution of discrete parcels of land to Purpose 5 is dependent on the scale and form of the settlements within and around which Green Belt is defined. For example, it is harder to draw out differences in contribution between parcels around large conurbations containing merged settlements.

**3.55** In the absence of any clear guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or more limited, role in encouraging urban regeneration, Bromsgrove District's Green Belt land is considered to contribute on an equal basis to Purpose 5.

**3.56** The District's latest Brownfield Register<sup>29</sup> contains a record of 6 sites covering an area of just over 7.4 hectares. All of the sites are located within the urban area and not in the Green Belt. Consequently, the release of Green Belt land does have the potential to harm Purpose 5.

### Factor 3: relationship between urban areas and open land (distinction)



**3.57** The extent to which land can be considered to relate to an urban area or to the wider countryside – referred to as the degree of 'distinction' from the urban area – is the third component of Green Belt assessment. Land that is related more strongly to urbanising development typically makes a weaker contribution to most of the Green Belt purposes:

- For Purpose 1: expansion of a large built-up area into land that lacks strong distinction from the existing settlement is less likely to be perceived as sprawl than expansion into an area that is less influenced by existing urban development.
- For Purpose 2: expansion into land that lacks strong distinction from a town is likely to have less perceived impact on separation from a neighbouring town.
- For Purpose 3: expansion into land that lacks strong distinction from a settlement is likely to have less perceived encroaching impact on the countryside. The PAS guidance recognises this, stating that, when considering release of land, *“The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved”*. The second part of this quote, the consideration of the boundaries that can be achieved, is addressed separately below.

**3.58** The extent to which Green Belt land relates to an urban area and to the wider countryside (i.e. the degree of distinction) will be influenced by:

- boundary features;
- landform and land cover; and
- urbanising influence.

**3.59** These are discussed below.

#### Boundary features

**3.60** The strength of Green Belt boundaries can increase the sense of distinction from the urban area. **Table 3.1** below provides an indication of the strength attributed to different types of boundary. Stronger boundary features are likely to lead to stronger distinction and are also considered to have more permanence.

<sup>29</sup> Brownfield Land Register 2021  
<https://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies-and-other-planning-information/brownfield-land-register.aspx>

**Table 3.1: Strength of example boundaries**

Strong boundary	Moderate boundary	Weak boundary
Physical feature significantly restricts access and forms consistent edge	Clear physical feature and relatively consistent edge, but already breached or easily crossed	No significant physical definition – edge may be blurred
For example: Motorway or dual-carriageway; railway;  river/floodplain; sharp change in landform.	For example: Linear tree cover; mature, well-treed hedgerow;  main road; stream; moderate change in landform.	For example: Regular garden/building boundaries or hedgerows;  Estate/access road; some development crosses boundary.

**3.61** If a strong boundary feature also forms a consistent settlement edge for a significant distance, it has been considered very strong.

**3.62** The cumulative impact of multiple minor boundary features can be equally significant as a single strong boundary feature.

### Landform and landcover

**3.63** Landform and land cover may serve as boundary features, as indicated in the table above, but this may extend into a broader feature which creates greater distinction between the urban area or countryside, for example a woodland, lake or valley.

### Urbanising visual influence

**3.64** As noted previously, the absence of visual openness does not diminish openness in Green Belt terms; however, it is accepted that there is a visual dimension to the perception of openness that can have a bearing on the distinction between urban areas and countryside<sup>30</sup>.

**3.65** Dominant views of an urban area, or dominant views of the open countryside can influence the perception of whether Green Belt is considered part of the urban area or open countryside. The presence of nearby 'urbanising development' within the Green Belt could also have an urbanising influence.

**3.66** Even in the absence of significant boundary features, urbanising visual influence diminishes with distance from the urban area. In a visually open landscape, with an absence of

physical features to screen views of the wider countryside, the influence of the urban area is likely to be weaker.

**3.67** Caution is used when considering views, recognising that seasonal variations and boundary maintenance regimes can have a significant impact. The scenic quality of views is not relevant to Green Belt assessments.

**3.68** In some cases, land on the fringe of an inset settlement, outside of the Green Belt, may not currently be developed. Unless the development of such land is constrained by other factors or designations the assumption is made that it will be developed, and that it therefore, depending on the nature of the Green Belt boundary, may have some urbanising visual influence.

### Assessment of Green Belt distinction

Is there a strong boundary feature to separate the land from the urban edge, or is the land far enough from the urban edge for several boundary features to combine to create separation?

Does the boundary form a physical barrier to prevent movement, or is it crossable or breached by development? Is it a landscape element that extends over a wider area than the land parcel being assessed?

Does the boundary form a visual barrier?

Are there other landscape or perceptual elements which affect the degree of urbanising influence?

Do landform or land cover within the land parcel, or between it and the inset settlement, strengthen distinction?

Higher potential harm to the purposes

Distinction from the urban area is strong:

Eg there is a strong, unbreached boundary feature, such as a major road, which forms a consistent boundary over a wider area; or

A prominent landform (eg a ridge) or landcover (eg a woodland) creates physical and visual separation

Lower potential harm to the purposes

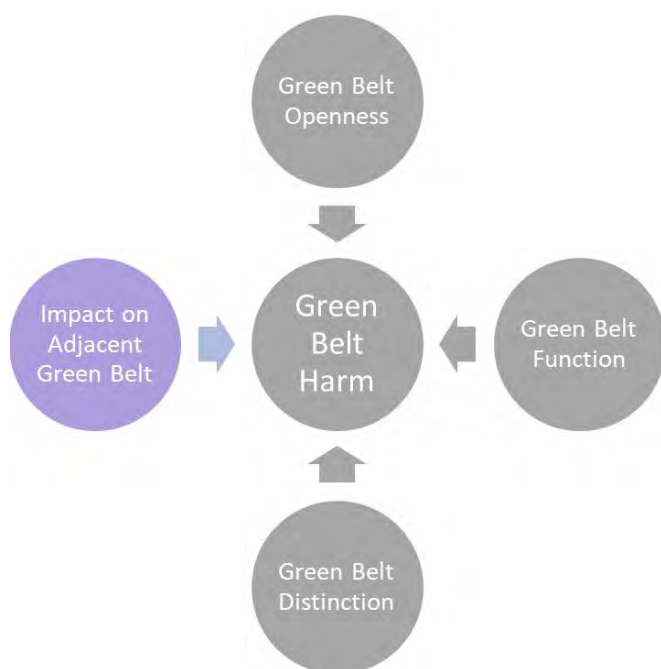
Distinction from the urban area is weak:

Eg there is an inconsistent boundary, with no clear feature to separate the land from the urban area, and development in the inset settlement and within the Green Belt has an urbanising visual influence.

<sup>30</sup> Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) includes judgements relating to the visual aspects of openness. Turner v

Secretary of State for Communities and Local Government & East Dorset District Council (2016) makes reference to the important visual dimension of consideration of impact on the Green Belt purposes.

## Factor 4: impact on the adjacent Green Belt



**3.69** Having considered the function and openness of the Green Belt and its relationship with the urban area, we then consider how the release of that land would affect the remaining Green Belt.

### Impact on distinction of adjacent Green Belt

**3.70** The first aspect of this determines how distinct adjacent Green Belt is from what would be the new urban edge, in comparison to how distinct it is now: the less distinct the adjacent Green Belt is from the potential future urban edge the greater the resulting harm.

**3.71** This is assessed by looking at the features(s) that would form the new Green Belt boundary, but it also requires consideration of the relative strength of adjacent Green Belt land. If that adjacent land could itself be released without causing greater harm than the release of the area in question, then weakening its distinction will cause less harm.

**3.72** Unless the new Green Belt boundary is stronger than the current one, or the area being assessed is to a degree contained by existing urban edges, there is typically some additional harm as a result of knock-on urbanising impact on land which is currently more remote from urban areas.

**3.73** It is assumed that newly released land will be developed, so unless there is a strong visual barrier between this and the adjacent Green Belt, some urbanising influence will result.

**3.74** The analysis of impact on adjacent Green Belt land does consider the impact on land beyond the district boundary.

### Assessment of impact on distinction of adjacent Green Belt land

With reference to the distinction considerations listed under Factor 3, would the new Green Belt boundary provide adjacent land with weaker distinction from the expanded inset area than is currently the case?

Higher potential harm to the purposes	The distinction from the urban area of adjacent, stronger Green Belt land would be significantly less than is currently the case.
Lower potential harm to the purposes	<p>The new Green Belt boundary would be stronger than the current one, resulting in no weakening of adjacent land's distinction from the urban area; or</p> <p>Although adjacent land would be weakened by the release, it is not stronger Green Belt than the site being assessed.</p>

### Impact on function of adjacent Green Belt

**3.75** The second aspect of potential harm to the remaining Green Belt as a result of the release of land is harm to the Green Belt's function. Regardless of whether release would weaken the distinction of adjacent land from an urban area, it could affect its Green Belt function. Potential impacts on function vary from purpose to purpose, as described below. The analysis of impact on Green Belt function includes consideration of impact on land beyond the District boundary.

#### Impact on Purpose 1 function (preventing the sprawl of large-built-up areas)

**3.76** As a large built-up area expands, any open land adjacent to it, to some degree, is helping to prevent further sprawl, but that in itself does not increase Green Belt harm. Theoretically the release of land could expand a settlement to an extent that it could be considered to constitute a 'large built-up area' where currently it does not, which would be a functional impact, but this is not a possibility for the land being assessed.

**3.77** It is, however, possible that release of land could weaken separation between a large built-up area and a smaller settlement such that the smaller settlement is perceived to have become part of the large built-up area. This would constitute additional harm.

Assessment of impact on Purpose 1 function of adjacent Green Belt land	
Would an existing settlement, currently distinct from the large built-up area, be perceived as becoming part of the large built-up area?	
Higher potential harm to the purpose	A smaller settlement would be subsumed into the large built-up area.
Lower potential harm to the purpose	No existing development beyond the large built-up area would be perceived as becoming part of it.

#### Impact on Purpose 2 function (preventing the coalescence of towns)

**3.78** This purpose is generally most affected by settlement expansion or by new inset development. If a gap between towns is significantly diminished, all of the remaining Green Belt gap is generally considered more fragile. What constitutes a 'significant' reduction in a settlement gap depends on the robustness of the current gap, and on whether or not the release of land would also cause the loss of important landscape features that strengthen current separation.

**3.79** It is also theoretically possible that a settlement could be expanded such that it would be deemed a 'town' where that was not formerly the case. The introduction of a new town can affect the Green Belt's functional role, increasing harm to Purpose 2.

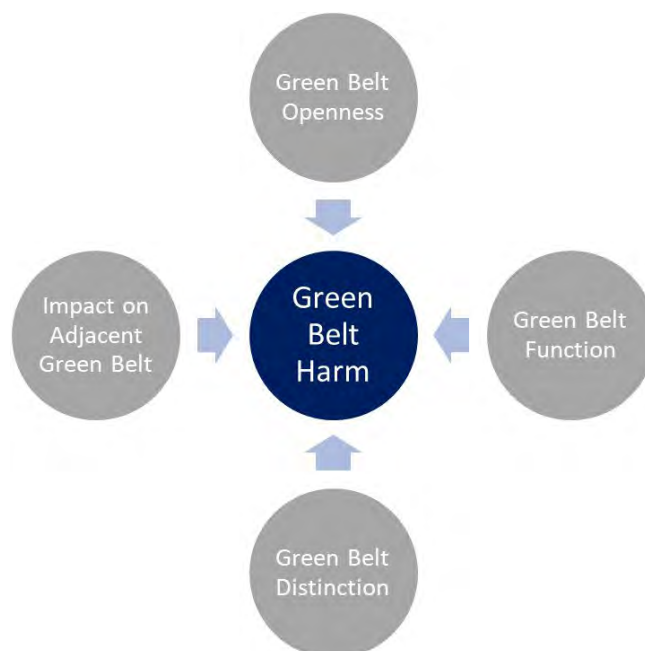
Assessment of impact on the Purpose 2 function of adjacent Green Belt land	
Would the physical distance between towns be significantly reduced?	
Would 'separating' features be lost?	
Would a smaller settlement become a town?	
Higher potential harm to the purpose	The perceived gap between towns would be significantly reduced, through loss of distance and/or separating features; or A smaller settlement would now be deemed a 'town'.
Lower potential harm to the purpose	There would be no significant reduction in separation between towns, in terms of either distance or loss of important separating features.

#### Impact on Purpose 3 function (preventing encroachment on the countryside)

**3.80** The countryside function of adjacent retained Green Belt land is rarely affected. The release of an area does not change the use of adjacent land, preventing it from being considered countryside. However, release of land could result in adjacent retained Green Belt land becoming contained to the extent that it is too isolated from the wider Green Belt to be considered part of the countryside.

Assessment of impact on the Purpose 3 function of adjacent Green Belt land	
Would land currently considered as countryside lose this characteristic as a result of containment within an urban area?	
Higher potential harm to the purpose	Open countryside would be isolated by urban development.
Lower potential harm to the purpose	Land adjacent to the new Green Belt boundary would still constitute 'countryside'.

#### Determining harm of release



**3.81** The assessment of the four factors described above were combined to give a rating for harm to each of the first three Green Belt purposes that would result from release of a land parcel.

**3.82** The harm ratings use a four-point scale from *low/no* through to *very high*. The ratings for harm to each purpose combine into an overall harm rating, using the same four-point scale. The overall harm rating reflects the highest rating for harm to any single Green Belt purpose.

**3.83** As previously outlined, where release of land within a parcel results in a high level of harm to two Green Belt purposes, it may typically be assumed that this would constitute higher overall harm than the release of land within a parcel that would cause high harm to only one purpose. At the top end of the harm scale, however, there may be instances where a high harm rating against a single purpose could be significant enough to match or outweigh another parcel's high harm ratings against two or more purposes.

**3.84** **Table 3.2** below provides indications as to how the different assessment elements combine to give harm ratings, but there are many different combinations for each of the rating levels. Professional judgement has been used in each individual case to consider how much weight to attach to each contributing element. Clear and detailed justification is provided for all ratings given in relation to how the overall judgement of Green Belt harm is reached (See **Appendix A**).



Table 3.2: Benchmark examples of harm ratings

Harm rating	Purpose	Example
Very high	1	Land is open and adjacent to a large built-up area but has very strong distinction from it. Its release would weaken adjacent Green Belt land.
	2	Land is open and lies in a very narrow gap between towns, and its release would weaken the distinction of any remaining land in that gap.
	3	Land is open countryside which has very strong distinction from any urban area. Its release would weaken adjacent Green Belt land.
High	1	Land is open and adjacent to a large built-up area. It has only weak distinction from it, but its release would result in a smaller settlement becoming joined to the large built-up area, such that the former would now be perceived as part of the latter.
	2	Land is partially developed and has only moderate distinction from the adjacent town, but it lies in a narrow gap between towns and its release would weaken the distinction of the remaining land in that gap.
	3	Land is open countryside which has very strong distinction from any urban area. However, it has strong boundary features so its release would have only a minor impact on adjacent Green Belt land.
Moderate	1	Land is open and adjacent to a large built-up area and has strong distinction from it. However, it has strong boundary features so its release would have only a minor impact on adjacent Green Belt land.
	2	Land is open and has strong distinction from the adjacent town. It lies in a relative wide gap between towns, but its release would weaken adjacent Green Belt land.
	3	Land is open countryside which has moderate distinction from any urban area. Its release would weaken adjacent Green Belt land.
Low	1	Land is open but is largely contained by the large built-up area. It has strong enough boundaries and covers a large enough area to have strong distinction from the large built-up area, but its release would have only minor impact on adjacent Green Belt land.
	2	Land is mostly developed. Although it lies in a relatively narrow gap between towns it has weak distinction from the urban area and its release would have only a minor impact on adjacent Green Belt land.
	3	Land is open but has uses which associate it with the urban area. It has moderate distinction from the urban area and its release would have only minor impact on adjacent Green Belt land.

### Assessing the harm of releasing land at motorway junctions

**3.85** BDC requested the assessment of areas of land in the vicinity of three motorway junctions as potential new inset employment development areas. The approach for this analysis was exactly the same as for the identification of variations in harm associated with release of land as an expansion of existing developed areas, other than in the definition of the assessment parcels. Areas of search were defined around the three junctions in question – M42 Junctions 2 and 3 and M5 Junction 4 – and variations in harm identified within these areas, assuming the creation of new inset development within these areas.

**3.86** The assessment of these sites was carried out independently from the main assessment of harm associated with release of land as an expansion of existing settlements. This means that the land falling within motorway junction areas of search has been parcelled twice, but to avoid confusion the motorway junction parcels are not displayed on the mapping associated with the main assessment.

### Assessing the Green Belt harm of releasing specific sites

**3.87** The parcel analysis process enables the Council to see the harm rating and supporting justification that is applicable to all currently identified potential development sites, where those developments would represent expansion of an existing inset settlement. Any sites identified subsequent to completion of the study can also be overlaid on the mapped findings showing the variations in harm.

**3.88** The Council has identified certain sites as having the potential to be released as new inset employment areas, separate from any existing inset settlements and from any settlements at the outer Green Belt edge. For these cases, the study includes site-specific analysis of the harm to the Green Belt purposes of the potential release, rather than assessing the area using the parcel(s) defined to reflect variations in the harm of release of land out from existing inset areas.

## Chapter 4

# Green Belt Harm Assessment Findings

**4.1** This chapter summarises the findings of the Green Belt harm assessment.

### Assessment outputs

**4.2** Parcels were defined to reflect identified variations in the function, distinction from the urban area and the impact of release on the wider Green Belt. These parcels, with the exception of those defined for the separate assessment of harm of creation of new inset development at motorway junctions, are shown on **Figure 4.1**.

**4.3** The detailed judgements associated with the harm of Green Belt release for settlement expansion within each parcel are set out in **Appendix A**. The assessment proforma within this appendix include:

- an aerial view showing the parcel boundary and location;
- an OS map showing the parcel boundary and any absolute constraints;
- the size of the parcel (excluding any constrained land that has not been rated for harm);
- commentary on the parcel's openness, Green Belt function, the different elements that contribute to its degree of distinction from urban areas and the impact of release on adjacent Green Belt;
- rating and supporting text assessing harm to each of the Green Belt Purposes, referencing function, openness, distinction from the urban area, and impact of release on the integrity of the adjacent Green Belt;
- a rating for the overall harm to the Green Belt purposes of the release of the parcel.

**4.4** The detailed judgements associated with the harm of Green Belt release for the creation of new inset employment areas at motorway junctions are set out in **Appendix B**. The format of these outputs is the same as those in **Appendix A**.

### Study findings

**4.5** The study's findings are summarised in the maps below, which illustrate the identified variations in the harm of release of Green Belt land in Bromsgrove District. **Figures 4.2 – 4.5** show the harm to Purposes 1-4 respectively.

**4.6** **Figure 4.6** combines these figures to illustrate the highest harm rating for each parcel

**4.7** **Table 4.1** lists, by settlement, the assessed parcels and their harm ratings.

**4.8** **Table 4.2** lists the assessed parcels around motorway junctions.



Figure 4.1: Harm assessment parcels

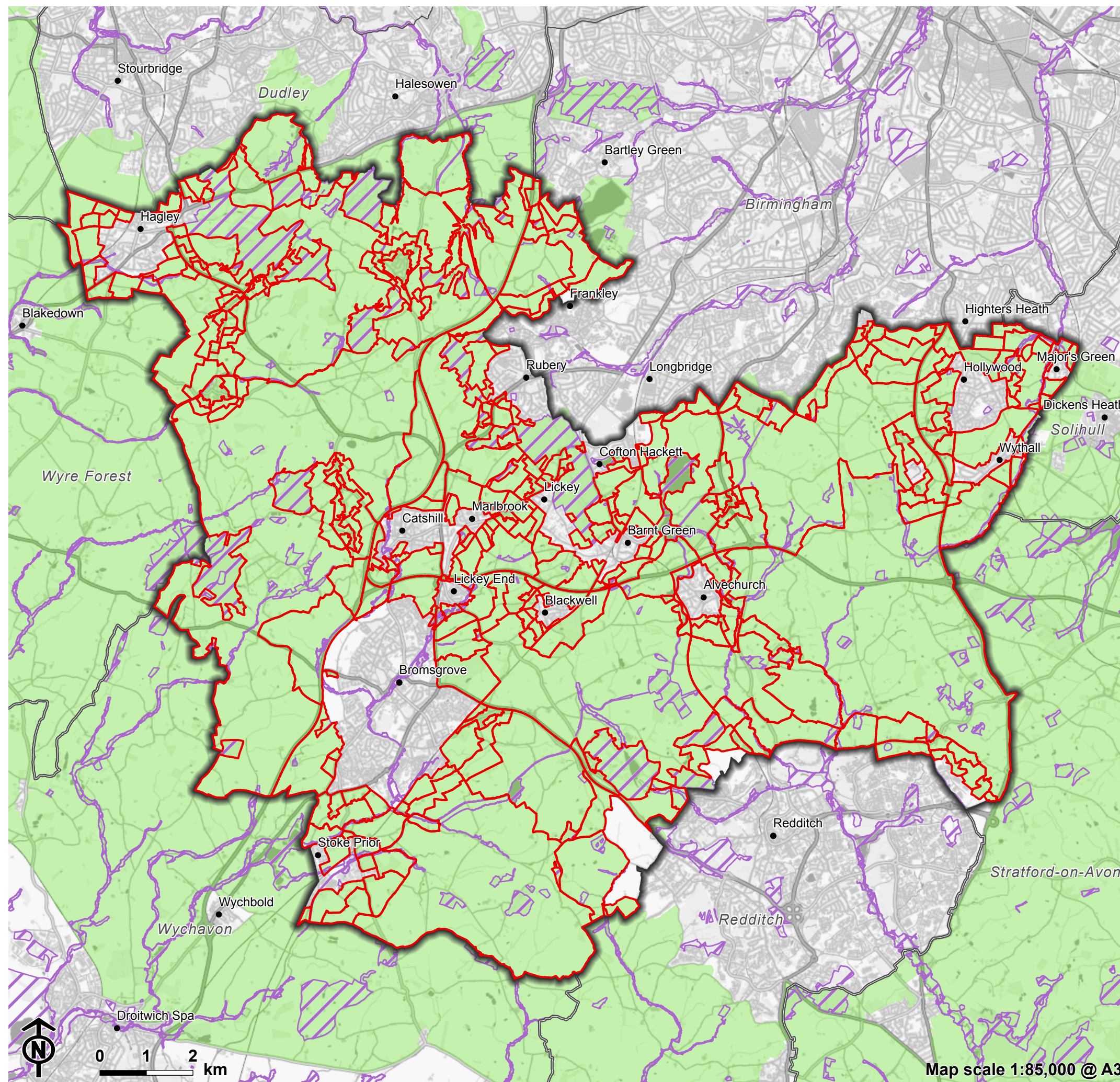
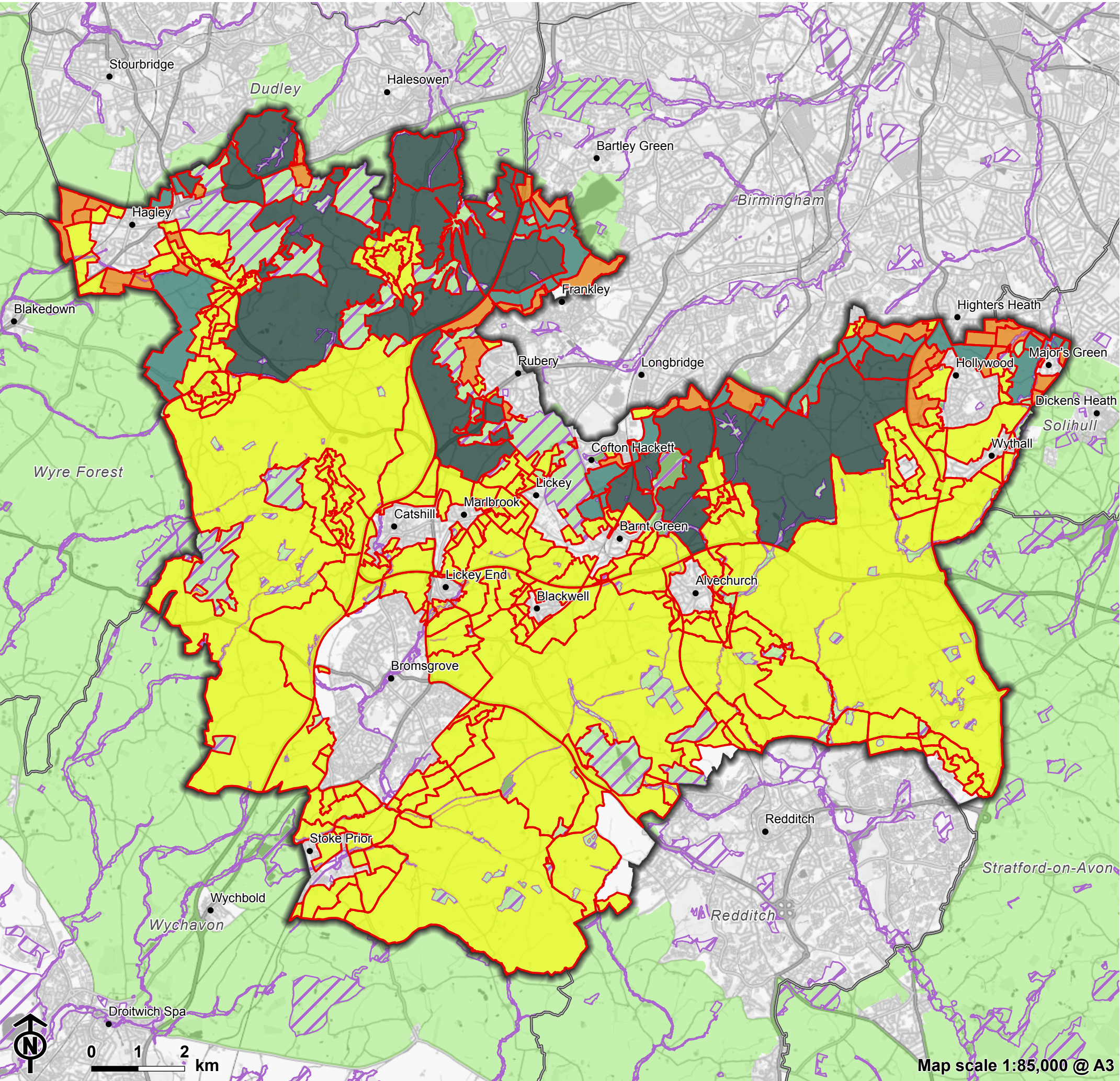


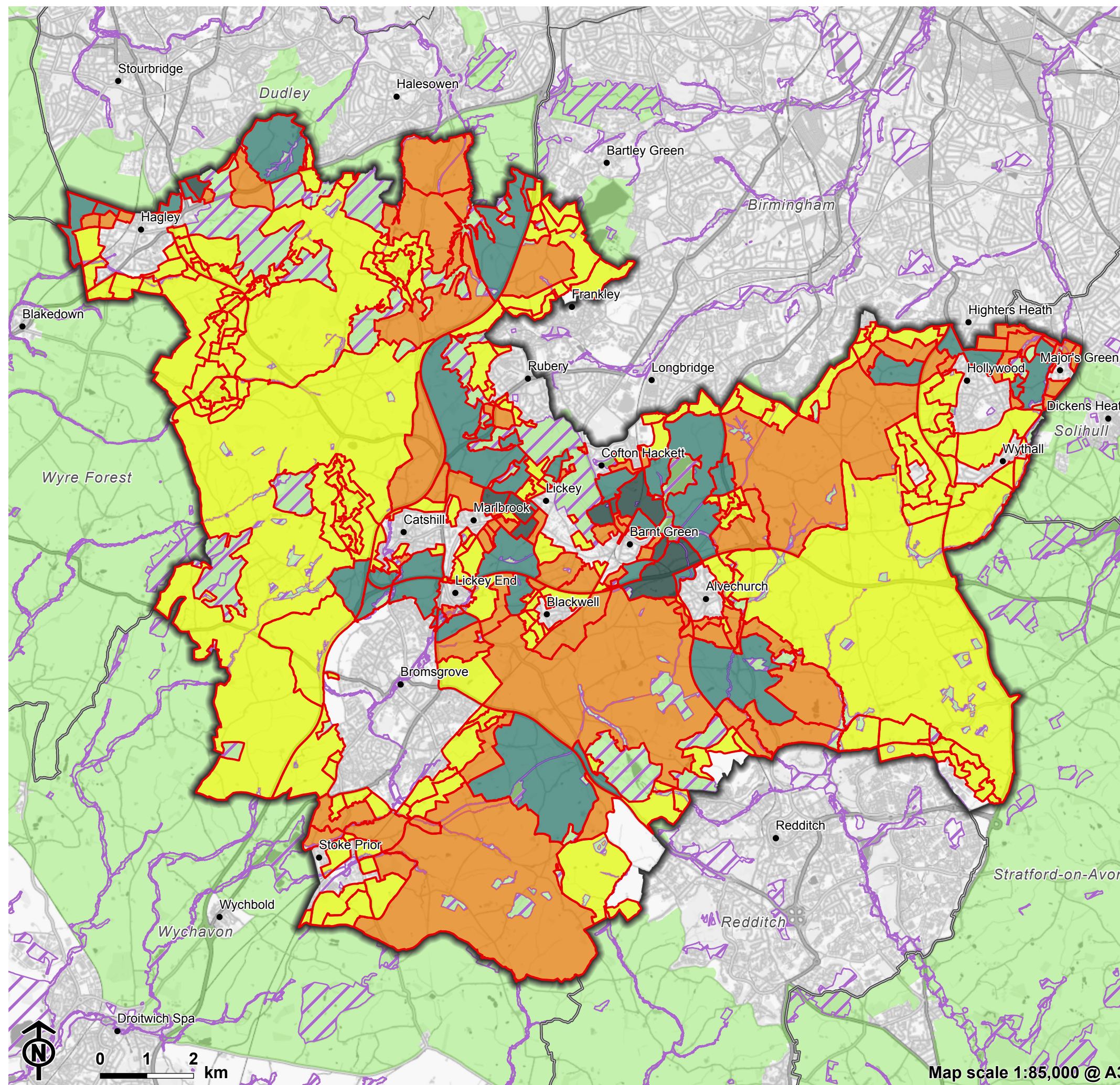


Figure 4.2: Harm to Green Belt Purpose 1 - checking the unrestricted sprawl of large built-up areas



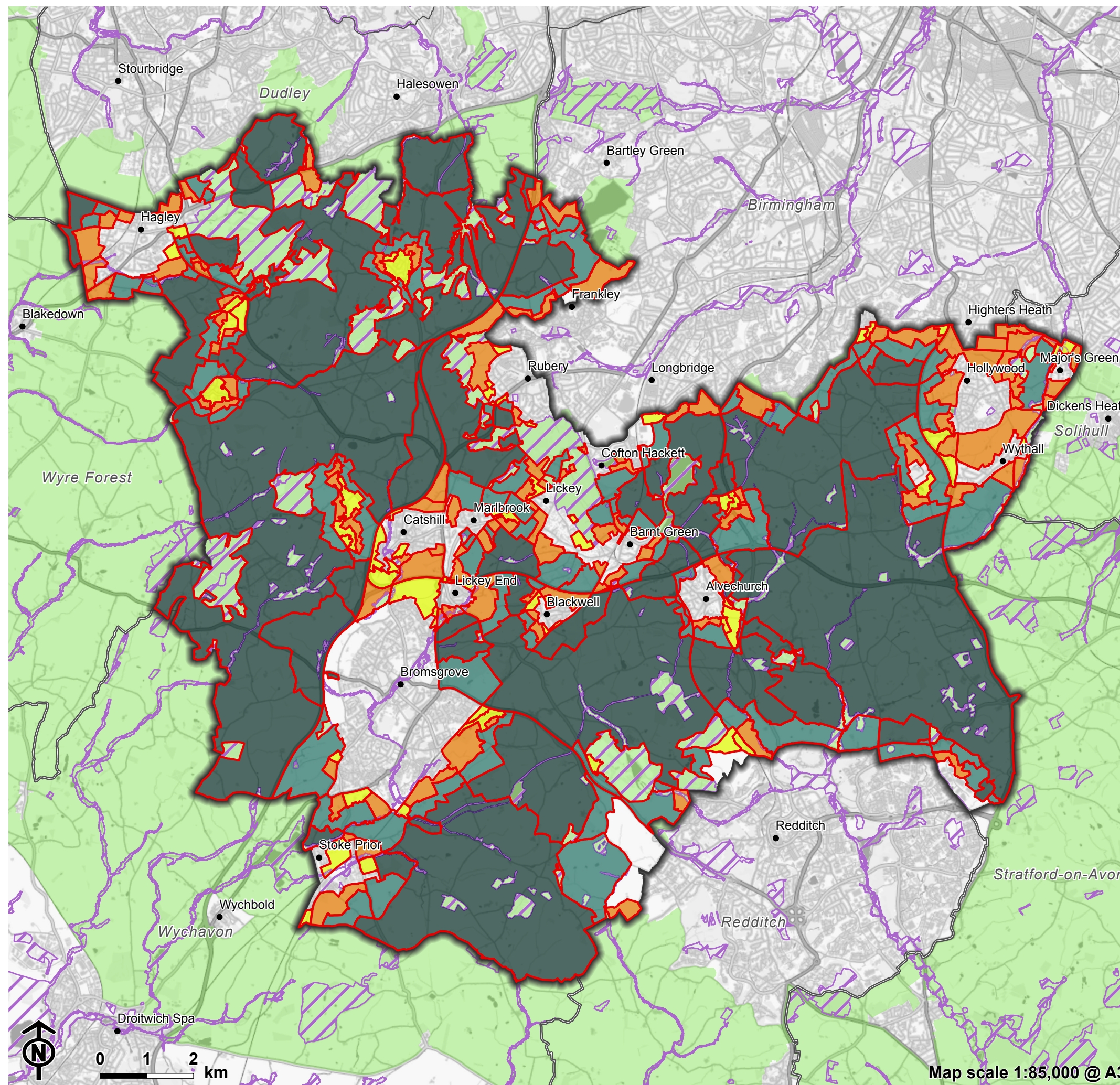


**Figure 4.3: Harm to Green Belt Purpose 2 - preventing neighbouring towns from merging into one another**





**Figure 4.4: Harm to Green Belt Purpose 3 - assisting in safeguarding the countryside from encroachment**



- Parcel
- Bromsgrove District
- Neighbouring authority
- Absolute constraints
- Green Belt
- Purpose 3 harm rating**
- Very high
- High
- Moderate
- Low/No harm



Figure 4.5: Harm to Green Belt Purpose 4 - preserving the setting and special character of historic towns

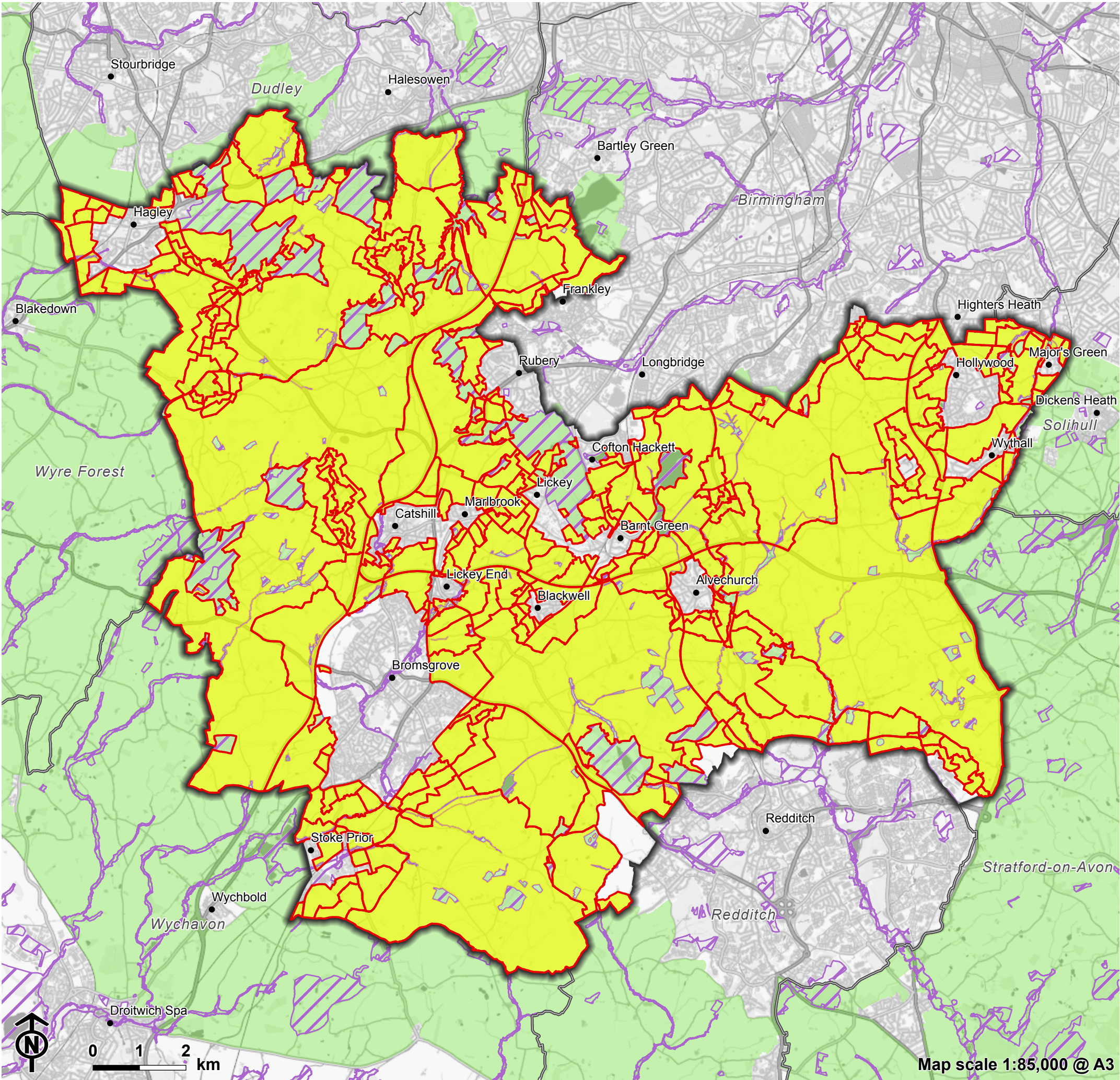




Figure 4.6: Harm ratings overview

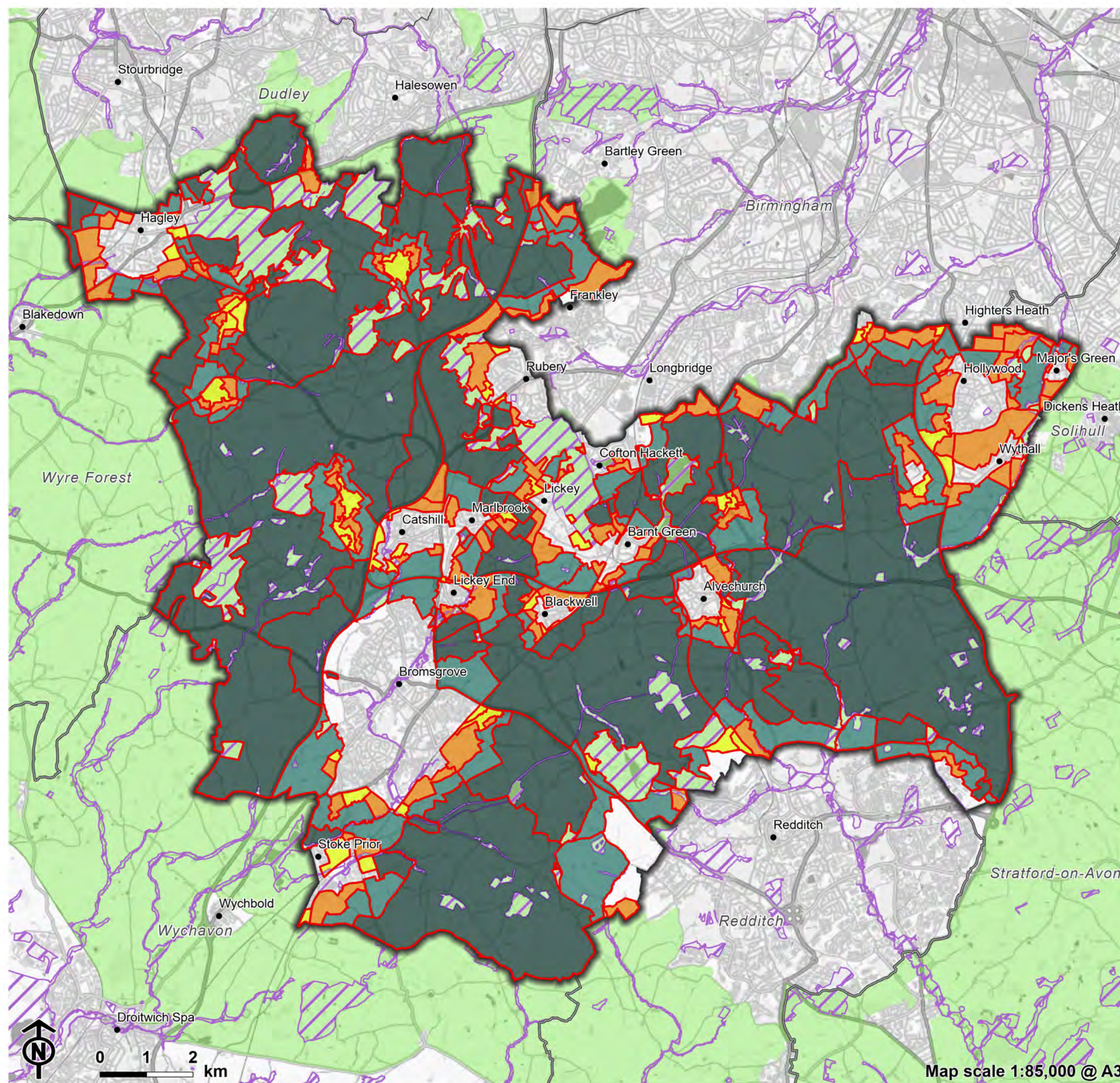




Table 4.1: Parcel harm ratings

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
AL1	Alvechurch	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
AL2	Alvechurch	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
AL3	Alvechurch	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
AL4	Alvechurch	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
AL5	Alvechurch	Low/no	Moderate	Low/no	Low/no	No rating	One moderate rating	Moderate
AL6	Alvechurch	Low/no	Moderate	High	Low/no	No rating	One high rating	High
AL7	Alvechurch	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
AL8	Alvechurch	Low/no	Moderate	High	Low/no	No rating	One high rating	High
AL9	Alvechurch	Low/no	Moderate	High	Low/no	No rating	One high rating	High
AL10	Alvechurch	Low/no	Low/no	High	Low/no	No rating	One high rating	High
AL11	Alvechurch	Low/no	Moderate	High	Low/no	No rating	One high rating	High
AL12	Alvechurch	Low/no	Moderate	High	Low/no	No rating	One high rating	High
AL13	Alvechurch	Low/no	High	High	Low/no	No rating	Two high ratings	High
AL14	Alvechurch	Low/no	Very high	Very high	Low/no	No rating	Two very high ratings	Very high
BA1	Barnt Green and Lickey	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BA2	Barnt Green and Lickey	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BA3	Barnt Green and Lickey	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
BA4	Barnt Green and Lickey	High	Very high	High	Low/no	No rating	One very high rating	Very high
BA5	Barnt Green and Lickey	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
BA6	Barnt Green and Lickey	High	Very high	High	Low/no	No rating	One very high rating	Very high
BA7	Barnt Green and Lickey	Low/no	Moderate	High	Low/no	No rating	One high rating	High
BA8	Barnt Green and Lickey	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BA9	Barnt Green and Lickey	Low/no	High	High	Low/no	No rating	Two high ratings	High
BA10	Barnt Green and Lickey	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
BA11	Barnt Green and Lickey	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
BA12	Barnt Green and Lickey	Low/no	Very high	High	Low/no	No rating	One very high rating	Very high

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
BA13	Barnt Green and Lickey	Low/no	High	High	Low/no	No rating	Two high ratings	High
BA14	Barnt Green and Lickey	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
BA15	Barnt Green and Lickey	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BA16	Barnt Green and Lickey	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BA17	Barnt Green and Lickey	Low/no	Moderate	High	Low/no	No rating	One high rating	High
BA18	Barnt Green and Lickey	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BA19	Barnt Green and Lickey	Low/no	Moderate	High	Low/no	No rating	One high rating	High
BA20	Barnt Green and Lickey	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
BA21	Barnt Green and Lickey	Low/no	Very high	High	Low/no	No rating	One very high rating	Very high
BA22	Barnt Green and Lickey	Low/no	High	Moderate	Low/no	No rating	One high rating	High
BA23	Barnt Green and Lickey	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BA24	Barnt Green and Lickey	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BA25	Barnt Green and Lickey	Low/no	High	High	Low/no	No rating	Two high ratings	High
BA26	Barnt Green and Lickey	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BA27	Barnt Green and Lickey	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BA28	Barnt Green and Lickey	Low/no	High	High	Low/no	No rating	Two high ratings	High
BA29	Barnt Green and Lickey	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
BE1	Belbroughton	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BE2	Belbroughton	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BE3	Belbroughton	Low/no	Low/no	High	Low/no	No rating	One high rating	High
BE4	Belbroughton	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
BE5	Belbroughton	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BE6	Belbroughton	Low/no	Low/no	High	Low/no	No rating	One high rating	High
BE7	Belbroughton	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BE8	Belbroughton	Low/no	Low/no	High	Low/no	No rating	One high rating	High
BE9	Belbroughton	Low/no	Low/no	High	Low/no	No rating	One high rating	High
BL1	Blackwell	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
BL2	Blackwell	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BL3	Blackwell	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BL4	Blackwell	Low/no	Moderate	Very high	Low/no	No rating	One very high rating	Very high
BL5	Blackwell	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BL6	Blackwell	Low/no	Low/no	High	Low/no	No rating	One high rating	High
BL7	Blackwell	Low/no	Low/no	High	Low/no	No rating	One high rating	High
BL8	Blackwell	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BL9	Blackwell	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BL10	Blackwell	Low/no	High	Very high	Low/no	No rating	One very high rating	Very high
BL11	Blackwell	Low/no	Moderate	High	Low/no	No rating	One high rating	High
BN1	Bromsgrove North and Lickey End	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
BN2	Bromsgrove North and Lickey End	Low/no	High	Moderate	Low/no	No rating	One high rating	High
BN3	Bromsgrove North and Lickey End	Low/no	High	Low/no	Low/no	No rating	One high rating	High
BN4	Bromsgrove North and Lickey End	Low/no	High	Low/no	Low/no	No rating	One high rating	High
BN5	Bromsgrove North and Lickey End	Low/no	High	Moderate	Low/no	No rating	One high rating	High
BN6	Bromsgrove North and Lickey End	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
BN7	Bromsgrove North and Lickey End	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BN8	Bromsgrove North and Lickey End	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BN9	Bromsgrove North and Lickey End	Low/no	Moderate	High	Low/no	No rating	One high rating	High
BN10	Bromsgrove North and Lickey End	Low/no	High	Very high	Low/no	No rating	One very high rating	Very high
BN11	Bromsgrove North and Lickey End	Low/no	Moderate	Very high	Low/no	No rating	One very high rating	Very high
BN12	Bromsgrove North and Lickey End	Low/no	Low/no	High	Low/no	No rating	One high rating	High
BN13	Bromsgrove North and Lickey End	Low/no	High	Very high	Low/no	No rating	One very high rating	Very high
BS1	Bromsgrove South and Finstall	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BS2	Bromsgrove South and Finstall	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BS3	Bromsgrove South and Finstall	Low/no	Low/no	High	Low/no	No rating	One high rating	High
BS4	Bromsgrove South and Finstall	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
BS5	Bromsgrove South and Finstall	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BS6	Bromsgrove South and Finstall	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BS7	Bromsgrove South and Finstall	Low/no	Moderate	High	Low/no	No rating	One high rating	High
BS8	Bromsgrove South and Finstall	Low/no	Moderate	High	Low/no	No rating	One high rating	High
BS9	Bromsgrove South and Finstall	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BS10	Bromsgrove South and Finstall	Low/no	Moderate	Very high	Low/no	No rating	One very high rating	Very high
BS11	Bromsgrove South and Finstall	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BS12	Bromsgrove South and Finstall	Low/no	Low/no	High	Low/no	No rating	One high rating	High
BS13	Bromsgrove South and Finstall	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BS14	Bromsgrove South and Finstall	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
BS15	Bromsgrove South and Finstall	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BS16	Bromsgrove South and Finstall	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
BS17	Bromsgrove South and Finstall	Low/no	Moderate	High	Low/no	No rating	One high rating	High
CA1	Catshill and Marlbrook	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
CA2	Catshill and Marlbrook	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CA3	Catshill and Marlbrook	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
CA4	Catshill and Marlbrook	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CA5	Catshill and Marlbrook	Low/no	Moderate	High	Low/no	No rating	One high rating	High
CA6	Catshill and Marlbrook	Low/no	High	High	Low/no	No rating	Two high ratings	High
CA7	Catshill and Marlbrook	Low/no	Moderate	Low/no	Low/no	No rating	One moderate rating	Moderate
CA8	Catshill and Marlbrook	Low/no	Very high	High	Low/no	No rating	One very high rating	Very high
CA9	Catshill and Marlbrook	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
CA10	Catshill and Marlbrook	Low/no	Very high	High	Low/no	No rating	One very high rating	Very high
CA11	Catshill and Marlbrook	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
CA12	Catshill and Marlbrook	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
CA13	Catshill and Marlbrook	Low/no	Moderate	High	Low/no	No rating	One high rating	High
CA14	Catshill and Marlbrook	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate



Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
CA15	Catshill and Marlbrook	Low/no	High	Very high	Low/no	No rating	One very high rating	Very high
CA16	Catshill and Marlbrook	Low/no	Low/no	High	Low/no	No rating	One high rating	High
CA17	Catshill and Marlbrook	Low/no	Low/no	High	Low/no	No rating	One high rating	High
CA18	Catshill and Marlbrook	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CA19	Catshill and Marlbrook	Low/no	Low/no	High	Low/no	No rating	One high rating	High
CA20	Catshill and Marlbrook	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CA21	Catshill and Marlbrook	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
CA22	Catshill and Marlbrook	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
CA23	Catshill and Marlbrook	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
CA24	Catshill and Marlbrook	Low/no	High	Moderate	Low/no	No rating	One high rating	High
CA25	Catshill and Marlbrook	Low/no	High	Low/no	Low/no	No rating	One high rating	High
CA26	Catshill and Marlbrook	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
CL1	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
CL2	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CL3	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
CL4	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	High	Low/no	No rating	One high rating	High
CL5	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CL6	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CL7	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	High	Low/no	No rating	One high rating	High
CL8	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
CL9	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	High	Low/no	No rating	One high rating	High
CL10	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CL11	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
CL12	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CL13	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	High	Low/no	No rating	One high rating	High
CL14	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CL15	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CL16	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	High	Low/no	No rating	One high rating	High
CL17	Clent, Lower Clent, Adam's Hill and Holy Cross	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
CO1	Cofton Hackett and Longbridge	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
CO2	Cofton Hackett and Longbridge	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
CO3	Cofton Hackett and Longbridge	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
CO4	Cofton Hackett and Longbridge	High	High	High	Low/no	No rating	Three high rating	High
CO5	Cofton Hackett and Longbridge	Very high	Very high	Very high	Low/no	No rating	Three very high ratings	Very high
CO6	Cofton Hackett and Longbridge	High	Moderate	High	Low/no	No rating	Two high ratings	High
CO7	Cofton Hackett and Longbridge	High	Low/no	High	Low/no	No rating	Two high ratings	High
CO8	Cofton Hackett and Longbridge	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
CO9	Cofton Hackett and Longbridge	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
CO10	Cofton Hackett and Longbridge	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
CO11	Cofton Hackett and Longbridge	High	Low/no	High	Low/no	No rating	Two high ratings	High

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
FA1	Fairfield and Bournheath	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
FA2	Fairfield and Bournheath	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
FA3	Fairfield and Bournheath	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
FA4	Fairfield and Bournheath	Low/no	Low/no	High	Low/no	No rating	One high rating	High
FA5	Fairfield and Bournheath	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
FA6	Fairfield and Bournheath	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
FA7	Fairfield and Bournheath	Low/no	Low/no	High	Low/no	No rating	One high rating	High
FR1	Frankley	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
FR2	Frankley	Very high	High	Very high	Low/no	No rating	Two very high ratings	Very high
FR3	Frankley	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
FR4	Frankley	High	Low/no	High	Low/no	No rating	Two high ratings	High
FR5	Frankley	High	Low/no	High	Low/no	No rating	Two high ratings	High
FR6	Frankley	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
FR7	Frankley	High	Low/no	High	Low/no	No rating	Two high ratings	High
FR8	Frankley	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
FR9	Frankley	High	Low/no	High	Low/no	No rating	Two high ratings	High
FR10	Frankley	Very high	Moderate	Very high	Low/no	No rating	Two very high ratings	Very high
HA1	Hagley	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
HA2	Hagley	High	High	Moderate	Low/no	No rating	Two high ratings	High
HA3	Hagley	High	High	Moderate	Low/no	No rating	Two high ratings	High
HA4	Hagley	Very high	Very high	High	Low/no	No rating	Two very high ratings	Very high
HA5	Hagley	Moderate	Moderate	High	Low/no	No rating	One high rating	High
HA6	Hagley	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
HA7	Hagley	Moderate	Low/no	High	Low/no	No rating	One high rating	High
HA8	Hagley	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
HA9	Hagley	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
HA10	Hagley	Moderate	Low/no	High	Low/no	No rating	One high rating	High

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
HA11	Hagley	Moderate	Low/no	High	Low/no	No rating	One high rating	High
HA12	Hagley	Moderate	Low/no	High	Low/no	No rating	One high rating	High
HA13	Hagley	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
HA14	Hagley	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
HA15	Hagley	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
HA16	Hagley	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
HA17	Hagley	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
HA18	Hagley	Moderate	High	High	Low/no	No rating	Two high ratings	High
HA19	Hagley	Moderate	Moderate	High	Low/no	No rating	One high rating	High
HA20	Hagley	Moderate	High	Very high	Low/no	No rating	One very high rating	Very high
HL1	Halesowen	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
HL2	Halesowen	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
HL3	Halesowen	Very high	High	Very high	Low/no	No rating	Two very high ratings	Very high
HL4	Halesowen	Very high	Low/no	Very high	Low/no	No rating	Two very high ratings	Very high
HL5	Halesowen	Very high	Moderate	Very high	Low/no	No rating	Two very high ratings	Very high
HL6	Halesowen	Very high	Moderate	Very high	Low/no	No rating	Two very high ratings	Very high
HO1	Hopwood	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
HO2	Hopwood	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
HO3	Hopwood	Low/no	Moderate	High	Low/no	No rating	One high rating	High
HO4	Hopwood	Low/no	Moderate	High	Low/no	No rating	One high rating	High
HO5	Hopwood	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
HO6	Hopwood	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
HO7	Hopwood	Low/no	High	Very high	Low/no	No rating	One very high rating	Very high
RN1	Redditch North	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RN2	Redditch North	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
RN3	Redditch North	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
RN4	Redditch North	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate



Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
RN5	Redditch North	Low/no	Moderate	High	Low/no	No rating	One high rating	High
RN6	Redditch North	Low/no	Moderate	High	Low/no	No rating	One high rating	High
RN7	Redditch North	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RN8	Redditch North	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RN9	Redditch North	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
RN10	Redditch North	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
RN11	Redditch North	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RN12	Redditch North	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RN13	Redditch North	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RN14	Redditch North	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
RN15	Redditch North	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RW1	Redditch West and Tardebigge	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
RW2	Redditch West and Tardebigge	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RW3	Redditch West and Tardebigge	Low/no	Moderate	High	Low/no	No rating	One high rating	High
RW4	Redditch West and Tardebigge	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
RW5	Redditch West and Tardebigge	Low/no	High	High	Low/no	No rating	Two high ratings	High
RW6	Redditch West and Tardebigge	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RW7	Redditch West and Tardebigge	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
RW8	Redditch West and Tardebigge	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RO1	Romsley	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
RO2	Romsley	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
RO3	Romsley	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
RO4	Romsley	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RO5	Romsley	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RO6	Romsley	Low/no	Low/no	High	Low/no	No rating	One high rating	High
RO7	Romsley	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
RO8	Romsley	Low/no	Low/no	High	Low/no	No rating	One high rating	High

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
RU1	Rubery	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
RU2	Rubery	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
RU3	Rubery	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
RU4	Rubery	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
RU5	Rubery	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
RU6	Rubery	High	Moderate	High	Low/no	No rating	Two high ratings	High
RU7	Rubery	High	Low/no	High	Low/no	No rating	Two high ratings	High
RU8	Rubery	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
RU9	Rubery	Very high	Moderate	Very high	Low/no	No rating	Two very high ratings	Very high
RU10	Rubery	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
SO1	South Birmingham suburbs	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
SO2	South Birmingham suburbs	High	Low/no	High	Low/no	No rating	Two high ratings	High
SO3	South Birmingham suburbs	High	Low/no	High	Low/no	No rating	Two high ratings	High
SO4	South Birmingham suburbs	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
SO5	South Birmingham suburbs	High	Low/no	High	Low/no	No rating	Two high ratings	High
SO6	South Birmingham suburbs	High	Moderate	High	Low/no	No rating	Two high ratings	High
SO7	South Birmingham suburbs	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
SO8	South Birmingham suburbs	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
SO9	South Birmingham suburbs	Moderate	Low/no	Moderate	Low/no	No rating	Two moderate ratings	Moderate
SO10	South Birmingham suburbs	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
SO11	South Birmingham suburbs	High	Moderate	High	Low/no	No rating	Two high ratings	High
SO12	South Birmingham suburbs	Very high	High	Very high	Low/no	No rating	Two very high ratings	Very high
ST1	Stoke Prior	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
ST2	Stoke Prior	Low/no	Moderate	Very high	Low/no	No rating	One very high rating	Very high
ST3	Stoke Prior	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
ST4	Stoke Prior	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
ST5	Stoke Prior	Low/no	Moderate	Very high	Low/no	No rating	One very high rating	Very high

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
ST6	Stoke Prior	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
ST7	Stoke Prior	Low/no	Low/no	High	Low/no	No rating	One high rating	High
ST8	Stoke Prior	Low/no	Low/no	High	Low/no	No rating	One high rating	High
ST9	Stoke Prior	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
WY1	Wythall, Hollywood and Major's Green	High	High	Moderate	Low/no	No rating	Two high ratings	High
WY2	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
WY3	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
WY4	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
WY5	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
WY6	Wythall, Hollywood and Major's Green	High	Moderate	Low/no	Low/no	No rating	One high rating	High
WY7	Wythall, Hollywood and Major's Green	High	Moderate	Moderate	Low/no	No rating	One high rating	High
WY8	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
WY9	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
WY10	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
WY11	Wythall, Hollywood and Major's Green	High	High	High	Low/no	No rating	Three high rating	High
WY12	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
WY13	Wythall, Hollywood and Major's Green	High	High	High	Low/no	No rating	Three high rating	High
WY14	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
WY15	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY16	Wythall, Hollywood and Major's Green	Low/no	High	Moderate	Low/no	No rating	One high rating	High
WY17	Wythall, Hollywood and Major's Green	Low/no	Moderate	Moderate	Low/no	No rating	Two moderate ratings	Moderate
WY18	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY19	Wythall, Hollywood and Major's Green	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
WY20	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY21	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY22	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY23	Wythall, Hollywood and Major's Green	Low/no	Low/no	High	Low/no	No rating	One high rating	High

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
WY24	Wythall, Hollywood and Major's Green	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
WY25	Wythall, Hollywood and Major's Green	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
WY26	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY27	Wythall, Hollywood and Major's Green	Low/no	Low/no	High	Low/no	No rating	One high rating	High
WY28	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY29	Wythall, Hollywood and Major's Green	Low/no	Low/no	High	Low/no	No rating	One high rating	High
WY30	Wythall, Hollywood and Major's Green	Low/no	Low/no	High	Low/no	No rating	One high rating	High
WY31	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY32	Wythall, Hollywood and Major's Green	Low/no	Low/no	Low/no	Low/no	No rating	Four low/no harm ratings	Low/no
WY33	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY34	Wythall, Hollywood and Major's Green	Low/no	Low/no	Moderate	Low/no	No rating	One moderate rating	Moderate
WY35	Wythall, Hollywood and Major's Green	Moderate	Low/no	High	Low/no	No rating	One high rating	High
WY36	Wythall, Hollywood and Major's Green	Moderate	Moderate	High	Low/no	No rating	One high rating	High
WY37	Wythall, Hollywood and Major's Green	Moderate	Moderate	Moderate	Low/no	No rating	Three moderate ratings	Moderate
OA1	Outer Areas	High	Low/no	Very high	Low/no	No rating	One very high rating	Very high
OA2	Outer Areas	Very high	Low/no	Very high	Low/no	No rating	Two very high ratings	Very high
OA3	Outer Areas	Very high	Moderate	Very high	Low/no	No rating	Two very high ratings	Very high
OA4	Outer Areas	Very high	High	Very high	Low/no	No rating	Two very high ratings	Very high
OA5	Outer Areas	Low/no	Moderate	Very high	Low/no	No rating	One very high rating	Very high
OA6	Outer Areas	Very high	High	Very high	Low/no	No rating	Two very high ratings	Very high
OA7	Outer Areas	Low/no	Moderate	Very high	Low/no	No rating	One very high rating	Very high
OA8	Outer Areas	Very high	High	Very high	Low/no	No rating	Two very high ratings	Very high
OA9	Outer Areas	Very high	Moderate	Very high	Low/no	No rating	Two very high ratings	Very high
OA10	Outer Areas	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
OA11	Outer Areas	Low/no	Moderate	Very high	Low/no	No rating	One very high rating	Very high
OA12	Outer Areas	Low/no	High	Very high	Low/no	No rating	One very high rating	Very high
OA13	Outer Areas	Low/no	High	Very high	Low/no	No rating	One very high rating	Very high



Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
OA14	Outer Areas	Low/no	Moderate	Very high	Low/no	No rating	One very high rating	Very high
OA15	Outer Areas	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high

Table 4.2: Motorway junction harm ratings

Parcel Number	Settlement	Purpose 1 harm	Purpose 2 harm	Purpose 3 harm	Purpose 4 harm	Purpose 5 harm	Highest Ratings (Purpose 1-4)	Highest rating
MO1	Motorway Junctions	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
MO2	Motorway Junctions	Low/no	Moderate	High	Low/no	No rating	One high rating	High
MO3	Motorway Junctions	Low/no	Low/no	Very high	Low/no	No rating	One very high rating	Very high
MO4	Motorway Junctions	Low/no	High	Very high	Low/no	No rating	One very high rating	Very high

## Chapter 5

### Next Steps

**5.1** This chapter addresses considerations around the potential release of land from the Green Belt, should a need for this be identified. It considers the case for exceptional circumstances, mitigation of harm and Green Belt enhancement.

#### The exceptional circumstances case

**5.2** This study will be used by BDC alongside other pieces of evidence to explore the potential for alterations to Green Belt Boundaries in the District to accommodate future growth.

**5.3** If there is a defined need, the Council will need to make alterations to the current Green Belt boundaries through the Local Plan-making process. This will require the Council to demonstrate the 'exceptional circumstances' for the release land from the Green Belt (as set out in Para 140 of the NPPF).

**5.4** As set out in paragraph 141 of the NPPF, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This includes:

- making as much use as possible of suitable brownfield sites and underutilised land;
- optimising the density of development and other locations well served by public transport; and
- discussing with neighbouring authorities about whether they could accommodate some of the identified need for development.

**5.5** This study will therefore be used alongside other evidence (eg sustainability, viability studies) to identify the potential harm of releasing specific sites, or combinations of sites for development. This will help to inform the selection of preferred site options and, if necessary, the preparation of the 'exceptional circumstances case' for the release of Green Belt land for development.

**5.6** The judgement in *Calverton Parish Council v Greater Nottingham Councils and others* (2015) provided a useful list of matters to consider when assessing whether the 'exceptional circumstances' for making alterations to Green Belt boundaries are present. This included:

- The acuteness/intensity of the objectively-assessed need;
- The inherent constraints on supply/availability of land;
- The consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- The nature and extent of harm to the Green Belt; and
- The extent to which consequent impact on the Green Belt purposes may be ameliorated or reduced to the lowest reasonably practicable extent.

**5.7** Further guidance on establishing the necessary 'exceptional circumstances' for making alterations to Green Belt boundaries is set out in the recent High Court judgement: *Compton Parish Council and others v Guildford Borough Council and others* (2019). This involved an appeal opposed to the principle and extent of land proposed for release from the Green Belt in the Council's submitted Local Plan. The judge concluded:

- "There is no definition of the policy concept of 'exceptional circumstances' for altering Green Belt boundaries. This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case."
- "The 'exceptional circumstances' can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary...there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy."

## Mitigation to reduce harm to Green Belt

**5.8** The variations in harm to the Green Belt purposes identified in this Stage 2 assessment can be used, when considering potential site allocations, to identify potential to mitigate harm by retaining in the Green Belt areas that would lead to greater harm if released.

**5.9** Beyond this, there is the potential to ameliorate harm by implementing measures which will reduce the impact that release of land would have on the integrity of adjacent Green

Belt land. Mitigation could apply either to land being released or land being retained as Green Belt.

**5.10** The extent to which harm can be mitigated will vary from site to site, but potential measures can be considered under different themes. The Green Belt purposes are considered to relate to the relationship between the land area in question, developed land, and the countryside. This relationship is influenced by: the location of the area; the extent of openness within it; and the role of landscape/physical elements, including boundary features in either separating the area from, or connecting it to built-up areas and the wider countryside.

**5.11** The list below outlines some mitigation measures that could be considered as part of the planning and development process. Which mitigation measures are the most appropriate will vary, depending on local circumstances and will need to be defined as part of the master planning process:

- Use landscape to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance. This can help to maintain a sense of separation between urban and open land. A boundary that is relatively homogeneous over a relatively long distance, such as a main road, is likely to be stronger than one which has more variation. Landscape works can help to minimise the impact of 'breaches' in such boundaries.
- Strengthen boundary at weak points – for example where 'breached' by roads. This can help reduce opportunities for sprawl. The use of buildings and landscaping can create strong 'gateways' to strengthen settlement-edge function.
- Define Green Belt edge using a strong, natural element which forms a visual barrier – for example a woodland belt. This can help to reduce the perception of urbanisation and may also screen residents from intrusive landscape elements within the Green Belt (for example major roads). Boundaries that create visual and movement barriers can however potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents so this needs to be carefully considered.
- Create a transition from urban to rural, using built density, height, materials and landscape to create a more permeable edge. This can help to reduce the perception of urbanisation. It may however have implications in terms of reducing housing yield.
- Consider ownership and management of landscape elements which contribute to Green Belt purposes. This



can help to ensure the permanence of Green Belt. However, trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (for example within back gardens).

- Enhance visual openness within the Green Belt. This can help to increase the perception of countryside. Although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
- Improve management practices to enhance countryside character. This can help to increase the strength of countryside character. Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.
- Design and locate buildings, landscape and green spaces to minimise intrusion on settlement settings. This can help to maintain perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements. The analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit.
- Design road infrastructure to limit the perception of increased urbanisation associated with new development. Increased levels of 'activity' can increase the perception of urbanisation.
- Use sustainable drainage features to define/enhance separation between settlement and countryside. This can help to strengthen the separation between urban and open land. It is important however to determine if local topography and ground conditions are suitable.
- Lessen the sense of intrusion on the countryside by designing buildings to incorporate local vernacular, in order to strengthen perception of new development as part of the existing urban settlement. Thorough site and settlement analysis can identify settlement character.

## Enhancement of Green Belt

**5.12** Paragraph 142 of the NPPF states that local planning authorities should set out ways in which 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. Furthermore, paragraph 145 of the NPPF states local planning authorities should plan positively to enhance the beneficial uses of the Green Belt. These requirements are supported by the NPPG which emphasises the need for Local Plans to include policies for compensatory improvements to the environmental quality and accessibility of the Green Belt. The NPPG highlights the need for these improvements to be informed by appropriate evidence on issues such as green infrastructure, woodland planting, landscape, biodiversity, habitat connectivity and natural capital, access and recreation.

**5.13** It is therefore important that the Council considers where and how the District's Green Belt can be enhanced, particularly the relationship between the District's preferred sustainable pattern of development and the designations' potential for new and improved appropriate uses.

**5.14** Some of the mitigation measures listed in the previous section that relate to Green Belt land can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land that (by adding to its value) will strengthen the case for that land's future protection. Some examples are provided in the list below:

- Improving access. Enhancing the coverage and condition of the rights of way network and increasing open space provision is a key enhancement opportunity.
- Providing locations for outdoor sport. Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
- Landscape and visual enhancement. Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
- Increasing biodiversity. Most Green Belt land has potential for increased biodiversity value – eg the management of hedgerows and agricultural field margins, and provision of habitat connectivity, planting of woodland. There may also be opportunities to link enhancements with requirements to deliver 'biodiversity net gain' associated with development proposals.
- Improving damaged and derelict land. Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive

management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

**5.15** Beneficial uses could be achieved through planning conditions, section 106 obligations and/or the Community Infrastructure Levy. The NPPG stresses the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and management.

## Conclusions

**5.16** This study has assessed the potential harm to the Green Belt purposes of releasing land for development within Bromsgrove District. The findings of this study will form an important piece of evidence for BDC's Local Plan Review.

**5.17** As outlined above there are other important factors that need to be considered when establishing exceptional circumstances for making alterations to Green Belt boundaries, most notably sustainability, viability and deliverability issues.

**5.18** In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation. In addition, consideration will need to be given to potential measures to mitigate harm to the Green Belt, as well as potential opportunities to enhance the beneficial use of the Green Belt.

## **Appendix A**

### **Green Belt Harm Parcel Assessments**

**See separate document.**

## **Appendix B**

### **Green Belt Harm Parcel Assessments – Motorway Junctions**

See separate document.