



# Green Belt Purposes Assessment Methodology

August 2019 Version



**Bromsgrove**  
District Council

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# 1. Introduction

**1.1** Bromsgrove District Council has commenced a District Plan Review. The plan review was initially necessary to identify land to accommodate the remainder of the adopted Bromsgrove District Plan (BDP) housing requirement to 2030 and to help to deliver the unmet housing needs of the Greater Birmingham area. However, it is also essential to look ahead beyond the current plan period to identify land needed to deliver the full range of needs for the District over the longer term.

**1.2** In line with the adopted BDP<sup>1</sup>, and to meet the future needs identified above, the Council has committed to undertake a full review of the Green Belt. This methodology is the first step in this process, setting out how the Council thinks the review should be undertaken.

**1.3** The term Green Belt Review can be misleading, with a common misconception being that the final study will recommend which land should be removed from the Green Belt and commence the de-designation/reallocation of this land. This is not the case. A Green Belt Review is purely that; a review of the existing Green Belt against the purposes set out in the NPPF (2019, paragraph 134) and in this document at paragraph 1.10. It will identify whether the land continues to fulfil one or more of the Green Belt purposes, but it will not allocate land for another use. To avoid confusion, the Council has decided to use the term “Green Belt Purposes Assessment” to more accurately describe what this piece of work will achieve.

**1.4** Figure 1, on page 3 demonstrates how the Green Belt Purposes Assessment process fits in with the timetable for the Bromsgrove District Plan Review.

## Context and history of Bromsgrove’s Green Belt

**1.5** Bromsgrove District is located to the south of Birmingham, within the West Midlands Green Belt. The District comprises the main town of Bromsgrove and a number of large and small settlements, some of which are excluded from the Green Belt whilst others are washed over and lie within it. The Green Belt in Bromsgrove District covers 19,301ha of land, which is approximately 90% of the District<sup>2</sup>. The current extent of the Green Belt within Bromsgrove District and the surrounding local planning authorities is shown in Figure 2 on page 4.

**1.6** The proposal for a West Midlands Metropolitan Green Belt was put forward in 1955 and was formally approved in 1975. The Green Belt surrounds the urban areas of Birmingham, Solihull, Coventry and the Black Country. The West Midlands Green Belt was established to stop major urban areas from merging together, as well as preventing the merging of smaller towns and cities on the periphery of the Green Belt. Within the Green Belt itself, south of the conurbation, there are a number of towns, including Bromsgrove, Redditch and Kidderminster.

**1.7** Prior to the adoption of the Bromsgrove District Local Plan in 2004 (the predecessor to the current BDP), Green Belt boundaries were confirmed in adopted local plans for Belbroughton, Wythall and Hagley/Clent; the remainder of the District relied on boundaries which were originally proposed in the County Development Plan for Worcestershire (1957) and confirmed generally in the County Structure Plans since 1975.

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

◆ 1. Policy BDP4 - Green Belt. Specifically BDP4.2  
2. 19,301 hectares of Green Belt land in 2019. Total land area 21,714 hectares.





**Figure 1: Green Belt Purposes Assessment Process alongside key District Plan Review stages**

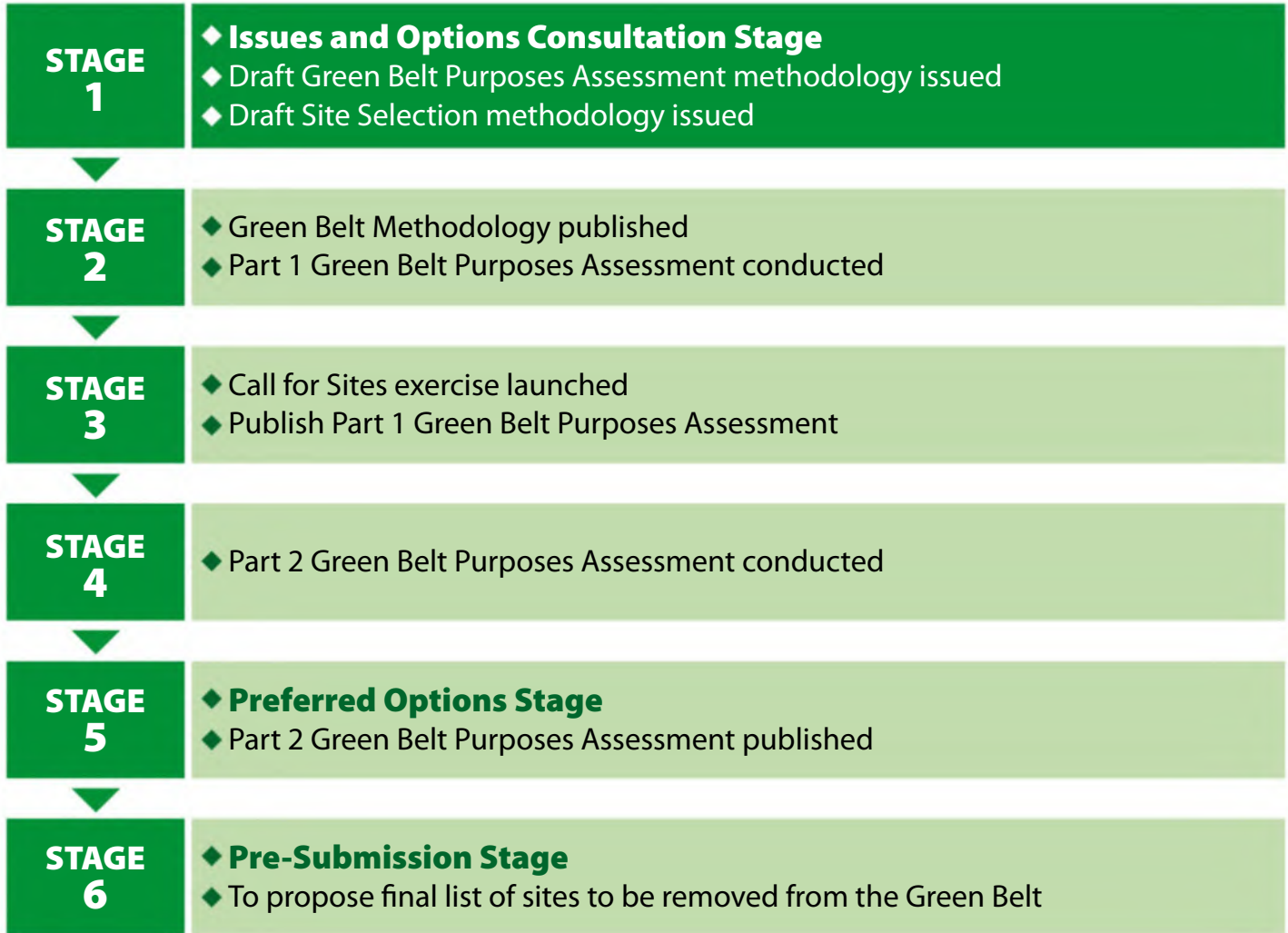
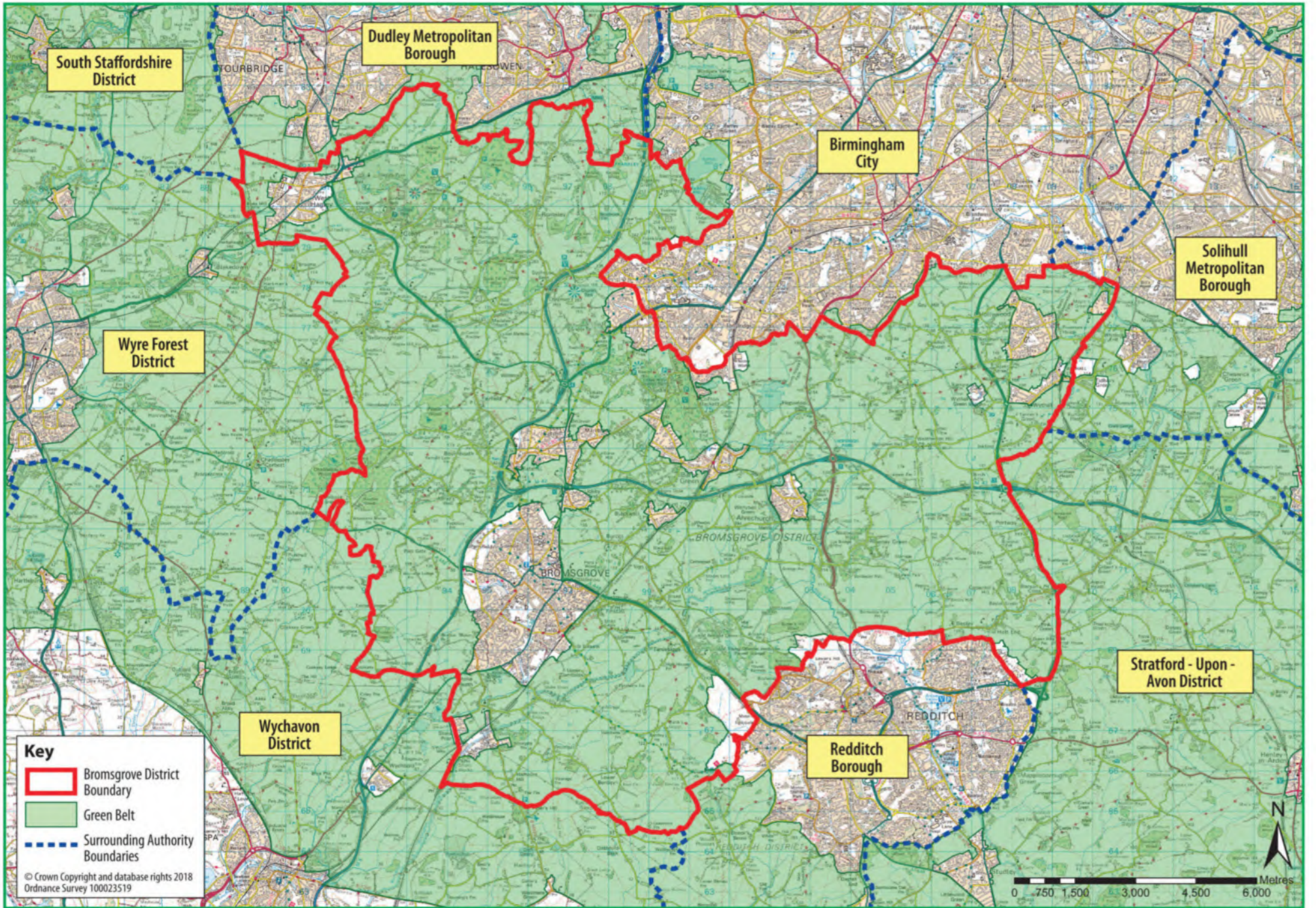




Figure 2: Extent of Green Belt within and surrounding Bromsgrove District

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## National Policy on Green Belt Designations

**1.9** Government stance on Green Belt has remained unchanged for a number of years, with Government manifestos and White Papers committed to its high level protection. The National Planning Policy Framework (NPPF) (2019) makes clear that Green Belt is among the areas where development should be restricted. Paragraph 133 states: “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”<sup>3</sup>. Notwithstanding the general stance on the protection of the Green Belt, the NPPF is also clear that Green Belt boundaries can be altered, but only in exceptional circumstances and that this process can only be undertaken through the preparation or review of the Local Plan.

**1.10** Paragraph 134 of the NPPF states that the Green Belt serves five purposes. These purposes and the extent to which Green Belt land continues to meet them is a fundamental element of any Assessment. The five purposes are:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**1.11** The NPPF is clear Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of Plans<sup>4</sup>. Once exceptional circumstances have been established, the place to set out de-designation of Green Belt land, allocation for other uses (including safeguarding for future development) and detailed boundary changes is the District Plan Review Development Plan Document (DPD) itself, which must be taken through the formal production process and ultimately examined by a Government appointed Planning Inspector.

## Aims of the Green Belt Purposes Assessment

**1.12** The purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt purposes has ever been undertaken. This Green Belt Purposes Assessment will provide an opportunity to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which will be useful as Part 2 of the Green Belt Purposes Assessment is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.

**1.13** Alongside the policy background set out in paragraph 1.1, the BDP housing requirements are considered to be an important contributory factor in demonstrating the exceptional circumstances for the Green Belt to be amended. That is because Bromsgrove town and the large settlements<sup>5</sup> are tightly bounded by the Green Belt, there is nowhere else for future development to go. Further detail on exceptional circumstances and the NPPF is set out in the next section.

◆ 3. *National Planning Policy Framework (2019) Paragraph 133*  
4. *National Planning Policy Framework (2019) Paragraph 136*  
5. *Defined in the BDP (2017) at Policy BDP2.4 Table 2*



**1.14** Policy BDP4.2 commits the Council to a full review of the Green Belt and this approach was tested and found to be sound at the examination<sup>6</sup> into the BDP. The release of land from the Green Belt is therefore necessary to meet the requirements of the current plan, even before consideration has been given to the needs of the District Plan Review for the duration of its plan period.

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

**Table 1: Green Belt Purposes Assessment - at a glance**

Green Belt Purposes Assessment - at a glance	
What it will do	What it will not do
<p><b>Part 1</b> will strategically assess the existing land designated as Green Belt in Bromsgrove District against the Green Belt purposes based on identified land parcels.</p>	<p>Recommend which land should be removed from the Green Belt.</p> <p>Will not provide detail on how smaller sites within the land parcels perform (this will be Part 2).</p>
<p><b>Part 1</b> will Identify parcels of land which perform strongest and weakest against the Green Belt purposes</p>	<p>Amend the Green Belt boundary.</p>
<p><b>Part 2</b> will provide a detailed assessment of sites which form part of the spatial strategy and which are free from significant constraints that cannot be mitigated against.</p>	<p>Allocate land for development.</p> <p>Amend the Green Belt boundary.</p>

<sup>6</sup> *BDP Inspector's Report - December 2016. [www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/the-bromsgrove-district-plan-2011-30/inspectors-report.aspx](http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/the-bromsgrove-district-plan-2011-30/inspectors-report.aspx)*



## 2. Wider Considerations

### National Planning Policy Framework

**2.1** The Government published the Revised National Planning Policy Framework in July 2018, and subsequent revision in 2019. The revisions maintain the strong protection of the Green Belt, but also implement a number of changes from the 2017 Housing White Paper. The key changes which influence the assessment of the Green Belt are summarised below.

**2.2** Neighbourhood plans (paragraph 136) - where a need for changes to Green Belt boundaries has been demonstrated through a strategic plan, detailed amendments to the boundaries can be made through neighbourhood plans. Bromsgrove has several designated neighbourhood planning areas to which this may apply, including a Neighbourhood Plan for Alvechurch which now forms part of the Bromsgrove Development Plan.

**2.3** Exceptional circumstances (paragraph 137) - in order to satisfy that exceptional circumstances exist to warrant changes to Green Belt boundaries, the strategic policy making should have firstly examined all other reasonable alternative options for meeting its identified need for development. This would need to include:

- Making as much use as possible of suitable brownfield sites and underutilised land;
- Optimising the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and
- Holding discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common grounds.

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

**2.5** Sustainable patterns of development (paragraph 138) - where it is necessary to release Green Belt land, plans should give first consideration to land which has been previously developed and/or is well served by public transport. Plans should also set out ways that the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

**2.6** Positive use of the Green Belt (paragraph 138) - seeks to improve the environmental quality or accessibility of remaining Green Belt land. The potential for more positive use of the District's Green Belt, such as through access improvements and linkages to the existing Green Infrastructure network will be explored during the plan making process. However, notes on potential access improvements could be recorded when undertaking site visits of the land parcels and may be explored further during Part 2 of the Green Belt Purposes Assessment.

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





**2.8** Safeguarded Land (paragraph 139 c and d) - encourages Local Planning Authorities to identify areas of safeguarded land where necessary. These should be areas located between the urban area and the Green Belt, and be utilised to meet longer term development needs beyond the plan period. No further guidance is provided on the designation of safeguarded land, although in the context of paragraph 136, Green Belt boundaries should have permanence into the long term, so that they endure beyond the plan period. A situation should be avoided whereby Bromsgrove's Green Belt is assessed and reviewed as part of this District Plan Review, only to be reviewed again in the subsequent plan period. It will be extremely difficult to accurately project development needs beyond the plan period. The Council will therefore be guided by the Green Belt Purposes Assessment to identify where land is no longer fulfilling its Green Belt function, and may be considered suitable to meet longer term development needs. Should there be surplus land for current requirements; land no longer meeting the Green Belt Purposes will be considered as safeguarded Land for future needs. If land is given this designation, it would not have the same level of protection as the current Green Belt.

## **Greater Birmingham and Black Country Housing Market Area (GBHMA) Strategic Growth Study**

**2.9** As part of the 2018 Greater Birmingham and Black Country Housing Market Area (GBHMA) Strategic Growth Study (SGS)<sup>7</sup>, a strategic review of the West Midlands Green Belt within the HMA was undertaken. This study analysed the form and strategic function of the Green Belt against the purposes set out in the NPPF. Given the context of assessing the whole of the West Midlands Green Belt, the purposes of greatest importance were determined to be:

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

**2.10** The outcome of the assessment against these two purposes were combined to determine those areas which make a principal contribution to the Green Belt, with all other areas shown as making a supporting contribution. This allowed the overall contribution to the Green Belt of the land parcels to be shown. The overall conclusions that the study draws are very broad.

**2.11** The SGS split Bromsgrove into approximately 20 parcels, whereas this local Green Belt Purposes Assessment will split Bromsgrove into 60 land parcels. This demonstrates the difference in the level of detail this study will assess the Green Belt in comparison to the SGS. The two studies may come to different conclusions about the strength of the Green Belt in Bromsgrove District, which would be wholly expected when both different sized land parcels and different professional judgements are involved. The correct approach is therefore felt to be to examine Bromsgrove's Green Belt against the Council's own assessment criteria and to test the potential development areas in the Green Belt arising from the GBHMA SGS in a consistent and rigorous way as the plan-making process progresses.

<sup>7</sup> [www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/greater-birmingham-housing-market-area-strategic-growth-study.aspx](http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/greater-birmingham-housing-market-area-strategic-growth-study.aspx)



## 3. Local Considerations

**3.1** As part of the District Plan Review a Strategic Housing Land Availability Assessment (SHLAA) will be completed. The SHLAA will consider all available land within the urban area of the District (all non-Green Belt sites). The intention is that land that can be delivered in the urban area for development such as housing will be maximised, in order to minimise the development requirements for Green Belt land (see paragraph 2.3 in relation to exceptional circumstances).

**3.2** The adopted Bromsgrove District Plan (January 2017) sets out at Policy BDP3 'Future Housing and Employment Growth' that a full Green Belt Review will be carried out. This triggers the need for the Green Belt Purposes Assessment as it is clearly acknowledged that the urban areas will not alone be able to meet the District's housing requirement. However, it has yet to be determined how much land will be required to ensure the amount of development needed is fully accommodated. In addition, the Council will undertake a Housing and Economic Development Needs Assessments which will inform the range of housing and employment growth required.

### Allocated Development Sites

**3.3** The adopted BDP allocates two urban extensions to the west and north of Redditch's urban area, entitled Foxlydiate and Brockhill East. These will provide a minimum of 3,400 dwellings and associated infrastructure. Ravensbank expansion site located to the north/east of Redditch's urban area is allocated for 10.3 hectares of employment land. The Plan also allocates three town expansion sites (Norton Farm, Perryfields Road and Whitford Road). Combined, these sites provide a minimum of 2,106 dwellings, 5 hectares of employment land, a local centre and associated infrastructure. These sites are outside of the Green Belt and for the purposes of this assessment they will be treated as developed sites, in accordance with the submitted masterplans.

### Status of settlements in the Green Belt and detailed boundary changes

**3.4** As part of the District Plan Review process, it will be necessary to consider the status of the settlements in Bromsgrove District, including:

- Inset settlements (where the settlement is excluded from the Green Belt)
- Washed-over settlements (where the settlement is within the Green Belt and Green Belt policies continue to apply)

**3.5** Additionally, the boundaries of settlements and the boundaries with other built-up areas will need to be considered to see if there are sections where an extension to existing settlements could be beneficial, in response to anomalies or incursions from development. In Part 1 of the Purposes Assessment, the presence of washed over or inset settlements within each land parcel will be discussed in the commentary, but no detailed analysis of the appropriateness of the boundaries will be carried out. This will emerge alongside the detailed work at Part 2, and any detailed boundary amendments taken forward through the District Plan Review, as it progresses. The justification and evidence to support detailed boundary changes around existing settlements will be presented in due course.





## 4. Green Belt Purposes Assessment Process

**4.1** Given the scale of the task to assess the 19,000 hectares of Green Belt in Bromsgrove District, it is proposed to split the assessment process into two parts. Figure 3 on page 11 sets out the detailed assessment process for the Green Belt assessment, with more detail on the process provided in section 5.

### **4.2 Part 1 - Strategic Assessment of the Green Belt Purposes**

In preparation for the Part 1 Assessment, the District's Green Belt has been split into 60 land parcels. These land parcels predominantly have been defined using Ordnance Survey maps and aerial photography and use clear physical features such as motorways, A roads, B roads, some minor roads, railways and canals. The land parcels vary in size dependent on the existence of these permanent physical features. Based on the presence of these permanent features there are instances where the land parcel boundaries extend beyond the District boundary as it is felt using a land parcel with strong defined boundaries is more robust with regard to the Green Belt, irrespective of administrative boundaries. The land parcels will then be assessed against the Green Belt purposes, through a commentary on their character and analysis of how they perform. Although there are five purposes outlined in the NPPF, only purposes 1 to 3 will be considered when assessing the land parcels (further explanation can be found in Table 2 on page 14). The output will be a detailed commentary on how each land parcel performs against each of the purposes and an assessment of its contribution to Green Belt. Tabulated results and maps will also be published. An 'overall' conclusion will not be drawn as each of the purposes performs different functions and therefore cannot be combined to provide an overall conclusion.

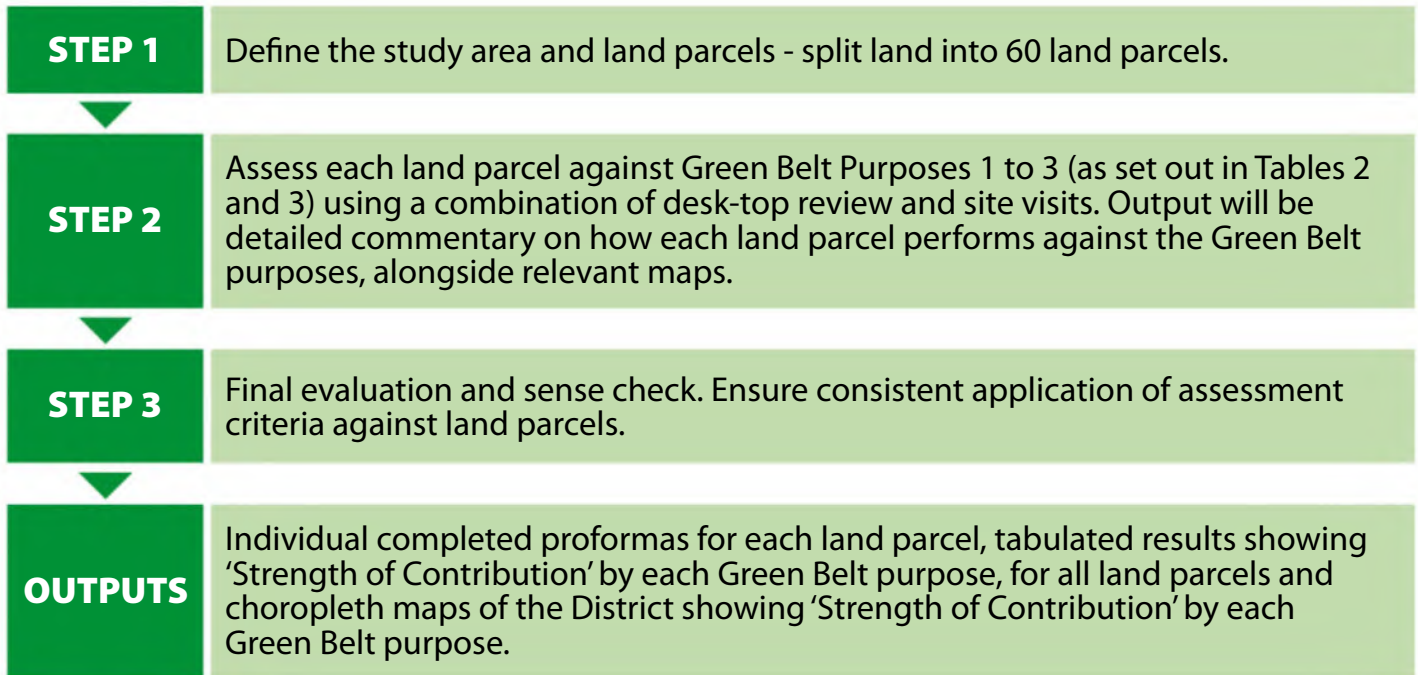
### **4.3 Part 2 - Detailed Assessment of Green Belt Purposes - Site Analysis**

Once a high level assessment of how the current Green Belt functions is complete, the District Plan Review process will progress to preparing a spatial strategy informed by evidence based documents and consultation responses. Sites which are in accordance with the spatial strategy and are free from significant constraints that cannot be mitigated against will be assessed at Part 2. The output from Part 2 will be an assessment of how these sites fulfil the Green Belt purposes and the level of likely harm to the Green Belt that would be caused should the site be released and put forward for development. Further criterion will then be applied to these sites to assess what other constraints are present at the site.

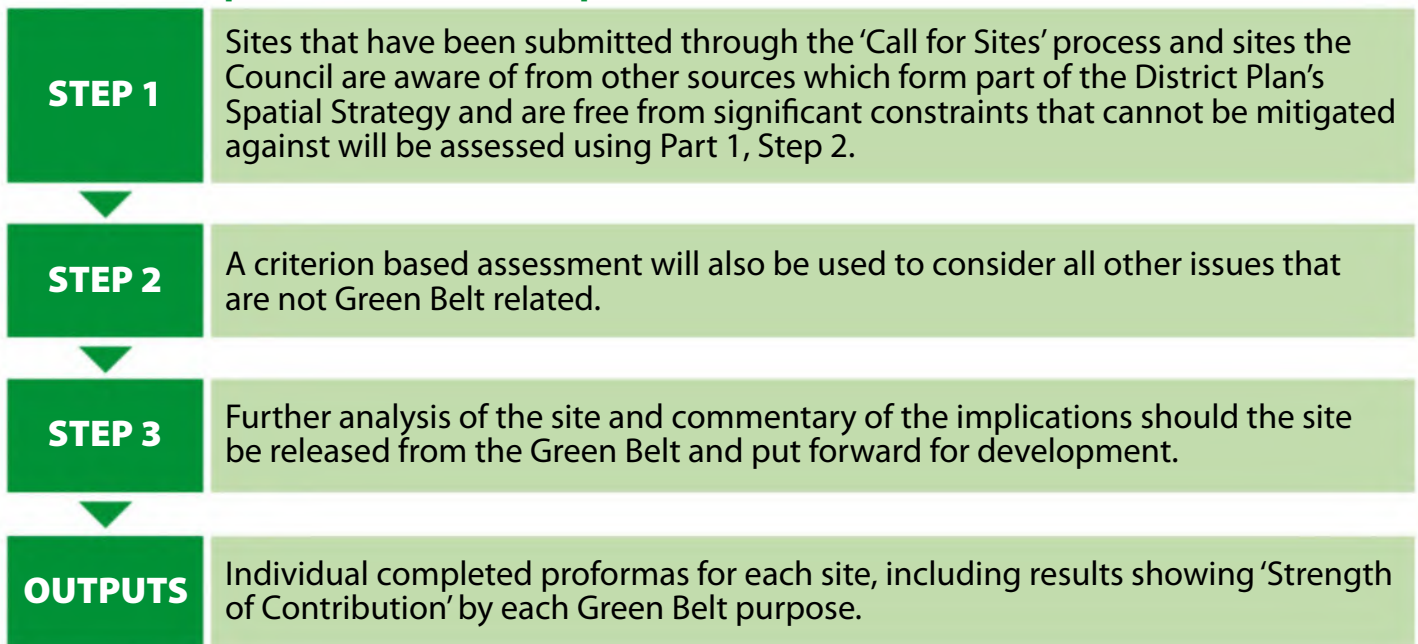


**Figure 3: Detailed Assessment process for the Green Belt Assessment**

**Part 1 - District Wide Green Belt Purposes Assessment**



**Part 2 - Site Specific Green Belt Purposes Assessments**







# 5. Part 1 – Strategic Assessment of the Green Belt Purposes Step-by-Step Methodology

## Overview

**5.1** There is no national guidance on exactly how a Green Belt Purposes Assessment or Review should be undertaken. Green Belt Reviews and assessment methodologies from other Local Planning Authorities have been considered when devising the methodology for Bromsgrove District. This assessment will be conducted in two distinct parts. For both parts, Planning Officers will use their professional judgement to make assessments on the contribution of the parcel to the Green Belt purposes. Planning Officers will use a consistent approach guided by the information contained within this document.

## Step 1 - Defining the study area and land parcels

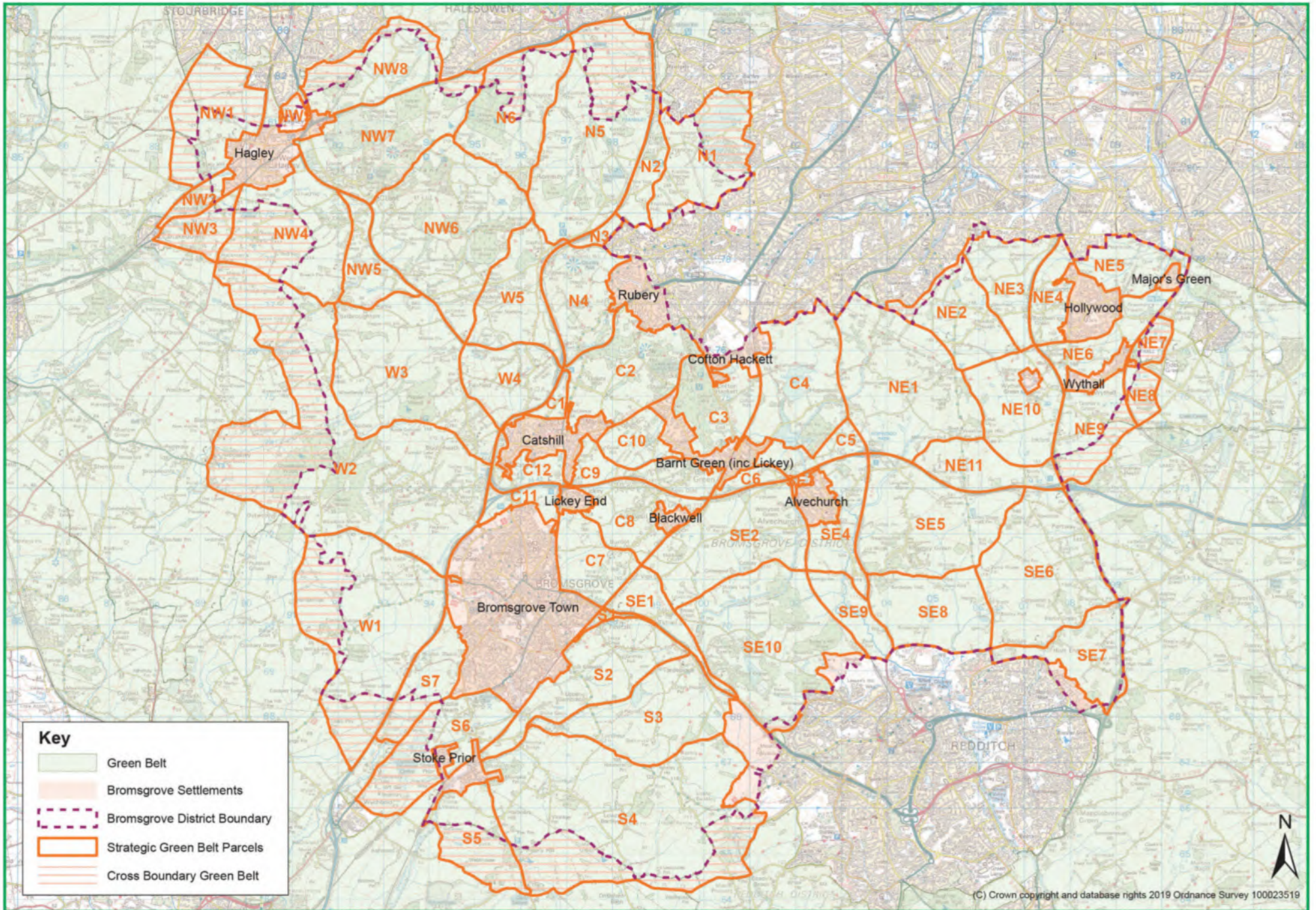
**5.2** The District has been divided into land parcels in order to establish the character of these areas and how they perform against the defined Green Belt purposes. The Council recognises that some of the identified land parcels are larger than others and due to this it is accepted that the character within a land parcel will be varied. Given the scale of the Green Belt in Bromsgrove and the significant role it plays in shaping the pattern and nature of the built form in the District, it is felt important to consider the District in its entirety at this stage.

**5.3** Figure 4 on page 13 illustrates the land parcels that will be used to conduct the Purposes Assessment. Land parcels for the purpose of an assessment have been defined using a logical approach to land parcel definition, based on permanent features such as physical features such as motorways, A roads, B roads, some minor roads, railways and canals. In certain instances in the absence of permanent physical features, boundaries have been drawn in a straight line between two physical features. These land parcels will then be used to help describe the character of the Green Belt and to assess their contribution to the function of the Green Belt. **The land parcels do not represent development boundaries and bear no relationship to sites where there is known development interest.**

**5.4** In some instances the land parcels extend beyond the District boundary. This is because it is felt using a land parcel with strong defined boundaries is more robust with regard to the Green Belt, irrespective of administrative boundaries. In these instances there were no strong, defensible boundaries within the administrative area that were suitable. Assessing the land outside of the administrative boundaries of Bromsgrove is to ensure a consistent approach when determining boundaries for each land parcel, to ensure all parcels are bound by strong, defensible features, where possible. No overall conclusions will be drawn on the role of land that is being assessed for any of the land parcels.



Figure 4: Proposed Green Belt Parcels







## Step 2 - Assessment against Green Belt purposes

5.5 Paragraph 134 of the NPPF sets out the five purposes of the Green Belt. It is helpful to consider what the terms within the purposes actually mean, how the purposes can be differentiated from each other and how they are applied to the Green Belt Purposes Assessment.

**Table 2: Green Belt Purposes - Explanation**

	NPPF Green Belt Purposes	Dictionary Definition of Terms / Further detail / Bromsgrove District Council Interpretation and application	
1	To check the unrestricted sprawl of large built-up areas	<p><b>Definition</b></p>	<p><b>Sprawl</b> - spread out over a large area in an untidy or irregular way. (Oxford Dictionary Online)</p> <p><b>Large built-up areas</b> - Built-up areas are defined as land which is 'irreversibly urban in character', meaning that they are characteristic of a village, town or city. (ONS, 2011 Census). Large built-up areas are therefore taken to be towns and cities or any area with significant urbanisation.</p>
		<p><b>Further detail</b></p>	<p>Evidence of sprawl could include ribbon development along main roads leading out of towns or villages or the existence of urban features. The continuation of unrestricted urban sprawl can be prevented by the containment properties of strong defensible boundaries. Development is not considered to be sprawl if it is planned and considered acceptable. Further information on what is considered to be a defensible boundary can be found at paragraph 6.5.</p>
		<p><b>BDC interpretation and application</b></p>	<p>For the purpose of this assessment, large built-up areas are to be defined as those nearby towns and areas which are part of the Birmingham conurbation, plus any other nearby freestanding settlements. For clarity when referring to a 'large built up area' this only relates to the physical built up, urbanised area. For example Cofton Hackett is listed as a large built up area in Table 3, this refers to the built up area only, not the wider area of Cofton Hackett. These areas are listed below.</p> <p>Large built-up areas included for this purpose are:            Bromsgrove Town            Cofton Hackett/Longbridge (as part of the conurbation)            Rubery (as part of the conurbation)            Birmingham            Solihull            Halesowen            Stourbridge            Redditch</p>



**Table 2: Green Belt Purposes - Explanation** *continued*

	<b>NPPF Green Belt Purposes</b>	<b>Dictionary Definition of Terms / Further detail / Bromsgrove District Council Interpretation and application</b>																									
<b>2</b>	To prevent neighbouring towns from merging	<p><b>Definition</b></p>	<p><b>Towns</b> - a built-up area with a name, defined boundaries, and local government, that is larger than a village and generally smaller than a city (Oxford Dictionary Online).</p> <p><b>Merging</b> - the physical or visual linking of two settlements or areas of built form.</p>																								
		<p><b>Further detail</b></p>	<p>Key to the assessment of this purpose will be consideration of the existing pattern of development and the need to protect key gaps between towns and other settlements.</p> <p>Existing ribbon development along main roads will also be relevant to the consideration of this purpose as this can form links between towns.</p>																								
		<p><b>BDC interpretation and application</b></p>	<p>No national policy guidance is given on what might constitute a 'town'. For the purpose of this assessment, towns are to be defined as all the settlements currently excluded from the Green Belt within Bromsgrove District, plus settlements outside of the District of a similar size (or larger), where there appears to be a relationship with Bromsgrove District. These are listed below.</p> <p>Towns included for this purpose are:</p> <table border="0"> <tr> <td>Bromsgrove Town</td> <td>Alvechurch</td> </tr> <tr> <td>Barnt Green (inc. Lickey)</td> <td>Blackwell</td> </tr> <tr> <td>Catshill</td> <td>Cofton Hackett (inc. Longbridge)</td> </tr> <tr> <td>Hagley</td> <td>Hollywood</td> </tr> <tr> <td>Lickey End</td> <td>Major's Green</td> </tr> <tr> <td>Rubery</td> <td>Stoke Prior</td> </tr> <tr> <td>Wythall</td> <td>Birmingham</td> </tr> <tr> <td>Solihull</td> <td>Halesowen</td> </tr> <tr> <td>Stourbridge</td> <td>Kidderminster</td> </tr> <tr> <td>Redditch</td> <td>Dickens Heath</td> </tr> <tr> <td>Blakedown</td> <td>Wychbold</td> </tr> <tr> <td>Droitwich Spa</td> <td></td> </tr> </table>	Bromsgrove Town	Alvechurch	Barnt Green (inc. Lickey)	Blackwell	Catshill	Cofton Hackett (inc. Longbridge)	Hagley	Hollywood	Lickey End	Major's Green	Rubery	Stoke Prior	Wythall	Birmingham	Solihull	Halesowen	Stourbridge	Kidderminster	Redditch	Dickens Heath	Blakedown	Wychbold	Droitwich Spa	
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Redditch	Dickens Heath																										
Blakedown	Wychbold																										
Droitwich Spa																											





**Table 2: Green Belt Purposes - Explanation** *continued*

	NPPF Green Belt Purposes	Dictionary Definition of Terms / Further detail / Bromsgrove District Council Interpretation and application	
3	To assist in safeguarding the countryside from encroachment	<p><b>Definition</b></p>	<p><b>Countryside</b> - open land with an absence of built development and urbanising influences, and characterised by rural land uses including agriculture and forestry.</p> <p><b>Encroachment</b> - a gradual advance beyond usual or acceptable limits (Oxford Dictionary Online).</p>
		<p><b>Further detail</b></p>	<p>Key to the countryside is the sense of openness, which can be defined as the absence of built development or other urbanising elements (i.e. not openness in a landscape character sense which concerns topography and woodland/hedgerow cover).</p>
		<p><b>BDC interpretation and application</b></p>	<p>There is no need to apply a localised interpretation to this Green Belt purpose.</p>
4	To preserve the setting and special character of historic towns	<p><b>Definition</b></p>	<p><b>Historic town</b> - settlement or place with historic features identified in local policy or through Conservation Area or other historic designation(s).</p>
		<p><b>Further detail</b></p>	<p>An example of the Green Belt serving this purpose would be a settlement where the historic area or centre is contextualised by rural features, such as views around properties within the historic area. The Green Belt around the cities of Oxford and Cambridge provides a very good example of where this purpose is strongly fulfilled.</p>
		<p><b>BDC interpretation and application</b></p>	<p>It is acknowledged there are many Conservation Areas within the Bromsgrove Green Belt and also in neighbouring districts adjacent to the Bromsgrove Green Belt. However these areas not classed as 'historic towns' and therefore the only area within Bromsgrove this criterion would relate to is the historic core of Bromsgrove town, located in the Town Centre. There is a considerable amount of development located between the historic core of the Conservation Area and the Green Belt. Therefore it is considered that in reality this purpose would have very little relevance when assessing the land parcels and <b>will not be considered when assessing the Bromsgrove Green Belt.</b></p> <p>For clarity, the historic environment is an important consideration with regard to potential development sites and will feature during the site selection process when considering the sites.</p>



**Table 2: Green Belt Purposes - Explanation** *continued*

	NPPF Green Belt Purposes	Dictionary Definition of Terms / Further detail / Bromsgrove District Council Interpretation and application	
5	To assist in urban regeneration by encouraging the recycling of derelict and other urban land	<p><b>Definition</b></p>	<p><b>Urban regeneration</b> - the process of improving derelict or dilapidated districts of a city, typically through redevelopment. (Oxford Dictionary Online).</p>
		<p><b>Further detail</b></p>	<p>An example of the Green Belt serving this role could be where development in the Green Belt is likely to make nearby brownfield land unattractive to develop. Regeneration initiatives in the vicinity would be relevant considerations.</p>
		<p><b>BDC interpretation and application</b></p>	<p>There has been much consideration across the country as to whether there is value in performing an assessment against this purpose. Planning Advisory Service (PAS) Guidance<sup>8</sup> suggests that if the process has been properly followed, the ability to accommodate development within the urban area will have been fully explored prior to considering land within the Green Belt. It goes on to say that if this is the case, then it could be said that all Green Belt achieves this purpose to the same extent. Many studies choose to omit this purpose as they conclude that every land parcel would perform the same when measured against it, therefore adding no value to the overall assessment.</p> <p>In the case of the West Midlands Green Belt, although the Green Belt was established to stop major urban areas and also smaller towns and cities from merging together, it has clearly played a key role in assisting the urban regeneration of the Birmingham conurbation and the reuse of brownfield land outside of the Green Belt elsewhere. Ultimately, it will be difficult to establish the role of one specific land parcel within Bromsgrove District over another in assisting urban regeneration, or to attribute specific evidence to this.</p> <p>For this purpose, the land parcels could all be rated equally or not at all, but neither approach would provide any real analysis. Therefore, whilst the Council acknowledges the value of the fifth purpose when considering the Green Belt across the country, it is considered that in reality this purpose would have very little relevance when assessing the land parcels and <b>will not be considered when assessing the Bromsgrove Green Belt.</b></p>

◆ 8. *Planning on the Doorstep: The Big Issues - Green Belt (February 2015)*



## Green Belt Purposes Summary

**5.6** It is important that the Green Belt Purposes Assessment is relevant and tailored to the area being assessed, therefore for the reasons set out in Table 2, only purposes 1 to 3 of the NPPF Green Belt purposes will be used in the assessment.

## How will the Green Belt Purposes Assessment be undertaken?

**5.7** The diagram provided at Figure 3 shows the step-by-step procedure that will be followed. Part 1 of the Green Belt Purposes Assessment will be undertaken by Planning Officers using a combination of:

- Desk-top research and analysis - using aerial photography, Street View© images, Ordnance Survey mapping and topography data, and
- Site visits - to explore the nature of the land parcel, the strength of boundaries and its relationship with settlements. These are likely to involve a minimum of two Planning Officers per land parcel, with multiple points visited around each land parcel.

**5.8** Notes about the key features and land use of the parcel will be recorded and a commentary against how the land parcel performs against each Green Belt purpose will be provided in the Part 1 report.

**5.9** Following desktop analysis and site visits, there may be the potential for the land parcel boundaries to be altered in order to improve the clarity of the analysis. This may be where a current land parcel boundary appears weak or poorly defined and a stronger boundary can be identified on site, or where additional boundaries can be identified which would allow for a finer grained analysis of large land parcels. These will not be changes to the actual Green Belt boundary, merely the mapped parcel boundary for assessment purposes. Planning Officers will record their reasoning for such changes when undertaking the assessments and the land parcels remapped and assessed accordingly. In order to ensure a consistent approach Planning Officers will conduct site visits in pairs.

**5.10** Table 3 on page 19 sets out how an assessment against each of the Green Belt purposes will actually be carried out, including considering the wording of the purpose in the context of Bromsgrove District and the criteria that will be used to rate each land parcel against the purposes. Most of the Green Belt Purposes Assessment Considerations would require a response to indicate that the land parcel makes a positive contribution; however some of the Assessment Considerations cover the presence of more detrimental features, which if in existence, would lessen the contribution the land parcel makes to the Green Belt purpose. The negative considerations are underlined.





**Table 3: Assessment Criteria**

	<b>NPPF Green Belt Purpose</b>	<b>Context in Bromsgrove District</b>	<b>Assessment Considerations</b>	<b>Strength of Contribution</b>														
1	To check the unrestricted sprawl of large built-up areas	<table border="1"> <thead> <tr> <th colspan="2" data-bbox="421 1330 501 1778"><b>"Large Built-up areas"</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="501 1599 628 1778">Within Bromsgrove District</td> <td data-bbox="501 1330 628 1599">In Neighbouring Local Authorities</td> </tr> <tr> <td data-bbox="628 1599 724 1778">Bromsgrove Town</td> <td data-bbox="628 1330 724 1599">Birmingham (Birmingham CC)</td> </tr> <tr> <td data-bbox="724 1599 932 1778">Cofton Hackett/ Longbridge (as part of the conurbation)</td> <td data-bbox="724 1330 932 1599">Halesowen (Dudley MBC)</td> </tr> <tr> <td data-bbox="932 1599 1075 1778">Rubery (as part of the conurbation)</td> <td data-bbox="932 1330 1075 1599">Redditch (Redditch BC)</td> </tr> <tr> <td data-bbox="1075 1599 1187 1778"></td> <td data-bbox="1075 1330 1187 1599">Solihull (Solihull MBC)</td> </tr> <tr> <td data-bbox="1187 1599 1283 1778"></td> <td data-bbox="1187 1330 1283 1599">Stourbridge (Dudley MBC)</td> </tr> </tbody> </table>	<b>"Large Built-up areas"</b>		Within Bromsgrove District	In Neighbouring Local Authorities	Bromsgrove Town	Birmingham (Birmingham CC)	Cofton Hackett/ Longbridge (as part of the conurbation)	Halesowen (Dudley MBC)	Rubery (as part of the conurbation)	Redditch (Redditch BC)		Solihull (Solihull MBC)		Stourbridge (Dudley MBC)	<p>The extent to which the land prevents the uncontrolled spread of the built-up area.</p> <p>The level of openness (defined as the absence of built development or other urbanising elements).</p> <p>The strength of the existing boundary features or presence of an alternative boundary within the land parcel.</p> <p><u>The presence of existing development which constitutes sprawl, such as ribbon development along key routes or other sporadic development.</u></p>	<p><b>Strong</b></p> <p>Land parcel is immediately adjacent to a large built-up area, is <b><i>largely free</i></b> from development which could constitute sprawl and has a <b><i>strong</i></b> level of openness. There is a strong defensible boundary adjacent to the built-up area and therefore containing it.</p> <p><b>Moderate</b></p> <p>Land parcel is adjacent to a large built-up area, is <b><i>mostly free</i></b> from development which could constitute sprawl and has a <b><i>fairly strong</i></b> level of openness. There is a complete or partial defensible boundary adjacent to the built-up area.</p> <p><b>Weak</b></p> <p>Land parcel is adjacent to a large built-up area but <b><i>shows evidence</i></b> of urban sprawl, limiting the openness of the land parcel. There is only a partial or in some cases no defensible boundary adjacent to the built-up area.</p> <p><b>No Contribution</b></p> <p>Land parcel is not adjacent to a large built-up area and does not play a role in preventing the sprawl of these areas.</p>
<b>"Large Built-up areas"</b>																		
Within Bromsgrove District	In Neighbouring Local Authorities																	
Bromsgrove Town	Birmingham (Birmingham CC)																	
Cofton Hackett/ Longbridge (as part of the conurbation)	Halesowen (Dudley MBC)																	
Rubery (as part of the conurbation)	Redditch (Redditch BC)																	
	Solihull (Solihull MBC)																	
	Stourbridge (Dudley MBC)																	

**Table 3: Assessment Criteria** *continued*

	NPPF Green Belt Purpose	Context in Bromsgrove District	Assessment Considerations	Strength of Contribution																														
2	To prevent neighbouring towns from merging	<table border="1"> <thead> <tr> <th colspan="2" data-bbox="252 1335 323 1783">"Neighbouring towns"</th> </tr> <tr> <th data-bbox="331 1615 451 1783">Within Bromsgrove District</th> <th data-bbox="331 1335 451 1615">In Neighbouring Local Authorities</th> </tr> </thead> <tbody> <tr> <td data-bbox="459 1615 555 1783">Bromsgrove Town</td> <td data-bbox="459 1335 555 1615">Birmingham (Birmingham CC)</td> </tr> <tr> <td data-bbox="563 1615 619 1783">Alvechurch</td> <td data-bbox="563 1335 619 1615">Blakedown (Wyre Forest)</td> </tr> <tr> <td data-bbox="627 1615 715 1783">Bart Green (inc. Lickey)</td> <td data-bbox="627 1335 715 1615">Dickens Heath (Solihull MBC)</td> </tr> <tr> <td data-bbox="722 1615 778 1783">Blackwell</td> <td data-bbox="722 1335 778 1615">Droitwich Spa (Wychavon)</td> </tr> <tr> <td data-bbox="786 1615 842 1783">Catshill</td> <td data-bbox="786 1335 842 1615">Halesowen (Dudley MBC)</td> </tr> <tr> <td data-bbox="850 1615 978 1783">Cofton Hackett (inc. Longbridge)</td> <td data-bbox="850 1335 978 1615">Kidderminster (Wyre Forest BC)</td> </tr> <tr> <td data-bbox="986 1615 1042 1783">Hagley</td> <td data-bbox="986 1335 1042 1615">Redditch (Redditch BC)</td> </tr> <tr> <td data-bbox="1050 1615 1106 1783">Hollywood</td> <td data-bbox="1050 1335 1106 1615">Solihull (Solihull MBC)</td> </tr> <tr> <td data-bbox="1114 1615 1169 1783">Lickey End</td> <td data-bbox="1114 1335 1169 1615">Stourbridge (Dudley MBC)</td> </tr> <tr> <td data-bbox="1177 1615 1233 1783">Major's Green</td> <td data-bbox="1177 1335 1233 1615">Wychbold (Wychavon)</td> </tr> <tr> <td data-bbox="1241 1615 1297 1783">Rubery</td> <td></td> </tr> <tr> <td data-bbox="1305 1615 1361 1783">Stoke Prior</td> <td></td> </tr> <tr> <td data-bbox="1369 1615 1425 1783">Wythall</td> <td></td> </tr> </tbody> </table>	"Neighbouring towns"		Within Bromsgrove District	In Neighbouring Local Authorities	Bromsgrove Town	Birmingham (Birmingham CC)	Alvechurch	Blakedown (Wyre Forest)	Bart Green (inc. Lickey)	Dickens Heath (Solihull MBC)	Blackwell	Droitwich Spa (Wychavon)	Catshill	Halesowen (Dudley MBC)	Cofton Hackett (inc. Longbridge)	Kidderminster (Wyre Forest BC)	Hagley	Redditch (Redditch BC)	Hollywood	Solihull (Solihull MBC)	Lickey End	Stourbridge (Dudley MBC)	Major's Green	Wychbold (Wychavon)	Rubery		Stoke Prior		Wythall		<p>The degree to which the land prevents the merging (visual or physical) of settlements.</p> <p>The level of openness (defined as the absence of built development or other urbanising elements).</p> <p>Character of the settlements concerned - are there existing features or patterns of development which mean they are at risk of merging?</p> <p>Consider the evidence of ribbon and sporadic development.</p>	<p><b>Strong</b></p> <p>Land parcel constitutes <i>all or most of a gap</i> between settlements. Loss of openness in this land parcel would cause visual or physical merging or <i>substantially reduce the existing gap</i>.</p> <p><b>Moderate</b></p> <p>Land parcel constitutes the <i>majority of a gap</i> between settlements (or does so in conjunction with other land parcels). Loss of openness would either physically or visually have a <i>negative impact on the existing gap</i>.</p> <p><b>Weak</b></p> <p>Land parcel is <i>not pivotal in providing a gap</i> between settlements. Loss of openness in this land parcel would not cause a significant visual or physical sense of merging.</p> <p><b>No Contribution</b></p> <p>Land parcel does not play a role in preventing the merging of settlements.</p>
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Wythall																																		

**Table 3: Assessment Criteria** *continued*

3	NPPF Green Belt Purpose	Context in Bromsgrove District	Assessment Considerations	Strength of Contribution
	To assist in safeguarding the countryside from encroachment	There is no need to apply a localised interpretation to this Green Belt purpose.	<p>The rural sense of the area, including consideration of development and other urbanising features.</p> <p>Countryside characteristics - an open landscape, which is natural, semi-natural or farmed.</p> <p>Topography and land uses.</p> <p>Evidence of existing encroachment eg. <u>urban features such as street lights, extensive pavements, floodlights or areas of hard standing.</u></p>	<p><b>Strong</b></p> <p>Land parcel has a <i>very strong rural sense</i>, is largely open and exhibits many countryside characteristics, has no or very little urbanising development.</p> <p><b>Moderate</b></p> <p>Land parcel <i>has a rural sense</i> and exhibits countryside characteristics but there may be some urban features affecting openness.</p> <p><b>Weak</b></p> <p>Land parcel has a <i>limited rural sense</i> and exhibits few countryside characteristics. Land parcel also contains urban features which have a negative impact on openness.</p> <p><b>No Contribution</b></p> <p>Land parcel lacks countryside characteristics and contains many urban features.</p>





## Overall contribution of each land parcel

**5.10** Paragraph 134 of the NPPF does not state or infer that one purpose is more important than another. The three purposes assessed against should therefore be afforded equal weight. Assigning numeric 'scores' to the individual purposes for each of the land parcels, to give an aggregate overall contribution will be avoided. Given that the location of the land parcel in proximity to a large built-up area or town will determine its strength for Purposes 1 and 2, it could be considered that only Purpose 3 can provide a truly comparable assessment of all land parcels against each other. This highlights the downside of aggregating the strength of contribution from all three purposes, when some land parcels will score poorly purely because they are remote from the large built-up area, for instance. Additionally, because of the variation in the size of land parcels, this may lead to uneven comparisons between the strengths of each land parcel.

**5.11** As such, no overall conclusion will be drawn on the strength of each land parcel. Rather, the commentary and strength of contribution will form the core of the analysis.

## Step 3: Final evaluation and 'sense check'

**5.12** Once all of the land parcels have been assessed, it is anticipated that Planning Officers involved in the process will sit down and discuss their findings. This will help to ensure that the assessment criteria have been applied consistently by all Planning Officers and to identify any anomalous results. The purpose of this exercise will not be to compare one land parcel against another, but to take an overview of all the results.

**5.13** The outputs from the Part 1 Purposes Assessment will be:

- Individual completed proformas for each land parcel
- Tabulated results showing Strength of Contribution by each purpose, for all land parcels
- Maps of the District showing Strength of Contribution by each Purpose for each land parcel



## 6. Part 2 – Detailed Assessment of the Green Belt Purposes– Site Analysis Step-by-Step Methodology

**6.1** For Part 2 of the Purposes Assessment, a range of more detailed sites will be considered against the Green Belt Purposes. The Purposes Assessment will be carried out in much the same way as for Part 1, but with a stronger focus on the strength of boundaries of the sites in question.

**6.2 It should be emphasised at this early stage that there will inevitably be differences in how the land parcels perform against the Green Belt Purposes at the strategic stage in Part 1 of the Purposes Assessment, versus how individual sites within those land parcels perform at the Detailed Assessment stage in Part 2.** This is because the scale of the Part 2 Purposes Assessment will mean sites within land parcels will be considered in a more localised and focused manner.

### Step 1 - Filtering Green Belt sites to assess and assessment of the site against Green Belt purposes

**6.3** Regardless of the result of the assessment of the parcels following the Part 1 Assessment, individual sites that have been submitted through the 'Call for Sites' process and sites the council are aware of from other sources which form part of the District Plan's Spatial Strategy and are free from significant constraints that cannot be mitigated against will be assessed using Part 1, Step 2 (to assess each site against the Green Belt purposes).

### Step 2 - Further assessment of the site against considerations that are not Green Belt

**6.4** A criteria based approach to site assessment will be utilised to determine how sites are prioritised for options development.

#### Site boundaries

**6.5** With regard to site boundaries, the NPPF states that when considering Green Belt boundaries, local planning authorities should define these using physical features which are readily recognisable and likely to be permanent<sup>9</sup>. A robust boundary will make a stronger contribution to preventing sprawl compared to a weaker boundary. Readily recognisable boundaries which are likely to be permanent include built features such as roads, railways, canals, the edges of settlements and landform features such as rivers, streams and woodland. Examples of weaker boundaries which may lack durability are field boundaries and tree lines/hedgerows (it is acknowledged that in some circumstances tree lines or hedgerows may be sufficiently dense and could be considered as a strong boundary, however for the most part, trees and hedgerows are susceptible to change and could easily weaken over time, limiting their permanence).

**6.6** Specific questions about the permanence of the site boundaries are needed to determine their appropriateness. Such questions will include:

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

<sup>9</sup> NPPF (2019) Para 139 f)





## Positive use of the Green Belt

**6.7** As briefly mentioned in paragraph 2.6, there will also be merit in considering the wider function of the Green Belt and any additional positive benefits the site plays, as outlined in paragraph 141 of the NPPF. Aspects to be covered are as follows:

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

## Sites close to the District boundary

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

## Step 3 - Overall contribution of the site to the Green Belt

**6.9** It is foreseen that an overall commentary will be given at site level as the conclusion to Part 2 of the Purposes Assessment. This will allow conclusions to be drawn on the overall contribution of the site to the Green Belt, and conversely, the harm to the Green Belt that the site would cause if de-designated and potentially released for development. The report will not make recommendations as to which sites should be removed from the Green Belt.

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

## 7. Link between the Part 1 and Part 2 assessments

**7.1** Part 1 of the Green Belt Purposes Assessment will provide a context for the smaller sites within any land parcel. The Part 1 Purposes Assessment will provide a view on how the wider land parcel as a whole functions against the Green Belt purposes. It is acknowledged that a small site within a land parcel can perform differently to the wider land parcel. Therefore the results of the Part 1 Purposes Assessment for a particular land parcel may not reflect the results for a specific site within a land parcel submitted through the call for sites or identified through other evidence base documents when considered through the Part 2 Purposes Assessment.

## 8. Next steps

**8.1** This methodology will be used to conduct the strategic assessment of the Green Belt purposes (Part 1 Assessment) and subsequently the detailed site assessments (Part 2 Assessment).

**If you need this information  
in another language or format,  
please contact us to discuss how we  
can best meet your needs.**

**Phone: 01527 548284**

**Email:  
equalities@bromsgroveandredditch.gov.uk**



**Bromsgrove**  
District Council  
[www.bromsgrove.gov.uk](http://www.bromsgrove.gov.uk)

## **Green Belt Purposes Assessment Methodology**

**Bromsgrove District Council**  
Planning and Regeneration • Parkside • Market Street • Bromsgrove  
Worcestershire B61 8DA