



City of
BRADFORD
METROPOLITAN DISTRICT COUNCIL

DRAFT BRADFORD DISTRICT LOCAL PLAN 2020-2038
PREFERRED OPTIONS – REGULATION 18 CONSULTATION
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Green Belt Site Assessments Technical Note and Methodology

Disclaimer:

The initial Green Belt Strategic Parcel Assessment and Site Specific Assessments are made available as part of the Local Plan evidence and have informed the Local Plan Preferred Option site assessments. It should be noted that this evidence represents the Council's initial assessment of Green Belt land in the District as part of the Selective Green Belt Review and the council invite further representations to be made in regards to the overall approach, strategic parcel and site specific assessments undertaken to date. The Council will consider all representations made and will continue to develop and finalise this evidence as part of the Local Plan preparation and justification of the Exceptional Circumstances for any proposed amendments to established Green Belt boundaries through the Local Plan process.

1. Introduction

- 1.1 The City of Bradford Metropolitan District Council (CBMDC) has begun work on preparing a new Local Plan for the District. In time this will replace the adopted Core Strategy and will contain allocated sites for development. A review of the Core Strategy was started in 2019, but the Council has now made the decision to progress to a single Local Plan following recent updates to national planning policy, particularly in relation to calculating housing requirements and Green Belt protection, as well as local policy changes.
- 1.2 Through the preparation in the Local Plan it is considered that Exceptional Circumstances exist at a strategic level that are fully evidenced and justified to alter green belt boundaries to meet identified development needs.
- 1.3 In 2019 consultants Arup were commissioned to produce a Green Belt Selective Review on behalf of the council, in line with the adopted Core Strategy Strategic Policy (SC7): Green Belt. This report assessed how strategic Green Belt parcels in the District perform against the five purposes of Green Belts set out in national policy (NPPF paragraph 134), to determine how they are currently contributing to those purposes. It is important to note that this report does not identify land for release or development or exceptional circumstances at a strategic or site level.
- 1.4 The decision to amend Green Belt boundaries must be taken through the Local Plan process as a whole and the Green Belt Review and site assessment comprise a key part of that comprehensive decision-making process. Following completion of first part of the Green Belt Selective Review, CBMDC is now undertaking Site Specific Green Belt Assessments. The findings from the full Green Belt Selective Review will then be integrated into the Local Plan site assessment process and used alongside a range of other evidence in considering if exceptional circumstances exist at a strategic, settlement and site level, which clearly justify altering Green Belt boundaries through the Local Plan.
- 1.5 This paper sets out the approach for undertaking the site specific Green Belt Assessments.

2. Policy Overview

National Policy

- 2.1 The Government attaches great importance to Green Belts with the general extent of Green Belts across the country already established. National Policy sets out the key approach to considering Green Belt through the Local Plan. NPPF paragraph 133 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.'

- 2.2 Green Belt serves five purposes (NPPF paragraph 134):

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

- 2.3 The issue of reviewing an established Green Belt boundary has to be considered within the legal framework for development plan preparation: Part 2 of Planning & Compulsory Purchase Act 2004 (PCPA 2004); Town and Country (Local Planning) (England) Regulations 2012.

- 2.4 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans (NPPF, para 134).

- 2.5 A key aspect when reviewing Green Belt boundaries is the need to promote sustainable patterns of development.

'Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport' (NPPF Para 138).

Local Policy

- 2.6 The Green Belt within the Bradford District is currently defined on the proposal map in the Replacement Unitary Development Plan (2005) under policy GB1. The Green Belt accounts for 23,886ha of land, approximately 65% of the District's land area.

- 2.7 The adopted Core Strategy (2017) sets out in Strategic Policy SC7 that exceptional circumstances require Green Belt releases in order to deliver, in full, the housing and job growth planned in the District. Policy SC7 also sets the context for undertaking a selective review of the green belt to evaluate the performance of Green Belt parcels against its purpose. Consultation on proposed revisions to Policy SC7 in light of changes to national and local policy through the Local Plan is on-going. However, it is still considered based on the most recent available evidence that exceptional circumstances exist at a strategic level within the District to justify potential amendments to the Green Belt boundary to accommodate future growth.
- 2.8 Through the preparation of the Local Plan exceptional circumstances will need to be justified at a strategic, settlement and site level if Green Belt boundaries are to be amended. The plan will need to consider a range of evidence, including that all other reasonable options for meeting identified need for development have been explored, consideration of the potential harm to the Green Belt resulting from proposed amendments to the Green Belt boundary and the need to promote sustainable patterns of developments. It is not the role of the Green Belt Review to demonstrate exceptional circumstances, but the evidence will feed into the overall consideration of exceptional circumstances alongside other matters such as the strategic policy distribution of housing and economic growth, development constraints as evidenced through site assessment work and the findings of the Sustainability Appraisal (SA).

3. Green Belt Review: Green Belt Site Assessment Methodology

- 3.1 The Green Belt Site Assessments will involve a site specific assessment against the five Green Belt purposes in national policy, the impact that removal of the site from Green Belt would have on the fundamental aims of Green Belt (to prevent urban sprawl) and the essential characteristics of Green Belts (their openness) and the need to define clear boundaries that are likely to be permanent and provide a new defensible and durable Green Belt boundary (NPPF, Paragraph 139).
- 3.2 The site specific Green Belt assessment will be informed by the results of the Selective Green Belt Review and any additional information gained from site assessments, internal consultee comments and site visits. This will include an assessment of the site's contribution to Green Belt purposes and consideration of the likely strength of any existing or new boundary. In addition an overall assessment will be required using professional planning judgement to consider the potential impact that the release of the site would have on the Green Belt with reference to a site's main characteristics, its potential for sprawl, impact on openness and its relationship with other elements that form boundaries.
- 3.3 This should be rated in terms of low potential impact, moderate potential impact and major potential impact. In terms of potential impact, it is not assumed that all of the purposes that the existing Green Belt performs will be affected by the proposed removal of a specific site. An overall judgement should be made at a site specific level, taking account of the characteristics of the site, and relationship of the site with the adjacent settlement and the wider Green Belt.

- 3.4 A brief written summary and overall conclusion based on the overall Green Belt site assessment will be recorded to fully justify the overall ratings given for a particular site.

Isolated and Detached sites

- 3.5 For Green Belt sites judged to be completely isolated and not connected to a settlement boundary, or with no potential to be combined with adjoining sites, then the site details should still be recorded but a full site specific Green Belt assessment will not be required. Instead this information will be recorded in a separate table (see Table 5 below) which establishes the reasons for not carrying out a full site specific Green Belt assessment. This is because isolated development which is not connected, or in close proximity to, urban areas has a higher potential for unrestricted sprawl than land adjoining or in close proximity to the built up area. Also these sites would not promote sustainable patterns of development in accordance with the strategic policies of the Local Plan and would be classed as unsustainable. Therefore the final rating for these should be recorded as 'major potential impact'
- 3.6 Green Belt sites which are detached from the settlement (but could form part of a larger site if combined with an adjacent site which is attached to the settlement) will be considered as isolated sites for the purpose of this assessment. Such sites should be included in the isolated sites table (see Table 5 below). However, the site assessment process is an iterative one and therefore taking account of the wider site assessment work, where a detached site is combined with an attached site to form a reasonable allocation option, then this site option will need a full site specific Green Belt assessment.

Previously Developed Sites in the Green Belt

- 3.7 For PDL sites which fall outside the considerations detailed under paragraphs 3.5 and 3.6 but are nevertheless detached or separated from the built form, these will not be subject initially to a full site specific Green Belt assessment, but reviewed firstly in terms of their overall quantum of PDL, and sustainability with regard to access to key services and facilities. Where sites score positively for accessibility (as defined through the Local Plan accessibility standards) additional work will be undertaken on evaluating the overall sustainability of these sites and appropriateness for development. Such sites should be included in a separate table (see Table 6 below).

Green Belt Site Assessment Pro-forma

- 3.8 The site specific Green Belt assessment findings will be recorded on a pro-forma on a site by site basis (see Table 4 below). For each site the following information should be provided:

Site characteristics

- The site reference number, name, size, sub-area and settlement.
- A map/ aerial photograph of the site boundary, to illustrate the nature of land cover.
- A map of the strategic Green Belt parcel(s) and reference no. the site is located within.

- A brief description of the site in terms of its land use and relationship with defined urban areas (i.e. site attached to settlement, site not attached but which could form part of a larger site which is adjoined to the settlement, isolated site not attached to settlement)
- Whether the site is considered PDL and/or accessible by public transport and overall SA score.

Assessment of site against Green Belt purposes

- Summary of findings of the Green Belt Selective Review for the parcel(s) within which the site falls.
- Text assessing the contribution of the site to each of the five Green Belt purposes. This should be based on the same criteria and definitions used for the Green Belt Selective Review (See Table 1).
- Each Purpose should receive a rating of either Low/ Moderate/Major or in some instances where the site plays no role for a purpose it should be rated as having ‘No Contribution’. This will only be applicable for: Purpose 1 where the site does adjoin the defined large built up area; Purpose 2 where the site is located in a parcel which does not play any role in preventing neighbouring towns from merging; Purpose 4 where the site does not adjoin an identified Historic Town and therefore does not play a role in preserving the setting or character of such a town. In such circumstances the text should explain the reasons why the site makes no contribution to the purpose.

Table 1: Green Belt Purposes Assessment Criteria

Purpose	Application	Key Criteria
1. To check the unrestricted sprawl of large built-up areas;	Assess the extent to which the Green Belt is able to restrict ‘sprawl’ of the defined large built-up areas in the Bradford District	<ul style="list-style-type: none"> • Connection to the urban area – the extent the site is contained by existing development. • Strength of existing Green Belt boundary.
2. To prevent neighbouring towns from merging into one another;	Assess the strength of the existing Green Belt boundary in preventing development which would result in the merging of gaps between neighbouring towns.	<ul style="list-style-type: none"> • The extent that development of the site would create a weaker defensible boundary than that of the existing (inner) Green Belt boundary and increase the likelihood of towns merging. • The significance of the gap between settlements and the extent the development of the site would lead to a significant reduction in distance or the physical/visual

Purpose	Application	Key Criteria
		<p>interconnection between settlements.</p> <ul style="list-style-type: none"> • The potential for ribbon development between settlements resulting from development of the site.
3. To assist in safeguarding the countryside from encroachment;	Assess the extent to which the Green Belt constitutes 'open countryside' by assessing countryside characteristics.	<ul style="list-style-type: none"> • The extent that the site protects the essential open countryside character as characterised by rural land uses. • The extent the site safeguards the countryside from encroachment (i.e. extent of built form/non-rural uses within the site under consideration).
4. To preserve the setting and special character of historic towns;	Analyse the impact on heritage assets where the Green Belt performs some role in preserving the setting and special character of the settlement.	<ul style="list-style-type: none"> • The extent the site has a role in supporting the character of the Historic Town or Place within the District. • The extent the site has a role in supporting the views into and out of the historic core.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	All sites are considered to score moderately against Purpose 5.	<ul style="list-style-type: none"> • N/A

- Overall rating of site against Green Belt purposes (major, moderate, low) informed by the same methodology used for the overall parcel score as set out in the Green Belt Selective Review. (See box below and Appendix 1 for details).

Green Belt Selective Review: Summary evaluation of site specific contribution to Green Belt purposes

As a guide only, the overall final evaluation is informed by the following range of values:

- Low: with an individual site providing up to 2 moderate and no major assessments against Green Belt purposes.
- Moderate: with an individual site providing more than 2 moderate and / or 1 major assessment against Green Belt purposes.
- Major: with an individual site providing 2 or more major assessments against Green Belt purposes.

Source: Selective Green Belt Review: Stage 1 and 2, paragraph 134.

Assessment of the site’s existing and potential new Green Belt boundaries

- Text assessing the strength of existing and potential new Green Belt boundaries with reference to any relevant boundary features of the site that are relevant to its relationship with settlement or the wider Green Belt (see Table 2 for boundary definitions):
 1. The strength of the existing (inner) Green Belt boundary adjoining the settlement that would be breached by development (strong, moderate, weak, entirely undefined).
 2. The strength of any potential new Green Belt boundary created by the (full extent of the) site (strong, moderate, weak, entirely undefined) and judgment of whether this would constitute a boundary which is stronger, weaker or the same strength as the existing settlement boundary which would be breached.
 3. If the proposed site boundary could be amended/re-drawn to produce a potentially stronger or more logical Green Belt boundary.

Table 2: Site boundary definition

Green Belt Boundary Definition	Boundary strength considerations:
Strong: defensible boundary (depending upon local context)	Durable/ ‘Recognisable and likely to be permanent’ features <ul style="list-style-type: none"> - Main River - Leeds and Liverpool Canal - Motorways - A Roads and Primary Roads - B Roads - Minor Roads

Green Belt Boundary Definition	Boundary strength considerations:
Moderate: Less Defensible Boundary (depending upon local context)	'Recognisable and less durable' features (where strong defensible boundaries are either not present or located a significant distance from the settlement edge) or if boundary contains a mix of strong and weak features: <ul style="list-style-type: none"> - Strongly defined footpaths and tracks - Streams and becks - Woodland, trees and hedgerows where these represent a continuous boundary - Viaducts - Prominent physical features (e.g. ridgelines) - Existing development with strongly established, regular or consistent boundaries. - Significant changes in topography
Weak: Boundaries lacking in durability (depending upon local context)	Features lacking in durability/ Not readily recognisable or unlikely to be permanent <ul style="list-style-type: none"> - Changes in landscape type / features - Existing development with soft, irregular or inconsistent boundaries (e.g. back gardens of residential properties) - Fences - Field boundaries
Entirely Undefined	<ul style="list-style-type: none"> - A suitable boundary would need to be created

Assessment of the site against potential for sprawl

- Text assessing the site's potential for unrestricted sprawl (Similar to Purpose 1). This will need to consider the following criteria:
 1. How the site relates to the settlement, including connection of boundary on how many sides and level of containment.
 2. Is the existing Green Belt boundary the site is connected to strong (helps to prevent sprawl), moderate or weak (less defensible/lacking durability) (may increase potential for sprawl)?
 3. Does the site represent a logical rounding off of the existing settlement pattern?

Assessment of the site against potential impact on openness

- Text assessing the site's impact on openness (Similar to Purpose 3). This will need to consider the following criteria:
 1. The presence of any built form on the site.
 2. Visual impact including the prominence and visibility of site and views across to the wider Green Belt. It is important to note that this is a high level assessment and should not consider wider visual landscape quality issues.

Assessment of the opportunities for compensatory improvement to the environmental quality and accessibility of the Green Belt

- Text assessing any high level opportunities for compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Additional guidance is available in the PPG (<https://www.gov.uk/guidance/green-belt#how-might-plans-set-out-ways-in-which-the-impact-of-removing-land-from-the-green-belt-can-be-offset-by-compensatory-improvements>). Key considerations include:
 1. Consider existing PROW and/or wildlife habitats on or within close proximity to the site – where there are such features – consider if potential enhancements can be made to them in order to improve accessibility to the wider Green Belt and improve the environmental quality of surrounding areas.
 2. Consider any other opportunities located within the Green Belt around the settlement, in particular any wildlife sites, green infrastructure corridors or habitat networks. This could include any areas identified in Neighbourhood Plans.

Site Specific Assessment Summary – Impact on the Green Belt

- Summary of the main outcomes of the site specific green belt assessment and potential impact that would result from the removal of the site from the Green Belt. This should take into consideration the contribution of the site to the Green Belt purposes, the potential for sprawl and impact on openness that the development of the site would have on the Green Belt and the strength and durability of any potential revised Green Belt boundaries.

Overall Conclusion

- A conclusion with an overall rating for the site based on professional planning judgement (see Table 3 below).

Table 3: Overall site rating

Overall Site Specific Green Belt Rating	Key considerations
Minor potential impact	Key considerations will include: <ul style="list-style-type: none"> • The site is located in a low/ moderate performing green belt parcel. A site within a parcel that makes a lower contribution is likely to have a less potential impact on the Green Belt. • The contribution the site makes to the purposes of including land in the green belt. A site that makes a lower contribution is likely to have less potential impact on the Green Belt.

Overall Site Specific Green Belt Rating	Key considerations
	<ul style="list-style-type: none"> • The potential for sprawl and impact on openness. A site that has lower potential for sprawl and/or less impact on openness is likely to have less potential impact on the Green Belt. • Whether the site presents the opportunity to create a strong or stronger new defensible and durable Green Belt boundary than the existing boundary. A site with stronger boundaries is likely to have less potential impact on the Green Belt.
Moderate potential impact	<p>Key considerations will include:</p> <ul style="list-style-type: none"> • The site is located in a low/moderate/major performing Green Belt parcel. A site within a parcel that makes a greater contribution is likely to have a larger potential impact on the Green Belt. • The contribution the site makes to the purposes of including land in the green belt. A site that makes a greater contribution is likely to have a larger potential impact on the Green Belt. • The potential for sprawl and impact on openness. A site that has higher potential for sprawl and/or impact on openness is likely to have a greater potential impact on the Green Belt. • Whether the site presents the opportunity to create a strong boundary and/or stronger new defensible and durable green belt boundary than the existing boundary. A site with weaker or less defensible boundaries is likely to have greater potential impact on the Green Belt.
Major potential impact	<p>Key considerations include:</p> <ul style="list-style-type: none"> • The site is located in a moderate/major Green Belt parcel. A site within a parcel that makes a greater contribution is likely to have a larger potential impact on the Green Belt. • The contribution the site makes to the purposes of including land in the green belt. A site that makes a

Overall Site Specific Green Belt Rating	Key considerations
	<p>greater contribution is likely to have a larger potential impact on the Green Belt.</p> <ul style="list-style-type: none"> • The potential for sprawl and impact on openness. A site that has higher potential for sprawl and/or impact on openness is likely to have a greater potential impact on the Green Belt. • Whether the site presents the opportunity to create a strong boundary and/or stronger new defensible and durable green belt boundary than the existing boundary. A site with weaker or less defensible boundaries is likely to have greater potential impact on the Green Belt.

Table 4: Site Specific Green Belt Assessment Pro-forma:

Site Specific Green Belt Assessment					
Site Reference:		Site Name:		Size (ha):	
Sub Area:			Settlement:		
Site Description:					
Map (Parcel and Site Boundary):			Aerial (Site Boundary):		
PDL Status:		Accessibility:		SA Score:	

Strategic Parcel Assessment Results:				
Parcel Reference:		Overall Rating:	Low/Moderate/Major	
Purpose 1: To check the unrestricted sprawl of large built-up areas.	Purpose 2: To prevent neighbouring towns merging into one another.	Purpose 3: To assist in safeguarding the countryside from encroachment.	Purpose 4: To preserve the setting and special character of historic towns.	Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Low/Moderate/Major	Low/Moderate/Major	Low/Moderate/Major	Low/Moderate/Major	Low/Moderate/Major
Site Specific Assessment Results:				
Assessment Summary:				
Purpose 1: To check the unrestricted sprawl of large built-up areas.	Purpose 2: To prevent neighbouring towns merging into one another.	Purpose 3: To assist in safeguarding the countryside from encroachment.	Purpose 4: To preserve the setting and special character of historic towns.	Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Low/Moderate/Major	Low/Moderate/Major	Low/Moderate/Major	Low/Moderate/Major	Low/Moderate/Major
Overall Summary of Purpose Assessment:	Based on planning judgement the site performs a <u>low/moderate/major</u> role overall when assessed against the NPPF Green Belt purposes.			
Boundary Strength - Existing (inner) Boundary:	Strong: defensible boundary/ Moderate: less defensible boundary/ Weak:			

<p>(<u>Strong</u>: defensible boundary; <u>Moderate</u>: less defensible boundary; <u>Weak</u>: boundaries lacking in durability; <u>Entirely Undefined</u>)</p>	<p>boundaries lacking in durability/ Entirely Undefined</p>	
<p>Boundary Strength – Potential new boundary: (<u>Strong</u>: defensible boundary; <u>Moderate</u>: less defensible boundary; <u>Weak</u>: boundaries lacking in durability; <u>Entirely Undefined</u>)</p>	<p>Strong: defensible boundary/ Moderate: less defensible boundary/ Weak: boundaries lacking in durability/ Entirely Undefined</p>	
<p>Boundary Strength – could an alternative site boundary be drawn to produce a potentially stronger or more logical Green Belt boundary?: (<u>Strong</u>: defensible boundary; <u>Moderate</u>: less defensible boundary; <u>Weak</u>: boundaries lacking in durability; <u>Entirely Undefined</u>)</p>	<p>Strong: defensible boundary/ Moderate: less defensible boundary/ Weak: boundaries lacking in durability/ Entirely Undefined</p>	
<p>Potential for Sprawl:</p>		
	<p>Low/Moderate/Major</p>	
<p>Impact on Openness:</p>		
	<p>Low/Moderate/Major</p>	

Opportunities for compensatory improvement to the environmental quality and accessibility of the Green Belt:	
Site Specific Assessment Summary – Impact on the Green Belt:	Purposes: Sprawl: Openness: Boundary Strength: Compensatory Improvements:
Overall Conclusion:	<p>The site is located in a <u>low/moderate/major</u> green belt parcel and:</p> <p>Based on planning judgement the site has a <u>low/moderate/major</u> potential impact on the Green Belt.</p>

Table 5: Isolated Sites Pro-forma template

Site Reference	Site Name	Isolated OR Detached	Comments	Map
			<p>For isolated sites – provide commentary to demonstrate why a full site specific Green Belt assessment has not been carried out. This may include issues relating to sustainable development.</p> <p>For detached sites – provide commentary to demonstrate why a full site specific Green Belt assessment has not been carried out. This may include issues relating to sustainable development. Provide details of any adjoining site(s) which are attached to the settlement and could be combined (with the detached site) to form a larger site and which would present a reasonable allocation option. A full site specific Green Belt assessment will need to be completed for this new site.</p>	

Table 6: Detached Previously Developed Sites in the Green Belt Pro-forma Template

Site Reference	Site Name	Gross Area (ha)	Brownfield / Greenfield % Split	Does the site meet Core Strategy accessibility standards?	Further considerations including any requirement for a full assessment	Map

4. Next Steps

- 4.1 The results of the site specific Green Belt Selective Review will be integrated into the overall site assessment pro-forma used for assessing both housing and employment sites. It should be flagged up on the pro-forma the need for further consideration and/or detailed professional input where necessary, for example potential boundary change to mitigate impacts of the site.
- 4.2 It is important to note that this assessment does not consider the cumulative impact of the release of multiple sites on the Green Belt as a whole. For example, where a site has been assessed as having low potential impact, if it were to be removed from the Green Belt, this does not necessarily mean that those sites should be allocated. Any release of Green Belt land requires consideration of the 'exceptional circumstances' justifying its release. The relatively poor performance of the land against Green Belt purposes is not, itself, an exceptional circumstance that can justify release of the land from the Green Belt. Other factors, such as the ability to meet development needs outside of the Green Belt and promoting sustainable development also need to be taken into consideration.
- 4.3 The overall justification of the detailed exceptional circumstances for any Green Belt changes by settlement/site as well as the strategic justification will be published as technical papers alongside the Local Plan.
- 4.4 The approach to justifying if there are there exceptional circumstances sufficient to support the amendment of the Green Belt boundary for a particular settlement/site is summarised below.

National Policy context

- 4.5 The NPPF requires any changes to the Green Belt boundaries to be made through the Local Plan process.
- 4.6 In line with national policy, plans should identify the most sustainable locations for growth to meet identified development needs. If such changes are proposed, this should include:
 - demonstration of exceptional circumstances; and
 - consideration of the need to promote sustainable patterns of development, such as a range of settlement specific, local, regional and national issues such as economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment of land against the Green Belt purposes.
 - plans should (where release of Green Belt is necessary) give first consideration to land which has been previously developed and/or is well served by public transport.
 - strategic planning authorities should also 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.
- 4.7 It is important to note that exceptional circumstances must first be demonstrated at the strategic scale to justify the need to amend Green Belt boundaries and again on a settlement and site basis.

- 4.8 In developing an ‘exceptional circumstances’ justification at settlement and site level it will be necessary to look at the objectively assessed needs for development, the need to promote sustainable patterns of development and whether these needs can be accommodated without releases from the Green Belt. These considerations should be balanced against both a Green Belt review assessment and an assessment of whether the release of land from the Green Belt would provide sustainable development options. The judgement in the 2015 court case *Calverton Parish Council v Greater Nottingham Council & Others* (EWHC 1078) identifies five matters to consider when assessing whether exceptional circumstances are present. The first of these is the acuteness/intensity of the objectively-assessed need. The other matters relate to the inherent constraints on supply/availability of land; the consequential difficulties in securing sustainable development without impinging on the Green Belt; any resulting harm caused to the Green Belt and the degree to which this could be ameliorated.
- 4.9 In making this assessment, it will be necessary to draw on both the Parts 1, 2 and 3 of the Selective Green Belt Review for each site including initial conclusions of the durability of boundaries and the potential to prevent sprawl, the extent a site serves the green belt purposes and consideration against Tests (iv) and (v) arising from the Calverton Judgement. These are [Test 4] the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and [Test 5] the extent to which the consequential impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.
- 4.10 In addition, for this final stage of the site allocations process, it will be necessary to draw on the wider evidence base which includes the SA and site assessments to balance the impact on the Green Belt against wider sustainability considerations. This will help to demonstrate the degree to which a site represents sustainable development in relation to compliance with the overall spatial strategy and a range of other sustainability considerations including accessibility, climate change mitigation, environmental protection and deliverability. For instance, the relatively poor performance of the land against Green Belt purposes is not, itself, an exceptional circumstance that would justify release of the land from the Green Belt. It must also be demonstrated that the site would represent sustainable development.
- 4.11 This will be broadly structured around the following:
- The rationale for housing or economic development at this settlement/location.
 - The availability of suitable, available and achievable sites within the urban area outside the Green Belt.
 - The site specific rationale for development and how it would achieve sustainable development.
 - The potential harm to the Green Belt and impact on Green Belt purposes at this location and an assessment of whether harm can be minimised or mitigated.
 - The continued role of the remaining Green Belt adjacent in this location.
 - Site specific exceptional circumstances conclusion.
- 4.12 Should the council decide to release land from the Green Belt through the Local Plan, further policy guidance or masterplans will need to be prepared as part of, or following on from, the Local Plan process. Masterplans should draw on the findings of the Green Belt Review and

professional landscape and design consultee advice to indicate precise development areas, new appropriate defensible Green Belt boundaries (existing or new features) and appropriate considerations for the layout and design of new developments so as to mitigate harm to the wider Green Belt.