

Green Belt Appraisal

Manor Farm, Poyle Road, Colnbrook

Prepared on behalf of

Manor Farm Propco Limited

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MANOR FARM, POYLE ROAD, COLNBROOK

GREEN BELT APPRAISAL

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1. INTRODUCTION

1.1. This report:

- assesses to what extent a Site on Poyle Road, Colnbrook contributes to the purposes of the Green Belt or displays essential Green Belt characteristics as defined in the National Planning Policy Framework (NPPF)¹; and
- provides an appraisal of any harm to the Green Belt which could result from the proposed development of the Site.

1.2. The Site comprises two parcels of land (referred to as 'Parcel A' and 'Parcel B'), linked by a strip of land which contains an existing track and some sheds, referred to as 'the Link Road' (Figure 1).



Figure 1

1.3. Site visits and field studies were undertaken in October 2023, May 2024 and July 2024 to understand the character of the Site and of the surrounding area.

1.4. The purposes and essential characteristics of Green Belts are set out in section 13 of the NPPF.

1.5. The five purposes which Green Belt should serve are defined in the NPPF as:

- *Purpose a: To check the unrestricted sprawl of large built-up areas;*
- *Purpose b: To prevent neighbouring towns merging into one another;*
- *Purpose c: To assist in safeguarding the countryside from encroachment;*

¹ Department of Housing, Communities and Local Government (2024); *National Planning Policy Framework*

- *Purpose d: To preserve the setting and special character of historic towns; and*
 - *Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*
- 1.6. The NPPF published on December 12th 2024 refers to a new category of Green Belt – ‘grey belt’ - which is defined in the Glossary 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’.*
- 1.7. The NPPF consultation document² noted that much Green Belt land is poor quality, inaccessible to the public and of poor ecological status and that its release from the Green Belt could bring about positive improvements for the quality and enjoyment of the environment.
- 1.8. The essential characteristics of Green Belts are defined in the NPPF as being their permanence and openness and the NPPF states that ‘*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open’.*
- 1.9. There is no legal definition of the term ‘*openness*’ in relation to Green Belt.
- 1.10. Green Belt is a spatial planning tool, not a designation which is designed to protect nature and landscape character or the benefits they provide, and land designated as Green Belt land is designated because of its location, rather than its landscape quality or recreational use. Green Belt policy does not therefore require Green Belt to be of high landscape quality, or even particularly attractive. It should be noted therefore that Green Belt reviews do not consider existing landscape quality.

² <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-5--brownfield-grey-belt-and-the-green-belt>

2. METHODOLOGY

- 2.1. The NPPF does not include guidance on how Green Belt assessments should be undertaken and there is no universally recognised methodology for carrying them out.

Assessing a site's contribution to Green Belt purposes

- 2.2. In 2021 Slough Borough Council (SBC) carried out consultation on the release of sites from the Green Belt for family housing³ as part of their Regulation 18 Consultation on the Local Plan. The SBC consultation document assessed sites' suitability for release from the Green Belt, however, did not explicitly assess the sites' contribution to the purposes of the Green Belt.
- 2.3. In the absence of a methodology applied by SBC, this report applies the GB Review methodology and criteria used by St Albans and City District Council (SACDC) (**Appendix A**) to appraise the Site against the nationally defined purposes of the Green Belt as set out in the NPPF.
- 2.4. Most Green Belt reviews do not assess how parcels of land perform against Purpose 5 since it is considered that the Green Belt as a whole fulfils this purpose and all parcels therefore perform equally well; attempts to differentiate would therefore be uninformative.
- 2.5. The NPPF consultation document (section 5; para 10) includes a proposed definition of land which makes a 'limited contribution' to Green Belt purposes. This is land which:
- a) Does not strongly perform against any Green Belt purpose; and
 - b) Has at least one of the following features:
 - i. Land containing substantial built development or which is fully enclosed by built form
 - ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another
 - iii. Land which is dominated by urban land uses, including physical developments
 - iv. Land which contributes little to preserving the setting and special character of historic towns
- 2.6. The parcels' contribution to each purpose is assessed in this report as Significant, Partial or Limited or None.

Assessing 'openness'

- 2.7. The Government provides some guidance on factors which the courts have identified can be taken into account when considering the potential impact of development on the openness of the Green Belt⁴. These include matters such as:
- openness can have both spatial and visual aspects – i.e. the visual impact of development proposals may be relevant, as could their volume;

³ Slough Borough Council (2021); *Proposed Release of Green Belt Sites for Family Housing*

⁴ <https://www.gov.uk/guidance/green-belt>

- 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.

Assessing potential harm to Green Belt

2.8. The Planning Advisory Service (PAS) published an advice note⁵ which provides criteria to assist in identifying types of areas of land which might make a relatively limited contribution to the overall Green Belt, or which might be considered for development through a review of the Green Belt according to the Green Belt purposes. These criteria are:

- land partially enclosed by development, i.e. where new development would effectively be ‘infill’ development;
- land where development would be well contained by the landscape;
- land where harm to the qualities that contributed to the distinct identity of separate settlements would be limited; and,
- land where a strong boundary could be created with a clear distinction between ‘town’ and ‘country’.

2.9. The NPPG identifies improvements to the environmental quality and accessibility of the remaining Green Belt land which could be implemented to compensate for development on adjacent Green Belt land. Identified improvements include:

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

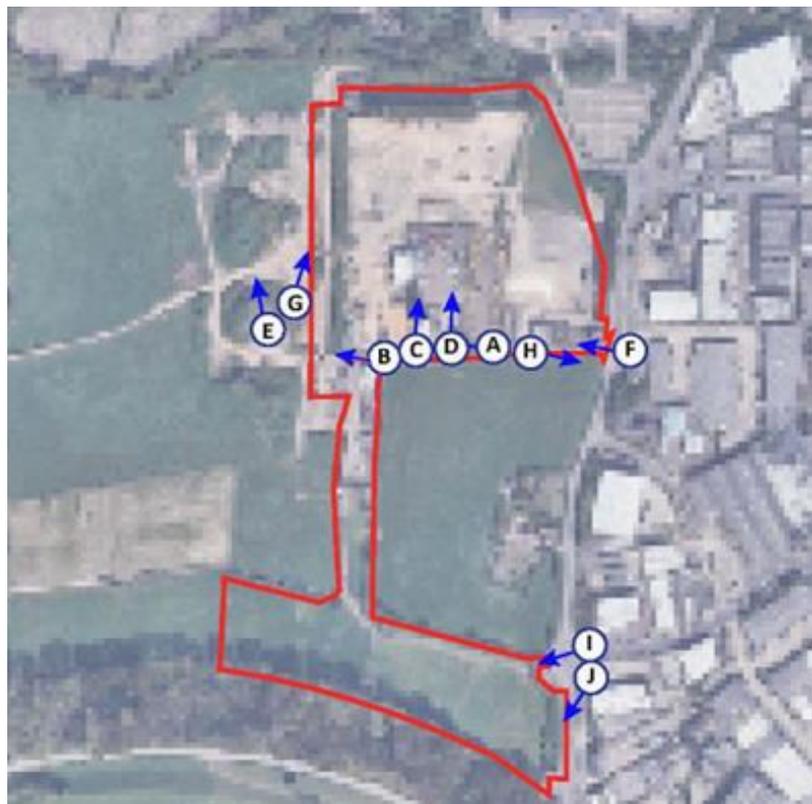
⁵ Planning Advisor Service (2015); *Planning on the Doorstep: The Big Issues – Green Belt*

3. GREEN BELT ASSESSMENT

- 3.1. This section of the report assesses to what extent the Site contributes to the purposes of the Green Belt and displays the essential Green Belt characteristic of openness.
- 3.2. The separate parcels are assessed separately in order to provide a fine grain understanding of their current contribution to the Green Belt.

Parcel A

- 3.3. Parcel A is a rectangular parcel of land bounded to the east by Poyle Road and the Britannia Industrial Estate, to the south and west by arable fields, and to the north by the Poyle Channel, associated tree cover and the Heathrow Terminal 5 Hilton Hotel.
- 3.4. Parcel A is Previously Developed Land, occupied by various storage, transport and light industrial uses, and can be characterised as being derelict or urban land, aligning with the definition of 'grey belt' in the consultation draft NPPF.
- 3.5. The parcel contains built form, including a brick building at the entrance from Poyle Road (Photo F), storage containers and extensive areas of hard standing. There is little vegetation within the parcel, generally limited to the boundaries (Photos A-F).
- 3.6. The areas of hard standing are used for open air storage of materials and as parking for coaches and commercial vehicles.



Key plan of photo locations



Photo A



Photo B



Photo C



Photo D



Photo E



Photo F

Contribution to Green Belt purposes

3.7. Applying the GB Review criteria, the extent to which Parcel A fulfils the purposes of the Green Belt is assessed below.

- Purpose a) *'To check the unrestricted sprawl of large built-up areas'*. Parcel A lies adjacent to the Britannia Industrial Estate, which is already fully urbanised, and, evidenced by the development which has occurred on it, the Green Belt designation of the parcel has not prevented sprawl; indeed activity has extended beyond the parcel's boundary to the west. Parcel A therefore makes no contribution to Purpose a).
- Purpose b) *'To prevent neighbouring towns from merging'*. Whilst the Site does not lie adjacent to any major towns, such as Slough, it does fall within the Colnbrook and Poyle Strategic Gap, intended to maintain a gap between the eastern edge of Slough and the

developed area of Greater London. However, in an appeal decision relating to Parcel A in 2016 (PP/J0350/A/12/2171967), the Inspector stated that *'The appeal site is situated in the extreme southwest corner of a designated strategic gap. It is however somewhat remote from Slough ...Residential properties are situated to the north of the site, and these extend into the gap... The site is therefore not prominent in this part of the gap, and the appeal development would serve to fill in and regularise the boundary of the gap, without threatening the open area to the west of the site.'* It is concluded that Parcel A does not therefore make any contribution to Purpose b).

- Purpose c) *'To assist in safeguarding the countryside from encroachment'*. Parcel A cannot be characterised as countryside due to the existing land uses and activity which represent urbanising development. The parcel relates more strongly to the urban edge. The Green Belt designation has not therefore safeguarded the countryside and the parcel makes no contribution to Purpose c).
- Purpose d) *'To preserve the setting and special character of historic towns'*. There are no historic towns of the type meant by the Framework (such as York or Bath) near the Site. Whilst the Colnbrook Conservation Area lies approximately 500m northwest of Parcel A and it is recognised that open land or countryside can provide an open setting or buffer for places with historic features, there is no relationship or connection between Parcel A and the Conservation Area in the form of character or visual perception. Parcel A therefore makes no contribution to Purpose d).

3.8. In relation to Purpose e) - *To assist in urban regeneration by encouraging the recycling of derelict and other urban land* – due to the existing land uses, Parcel A can be characterised as already being derelict or urban land. Unusually for Green Belt land, Parcel A therefore does not contribute to Purpose e).

3.9. Overall, it is therefore concluded that Parcel A does not currently contribute to any of the purposes of the Green Belt. Parcel A therefore meets the definition of both Previously Developed Land and Grey Belt.

Assessment of openness

3.10. Considering to what extent Parcel A exhibits the essential Green Belt characteristic of openness, overall, it has no notable openness.

3.11. It contains built form and is generally visually contained at ground level by boundary vegetation and security fencing (Photos G-H). The northern area of the parcel - although it does not contain

built form and is therefore spatially open - is screened and relatively high levels of activity and vehicle movements linked to current land uses were observed during site visits and field surveys.



Photo G



Photo H

- 3.12. The whole parcel is therefore dominated by urban land uses.
- 3.13. Generally, it is considered that Parcel A does not contribute to the visual openness of the Green Belt, either across the parcel itself, due to the existing built form and activity, or from beyond the parcel, contributing to visual separation. Parcel A cannot be considered as part of the countryside, rather an extension of the urban/settled area.
- 3.14. If an aspect of Green Belt openness relates to a lack of 'inappropriate development', applying the definitions of appropriate Green Belt development provided in the NPPF (paragraphs 154 and 155), Parcel A can be considered to already contain inappropriate development and would not therefore be considered to be open.
- 3.15. It is concluded that overall, Parcel A does not exhibit the Green Belt characteristic of openness.

Parcel B

- 3.16. Parcel B is a rectangular parcel of land bounded by Poyle Road to the east, by a mature tree belt known as Poyle Poplars to the south, and to the west and north by arable land. There is a pumping station at the northeast corner, accessed from Poyle Road.
- 3.17. Parcel B is contained by mature field hedgerows to the north and east (Photos I and J) and by Poyle Poplars to the south. It is contiguous with the open land to the west - although not visually connected to it due to the height and maturity of the boundary hedgerows - and is in arable use. It can be characterised as countryside.



Photo I



Photo J

- 3.18. Although adjacent to the industrial estate to the east, Parcel B does not contain any urbanising land uses and features. Due to Poyle Poplars and the mature field hedgerows which form its boundaries, it has a relatively enclosed character.

Contribution to Green Belt purposes

- 3.19. Applying the GB Review criteria, the extent to which Parcel B fulfils the purposes of the Green Belt is assessed below.

- Purpose a) *'To check the unrestricted sprawl of large built-up areas'*. Parcel B lies adjacent to the Britannia Industrial Estate and relates to both the urban area and to the wider countryside in that it lies adjacent to a built-up area but has a relatively strong sense of openness. The Green Belt designation may have restrained development to the west of Poyle Road and it is considered that Parcel B makes a partial contribution to Purpose a).
- Purpose b) *'To prevent neighbouring towns from merging'*. Like Parcel A, Parcel B does not lie adjacent to any major towns, such as Slough, but does fall within the Colnbrook and Poyle Strategic Gap. However, like Parcel A, Parcel B is situated in the extreme southwest corner of the gap, is not prominent in this part of the gap and is remote from Slough. Development in Parcel B would not threaten the open area to the west of the site and it is therefore concluded that Parcel B makes no contribution to Purpose b).
- Purpose c) *'To assist in safeguarding the countryside from encroachment'*. Parcel B can be characterised as countryside and the parcel therefore makes a significant contribution to Purpose c).
- Purpose d) *'To preserve the setting and special character of historic towns'*. There are no historic towns of the type meant by the Framework near Parcel B, and as with Parcel A, there is no relationship or connection between Parcel B and the Conservation Area in the form of character or visual perception. Parcel B therefore makes no contribution to Purpose d).

- 3.20. Overall, it is considered that Parcel B makes a significant contribution to one purpose of the Green Belt (Purpose c)) and makes a limited contribution to a second purpose (Purpose a)). Parcel B therefore meets the definition of Grey Belt.

Assessment of openness

- 3.21. Considering to what extent Parcel B exhibits the essential Green Belt characteristic of openness, whilst it is visually contained by mature boundary vegetation, it contains no built form and does contribute to the visual openness of the Green Belt, both within the parcel itself and in views from the west. It is assumed that it experiences very low levels of activity.
- 3.22. Parcel B is therefore considered to exhibit the essential Green Belt characteristic of openness.

Link Road

- 3.23. The Link Road is a strip of land bordered by a native hedgerow to the east and open land to the west. It contains areas of hard standing and five sheds of varying sizes.

Contribution to Green Belt purposes

- 3.24. Applying the GB Review criteria, the extent to which the Link Road fulfils the purposes of the Green Belt is assessed below.
- Purpose a) *'To check the unrestricted sprawl of large built-up areas'*. The Link Road is a relatively narrow strip of land between two fields and does not lie adjacent to a built-up area; it is considered that it does not make a contribution to Purpose a).
 - Purpose b) *'To prevent neighbouring towns from merging'*. Like Parcels A and B, the Link Road does not lie adjacent to any major towns and it is therefore concluded that it makes no contribution to Purpose b).
 - Purpose c) *'To assist in safeguarding the countryside from encroachment'*. The Link Road is a relatively narrow strip of land between two fields and does not make a contribution to Purpose c).
 - Purpose 4 *'To preserve the setting and special character of historic towns'*. There are no historic towns of the type near the Link Road and there is no relationship or connection between it and the Conservation Area. It therefore makes no contribution to Purpose d).
- 3.25. Overall, it is concluded that the Link Road does not currently contribute to any of the purposes of the Green Belt. The Link Road meets the definition of Grey Belt.

Assessment of openness

- 3.26. Considering to what extent the Link Road exhibits the essential Green Belt characteristic of openness, whilst open to the field to the west, it contains some built form. It is assumed that it experiences very low levels of activity.
- 3.27. The Link Road is therefore considered to partially exhibit the essential Green Belt characteristic of openness.

Conclusions on the Site's contribution to Green Belt purposes

- 3.28. It is concluded that overall, the Site makes a limited contribution to the purposes of the Green Belt. The appraisal is summarised at Table 1.

Table 1: Contribution of the Site to Green Belt purposes

Green Belt Purpose	Parcel A		Parcel B		Link Road	
	Contribution to purpose	Commentary	Contribution to purpose	Commentary	Contribution to purpose	Commentary
a: To check the unrestricted sprawl of large built-up areas	None	Parcel A lies adjacent to the Britannia Industrial Estate, however, due to its developed nature, it does not function as an effective barrier against sprawl	Limited	Parcel B lies adjacent to the Britannia Industrial Estate and may function as an effective barrier against sprawl to the west of Poyle Road	None	The Link Road lies between two fields and is not adjacent to a built-up area
b: To prevent neighbouring towns merging into one another	None	Parcel A is located remote from the town of Slough and does not perform an important role in separating it from Greater London	None	Parcel B is located remote from the town of Slough and does not perform an important role in separating it from Greater London	None	The Link Road is located remote from the town of Slough and does not perform an important role in separating it from Greater London
c: To assist in safeguarding the countryside from encroachment	None	Parcel A is previously developed land with a range of commercial and light	Significant	As open land with an absence of built development and a rural	None	The Link Road contains some built form and is

Green Belt Purpose	Parcel A		Parcel B		Link Road	
	Contribution to purpose	Commentary	Contribution to purpose	Commentary	Contribution to purpose	Commentary
		industrial uses and cannot be characterised as countryside		land use (agriculture), Parcel B can be characterised as countryside		not countryside
d: To preserve the setting and special character of historic towns	None	Parcel A does not lie adjacent to or in the setting of an historic town or place with historic features	None	Parcel B does not lie adjacent to or in the setting of an historic town or place with historic features	None	The Link Road does not lie adjacent to or in the setting of an historic town or place with historic features

3.29. In relation to the essential Green Belt characteristic of openness, Parcel B can be considered to display this characteristic, whilst Parcel A does not display it and the Link Road partially displays it.

3.30. The Site as a whole can be classified as Grey Belt.

4. POTENTIAL HARM TO GREEN BELT

- 4.1. This section assesses whether the Proposed Development, which would result in a reduction in openness within the Site, would cause harm to the wider Green Belt by adversely affecting the contribution and integrity of the adjacent Green Belt.
- 4.2. The Proposed Development comprises a data centre in Parcel A, with associated infrastructure and landscaping, and a Battery Energy Storage System (BESS) in Parcel B.
- 4.3. The existing built form in the Link Road would be demolished and the existing track linking Parcels A and B would provide construction and maintenance access to Parcel B.
- 4.4. A new public footpath is proposed as part of the proposals, linking Poyle Road with the nature reserve. This aligns with Government guidance to facilitate improvements to the environmental quality and accessibility of adjacent Green Belt land with features such as enhanced green infrastructure, new or enhanced walking and cycle routes, and improvements to biodiversity and habitat connectivity.
- 4.5. There is potential for additional enhancements to the wider Green Belt to be delivered, however detail of these are not included within the scope of the proposals submitted for approval and this assessment does not therefore consider them further.

Parcel A

- 4.6. Applying the PAS criteria (para 2.7), Parcel A is bounded by existing development to two sides – to the north and east - and development of it could not therefore be characterised as ‘infill’ development. However, development would be well contained by the landscape and there would be no harm to the qualities that contribute to the distinct identity of separate settlements.
- 4.7. The proposed development of Parcel A could be accommodated without giving rise to a perception of excessive encroachment into the wider countryside.
- 4.8. In terms of the effects of development on Green Belt Purposes, the Green Belt designation has not restricted sprawl within Parcel A and development of it would not therefore result in further unrestricted sprawl. Parcel A is a relatively enclosed parcel of land, development would not encroach on the wider countryside and would not result in a significant increase in urbanising influences or diminish the extent to which the adjacent Green Belt would be considered countryside.
- 4.9. Development of Parcel A would not affect the setting of any historic towns.

- 4.10. Parcel A is considered to currently make a weak contribution to Green Belt purposes and the proposed development of it, which represents the redevelopment of previously developed land, would not weaken the integrity of adjacent Green Belt land, nor would the contribution of the neighbouring land to Green Belt purposes be weakened were it to be developed.
- 4.11. Visual openness is relevant to a consideration of openness. The visibility of the proposed scheme has been assessed in a Landscape and Visual Impact Appraisal (LVIA) which concludes that from the wider area there would be limited to no visual effects resulting from development of Parcel A. Where there would be views of the proposed data centre, it would be experienced within the context of the existing industrial estate. Whilst development of Parcel A would affect the openness of the Parcel, it would not therefore affect the openness of the wider Green Belt.

Parcel B

- 4.12. Applying the PAS criteria, although Parcel B is well contained by landscape features (the mature hedgerows and Poyle Poplars), it is not enclosed by settlement and development of it could not be considered 'infill' development.
- 4.13. The proposed development of Parcel B would not result in the breaching of any existing strong boundary features and the relatively low profile of the battery storage units at just over 3m high would not result in an increase in the built containment of adjacent land. The BESS could be accommodated without giving rise to a perception of excessive encroachment into the wider countryside.
- 4.14. Parcel B is not enclosed by development, however development of it would be contained by the landscape. There would be no harm to the qualities that contribute to the distinct identity of separate settlements.
- 4.15. Parcel B is separated from the wider countryside by the mature native hedgerows, which are readily recognisable and permanent, restricting future unrestricted sprawl and securing it from further encroachment in the future.
- 4.16. The proposals would not affect the setting of any historic towns.
- 4.17. Development of Parcel B should not weaken the integrity of adjacent Green Belt land and the contribution of the neighbouring land would not be weakened were it to be developed.
- 4.18. While the proposed BESS would represent a de facto spatial intrusion upon the openness of the Green Belt, it would not intrude visually on the openness of the wider Green Belt and would not

result in a significant increase in urbanising influences on the wider Green Belt or diminish the extent to which the adjacent Green Belt would be considered countryside.

- 4.19. The visibility of the proposed BESS has been assessed in the LVIA which concludes that from the wider area there would be no visual effects resulting from development of Parcel B.

The Link Road

- 4.20. Built form in the Link Road would be removed and there are no proposals to upgrade with lighting, road markings or other highways paraphernalia. Vehicle movements when the BESS is operational are anticipated to be minimal.
- 4.21. Development of the Link Road would have no effect on the wider Green Belt and, following the removal of the existing built form, the openness of the Link Road itself would increase spatially.
- 4.22. Paras 155 and 156 of the NPPF states that commercial development in the Green Belt which utilises grey belt land in sustainable locations would not be inappropriate when the development would provide improvements to existing, green spaces that are accessible to the public and would not fundamentally undermine the function of the Green Belt across the wider area. It is considered that the Proposed Development would fulfil these criteria.

5. SUMMARY AND CONCLUSIONS

- 5.1. It is considered that Parcel A currently makes no contribution to Green Belt purposes as defined in the NPPF and does not exhibit the Green Belt characteristic of openness.
- 5.2. Parcel B is assessed as making a significant contribution to one purpose of the Green Belt (Purpose c)) and a limited contribution to Purpose a). Parcel B exhibits the essential Green Belt characteristic of openness.
- 5.3. The Link Road makes no contribution to the Green Belt.
- 5.4. Applying the NPPF definition, the Site as a whole can be considered to be Grey Belt.
- 5.5. It is concluded that development of the type and scale proposed would be compatible in terms of design, form and appearance with the character of the surrounding area and, notwithstanding the loss of openness of Parcel B, would not result in unacceptable harm to the contribution made by the wider Green Belt to Green Belt purposes and would provide improved access to good quality green space.

APPENDIX A – Green Belt Review Assessment Criteria

Table 5.4. Purposes Assessment Criteria Questions

Purpose	Definition of Purpose to be applied in Assessment
<i>To check the unrestricted sprawl of large built-up areas</i>	1) Does the parcel act, in itself, as an effective barrier against sprawl from large built-up areas outside of the study area specifically London, Luton & Dunstable and Stevenage? 2) Does the parcel contribute, as part of a wider network of parcels, to a strategic barrier against the sprawl of these built-up areas?
<i>To prevent neighbouring towns from merging</i>	3) Does the parcel provide, or form part of, a gap or space between existing 1 st tier settlements (neighbouring towns)? 4) What is the distance of the gap between the settlements? 5) Is there evidence of ribbon development on major route corridors? 6) What is the visual perception of the gap between settlements from major route corridors? 7) Would a reduction in the gap compromise the separation of settlements in physical terms? 8) Would a reduction in the gap compromise the separation of settlements and the overall openness of the parcel visually?
<i>To assist in safeguarding the countryside from encroachment</i>	9) What countryside / rural characteristics exist within the parcel including agricultural or forestry land uses and how is this recognised in established national and local landscape designations? 10) Has there already been any significant encroachment by built development or other urbanising elements? (Specify the proportion (%) of built development in the parcel)
<i>To preserve the setting and special character of historic towns</i>	11) What settlements or places with historic features exist within the parcel? 12) What is the relationship and connection (in the form of character, views and visual perception) between the parcel and historic feature? 13) Does the parcel provide an open setting or a buffer against encroachment by development around settlements or places with historic features?

