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## FIGURE 6

Project  
Land at Rose Farm,  
Istead Rise,  
Drawing Title  
Opportunities and Constraints Plan

Date 12.05.2025 Scale 1:2,500 @A3 Drawn by EJ Check by GM  
Project No 333102059 Drawing No LN-LP-06 Revision -



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## Figure 7: Illustrative Landscape Masterplan



## **Appendix A LVIA Methodology & GB**



Project Number: 333102059

# Appendix A

## A.1 Introduction

A.1.1 The Landscape Institute and the Institute of Environmental Management & Assessment's Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA 3), 2013, notes in Chapter 1 that Landscape and Visual Impact Assessment (LVIA) relates to:

*"...the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity"*

A.1.2 The methodology employed in carrying out the LVIA has been drawn from guidelines set out in GLVIA 3 and Natural England landscape character guidance. The guidelines are not intended as a prescriptive set of rules, and the approach has been adapted to the specific project.

A.1.3 LVAs are undertaken by professionals who are also typically involved in the design of the landscape and the preparation of subsequent management proposals. This can allow the assessment to proceed as an integral part of the overall scheme design. Judgements are based on training and experience and supported by clear evidence and reasoned argument.

A.1.4 The purpose of LVAs is to identify the potential for and assess the likely effects of change resulting from development. Landscape and visual assessments are separate, although linked, procedures. A distinction is made between:

- landscape - landscape character and the elements and features that contribute to it (landscape receptors); and
- visual - people who experience views within the landscape (visual receptors).

A.1.5 An LVIA is typically accompanied by illustrative material, including baseline mapping and photographs of the Site itself and from the wider context.

A.1.6 There are typically four key stages to LVIA, as follows:

- Baseline Studies;
- Design;
- Assessment of Landscape and Visual Effects; and
- Cumulative Assessment (should this be required).

## Baseline Studies

A.1.7 The purpose of baseline studies is to record the existing landscape features, characteristics, the way the landscape is experienced and potential visual receptors. The following are typically undertaken as part of the baseline studies:

- Identification of the extents of the study area. This is based on professional judgement and may vary depending on the type of development proposed and landscape context.
- A desktop study of patterns and scale of landform, land use and built development, relevant current planning policy (including landscape designations) and landscape character publications. Further localised character assessments may also be undertaken to supplement published assessments.
- Where such additional assessments are undertaken, these are based on principles set out in published guidance, including the Natural England 2014 publication: An Approach to Landscape Character Assessment. Factors typically considered may include the following, as relevant:
  - Landform and hydrology;
  - Land use and settlement;
  - Pattern/texture/line;
  - Scale;
  - Historical development/time depth;
  - Activity/cultural association;
  - Spatial structure and built form;
  - Infrastructure;
  - Movement and connectivity;
  - Green Infrastructure;
  - Enclosure/views; and
  - Tranquillity.
- Zone of Theoretical Visibility (ZTV) modelling to assist in identifying potential viewpoints, should this be deemed necessary, dependent on professional judgement of the visual envelope of the Site/Proposed Development.
- Identification of potential representative viewpoints within the study area.
- Site/context Landscape and Visual Appraisal (LVA) visit.

A.1.8 Where relevant, the future baseline of the Site and its context is also considered, in order to account for ongoing change in the landscape, for example developments that are under construction, and which will have altered the landscape context to the Site by the time the Proposed Development would be likely to be initiated.

## Design and Mitigation

A.1.9 LVIAs are undertaken by professionals who are also often involved in the design of the landscape, site design, and the preparation of subsequent management proposals. The design and assessment stages are iterative, with stages overlapping in part.

A.1.10 Mitigation measures are embedded within the design of the Proposed Development (or the development parameters for an outline application) arising from desk-based study and LVIAs field work. These measures, such as the building layout, massing, height, and arrangement of open spaces and new structural planting, are termed 'Primary Mitigation'. Effective Primary Mitigation strategies avoid or reduce adverse effects by ensuring the key principles of the design of the development, as noted above, are sympathetic with the existing baseline.

A.1.11 Additional recommended measures to reduce adverse effects are termed 'Secondary Mitigation'. These may be illustrated in material accompanying the proposal, including a Design and Access Statement.

A.1.12 Typical Secondary Mitigation strategies can include:

- Additional design detail including building materials or landscape design approaches, including indicative species;
- A Landscape and Biodiversity Management Strategy to secure ongoing enhancement of landscape features;
- A Construction Environmental Management Plan to minimise effects arising during the construction process, typically including tree protection; and
- A programme of appropriate monitoring, agreed with the regulatory authority, so that compliance and effectiveness can be readily monitored and evaluated.

A.1.13 The contribution made by areas of planting introduced as part of the Proposed Development is also considered in terms of the effects at year 1 and the residual effects (allowing for growth of planting over time), and the height of this planting for assessment purposes is assumed to be as follows (based on an average growth rate of 1m in 3 years – the specific rate of growth varies according to species, conditions and management):

- Planting at Year 1: typically 0.7-4.5 metres; and
- Planting at Year 15: typically 5.5-9.5 metres.

A.1.14 In addition, measures may be taken to offset or compensate for adverse effects, if these are not already built into the design proposals. Typical compensation measures are the

replacement of felled trees with new trees or off-site provision of public amenity or access where this may be lost within the Site.

### **Enhancement**

A.1.15 Whilst distinct from mitigation of adverse effects, enhancement may be achieved through the Proposed Development (e.g. the creation of a new landscape or public amenity/access; enhancement in character or view; or improved management of existing landscape features secured through the Proposed Development). The beneficial changes resulting from these measures are incorporated into assessment of landscape and visual effects.

## **A.2 Assessment of Landscape Effects**

A.2.1 GLVIA 3 Paragraph 5.1 states that:

*“An assessment of landscape effects deals with the effects of change and development on landscape as a resource.”*

A.2.2 The significance of landscape effects is derived from a combination of assessments of the **sensitivity** of the landscape receptor and the **magnitude** of effect (change) experienced as a result of the Proposed Development.

### **Sensitivity of Landscape Receptors**

A.2.3 The sensitivity of a landscape receptor is a combination of the **value** of the landscape receptor and the **susceptibility** (in other words ‘vulnerability’) of the landscape receptor to the type of change proposed, using professional judgement.

### **Landscape Value**

A.2.4 The assessment of value is based on a combination of the importance of landscape-related planning designations and the following attributes:

- Landscape quality (condition): the measure of the physical state of the landscape. It may include the extent to which typical landscape character is represented in individual areas, the intactness of the landscape and the condition of individual elements.
- Scenic quality: the extent that the landscape receptor appeals to the visual senses;
- Perceptual aspects: the extent that the landscape receptor is recognised for its perceptual qualities (e.g. remoteness or tranquillity);
- Rarity: the presence of unusual elements or features;
- Representativeness: the presence of particularly characteristic features;
- Recreation: the extent that recreational activities contribute to the landscape receptor; and

- Association: the extent that cultural or historical associations contribute to the landscape receptor.

A.2.5 Landscapes, including their character and features, may be designated for their landscape and visual qualities at a range of levels (national, county, and local level).

A.2.6 The overall value for each landscape receptor is categorised as either High, Medium, or Low (as described below in **Table A.2.1**):

**Table A.2.1: Landscape Value**

Level	Criteria
High	Landscape area of distinctive components and characteristics that may also be nationally designated for scenic beauty. A landscape feature that makes a strong positive contribution to landscape character e.g. a mature tree or woodland.
Medium	Landscape area of common components and characteristics that may be designated at county or borough level for its landscape and visual qualities. A landscape feature that makes some positive contribution to landscape character.
Low	Landscape area/feature of inconsequential components and characteristics, undesignated and with little or no wider recognition of value, although potentially of importance to the local community.

### **Landscape Susceptibility**

A.2.7 The susceptibility of the landscape is a measure of its vulnerability to the type of development proposed, without undue consequences for the maintenance of the baseline situation.

Landscape character/features of low susceptibility would have a high capacity to accommodate change, and landscape character/features of high susceptibility would have a low capacity to accommodate change. The following criteria are taken into consideration in the assessment of the susceptibility of landscape character, although not all criteria are equally applicable or important within a given landscape / type of development proposed:

- Landform;
- Pattern/Complexity;
- Composition;
- Landcover;
- Relationship of a given landscape area to existing settlements or developments; and
- Potential for appropriate mitigation within the context of existing character and guidelines.

A.2.8 With regard to landscape features, susceptibility relates to the potential for loss/retention of the relevant features in relation to the type of development proposed (for example trees within a Site are potentially highly susceptible to construction of an industrial shed, where they might not be to construction of residential units, as the latter provides more scope to mitigate by design); and the ease with which such elements may be replaced, where appropriate.

A.2.9 The susceptibility of each landscape receptor is categorised as High, Medium, or Low (as described below in **Table A.2.2**):

**Table A.2.2: Landscape Susceptibility**

Susceptibility	Criteria
High	The receptor is likely to have little scope to accommodate the type of development proposed without undue consequences upon its overall integrity.
Medium	The receptor is likely to have some scope to accommodate the type of development proposed without undue consequences upon its overall integrity.
Low	The receptor is likely to be able to accommodate the type of development proposed with little or no consequences upon its overall integrity.

A.2.10 Based on the combination of value and susceptibility, an assessment of landscape sensitivity is reached, defined as High, Medium, or Low. Typically a high value and high susceptibility receptor would result in a receptor of high sensitivity; and a low value and low susceptibility receptor would result in a receptor of low sensitivity.

**Landscape Magnitude of Effect (Change)**

A.2.11 The landscape magnitude of effect is informed by judgements about the precise nature of the change brought about by the Proposed Development both in terms of the existing landscape character and landscape elements / features and the addition of new landscape elements / features, and its duration and reversibility (as described below in **Table A.2.3**):

**Table A.2.3: Landscape Magnitude of Effect (Change)**

Magnitude	Criteria
Large	Pronounced change to the existing landscape receptor that may affect an extensive area. The change may be long-term or may be irreversible.
Medium	Partial change to the existing landscape receptor that may affect a relatively extensive area. The change may be medium-term or may be irreversible.

Magnitude	Criteria
Small	Limited change to the existing landscape receptor that may affect a relatively limited area. The change may be short-term or reversible.
Very Small	Very slight change to the existing landscape receptor that may affect a limited area. The alteration may be short-term or reversible.
None	No change to the existing landscape receptor.

## A.3 Assessment of Visual Effects

A.3.1 GLVIA 3 Paragraph 6.1 states that:

*“An assessment of visual effects deals with the effects of change and development on the views available to people and their visual amenity.”*

A.3.2 The significance of visual effects is derived from a combination of assessments of the **sensitivity** of the visual receptor and the **magnitude** of effect (change) experienced as a result of the Proposed Development.

### Viewpoint Selection

A.3.3 In order to assess the effects on visual receptors, a selection of publicly accessible viewpoints is made. This could include representative viewpoints (e.g. representing views of users of a particular footpath) and specific viewpoints (e.g. a key view from a specific visitor attraction).

A.3.4 Views may be categorised as either near distance, medium distance, or long distance with the relevant distances dependant on the size and nature of the development, based on professional judgement.

A.3.5 Viewpoints fall into three broad categories:

- **Representative:** selected to represent the experience of different types of receptor;
- **Specific:** chosen because they are key and sometimes promoted viewpoints within the landscape; and
- **Illustrative:** demonstrating a particular effect or specific issues.

A.3.6 The type of view is typically described as transient (i.e. experienced when moving) or fixed (i.e. from a static location). It is also described in terms of the degree of screening or openness (e.g. open or uninterrupted; filtered (including where partially screened) by vegetation or other structures; or curtailed by intervening land form, built form or vegetation) and the angle of view (e.g. frontal or oblique).

## Sensitivity of Visual Receptors

A.3.7 The sensitivity of a visual receptor is a consideration of the **value** of the view and the **susceptibility** of the visual receptor, the latter being primarily based on consideration of the extent to which a visual receptor is focused on appreciation of the landscape.

A.3.8 Professional judgement is used to determine these factors, based on considerations set out in **Table A.3.1** and **Table A.3.2** below:

### Value of Views

**Table A.3.1: Value of Views**

Value	Criteria
High	View of/from a location that is likely to be of national importance, either designated or with national cultural associations.
Medium	View of/from a location that is likely to be of local importance, either designated or with local cultural associations.
Low	View of/from a location that is not designated, with minimal or no cultural associations.

### Susceptibility of Visual Receptors

**Table A.3.2: Susceptibility of Visual Receptor**

Susceptibility	Criteria
High	People at their place of residence; People engaged in outdoor recreation, including users of Public Rights of Way (PRoW), whose attention is likely to be focused on the landscape; and People travelling along recognised scenic routes or where their appreciation of the view contributes to the amenity experience of their journey.
Medium	People engaged in outdoor sport and recreation, where their appreciation of their surroundings is incidental to their enjoyment; and People travelling on secondary roads or country lanes, rail or other transport routes.
Low	People travelling on major roads; and People at their place of work.

A.3.9 The sensitivity of a visual receptor results from the combination of value and susceptibility and is rated as High, Medium, or Low. Typically a high value and high susceptibility receptor would result in a receptor of high sensitivity; and a low value and low susceptibility receptor would result in a receptor of low sensitivity.

### **Visual Magnitude of Effect (Change)**

A.3.10 In the evaluation of the effects on views and the visual amenity of the identified receptors, the magnitude of visual effect is typically described with reference to:

- The scale of change in the view with respect to the loss or addition of features in the view and changes in its composition. Factors contributing to this include:
  - The angle of view in relation to the main activity of the receptor;
  - The distance of the viewer from the Proposed Development; and
  - The extent of the area over which the changes would be visible.
- Whether or not the view is experienced in fixed or transient views and, in the latter, whether it is intermittent/glimpsed or continuous; and
- The duration of the change, whether temporary or permanent.

A.3.11 The criteria for the magnitude of visual effects is set out in **Table A.3.3** below:

**Table A.3.3: Visual Magnitude of Effect (Change)**

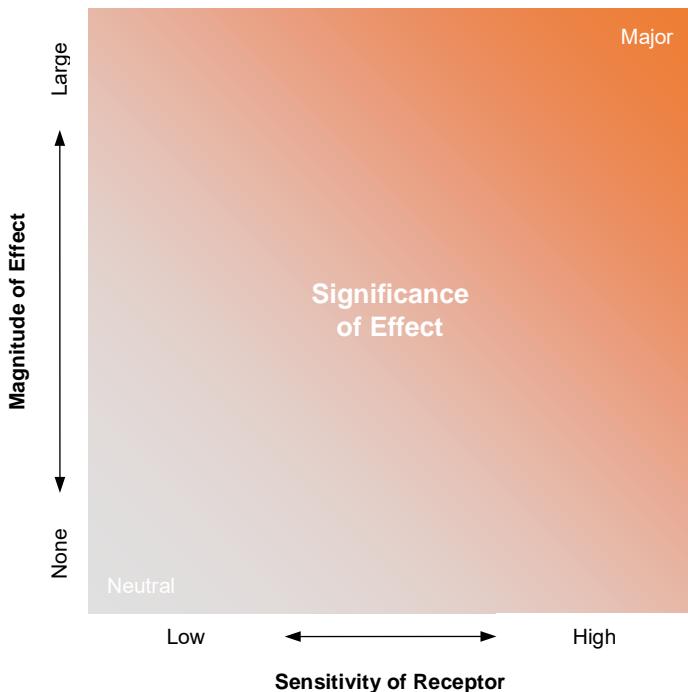
Magnitude	Criteria
Large	The proposals will cause a pronounced change to the existing view, resulting in the loss or addition of features that will substantially alter the composition of the view. The change may be long-term or may be irreversible.
Medium	The proposals will cause a noticeable change in the view, resulting from the loss or addition of features in the view and will noticeably alter the composition of the view. The change may be medium-term or may be irreversible.
Small	The proposals will cause a limited change in the view, which would not materially alter the composition of the view. The change may be short-term or reversible.
Very Small	The proposals will cause a barely perceptible change in the view. The change may be short-term or reversible.
None	No change discernible in the view.

## A.4 Significance of Effects

A.4.1 In order to draw conclusions about the significance of landscape or visual effects, the combination of the sensitivity of the receptors and the magnitude of effect are considered for the Proposed Development at **Day 1** of the operational phase (once the Proposed Development has been completed); and, depending on the assessment, also at a point where planting associated with the Proposed Development will be establishing e.g. **Year 15**. In certain circumstances, it may also be appropriate to consider effects at construction and on decommissioning of the Proposed Development.

A.4.2 The significance of effects are rated on a scale of Neutral to Major. The assessment of significance of effects is subject to professional judgement but in broad terms, where a receptor of High sensitivity experiences a Large magnitude of effect as a result of the Proposed Development, the significance of effect is likely to be Major. Conversely, where a receptor of Low sensitivity experiences a Very Small magnitude of effect as a result of the Proposed Development, the significance of effect is likely to be Negligible.

**Figure A.4.1: Significance of Effects**



A.4.3 Where it is considered that there is potential for both beneficial and adverse changes, these magnitudes of effect (change) are noted, and the balance of these considerations used to inform conclusions on significance of effect.

- A.4.4 The assessment of residual effects refers to the likely effects of the Proposed Development that will remain once Secondary Mitigation measures are applied and also considers the growth of planting introduced within the Proposed Development (including where this is part of Primary or Secondary Mitigation).
- A.4.5 For schemes subject to Environmental Impact Assessment, as governed by the Environmental Impact Assessment Directive (2011/92/EU), an assessment of whether or not the effect is considered 'significant' is required. This is relative to each scheme but, in general, effects of Major or Moderate (adverse/beneficial) significance are deemed 'significant'.

**Table A.4.1: Significance of Landscape Effects – Criteria**

Significance	Criteria
Major Beneficial	Alterations that would be substantially characteristic and result in a pronounced improvement of the existing landscape resource. Valued characteristic features would be restored or reintroduced as part of the Proposed Development.
Moderate Beneficial	Alterations that result in a partial improvement of the existing landscape resource. Valued characteristic features would be partially restored or reintroduced.
Minor Beneficial	Alterations that result in a limited improvement of the existing landscape resource. Characteristic features would be restored to a limited degree.
Negligible Beneficial	Alterations that result in a very slight improvement to the existing landscape resource, not uncharacteristic within the receiving landscape.
Neutral	Neither beneficial nor adverse effects on the existing landscape resource.
Negligible Adverse	Alterations that result in a very slight deterioration to the existing landscape resource, not uncharacteristic within the receiving landscape.
Minor Adverse	Alterations that result in a limited deterioration of the existing landscape resource. Characteristic features would be lost to a limited degree.
Moderate Adverse	Alterations that result in a partial deterioration of the existing landscape resource. Valued characteristic features would be partially lost.
Major Adverse	Alterations that would be substantially uncharacteristic and result in a pronounced deterioration of the existing landscape resource. Valued characteristic features would be wholly lost.

**Table A.4.2: Significance of Visual Effects – Criteria**

Significance	Criteria
Major Beneficial	Alterations that typically result in a pronounced improvement in the existing view.
Moderate Beneficial	Alterations that typically result in a noticeable improvement in the existing view.
Minor Beneficial	Alterations that typically result in a limited improvement in the existing view.
Negligible Beneficial	Alterations that typically result in a barely perceptible improvement in the existing view.
Neutral	Neither beneficial nor adverse effects on the existing view.
Negligible Adverse	Alterations that typically result in a barely perceptible deterioration in the existing view.

<b>Significance</b>	<b>Criteria</b>
Minor Adverse	Alterations that typically result in a limited deterioration in the existing view.
Moderate Adverse	Alterations that typically result in a noticeable deterioration in the existing view.
Major Adverse	Alterations that typically result in a pronounced deterioration in the existing view.

# **Green Belt Assessment Methodology**

**March 2025**

**(NPPF December 2024 and PPG Green Belt February 2025)**



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## Green Belt Assessment Methodology

### Background Overview: The Green Belt: National Planning Policy

Chapter 13 of the National Planning Policy Framework (NPPF) (December 2024) addresses the Green Belt, with **Paragraph 142** stating “*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*” and that “*the essential characteristics of Green Belts are their openness and their permanence*”.

**Paragraph 143** subsequently sets out the following five purposes of the Green Belt:

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

### Green Belt review and boundary alteration

**Paragraph 145** sets out that “*once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*”.

**Paragraph 146** states that “*exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan*”.

The NPPF seeks to align Green Belt boundary reviews with sustainable patterns of development.

**Paragraph 148** states:

“*Where it is necessary to release Green Belt Land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.*”

**Paragraph 148** also notes that Local Planning Authorities are encouraged to “*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*”.

**Paragraph 149** lists a number of criteria local planning authorities should address when defining new Green Belt boundaries, including:

“(f)…define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

### Proposals within the Green Belt

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**Paragraph 153** states that when considering any planning application

*“local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness<sup>55</sup>.”*

**Footnote 55** sets out the exception: *“Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate”*

Paragraph 153 goes on to set out that: *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”*.

In relation to proposals affecting the Green Belt, **Paragraph 153** states that *“local authorities should ensure substantial weight is given to any harm to the Green Belt, including harm to its openness”*.

Any development in the Green Belt is considered inappropriate unless it is covered by the exceptions in Footnote 55 or, as set out in **Paragraph 154**, it falls into one of the exception categories which are:

- a) *“buildings for agriculture and forestry;”*
- b) *“the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;”*
- c) *“the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;”*
- d) *“the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;”*
- e) *“limited infilling in villages;”*
- f) *“limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and”*
- g) *“limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.”*
- h) *“Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*

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- i. mineral extraction;*
- ii. engineering operations;*
- iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
- iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;*
- v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
- vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.*

However, following from this, **Paragraph 155** highlights ***that “the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where”:***

*“The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*

*There is a demonstrable unmet need for the type of development proposed;*

*The development would be in a sustainable location, with particular reference to [paragraphs 110 and 115 of this Framework]; and*

*Where applicable the development proposed meets the ‘Golden Rules’ requirements”*

**Paragraph 156** of the NPPF stipulates where major development involving the provision of housing is proposed on sites released from the Green Belt or on sites in the Green Belt subject to a planning application, the following contributions (**‘Golden Rules’**) should be made:

*“affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*

*necessary improvements to local or national infrastructure; and*

*the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”*

**Paragraph 158** goes on to state that if ***“a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”***.

Lastly, the NPPF states at **Paragraph 159**:

*“The improvements to green spaces required as part of the **Golden Rules** should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan.”*

The 2025 Planning Policy Guidance (PPG) update on Green Belt complements the 2024 update of the NPPF providing information on the key considerations for assessing the contribution Green Belt land to green Belt purposes and identifying grey belt. As noted in the Scope of Guidance, the 14 paragraphs contained in the guidance set out:

- *“the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land”*
- *“the considerations involved in determining whether release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;”*
- *“guidance for considering proposals on potential grey belt land”*
- *“guidance on identifying sustainable locations when considering the release or development of Green Belt land”*
- *“updated guidance on how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, should contribute to accessible green space”*
- *“updated guidance on how to consider the potential impact of development on the openness of the Green Belt”*

It is noted in the introductory text, in relation to identification of grey belt, that *“Where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework (NPPF).”*

Criteria for evaluating the contribution of Green Belt land to purposes a, b and d, are set out in PPG Paragraph 005 Reference ID: 64-005-20250225, and these are reflected in the criteria set out at **Table 1**. The guidance clarifies that purposes A, B and D relate to large built up areas and towns and not to villages.

PPG Paragraph: 006 Reference ID: 64-006-20250225 notes that where designations or policies covered by footnote 7 *“would provide a strong reason for refusing or restricting development....it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals”*

PPG Paragraph: 011, Reference ID: 64-011-20250225, notes how should authorities establish whether Green Belt land is in sustainable locations. It states:

*“The Framework is clear that, when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location would be appropriate for the kind of development proposed. Similarly, when making decisions regarding planning applications on grey belt*

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*land, authorities should ensure that the development would be in a sustainable location. For the purpose of these decisions, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate.*

*Whether locations are sustainable should be determined in light of local context and site or development-specific considerations. However, in reaching these judgements, national policy is clear that authorities should consider opportunities to maximise sustainable transport solutions, as set out in paragraphs 110 and 115 of the NPPF.”*

PPG Paragraph: 012, Reference ID: 64-012-20250225 notes how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, contribute to accessible green space. It states that the following contributions to accessible green space should be considered:

- *“New residents and the wider public should be able to access good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.*
- *Accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions.*
- *Where possible access to green spaces should include safe active travel routes and should be served by public transport, which also means providing the necessary infrastructure (such as footpaths and bridleways).*
- *Proposals should consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.*
- *Where appropriate, authorities should consider the use of conditions or planning obligations. The Community Infrastructure Levy can also be used to fund improvements to existing greenspaces or the provision of new ones. Local authorities should consider arrangements for the long-term maintenance of green spaces.”*

PPG Paragraph: 013, Reference ID: 64-013-20250225 identifies the factors that can be taken into account when considering the potential impact of development on the openness of the Green Belt. These include, but are not limited to the following:

- *“openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*

- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.”*

PPG Paragraph: 014, Reference ID: 64-014-20250225 notes how should harm to the Green Belt including harm to its openness shall be considered if a development is not inappropriate development. It states:

*“Footnote 55 to the NPPF sets out that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.*

*This is consistent with rulings from the courts on these matters that, where development (of any kind, now including development on grey belt or previously developed land) is not considered to be inappropriate in the Green Belt, it follows that the test of impacts to openness or to Green Belt purposes are addressed and that therefore a proposal does not have to be justified by “very special circumstances”.*

### **Criteria for Assessment of the contribution of the Site to Purposes (a), (b), (c) and (d) of the Green Belt**

Should it not qualify as Previously Developed Land, or grey belt, the Site or relevant area of Green Belt is assessed against the first four purposes of the Green Belt as set out in Paragraph 143 of the NPPF:

- “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...”*

With respect to the fifth purpose of the Green Belt, that is (e) *“to assist in urban regeneration by encouraging the recycling of derelict and other urban land”*, should the Site or relevant area of Green Belt be brought forward for development it would not prejudice derelict or other urban land being brought forward for urban regeneration. The principle of retaining land within the Green Belt holds true for all areas within the Green Belt, therefore the Site is considered to make the same contribution to this purpose of the Green Belt as any other land parcel within the Green Belt. Accordingly, no additional specific assessment is undertaken.

The criteria for the assessment of the contribution that a Site or relevant area of Green Belt makes to the purposes of the Green Belt and to the ability of the remaining Green Belt to fulfil the purposes, are set out in **Table 1**:

**Table 1: Purposes of the Green Belt - Assessment Criteria**

Purpose	Criteria
a - Check the unrestricted sprawl of large built-up areas <sup>1</sup>	<p><b>Strong:</b> Development of the land would be strongly perceived as sprawl, insofar as it is adjacent or near to a large built-up area, is not contained by robust physical features that could restrict and contain development and/or would extend the settlement in an incongruous pattern (such as an extended “finger” of development into the Green Belt).</p> <p><b>Moderate:</b> Development of the land would be perceived as sprawl to a moderate extent, insofar as it is adjacent or near to a large built-up area, but also contains features that weaken the lands contribution to purpose A, such as (but not limited to): having physical features in reasonable proximity that could restrict and contain development; being partially enclosed by existing development, such that new development would not result in an incongruous pattern of development; contains existing development; or is subject to other urbanising influences.</p> <p><b>Weak or None:</b> Development of the land would not be perceived as sprawl, or weakly, as it is not adjacent to or near a large built up area, or is largely enclosed by significant existing development.</p>
b - Prevent neighbouring towns from merging <sup>1</sup>	<p><b>Strong:</b> No built or engineered forms present and perceived as inherently undeveloped and/or rural in character, forming a substantial part of a gap between towns and the development of which would be likely to result in the loss of visual separation of towns.</p> <p><b>Moderate:</b> May be location in a gap between towns but contribution to purpose B weakened by such considerations as (but not limited to) presence of built or engineered forms; being a small part of the gap between towns; and having the capacity to be developed without loss of visual separation between towns - due to the presence (in close proximity) of structures, natural landscape elements or topography that preserves visual separation.</p> <p><b>Weak or None:</b> Does not form part of a gap between towns, or where it does, is a small part of the gap and does not contribute to visual separation</p>
c - Assist in safeguarding the countryside from encroachment	<p><b>Strong:</b> No built or engineered forms present and perceived as inherently undeveloped and/or rural in character.</p> <p><b>Moderate:</b> Built or engineered forms present but retaining a perception of being predominantly undeveloped and/or rural in character.</p> <p><b>Weak or None:</b> Built or engineered forms are present, with perceptions ranging from minimally developed or rural in character to inherently developed or urban in nature.</p>
d - Preserve the setting and special character of historic towns <sup>1</sup>	<p><b>Strong:</b> Forms part of the setting of the historic town and makes a considerable contribution to its special character. Such as being within, adjacent to, or of significant visual importance to the historic aspects of the town.</p> <p><b>Moderate:</b> Likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): being separated to some extent from historic aspects of the town by existing development or topography;</p>

<sup>1</sup> Villages are not considered to be large built up areas or towns as per PPG Paragraph 005.

Purpose	Criteria
	<p>containing existing development; not having an important visual, physical, or experiential relationship to historic aspects of the town</p> <p><b>Weak or None:</b> Not adjacent to or near an historic town, not forming part of the setting of a historic town or having no visual, physical, or experiential connection to the historic aspects of a historic town.</p>

### **Assessment of Harm to the characteristics of the Green Belt resulting from loss of Openness and Permanence.**

In terms of proposals within the Green Belt, development is not inappropriate in the Green Belt if the land is Grey Belt and wouldn't fundamentally undermine the combined purposes of the remaining wider Green Belt in the plan area. These purposes include purpose c: "assist in safeguarding countryside from encroachment". Paragraph 153 notes that substantial weight is given to harm to the Green Belt from proposals, including in terms of openness.

The NPPF states that the key characteristics of the Green Belt are "*their openness and their permanence*". In defining new boundaries to the Green Belt, it must be ensured that these characteristics are not diminished for the areas remaining within the Green Belt designation as a direct result of development. An assessment is made of the openness of the Green Belt in the vicinity of the Site or relevant area of Green Belt and to what extent its development or removal from Green Belt could affect the openness and permanence of the remaining Green Belt.

Openness can be considered:

- By definition – i.e., the absence of built development in principle;
- Spatially / volumetrically – i.e., how much openness is taken up physically by built development; and
- Visually – i.e., how the openness or its loss is perceived visually.

Guidance set out in the PPG (Paragraph: 013, Reference ID: 64-013-20250225) identifies the factors to be taken into account when considering the potential impact of development on the openness of the Green Belt. These include, but are not limited to the following:

- "*openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- "*the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- "*the degree of activity likely to be generated, such as traffic generation.*"

The effect on openness is assessed in terms of '**spatial harm**', that is the physical reduction in the openness, or undeveloped nature, of the Site or relevant Green Belt area, as a result of the increase in development; and the '**visual harm**', that is the increase in visibility of built form

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from the remaining Green Belt surrounding the Site, and therefore a reduction in visible or perceived openness.

**Spatial harm** will be dependent on a comparison between the extent on the Site or relevant Green Belt area of any existing development and the extent of proposed built form or development.

**Visual harm** will be dependent on the existing visual context of the Site or relevant Green Belt area and its surroundings, such as the availability of views into the Site/area affording a view of its open character; degree of screening or visual containment in relation to views of both the existing Site/area and any proposed built form or development, including accounting for the mitigation by design approaches taken, such as the type of development, location, height, scale, density and appearance (such as lighting and colour), and retained vegetation or proposed planting.

The duration and/or reversibility of potential development on the Site or relevant Green Belt area, and the degree of activity generated, may also have an effect on the perceived harm to the openness of the Site/ area and its surrounding context.

In addition, the Site or relevant Green Belt area is assessed in terms of its relationship to existing elements and visual barriers, such as existing development, infrastructure, roads, railways and water features, as well as visual barriers such as ridgelines, vegetation, tree belts, areas of woodland and areas of other notable vegetation. This assists in the assessment of the impact of potential development within the Site/area upon the openness of the remaining Green Belt.

Where relevant, these factors, in addition to the consideration of the contribution of the Site or relevant Green Belt area as existing to the Green Belt, are then used to determine the degree of harm to the Green Belt, resulting from potential development of the Site/area.

The criteria set out in Table 1 above also form the basis for consideration of harm to the Green Belt purposes. Typically, a low contribution to any of the purposes will result in a low level of harm associated with that purpose arising from any development.

### **Assessment of the Site, based on its contribution to Purposes (a), (b) and (d), with regard to whether the Site can be considered as “Grey Belt”**

‘Grey Belt’ is defined in the Glossary within the NPPF as:

**“Grey Belt: For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7<sup>2</sup> (other than Green Belt) would provide a strong reason for refusing or restricting development.”**

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<sup>2</sup> NPPF Footnote 7: “The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”

Therefore, subject to there being no strong reason for refusing development<sup>3</sup> (as per footnote 7) if the Site or relevant Green Belt area does not contribute strongly to Purposes (a), (b) and (d), the Site/area is 'Grey Belt'.

**Assessment against the characteristics of the Green Belt to determine whether the development of the Site should not be considered 'Inappropriate'**

To satisfy NPPF Paragraph 155, for the Proposed Development to not be regarded as inappropriate, it will be necessary to demonstrate that the Site or relevant Green Belt area is Grey Belt land and that its development would not fundamentally undermine the purposes (taken together) of the Green Belt across the area of the plan.

To determine if the Site or relevant Green Belt area comprises Grey Belt the methodology above will be used. It is then necessary to establish the degree to which the whole of the remaining Green Belt within the relevant plan area fulfils Purposes (a), (b), (c), (d) and (e) of the Green Belt, that is at the strategic level of function regarding purposes of the Green Belt.

**Definitions**

**Table 2** below provides a glossary of the terms used in relation to the Green Belt assessment.

**Table 2: Definitions**

Term	Definition
Brownfield	(see Previously Developed Land)
Character	A distinct, recognisable and consistent pattern of elements in the landscape that differentiates one area from another.
Coalescence	The physical or visual linkage of large built-up areas.
Countryside	In planning terms: land outwith the settlement boundary; and/or, In broader terms: the landscape of a rural area.
Defensible Boundary	A physical feature that is readily recognisable and likely to be permanent.
Encroachment	Physical incursion of a large built-up area beyond the limits of the existing built-up area into an area perceived as countryside.
Exceptional Circumstances	As per Paragraph 145 of the NPPF these are fully evidenced and justified circumstances for altering Green Belt boundaries through the preparation of or updating of plans.
Golden Rules	As per Paragraphs 155 and 156 of the NPPF "Golden Rules" are conditions which must be met, alongside other requirements, for major development providing housing on sites released from the Green Belt or on sites in the Green Belt, subject to a planning application. The "Golden Rules" are set out in Paragraph 156 of the NPPF.
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

<sup>3</sup> As per Paragraph 006 of the PPG: "As defined in the NPPF, grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. In reaching this judgement, authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7. Where this is the case, it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals."

Term	Definition
Greenfield	Land (or a defined site) usually farmland, that has not previously been developed.
Grey Belt	Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. Grey Belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) in the NPPF would provide a strong reason for refusing or restricting development.
Historic Town	A town which falls under the protection of a Conservation Area or Local Plan policies that protect their historic character and setting. An Historic Town typically has origins dating back to a significant historical period and retains a strong historic character.
Inappropriate Development	Development, which is harmful to the Green Belt, that can only be approved in "very special circumstances", as stated in Paragraph 153 of the NPPF. Inappropriate Development exceptions are set out in Footnote 55 and Paragraphs 154 and 155.
Large Built-up Area	An area that corresponds to the settlements identified in the relevant Local Plan, including those inset from the Green Belt.
Merging	(see Coalescence)
Neighbouring Town	Refers to settlements identified within the relevant Local Plan and those within the neighbouring authorities' administrative boundary that abut the Green Belt.
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Openness	Openness is taken to be the degree to which an area is primarily unaffected by built features, in combination with the consideration of the visual perception of built features. In order to be a robust assessment, this should be considered from first principles, i.e. acknowledging existing structures that occur physically and visually within the area, rather than seeing them as being 'washed over' by the existing Green Belt designation.
Previously Developed Land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built -up areas such as private gardens, parks, recreation grounds and allotments and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Sprawl	The outward spread of a large built-up area in an incoherent, sporadic, dispersed or irregular way.
Very Special Circumstances	Circumstances in which " <i>potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations</i> ". Paragraph 153 of the NPPF. These need to be satisfied to allow planning permission for a development within the Green Belt.
Villages	Refers to settlements identified as villages within the settlement hierarchy in the relevant Local Plan.

## Green Belt Planning Policy

### National Policy

#### National Planning Policy Framework (NPPF), December 2024

Chapter 13 addresses the Green Belt, with Paragraph 142 stating “*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*” and that “*the essential characteristics of Green Belts are their openness and their permanence*”.

Paragraph 143 subsequently sets out the following five purposes of the Green Belt:

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

Paragraph 147 addresses the exceptional circumstances required for changes to Green Belt Boundaries, stating that:

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in Chapter 11 of this Framework, 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*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”*

Paragraph 148 states, in particular, that:

*“Where it is necessary to release Green Belt Land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”*

Paragraph 148 goes on to state that:

*“However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s*

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*location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making 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.”*

Paragraph 149 addresses defining Green Belt boundaries, setting out that plans should:

- “a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

Paragraphs 153 to 160 address Proposals affecting the Green Belt.

Paragraph 153 requires that:

*“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness<sup>55</sup>. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*

Paragraph 154 addresses ‘inappropriate development’ stating that:

*“Development in the Green Belt is inappropriate unless one of the following exceptions applies:*

- a) buildings for agriculture and forestry;*
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*

- d) *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) *limited infilling in villages;*
- f) *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- g) *limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*
- h) *Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
  - i) *mineral extraction;*
  - ii) *engineering operations;*
  - iii) *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
  - iv) *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
  - v) *material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
  - vi) *development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.”*

However, Paragraph 155 goes on to state that:

*“The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:*

- a) *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b) *There is a demonstrable unmet need for the type of development proposed;*
- c) *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d) *Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.”*

Paragraph 156 goes on to set out that:

*“Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review<sup>58</sup>, or on sites in the Green Belt subject to a planning application<sup>59</sup>, the following contributions (‘Golden Rules’) should be made:*

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- a) *affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b) *necessary improvements to local or national infrastructure; and*
- c) *the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”*

Paragraph 158 then goes on to confirm that:

*“A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.”*

Paragraph 159 then adds that:

*“The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan.*

## Appendix B     Site Appraisal Photographs A to O



Project Number: 333102059



Site Appraisal Photograph A looking north from the access track into the Site



Site Appraisal Photograph B looking south from the access track into the Site



Site Appraisal Photograph C looking west from Field 2



Site Appraisal Photograph D looking east from the edge of Field 1



Site Appraisal Photograph E looking west from the edge of Field 1



Site Appraisal Photograph F looking south from the northern edge of Field 3



Site Appraisal Photograph G looking north-west towards the farmsteads in Field 2



Site Appraisal Photograph H looking south from Field 2



Site Appraisal Photograph I looking south from Field 3



Site Appraisal Photograph J looking west from the southern edge of Field 1



Site Appraisal Photograph K looking north from the southern edge of Field 4



Site Appraisal Photograph L looking south from the northern edge of Field 7