



Rochford District and Southend-on-Sea Borough Joint Green Belt Study

Final Report

Prepared by LUC
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Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
GIS & Visualisation

LUC LONDON
43 Chalton Street
London
NW1 1JD
T +44 (0)20 7383 5784
london@landuse.co.uk

Offices also in:
Bristol
Edinburgh
Glasgow
Lancaster
Manchester



FS 566056 EMS 566057

Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chalton Street
London NW1 1JD
LUC uses 100% recycled paper

ADVISORY NOTE

This document is an evidence report that has been prepared for the Council's new Local Plan. It is not a statement of Council policy and is intended to inform future decisions but does not bind the Council to any particular decision.

Where the document contains findings, it is important that these are understood in context provided in the document. Publication of this document should not be interpreted as endorsement of these findings.

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Executive Summary

Overview

LUC has been commissioned to undertake an assessment of the Green Belt land within the District of Rochford and the Borough of Southend-on-Sea.

Stage 1 of this Study assesses how strongly different areas of Rochford District 'contribute' to the five purposes of Green Belts set out in national policy. These five purposes are:

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

Stage 2 of this Study assesses individual pieces of land that landowners have asked the Council to consider when deciding what parts of the District should be allowed to develop in the future. However, inclusion of land within the Study does not indicate that the Council considers it to be suitable for development. It is also important to emphasise that Green Belt is only one of many considerations that will need to be taken into account by the Council when deciding if a piece of land is suitable for development. These other considerations, which are not considered in this Study, including infrastructure capacity, impact on ecology, impact on transport networks and flood risk.

A more detailed explanation of the Study approach and findings are set out below.

Study Scope

The Study has been undertaken in two stages:

- **Stage 1** identifies strategic variations in the 'contribution' of land to the five Green Belt purposes as defined in the National Planning Policy Framework (NPPF). In addition, Stage 1 identifies areas of potential for realignment of the Green belt boundary along alternative permanent and readily recognisable physical features, or just to resolve digital mapping errors. The Stage 1 study also assesses the potential for the Councils to designate new Green Belt land.
- **Stage 2** involves a more detailed assessment of the potential 'harm' of releasing sites/ parcels of land from the Green Belt. This study assesses specific promoted sites identified by Rochford and Southend-on-Sea Councils, in addition to areas that made the weakest contribution to the Green Belt purposes as identified in the Stage 1 strategic assessment.

Together the two stages provide the necessary Green Belt evidence to enable the Councils to consider if alterations to Green Belt boundaries should be proposed. However, there are other important environmental and sustainability factors that need to be considered in order to establish the necessary exceptional circumstances for making alterations to Green Belt boundaries. In each location where alterations to Green Belt boundaries are being considered, planning judgement will be required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.

Further details on the methodology used to assess Green Belt contribution and harm can be found **Chapters 2** and **4**.

Stage 1 Findings

The vast majority of the Green Belt in Rochford and Southend-on-Sea continues to serve the Green Belt purposes well, in particular with regard to maintaining the openness of the countryside. However, there are several pockets of Green Belt adjacent to the existing urban edges that make a weak contribution to the majority of the Green Belt purposes. Of the 88 Stage 1 parcels identified **Table ES1** below lists parcels that contain Green Belt land considered to make a lower contribution to the NPPF Green Belt purposes.

Table ES1 – Lower performing Stage 1 Green Belt parcels

Number of weak ratings	Number of moderate ratings	Area (ha)	Parcels
4	0	42.3	P18, P38, P41 P47, P50, P55, P60, P64, P66
3	1	34.2	P13, P17, P80

2	2	94.4	P02, P04, P05, P06, P07, P12, P14, P24, P27, P30, P39, P43, P48, P53, P57, P62, P70, P71, P72, P73, P74, P75, P76, P77, P78, P81, P83, P85, P86, P87
1	3	98.3	P08, P09, P10, P15, P16, P22, P26, P32, P45, P46, P51, P52, P56, P58, P59, P63, P88
0	4	0	-

The detailed Stage 1 assessments are included in **Appendix 3**.

In addition, there are several potential minor boundary adjustments that could be made to the existing Green Belt boundary GIS data layer held by the Councils, to correct digitisation errors and realign boundaries along more permanent and readily recognisable features.

The only significant areas of open countryside currently not designated as Green Belt – Foulness Island and the land to the east of Southend-on-Sea – are currently under the ownership and

operation of the MOD and designated as Flood Zone 3. In addition, significant parts of the area fall with the Foulness Island Special Protection Area (SPA) – a European ecological designation used to protect specific bird species and their habitats. Therefore, the existing planning and development management policies would enable the protection of these areas without the need for their designation as Green Belt. The Study does not therefore recommend that any additional land should be designated as Green Belt.

Stage 2 Findings

Roughly 250 sites and lower performing Stage 1 parcels were assessed in detail at Stage 2. Where appropriate, the Stage 2 assessments drew out variations in harm within the sites and parcels assessed.

Consideration of the harm to Green Belt that could result from the release of land for development is an essential aspect of establishing the 'exceptional circumstances' for making alterations to Green Belt boundaries. However, there are other important factors that need to be considered, most notably the environmental and sustainability effects of development. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in high harm to the Green Belt. Conversely, the release of Green Belt land likely to result in low harm may not be appropriate or sustainable. In each location where alterations to Green Belt boundaries are being considered, planning judgement will be required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.

In light of the above, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies relative variations in the harm to the designation. **Tables ES2** and **ES3** sets out the total area and proportion of Green Belt land rated at high, moderate-high, moderate, low-moderate and low in Rochford and Southend-on-Sea respectively.

Table ES2 – Total area of Rochford Green Belt land assessed at each harm rating

Harm Rating	Total Area of Land (excluding constraints)	
	Area (Ha)	Percentage of Site/Parcel Area
High	1510.03	70.49
Moderate - High	490.12	22.88
Moderate	86.53	4.04
Low - Moderate	47.02	2.19
Low	8.55	0.40

Table ES3 – Total area of Southend-on-Sea Green Belt land assessed at each harm rating

Harm Rating	Total Area of Land (excluding constraints)	
	Area (Ha)	Percentage of Site/Parcel Area
High	280.57	92.14
Moderate - High	6.50	2.13
Moderate	0.00	0.00
Low - Moderate	0.28	0.09
Low	17.15	5.63

The findings for the Stage 2 assessment of harm are presented in detail in **Appendix 4**.

1 Introduction

- 1.1 LUC has been commissioned to undertake an assessment of the Green Belt land within the District of Rochford and the Borough of Southend-on-Sea. The Study represents an important piece of evidence for each of the Council's emerging Local Plans.

Study Objectives

- 1.2 The overall purpose of the Study is to undertake an independent, robust and transparent assessment of Green Belt within Rochford and Southend-on-Sea. This includes comprehensive assessments of the performance of Green Belt land in line with national policy, guidance and case law.
- 1.3 The Study has been undertaken in two stages:
- **Stage 1** identifies strategic variations in the '**contribution**' of land to the five Green Belt purposes as defined in the National Planning Policy Framework (NPPF). This assessment has regard to the wider context of Green Belt land within Rochford, Southend-on-Sea and neighbouring authorities and other environmental designations.
 - **Stage 2** involves a more detailed assessment of the potential '**harm**' of releasing sites from the Green Belt, focussing on specific areas of Green Belt land including the weaker performing areas identified in Stage 1 and sites submitted to the Councils for development.
- 1.4 The Stage 1 assessment identifying variations in the **contribution** made by land to Green Belt purposes is the exclusive focus of most Green Belt studies informing local plan-making. Some studies also consider the potential **harm** to the Green Belt that would result from the release of specific sites or parcels of land. In assessing harm at Stage 2 we consider how loss of land from the Green Belt would affect the strength/integrity of the remaining Green Belt.
- 1.5 LUC's assessment of harm is consistent with the latest case law on the matter, notably *Calverton Parish Council v Greater Nottingham Councils & others (2015)* which found that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the '*nature and extent of harm*' to the Green Belt and '*the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.*'
- 1.6 **In combination, this staged assessment provides the necessary Green Belt evidence, alongside other wider sustainability, viability and deliverability considerations to enable the Councils to consider if alterations to Green Belt boundaries should be proposed. There are other important factors that need to be considered in order to establish the necessary 'exceptional circumstances', most notably the environmental and sustainability effects of development. Whilst it is desirable to minimise harm to the Green Belt, the most sustainable locations for development may result in high harm to the Green Belt. Conversely, the release of Green Belt land likely to result in low harm may not be appropriate or sustainable. In each location where alterations to Green Belt boundaries are being considered, planning judgement will be required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.**

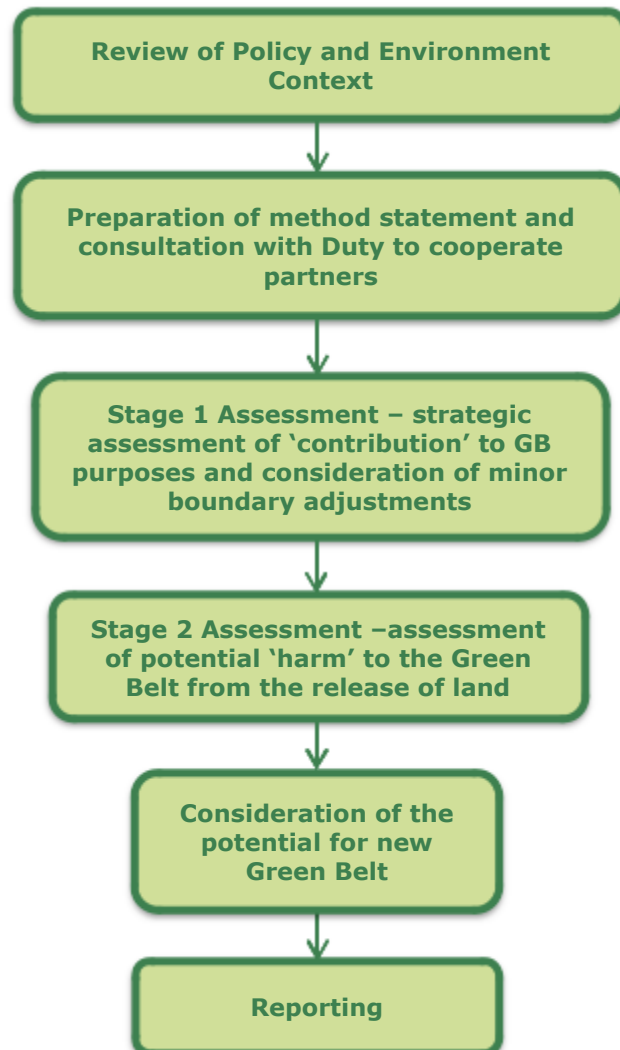
Method Statement Engagement

- 1.7 A method statement was circulated to the Council's key stakeholders with whom the Council has a duty to cooperate¹ in October 2018. This includes neighbouring local authorities, Environment Agency, Historic England and Natural England.
- 1.8 This provided an opportunity for the Council's duty to cooperate partners to review and comment on the proposed approach to the Study. Stakeholder comments on the method statement have been reviewed and have informed the preparation of this report. **Appendix 5** contains a record of the duty to cooperate consultation comments received.

Methodology Overview

- 1.9 There is no defined approach set out in national guidance as to how Green Belt assessments should be undertaken. The approach is based on LUC's extensive experience of undertaking Green Belt assessments for numerous authorities which have been tested through Examination and found to be robust.
- 1.10 **Figure 1.1** illustrates the key stages of the study methodology.

Figure 1.1: Methodology



¹ Section 110 of the Localism Act (2011).

Report Structure

1.11 The remainder of this report is structured as follows:

- **Chapter 2** outlines the assessment methodology for the Stage 1 Study of Green Belt contribution.
- **Chapter 3** sets out the findings of the Stage 1 study of Green Belt contribution.
- **Chapter 4** outlines the assessment methodology for the Stage 2 Study of Green Belt harm.
- **Chapter 5** sets out the findings of the Stage 2 study of Green Belt harm.
- **Chapter 6** sets out the key considerations for making alterations to Green Belt boundaries, including general opportunities for mitigating harm to the Green Belt and enhancing the beneficial uses of Green Belt.

1.12 The report is accompanied by the following appendices:

- **Appendix 1** sets out the national, regional and local policy context on designating and managing Green Belts. It also summarises guidance and case law related to Green Belts and the approaches used in Green Belt studies in neighbouring local authorities.
- **Appendix 2** illustrates the details of a list of potential minor Green Belt boundary adjustments.
- **Appendix 3** sets out the detailed Stage 1 Green Belt contribution assessments by parcel.
- **Appendix 4** sets out the detailed Stage 2 Green Belt harm assessments by assessment area.
- **Appendix 5** summarises the consultation comments received in response to the consultation on the Study Method Statement.
- **Appendix 6** contains a table of the sites considered in the study and their relevant parcels and assessment areas.

2 Stage 1 Assessment Methodology

- 2.1 The Stage 1 assessment methodology is based on the NPPF's five purposes of Green Belt. As a precursor to the area-based assessment of Green Belt, it was necessary to gain a detailed understanding of the functionality of the Green Belt in Rochford and Southend-on-Sea. **Appendix 1** provides the policy context for the Study. This information has directly informed the assessment criteria and the definitions of key terms used in the methodology.

Green Belt Assessment Definitions and Criteria

- 2.2 As outlined in **Appendix 1**, there are five Green Belt purposes as defined in paragraph 134 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.
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.3 A summary of the key criteria considered for each NPPF purpose is provided below.
- 2.4 The factors that affect the contribution made by land to each purpose are not distinct to each purpose. With the exception of assistance in urban regeneration, all the Green Belt purposes can be seen to require consideration of the relationship between the assessment area, settlements and the countryside as influenced by the following common factors:
- **Development and land use** – the extent and form of existing development, and land use characteristics, affect the degree to which Green Belt can be considered to be part of the countryside rather than an extension of the urban/settled area.
 - **Location** – the position of Green Belt in relation to other distinctive pockets of Green Belt land and settlements can affect its role in relation to the potential expansion of settlements.
 - **Separating features** – physical elements such as woodland blocks, rivers and ridges or areas of primary constraint (e.g. SACs, SSSIs) have a physical and visual impact on settlement-countryside relationships.
 - **Connecting features** – physical elements such as roads or rail links can reduce the impact of separating features, and landform (e.g. valleys) can also draw areas together.
- 2.5 In addition to the five purposes of Green Belt, the NPPF refers to two 'essential characteristics': 'openness' and 'permanence'. Both characteristics are applicable to all assessment criteria. These terms are defined in more detail below.

Openness

- 2.6 Two important planning appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect.

- 2.7 As outlined above, the NPPF identifies openness as an 'essential characteristic' of Green Belt, rather than a function or purpose. Openness is therefore seen as a key element in the assessment of all Green Belt purposes. Land that lacks openness will play less of a role in preventing sprawl, separating towns, preventing countryside encroachment or providing a setting to a historic town.
- 2.8 **Spatial openness** as a characteristic can be considered in terms of the scale and density of built development. The location, extent and form of new development in the Green Belt can, in isolation or in combination, compromise/harm the openness of the Green Belt². Similarly, the location, extent and form of existing development affects the degree to which Green Belt land can be considered to be open rather than an extension of a built-up area in its own right. However, not all built development is considered to affect openness. The NPPF lists in paragraph 145 a number of types of buildings that are 'not inappropriate' within the Green Belt.
- 2.9 **Visual openness** is important in so far as it relates to the purposes of Green Belt. In certain places there is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' (Purpose 1), and preventing 'neighbouring towns merging into one another' (Purpose 2); openness of aspect is a characteristic quality of the countryside, therefore 'safeguarding the countryside from encroachment' (Purpose 3) includes preservation of openness; and preservation of 'the setting...of historic towns' (purpose 4) includes visual setting³. For example, a range of natural and man-made features – topography, vegetation, buildings and linear features such as roads and railways – can contribute to or compromise the visual openness of the Green Belt. A key distinction however is that while vegetation or landform can provide visual enclosure to development that lessens its visual impact this does not diminish the *spatial openness* of the Green Belt.
- 2.10 As noted by the Inspector in the Welwyn Hatfield local Plan Examination (see **Appendix 1**) openness should also not be concerned about the character of the landscape, but instead it should **relate to the absence of built development and other dominant urban influences**.
- 2.11 Appropriate development within the Green Belt cannot, according to case law⁴, be considered to have an urbanising influence and therefore harm Green Belt purposes. For the purposes of this study therefore, development deemed to be 'appropriate' within the Green Belt (as defined in the closed lists within paragraphs 145 and 146 of the NPPF) is not considered to constitute an urban land use, or an urban influence in the countryside. However, what is deemed to be appropriate development in the NPPF has to be carefully considered as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriateas long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 2.12 Caution has therefore been exercised in the application of what is defined as an appropriate use. It is not possible within a Strategic Green Belt study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut e.g. for example buildings for agriculture and forestry are deemed to be appropriate development regardless of whether they preserve the openness or conflict with the GB purposes. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, a considered view has been taken on the extent to which the proposed land use has affected the GB purposes, for example by affecting openness, or encroaching on the perception of countryside i.e. the sense of distinction between the urban area and countryside.

² This point is made in the judgement in *Heath & Hampstead Society v London Borough of Camden* (2008).

³ This point is made in the judgement in *Turner v Secretary of State for Communities and Local Government & East Dorset District Council* (2016).

⁴ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in *R (Lee Valley Regional Park Authority) v Epping Forest DC* [2016] EWCA Civ 404.

2.13 This is of relevance to the assessment approach for all of the Green Belt purposes.

Permanence

2.14 The concept of permanence is a planning consideration rather than a physical or visual characteristic. **Green Belt is a permanent planning designation which, once established, should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.** Therefore, it is recognised that there are benefits in using features which are clearly defined and which also play a physical or visual role in separating town and countryside to act as Green Belt boundaries.

2.15 In addition to openness and permanence, it is considered helpful to make reference to two other factors that influence the contribution of Green Belt land to the Green Belt purposes: 'containment' and 'distinction'. Consideration of containment and distinction in combination with openness allow for a finer grain of assessment that cannot be achieved through consideration of the broader applicability of the purposes alone.

Containment

2.16 Urbanising influences, whether land inset from the Green Belt or urbanising development within it which has an urbanising character (i.e. is likely to be 'inappropriate' in Green Belt terms), can contain Green Belt land from the wider countryside and increase its relationship with urbanising development.

2.17 This factor relates to containment of Green Belt land by urbanising influences only, not 'natural' landscape features.

2.18 Paragraph 145 of the NPPF notes that 'limited infilling' is not inappropriate within the Green Belt. Furthermore, PAS guidance⁵ states that development that would effectively be 'infill', due to the land's partial enclosure by development, would have a relatively limited impact in terms of Green Belt contribution.

Examples of land which lacks urbanising development, and which therefore is considered open in Green Belt terms, and which would not constitute a containing influence on other Green Belt land, are:

- Any land without built form.
- Agricultural/horticultural/forestry buildings (e.g. farms, glasshouses).
- Mineral extraction or engineering operations that preserve its openness and do not conflict with the purposes of including land within it.
- Low density or small-scale rural settlement.

Examples of development which could potentially reduce Green Belt openness, and which could therefore be considered a containing influence, are:


- Buildings other than those for agriculture/horticulture/forestry.
- Solar farms.
- Car parks.
- Floodlit sports pitches.

Distinction

2.19 'Distinction' represents the relationship between the existing inset area and the Green Belt. Landform and/or landcover can create a physical distinction between development and

⁵ Planning Advisory Service, 2015, Planning on the Doorstep: The Big Issues – Green Belt. Available online at: <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

Green Belt land, limiting the relationship between the two, e.g. major roads, railway lines, strong landforms.

Description		Example Features
No perception of development beyond, with boundary feature creating physical gap; or physical feature significantly restricts access and forms consistent edge	Stronger Distinction  Weaker Distinction	Woodland block Motorway River/floodplain
Development perceptible but clear sense of distinction; or physical feature restricts access and/or forms relatively consistent edge over wider area.		Strong landform distinction - e.g. consistent ridge crest or valley Major road
Development perceptible but generally not visible.		Linear tree cover or mature, well-treed hedgerow Stream Moderate landform distinction Minor through road
Development clearly perceptible and generally visible.		Regular garden/building boundaries or hedgerows Estate/access road
No clear physical definition - settlement edge is blurred		Some development crosses boundary

NPPF Purposes

- 2.20 To draw out clear variations in contribution to each Green Belt purpose, the three point scale set out in **Table 2.1** has been used.

Table 2.1: Green Belt contribution ratings

Strong Contribution	Green Belt performs well against the purpose.
Moderate Contribution	Green Belt performs moderately well against the purpose.
Weak/No Contribution	Green Belt makes a weak or no contribution to the purpose.

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

- 2.21 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the Study requires the definition of variations in the extent to which land performs this purpose. This requires a detailed, area-based assessment against this strategic purpose.

- 2.22 For the purpose of this study, it is necessary to define what constitutes a 'large built-up area' within and in close proximity to Rochford District and Southend-on-Sea and what is meant by the term 'sprawl'.

Definition of 'large built-up area'

- 2.23 The Green Belt within Rochford and Southend-on-Sea forms part of the Metropolitan Green Belt surrounding Greater London, preventing the sprawl of the city. However, the Green Belt within Rochford and Southend-on-Sea represents a clear eastwards extension to the main body of the Metropolitan Green Belt. Surrounding Southend-on-Sea, this eastwards extension to the Metropolitan Green Belt is clearly designed to prevent the sprawl of Southend-on-Sea as well as the merging of the settlements in the wider area. Therefore, **Southend-on-Sea** is considered to be a large built up area alongside **Greater London**.

Definition of 'sprawl'

- 2.24 The PAS guidance states in relation to Purpose 1⁶:

"The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"

- 2.25 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:

"As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development."

- 2.26 Whilst definitions of sprawl vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the contribution land makes to preventing sprawl in a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role a land area plays will be dependent on its relationship with a large built-up area.

Purpose 1 Assessment Criteria

- 2.27 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). All of the development forms noted in the RTPI note quoted above have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence.
- 2.28 To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development or the strength of physical separation from the wider countryside, will make a weaker contribution to this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it will make a stronger contribution.
- 2.29 Urban fringe land uses and the influence of adjacent urban areas, whilst they may reduce the extent to which land is considered to be part of the countryside, do not diminish the

⁶ Planning Advisory Service, 2015, Planning on the Doorstep: The Big Issues – Green Belt. Available online at: <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

extent to which expansion of a large built up area would be considered sprawl – i.e. this is a key difference between Purpose 1 and Purpose 3.

- 2.30 Contribution to Purpose 1 will diminish with distance from the large built-up area, but other factors will influence the range within which new development could potentially be considered sprawl associated with it. The presence of physical features that create clear distinction from the urban area may diminish its range of influence, and likewise the presence of another sizeable urban settlement that is distinctly separate from the large built-up area, with which new development might instead be associated, will diminish the relationship with the large built-up area.
- 2.31 In summary, key questions asked in assessing Purpose 1, the prevention of sprawl of large, built-up areas, include:
- Does the land lie adjacent to, or in close proximity to the large built up area?
 - To what extent is the land open, or does it contain existing urban development?
 - Does the land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
 - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl? What is the degree of containment by existing built development or other features (e.g. landform)?
- 2.32 **Table 2.2** summarises the criteria that were used for the assessment of Purpose 1.

Table 2.2: Purpose 1 assessment criteria

Purpose 1: Check the unrestricted sprawl of large built-up areas	
<p>Development/land-use: where there is less existing development, the Green Belt makes a stronger contribution.</p> <p>Location: land closer to the large, built-up area generally makes a stronger contribution.</p> <p>Separating features: land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.</p> <p>Connecting features: where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.</p>	
Strong Contribution	Land adjacent or close to the large built-up area that contains no or very limited urban development and has a strong sense of openness. It relates strongly to the wider countryside as opposed to the urban area.
Moderate Contribution	Land adjacent or close to the large built-up that contains limited urban development and has a relatively strong sense of openness. It may relate to both the settlement and the wider countryside or have a degree of separation from both.
Weak/No Contribution	Land adjacent or close to the large built-up area that is already fully urbanised; or land that is sufficiently separated or distant from a large built-up area for there to be any significant potential for urban sprawl from the large built up area.

Purpose 2: To prevent neighbouring towns from merging into one another

- 2.33 To ensure that the study takes full account of this purpose, it is necessary to define what constitutes a ‘town’ within and in close proximity to Rochford and Southend-on-Sea.

Definition of 'towns'

- 2.34 Rochford District Council's adopted Core Strategy names **Rayleigh**, **Rochford** merged with **Ashingdon** and **Hockley** merged with **Hawkwell** as the most significant settlements within the Districts settlement hierarchy. Hullbridge and Great Wakering are listed as tier 2 settlements. Both Hullbridge and Great Wakering are notably smaller than the District's other significant settlements and are therefore not defined as towns. However, the contribution of these smaller settlements in narrowing the gap between other towns within and in close proximity to the Study area has been considered.
- 2.35 Southend-on-Sea is predominantly an urban Borough formed of the town of Southend-on-Sea and the smaller settlements of Leigh-on-Sea, Chalkwell, Westcliff, Prittlewell, Southchurch, Thorpe Bay and Shoeburyness. However, as these smaller settlements are all contiguous with the larger town of **Southend-on-Sea** with no clear Green Belt land between them, they have all been treated as a 'town' for the purposes of the assessment of Purpose 2.
- 2.36 In addition to the larger settlements within Rochford and Southend-on-Sea, there are a number of settlements of a similar size within close proximity to the Study area. They include **Canvey Island** and **South Benfleet** in Castle Point District, **Basildon** and **Wickford** in Basildon Borough and **South Woodham Ferrers** in Chelmsford District. All are identified in their respective Local Plans as towns or significant settlements. **Hadleigh** (including Thundersley with which it is merged) in Castle Point District is contiguous with the built up area of Southend-on-Sea and Rayleigh, but is considered to be a distinct town in Castle Point District's Local Plan.
- 2.37 In summary, the settlements within and in the immediate vicinity of the Study area that are defined as 'towns' for the assessment of Purpose 2 include:
- Basildon.
 - Canvey Island.
 - Hadleigh.
 - Hockley merged with Hawkwell.
 - Rayleigh.
 - Rochford merged with Ashingdon.
 - South Benfleet.
 - Southend-on-Sea.
 - South Woodham Ferrers.
 - Wickford.
- 2.38 Although the above are the only settlements in the area to be considered to be of a sufficient size and significance to be defined as towns, it is recognised that the perceived gaps between towns will be affected by smaller, intervening settlements. Full account has therefore been taken of the role that smaller settlements play in reducing the perceived gaps between the larger 'towns'.
- 2.39 Following the definition of towns within and in close proximity to the Study area, it has been possible to establish where the Green Belt gaps lie between them.

Purpose 2 assessment criteria

- 2.40 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considers both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This accords with PAS guidance⁷ which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another.

⁷ Planning Advisory Service, 2015, Planning on the Doorstep: The Big Issues – Green Belt. Available online at: <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>
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- 2.41 Land that is juxtaposed between towns will make a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land will be. Physical proximity is the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, will make a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement needs to be made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, contribution to Purpose 2 may be reduced.
- 2.42 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation whereas a separating feature such as a woodland block or hill may increase the perception of separation. Smaller inset settlements will also reduce the amount of countryside between towns, particularly as perceived from connecting roads. Land that lacks a strong sense of openness, due to the extent of existing development that has occurred, will also make a weaker contribution.
- 2.43 In summary, key questions asked in assessing Purpose 2, preventing the coalescence of towns, are:
- Does the land lie directly between two settlements being considered under Purpose 2?
 - How far apart are the towns being considered?
 - Is there strong intervisibility between the towns?
 - How do the gaps between smaller settlements affect the perceived gaps between towns?
 - Are there any separating features between the towns e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
 - Are there any connecting features between the towns e.g. roads, railways which reduce the sense of separation between the settlements?
 - What is the overall fragility/ robustness of the gap taking the above into account?
- 2.44 **Table 2.3** summarises the proposed criteria that were used for the assessment of Purpose 2 in the study.

Table 2.3: Purpose 2 assessment criteria

Purpose 2: Prevent neighbouring towns from merging
<p>Development/land-use: less developed land will make a stronger contribution – a ‘gap’ which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.</p> <p>Location: land juxtaposed between towns makes a stronger contribution.</p> <p>Size: where the gap between settlements is wide, the Green Belt makes a weaker contribution.</p> <p>Separating features: the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However, loss of such features would consequently have a greater adverse impact on settlement separation.</p> <p>Connecting features: where physical features strengthen the relationship between</p>

towns, e.g. where settlements are directly linked by a major road, or have a strong visual connection, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.

Strong Contribution	Land that plays a highly significant role in inhibiting physical or visual coalescence of towns, such as narrow gaps that are visually open with few separating features.
Moderate Contribution	Land that plays a role in inhibiting physical or visual coalescence of towns, but which is also bordered by separating features which prevent visual or physical coalescence of towns.
Weak/No Contribution	Land which is not located within a gap between towns, or plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 2.45 The third Green Belt purpose focuses on the role of the Green Belt in safeguarding the countryside from encroachment. To ensure that Rochford and Southend-on-Sea takes full account of this purpose, it is necessary to define 'encroachment'. The NPPF lists in paragraph 145 a number of types of buildings that are 'not inappropriate' within the Green Belt. As a matter of law, development such as agriculture and forestry which is appropriate in the Green Belt and is not required to 'preserve the openness' of the Green Belt cannot be considered to impinge on its openness⁸.
- 2.46 In order to effectively assess the effects of encroachment on countryside, it is important to determine the extent to which Green Belt land:
- Contains or is influenced by urbanising land uses and features.
 - Relates to adjacent settlements and/or to the wider countryside.
- 2.47 Urbanising land uses and features are considered to include any features that diminish openness or compromise the rural character of the countryside.
- 2.48 Paragraphs 145 and 146 of the NPPF and associated case law provides guidance on into what land uses and features are considered to be 'appropriate' development in the Green Belt (see **Appendix 1**).
- 2.49 The methodology does not distinguish between different 'degrees' of countryside beyond considering urban influence, as this would stray into assessing the impact on landscape character. If land further from an urban area is for example, more 'rural' and tranquil, this is a landscape sensitivity issue.
- Purpose 3 assessment criteria*
- 2.50 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:
- i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses;
 - ii) the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. whether it has a stronger relationship to urban area than with the wider countryside).

⁸ Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016), see Appendix 1.

2.51 Physical landscape elements (or a lack of them) may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical landscape containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence: the urban area would need to be a dominating influence either through a) the scale of development; or b) the degree of containment of the open land by development. The presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may also give land a strong relationship with a visible urban area even if buildings are not particularly dominant.

2.52 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape or visual character. For example, land that displays a strong landscape character in terms of sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape or visual point of view. However, the same land in Green Belt terms may well make an equal contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.

2.53 In summary, the key questions asked in assessing Purpose 3: safeguarding the countryside from encroachment include:

- To what extent does the land exhibit the characteristics of the countryside – i.e. an absence of built or otherwise urban development?
- Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
- Does land relate more strongly to the settlement(s) or to the wider countryside?

2.54 **Table 2.4** summarises the criteria that were used for the assessment of Purpose 3 in the study.

Table 2.4: Purpose 3 assessment criteria

Purpose 3: Assist in safeguarding the countryside from encroachment	
Development/land-use:	where there is less urbanising land use and more openness, land makes a stronger contribution.
Separating features:	land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.
Connecting features:	an absence of physical features to link settlement and countryside means that land makes a stronger contribution.
Strong Contribution	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms ⁹) and which does not have a stronger relationship with the urban area than with the wider countryside.

⁹ This does not include development which is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

Moderate Contribution	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), and which has a stronger relationship with the urban area than with the wider countryside (i.e. it is contained in some way by urbanising and or other features); or Land which retains some degree of openness but which is compromised by urbanising development or uses within it.
Weak/No Contribution	Land that does not contain the characteristics of open countryside and is influenced by urbanising development of a scale, density or form which significantly compromises openness.

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

- 2.55 The fourth Green Belt purpose focuses on the role of the Green Belt in preserving the setting and special character of historic towns. The purpose makes specific reference to 'historic towns' not individual historical assets or smaller settlements such as villages and hamlets.
- 2.56 An extract from Hansard in 1988 (HC Deb 08 November 1988 vol 140 c148W 148W) clarifies which historic settlements in England were considered 'historic towns' in the context of the Green Belt purposes:

Mr. Frank Field: To ask the Secretary of State for the Environment if he will include York, Chester, Bath, Oxford and Cambridge on a list of towns and cities whose Green Belts fulfil the purpose of preserving the special character of historic towns as laid down in Planning Policy Guidance Note 2.

Mr. Chope: Of all the Green Belt purposes listed in Planning Policy Guidance Note 2 that of "preserving the special character of historic towns" is especially relevant to the Green Belts referred to by the hon. Member.

- 2.57 Historic England in their consultation response to the Welwyn Hatfield Stage 3 Green Belt Study (2018) also noted that Durham has since been added to this list.
- 2.58 It is therefore considered inappropriate to consider elements of the historic environment which do not relate to historic towns and their wider setting. This is supported by the PAS guidance¹⁰ which states:
'This purpose is generally accepted as relating to very few settlements in practice.'
- 2.59 The connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.
- 2.60 Key questions include:
- What is the relationship of the land with the historic town?
 - Does the land form part of the setting and/or special character of an historic town?

¹⁰ Planning Advisory Service, 2015, Planning on the Doorstep: The Big Issues – Green Belt. Available online at: <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

- What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 2.61 Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic settlements.
- 2.62 To ensure that Rochford and Southend-on-Sea take full account of this purpose, it is necessary to establish which settlements in the Study area are historic towns, and whether they have a physical or visual relationship with the Green Belt land. A review of the Council's latest evidence bases related to the historic environment has been undertaken, including historic landscape character assessments and conservation area appraisals.
- 2.63 The Essex Landscape Character Assessment¹¹ states that one of the principal functions of the Green Belt in Essex is to '*preserve the setting and special character of historic towns located within the Belt*'. However, the assessment does not specify which towns.
- 2.64 The Rochford District Historic Characterisation Project published in 2006¹² represents the most recent assessment of the historic character of the study area. The assessment report references several historic settlements, including the acknowledged towns of Rayleigh and Rochford merged with Ashingdon (see purpose 2 above). The town of Hockley merged with Hawkwell is acknowledged as being formed of largely dense post-World War II housing. No significant historic features are identified, therefore the settlement is not defined as a historic town. The medieval village of Great Wakering is described as one of the small historic settlements in Rochford but is not defined as a historic town.
- 2.65 The built up area of **Rochford** and Ashingdon is largely made-up of pre- and post-World War II housing interspersed with more recent suburbs, with the historic cores of the now merged settlements being located to the south and north, respectively. The historic medieval town of Rochford built up around the intersection of North, West, East and South Street at the southern end of the settlement, adjacent to the historic market square. To the west of Rochford's historic core lies Rochford Hall comprised of the remains on an early Tudor brick built mansion and its associated farming and landscape features. It is possible that this church/hall complex was a focal point for an earlier dispersed settlement pattern prior to the foundation of the town. The church and hall and its immediate surroundings sit within the Rochford Conservation Area and the Green Belt¹³. However the railway line, which cuts through the town's Conservation Area, separates the historic core of the town from the wider Green Belt. Furthermore, the church/hall complex in the Green Belt now operates as a golf club. Therefore the Green Belt is not considered to make a notable contribution to the setting and special character to historic Rochford.
- 2.66 The historic core of old **Ashingdon** village is small, comprising a church and manor house on Ashingdon hill. Both assets have a limited relationship with the modern town which sprawls southwards merging with Rochford. Although the Ashingdon hill has extensive views over the Crouch estuary and the Canewdon area to the north and east, these views of the wider Green Belt contribute to the setting and special character of the church and manor house, not the setting and special character of town.¹⁴
- 2.67 **Rayleigh** is a historic town with a medieval historic core, including the motte and bailey castle Rayleigh Mount, the Holy Trinity Church, Rayleigh Windmill, the Dutch Cottage and the High Street bordering the original market place, located on a distinctive raised ridge / plateau roughly 60-70m above the surrounding countryside¹⁵. The assets and their immediate setting are designated as a Conservation Area. Despite the prominent location of the town's historic core, the Rayleigh Conservation Area Appraisal only notes one distant view of the countryside to the north-west. However, as the historic core is largely screened from the open countryside by trees and buildings and the historic core is surrounded by modern industrial estates and areas of housing that were developed in the

11 https://www.rochford.gov.uk/sites/default/files/planning_landscapecharacter.pdf

12 https://www.rochford.gov.uk/sites/default/files/planning_historic_environment_characterisation_project.pdf

13 https://www.rochford.gov.uk/sites/default/files/planning_historic_environment_conservation_areas_rochford_final.pdf

14 https://www.rochford.gov.uk/sites/default/files/planning_historic_environment_characterisation_project.pdf

15 https://www.rochford.gov.uk/sites/default/files/planning_historic_environment_characterisation_project.pdf

late 19th / early 20th centuries, the Green Belt is not considered to contribute to the setting and special character of the town.

- 2.68 The Study area's largest town **Southend-on-Sea** has its origins in the Regency period of the late 18th century and expanded rapidly in the second half of the 19th century, after the arrival of the railways.¹⁶¹⁷ Its central historic core is located on the cliffs above the esplanade and is characterised by a block of Regency terraced houses named the 'Royal Terrace'. This central core is now designated under several Conservation Areas organised around blocks of growth and distinct topographical and architectural features such as Clifftown and Warrior Square. Orientated to overlook the estuary and the sea beyond, and surrounded by more modern development, these central Conservation Areas have no physical or visual relationship with the Green Belt land surrounding Southend-on-Sea. Other notable historic cores, which were originally separate villages but now merged with Southend-on-Sea include Leigh to the west, Shoeburyness to the east and Prittlewell to the north.
- 2.69 Much like the central core of Southend-on-Sea, the historic cores of Leigh and Shoeburyness are both located on and orientated towards the coast and surrounded by modern development which has little relationship with the Green Belt land surrounding Southend-on-Sea. The one notable exception is the open land of the Belton Hills to the west and Leigh Marsh to the south west, although, in isolation, this suburb is not considered to be a historic town in Green Belt terms.¹⁸
- 2.70 The historic core of Prittlewell retains some of the character of its village origins owing to the topography of the area which slopes to the north down to the Prittle Brook, maintaining open views of Priory Park to the north. However the layers of more modern development further north prevent views of the wider open countryside designated as Green Belt.¹⁹
- 2.71 Largely owing to the orientation and origins of the town and its suburbs towards the sea, the Green Belt land surrounding Southend-on-Sea, although important in defining the character of the modern town, does not have a strong physical or visual relationship with the historic core of the historic town and their notable historic characteristics. Therefore the Green Belt around Southend-on-Sea is considered to make a limited contribution to Green Belt purpose 4.
- 2.72 **Table 2.5** summarises the criteria that were used for the assessment of Purpose 4 in the study.

Table 2.5: Purpose 4 assessment criteria

Purpose 4: Preserve the setting and special character of historic towns	
Development/land-use:	less developed land makes a stronger contribution.
Location:	an area that contains key characteristics, or important in views to or from them, makes a stronger contribution.
Separating features:	land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution.
Connecting features:	where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger.
Strong Contribution	The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town's special character or setting.

16 https://www.rochford.gov.uk/sites/default/files/planning_historic_environment_characterisation_project.pdf

17 http://www.southend.gov.uk/downloads/download/302/southend_character_study

18 https://www.southend.gov.uk/info/200422/conservation_areas

19 https://www.southend.gov.uk/info/200422/conservation_areas

Moderate Contribution	The land and its openness makes a contribution to the characteristics identified as contributing to a historic town's special character or setting.
Weak/No Contribution	Land forms little or no part of the setting of an historic town and does not contribute to its special character.

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

2.73 Historically, most Green Belt studies have not assessed in detail individual Green Belt land parcels against Purpose 5, either opting not to rate them or rating them all equally, on the grounds that it is difficult to support arguments that one parcel of land makes a higher contribution to encouraging re-use of urban land than another. The PAS guidance states:

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

2.74 In other words, it is debatable whether development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative contribution of discrete parcels of Green Belt land to Purpose 5.

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

2.76 Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Assent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development. In addition, the National Planning Policy Framework requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development – a Housing and Economic Land Availability Assessment (HELAA). Together, these evidence bases provide an accurate and up-to-date area of available brownfield land within individual settlements, which can be used to calculate the proportion of available brownfield land relative to the size of each settlement. Rochford and Southend-on-Sea's Brownfield Land Registers have been used to calculate the area of brownfield land within the urbanised²⁰ area of the respective authorities.

2.77 Using these evidence bases to inform meaningful judgements on the relative contribution of discrete parcels of land to Purpose 5 is dependent on the scale and form of the settlements within and around which Green Belt is defined. For example, it is harder to draw out differences in contribution between parcels around large conurbations containing merged settlements than it is land around different isolated settlements each with their own brownfield land areas.

2.78 Given the fact that the vast majority of the urban area within the Study area is comprised of Southend-on-Sea and the close proximity of the Rochford's distinct settlements – Rayleigh, Hockley merged with Hawkwell and Rochford merged with Ashingdon, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. In order that the Study appropriately assesses Purpose 5 and affords it equal weighting with Purposes 1-4, an even level of contribution to Purpose 5 has been determined for all areas of Green Belt based on the average availability of brownfield land across Rochford and Southend-on-Sea.

²⁰The urbanised area constitutes land within the Borough which does not fall within the Green Belt.

- 2.79 Without a clear range of brownfield land proportions for each settlement across the Study area, it is not possible to calculate a tailored set of percentage ranges from which to judge contribution to Purpose 5. There is also no guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or weaker, role in encouraging urban regeneration.
- 2.80 Southend-on-Sea Borough Council's Brownfield Register²¹ contains a record of roughly 50ha of suitable and available brownfield land within the Borough none of which sits within the Green Belt. This represents 1.44% of the total urbanised area of the Borough, which is roughly 3,480ha.
- 2.81 Rochford District Council's Brownfield Register²² contains a record of roughly 31.5ha of suitable and available brownfield land within the District, although 7.5ha of the registered brownfield land falls within the Green Belt, leaving roughly 24ha within the urbanised area of the District. This represents 0.84% of the total urbanised area of the District, which is roughly 2,855ha.
- 2.82 Overall the amount of suitable and available brownfield land identified in the Councils' brownfield land registers represents a relatively small proportion of the total area of urbanised land in the Study area. Therefore, all Green Belt land within the Study area is considered to make a **Strong contribution** to Green Belt Purpose 5. This recognises the historic role that the Green Belt has had in redirecting growth to within the urban area, as evidenced by the relatively low area of suitable and available brownfield land within the urbanised area, but also acknowledges the limited opportunity to recycle derelict and other urban land over the next plan period.

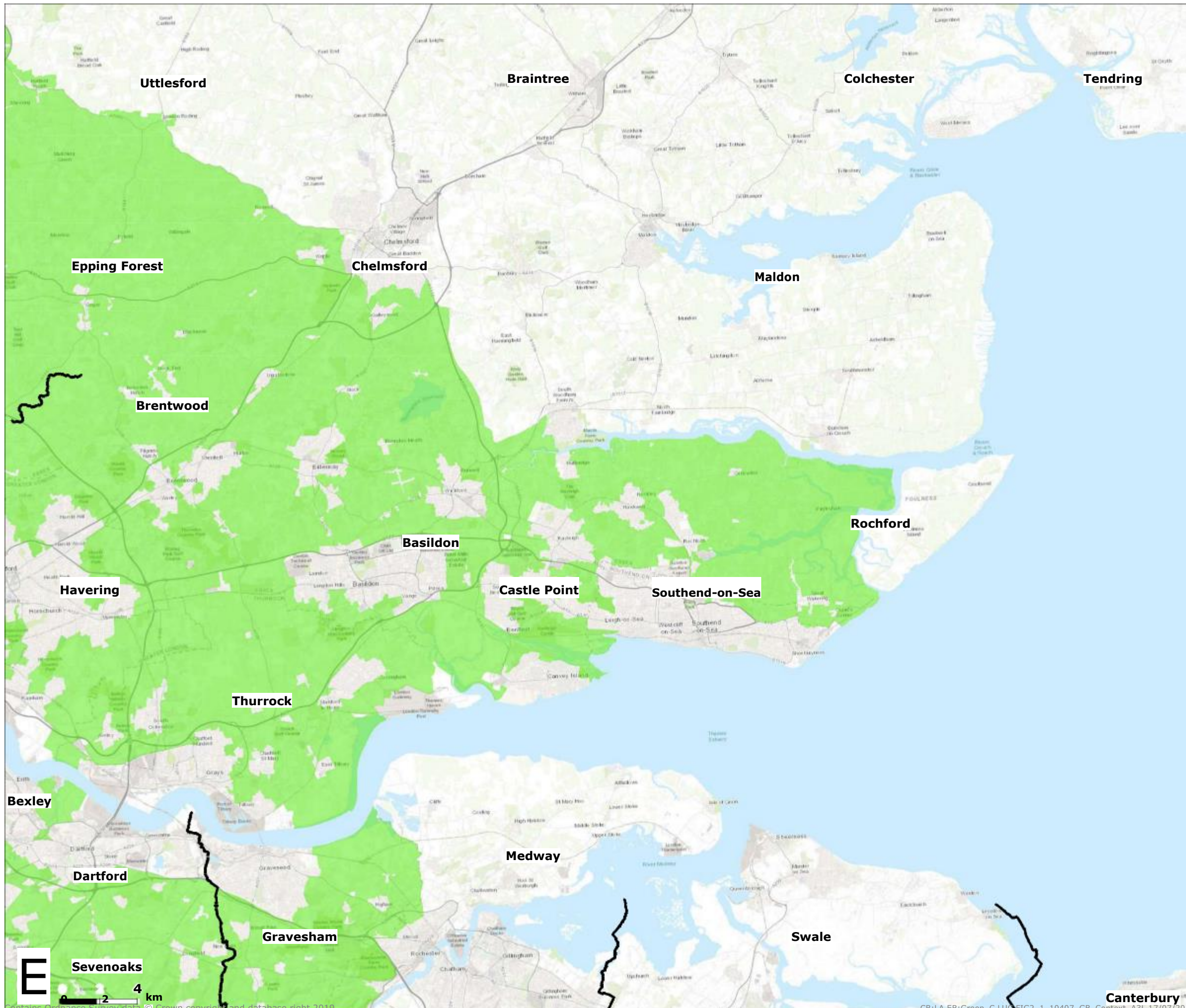
Stage 1 Assessment Process

- 2.83 The first step of the Stage 1 assessment involved identifying any Green Belt locations where sufficient urbanising development has occurred which has had a significant impact on Green Belt openness (as defined above). Distinctions were made between development which is rural enough in character, or small enough in size, or low enough in density, to justify its designation as Green Belt, and development that calls into question its Green Belt status.
- 2.84 The second step assesses the fragility of gaps between the settlements identified as 'towns' under Green Belt Purpose 2.
- 2.85 The assessment then proceeded on a settlement by settlement basis, starting with the largest areas of inset development through to the smaller inset villages. If any significant areas of washed-over urbanising development were identified in the initial stage, these too formed a focus for analysis. Recognising the common factors that influence the role of Green Belt land in the relationship between urban settlement and countryside, the analysis:
- Assessed the strength of the relationship between the Green Belt and the urban area, considering the extent and form of development, land use characteristics and separating and connecting features.
 - Identified changes in the strength of the relationship between settlement and countryside, again considering the extent and form of development, land use characteristics and separating and connecting features.
 - Considered how these spatial relationships affect contribution to each of the Green Belt purposes, and map lines to mark these changes.

²¹ Southend-on-Sea Borough Council's Brownfield Register, 2017. Available at: https://www.southend.gov.uk/downloads/file/5346/southend_brownfield_register_2017-03-31_rev1

²² Rochford District Council Brownfield Register, 2018. Available at: <https://www.rochford.gov.uk/planning-and-building/planning-policy/brownfield-register>


- 2.86 The analysis progressed outwards from each settlement until it was determined that land:
- Ceased to play a significant role in preventing sprawl of a large built-up area.
 - Made a consistent contribution to settlement separation or no contribution to this purpose.
 - Had a strong distinction from urban settlement and a strong relationship with the wider countryside.
 - Made no contribution to the setting or special character of a historic town.
- 2.87 The overall findings of the Stage 1 assessment are set out in **Chapter 3**.



**Rochford and Southend
Green Belt Study**

**Figure 2.1: Green Belt context
of Rochford District and
Southend Borough**

Local Authority
Boundary Green Belt

Map Scale @A3: 1:200,000

 Source: LUC, DCLG, OS

3 Stage 1 Assessment Findings

- 3.1 The primary aim of the Stage 1 assessment is to establish the variation in the contribution of designated land to achieving Green Belt purposes. Based on the assessment criteria outlined in **Chapter 2**, a review of the contribution of Green Belt land to each of the five Green Belt purposes was undertaken, drawing out spatial variations in the contribution of Green Belt land to each Green Belt purpose.
- 3.2 Each Stage 1 purpose assessment was undertaken for the area within Rochford District and Southend-on-Sea as a whole. The purpose behind this initial Borough and District-wide assessment was to draw out variations in contribution before the detailed assessments were undertaken at Stage 2, avoiding broad variations in contribution within prematurely and more arbitrarily defined parcels. Significant variations in contribution within a parcel can be an additional source of complication when providing assessment ratings – e.g. should a rating reflect the strongest level of contribution, or should it represent an average within the parcel?
- 3.3 A map is included for each Green Belt purpose illustrating the assessed variations in contribution across Rochford District and Southend-on-Sea (**Figure 3.1**: Purpose 1 assessment to **Figure 3.5**: Purpose 5 assessment). Each map is accompanied by supporting text (see the below sections) describing the pattern of variation for each purpose and the reasoning behind its definition.
- 3.4 Following the Borough and District-wide assessment of Green Belt against each purpose, the areas of the Green Belt which make the strongest and weakest contribution to the Green Belt purposes are identified, this is illustrated on **Figure 3.6**.
- 3.5 By combining the lines marking variations in contribution to each purpose, a list of land parcels have been generated, each of which has a reference number and rating for their contribution to each NPPF purpose. The parcels are illustrated in **Figure 3.7** and their contribution to each purpose is shown in **Table 3.1**.
- 3.6 The detailed Stage 1 parcel assessments are set out in **Appendix 3**, on a parcel by parcel basis. This Appendix includes an assessment of the contribution of the parcel against each of the purposes of the Green Belt, a map of the parcel and text justifying the scores.
- 3.7 The assessment findings represent a point in time based on the land uses, separating and connecting features at the time of assessment. Changes in land use, the creation of new or the loss of existing features have the potential to significantly affect the contribution of Green Belt land to the Green Belt purposes. For example, to loss of woodland block has the potential increase the relationship of Green Belt land sandwiched between the woodland and settlements with the wider countryside.

Assessment of Contribution to the Green Belt purposes

- 3.8 The following section summarises the findings of the assessment of contribution for each Purpose as shown on **Figures 3.1-3.5**. **Appendix 3** sets out the detailed assessments for each land parcel.
- 3.9 Two pockets of Green Belt in the Study area are inset with urban areas and therefore are not contiguous with the wider Green Belt:
 - Land south and west of Fossetts Way containing parts of Sutton Road Cemetery and the Jones Memorial Recreation Ground in Southend-on-Sea.
 - Land next to Clements Hall Leisure Centre, in Hawkwell, Rochford.

- 3.10 In both cases, these pockets of Green Belt are considered to make a low contribution to all Green Belt purposes (excluding purpose 5 for which all Green Belt is considered to make a strong contribution).

Contribution to Green Belt purpose 1 – to check the unrestricted sprawl of large built-up areas

- 3.11 The contribution to Purpose 1 was assessed by determining the role Green Belt land plays in preventing the sprawl of the large built up area of Southend-on-Sea (See **Figure 3.1**). While there are smaller areas of variation, three broad areas of contribution have been identified based on their proximity to Southend-on-Sea:
- The land which sits immediately to the north and west of Southend-on-Sea up to the first significant readily recognisable and permanent boundary is considered to contribute strongly to Purpose 1 due to the close proximity of this Green Belt to the urban edge of Southend-on-Sea. Notable boundary features marking the edge of the general area of strong contribution include the settlements of Great Wakering, Rayleigh and Rochford, Sutton Road / Barrow Hall Road / Shopland Road / Bridge Road and the River Roach.
 - Beyond the boundaries listed above, up to the next consistent line of readily recognisable and permanent boundary features, the Green Belt is considered to make a moderate contribution to Purpose 1. This is due the relative close proximity of this Green Belt land to Southend-on-Sea, but also in acknowledgement of the fact that this Green Belt land does not represent the first line of defence inhibiting the sprawl of Southend-on-Sea. Notable boundary features marking the edge of the general area of moderate contribution include the urban edge of Hawkwell and the road (High Road to the west) and railway line (to the east) that cut through the centre of the settlement, the River Roach and the Middleway waterway which marks the eastern edge of the metropolitan Green Belt and Foulness Island beyond.
 - The majority of the Green Belt land within the Study area which lies beyond these notable boundary features is considered to be far enough away from the large built-up area of Southend-on-Sea to make a weak or no contribution to Purpose 1.
 - However, it is considered that the area of Green Belt which is to a large extent contained between Southend-on-Sea, Rochford, Hockley and Rayleigh contributes strongly to Purpose 1. This is because these settlements are too close to Southend-on-Sea for future development within this area not to have a significant association with the large built up area. The Green Belt land which adjoins the 'outer' edges of Rochford, Hockley and Rayleigh – i.e. not lying between them and Southend – makes a moderate contribution to Purpose 1: expansion would be associated principally with those smaller settlements but would also, because of their limited separation from Southend, be associated with the large built up area.
- 3.12 The Green Belt land south and east of Leigh-on-Sea in Southend-on-Sea is considered to contribute to preventing the southwards sprawl of Southend-on-Sea. The Green Belt in between the large built up area and the waterway that separates the mainland from Two Tree Island and Leigh Marsh is considered to make a strong contribution to Purpose 1; Two Tree Island and Lee Marsh, by virtue of their close proximity to the large built-up area are considered to make a moderate contribution to Purpose 1.
- 3.13 In addition to proximity to the large built up area, the presence, or absence of urbanising development can also impact the contribution of Green Belt land to Purpose 1. Variations in the contribution to Purpose 1 over the broader areas have therefore been drawn out based on variation in the presence, scale and density of built development and its influence in urbanising, compromising openness and / or separating pockets of land from the wider open countryside. Green Belt land that lies in close proximity to Southend-on-Sea, contains no or very limited urbanising development, has a strong sense of openness and relates more to the countryside than the large built up urban area, makes either a strong or moderate contribution to Purpose 1. Conversely, land in close proximity to Southend-on-Sea that is urbanised by buildings and structures generally makes a weaker contribution

relative to the Green Belt that surrounds it. With the exception of the land uses listed as not inappropriate in the Green Belt in paragraphs 145 and 146 in the NPPF, buildings and structures within and directly adjacent to the Green Belt weaken the relationship between the Green Belt and the countryside and strengthen the relationship with the urban area.

3.14 The level of contribution is dependent on the scale and density of the development. Notable variations include:

- Relatively dense residential development, sub-stations, commercial garden centres and static caravan sites generally reduce the contribution of Green Belt land to Purpose 1 due to their urbanising influence on the countryside. The extent to which contribution is lessened is dependent on the scale, density and location of the development. The greater the scale and density the lower the contribution; when such land uses are located in close proximity to the edge of an inset settlement they often blur the lines between the countryside and the urban edge, lowering contribution further. Sewage treatment works, too, can have an urbanising influence of the countryside; however the substations located within Rochford and Southend were all considered to be sufficiently isolated and low density to not have a significant urbanising influence on the countryside.
- The types of development considered to be not inappropriate in the Green Belt as set out in paragraphs 145 to 146 of the NPPF were not considered to have an urbanising influence or affect openness. For example, isolated glasshouses²³, much like farm buildings, which do not form part of a commercial garden centre, are appropriate in the Green Belt.
- Some areas of Green Belt are considered to make a moderate or low contribution to Purpose 1 in areas of generally strong or moderate contribution due to the presence of strong boundary features which enclose Green Belt, reducing the relationship of the Green Belt with the wider countryside and strengthening the relationship of the Green Belt with urban areas. Notable examples include:
 - The open Green Belt land south of Rochford town centre is bordered on four sides by inset urbanising development – Purdey’s industrial estate to the east, residential development along Southend Road and south of Sutton road and Riverside industrial estate to the north. Despite having almost no relationship with the wider Green Belt, the large size and open nature of the land maintains a moderate contribution to Purpose 2. However, the top western corner which is occupied by a garden centre directly adjacent to the urban area of Rochford is considered to make a low contribution to Purpose 1.
 - The playing field of Grove Wood Primary School, to the east of Rayleigh is considered to make a moderate contribution as it is enclosed on three sides by inset development which contains the area and the relationship with the wider Green Belt to the east is limited by screening woodland.
 - The field east of Shoebury Road, retained by the development set back from Great Wakering to the north is enclosed on three sides by residential development.
 - The Green Belt land immediately to the west of Friars Park north of Shoeburyness (east Southend-on-Sea) enclosed on two sides by dense residential development is considered to have more of a relationship with the large built-up area of Southend-on-Sea than the wider countryside.

²³This is based on the decision of Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016) which found that glasshouse development in the Green Belt is appropriate since it is a 'building for agriculture' under the first bullet of paragraph 145 of the NPPF and therefore not capable of generating harm to the Green Belt designation.

Contribution to Green Belt Purpose 2 – to prevent neighbouring towns from merging into one another

- 3.15 The contribution to Purpose 2 was assessed by determining the role Green Belt land plays in preventing the merging of neighbouring towns. Land that is juxtaposed between towns and plays a highly significant role in inhibiting physical and visual coalescence due to the narrowness and / or visual openness of a gap is considered to make a strong contribution to Purpose 2. Conversely, land which is not located within a gap between towns or sits in gaps with significant separating features and / or significant distances between towns is considered to make a weak or no contribution to Purpose 2 (See **Figure 3.2**).
- 3.16 Green Belt land which is generally considered to make a strong contribution to Purpose 2 due to its location between neighbouring towns that are relatively close together includes:
- Land between Southend-on-Sea and Rochford.
 - Land between Rochford and Hockley.
 - Land between Southend-on-Sea and Hockley.
 - Land between Hockley and Rayleigh.
 - Land between Southend-on-Sea and Rayleigh.
- 3.17 The Green Belt land in between Rayleigh and Hockley and South Woodham Ferrers and the Green Belt land immediately to the east of what remains of the gap between Southend-on-Sea and Rochford is considered to make a moderate contribution to Purpose 2 by virtue of the fact that the gap between these towns is larger and therefore less fragile than the gaps to the south.
- 3.18 The Green Belt land in between Rayleigh and Wickford to the west is considered to make a strong/moderate contribution to Purpose 2. The Green Belt land in between the towns' urban edges and the strong boundaries of the A1245 and the A130 is considered to make a moderate contribution to Purpose 2 due to the fact that the roads contribute to maintaining a sense of separation between the towns. The open countryside which sits in between the two roads is considered to make a strong contribution to Purpose 2 because its loss would undermine the value of the Green Belt land in the gap to the west and east.
- 3.19 There are more detailed variations in contribution to Purpose 2 within these larger areas of strong and moderate contribution:
- Green Belt land that is retained by or sits behind urban areas that sit in closer proximity to neighbouring Green Belt towns are considered to make a lower contribution to Purpose 2 due to the fact that such Green Belt land does not lie directly juxtaposed between the narrowest portions of the gaps between neighbouring towns.
 - Inappropriate development within gaps which make a contribution to Purpose 2 often reduce the contribution of the developed land, as well as land in the immediate vicinity. The significance of this reduction is linked to the contribution of the wider Green Belt land to Purpose 2 and the scale and density of built development.
 - Green Belt that is enclosed by an urban area and / or other strong separating features such as rivers or railways are considered to make a lower contribution as the separating features act as barriers to the merging of settlements, reducing the contribution of the Green Belt land to Purpose 2.
- 3.20 All remaining Green Belt land within the Study area, notably the Green Belt land to the west of Rochford, is considered to make a weak or no contribution to Purpose 2 due to the fact that the land does not sit between two neighbouring Green Belt towns.

Contribution to Green Belt Purpose 3 – to assist in safeguarding the countryside from encroachment

- 3.21 Contribution to Purpose 3 has been assessed in the same way as Purpose 1, with the exception being that contribution to Purpose 3 is not influenced by proximity to a large built-up area. Variations in contribution to Purpose 3 have been drawn out based on variations in the presence, scale and density of built development and its urbanising influence, and whether this compromises openness.
- 3.22 Green Belt land that contains no, or very limited, urban development and has a strong sense of openness, and relates strongly to the wider countryside as opposed to the urban area makes a strong contribution to Purpose 3. On the other hand, Green Belt land that is urbanised by buildings or structures makes a weaker contribution to Purpose 3 (See **Figure 3.3**).
- 3.23 The vast majority of Green Belt land in the Borough and District makes a strong contribution to Purpose 3. However, a number of smaller areas, mostly in the western part of Rochford District, make a moderate or weak contribution to this purpose because they contain some form of urbanising development and / or have sufficient containment by the urban edge to give them a stronger relationship with the built up area than with the wider countryside. Whilst many of these areas lie adjacent to the urban edge a number are small, isolated pockets of development, for example small areas of housing, garden centres or sub stations.
- 3.24 Differences in the contribution of Green Belt land between Purpose 1 and Purpose 3 largely exist in areas that are not close to the large built up area of Southend-on-Sea and therefore have a low contribution to Purpose 1, but are absent of any urbanising development and so contribute strongly to Purpose 3.

Contribution to Green Belt Purpose 4 – to preserve the setting and special character of historic towns

- 3.25 For the reasons set out in **Chapter 2**, all Green Belt land is considered to make a low contribution to Purpose 4 (See **Figure 3.4**).

Contribution to Green Belt Purpose 5 – to assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 3.26 For the reasons set out in **Chapter 2**, all Green Belt land is considered to make a strong contribution to Purpose 5 (See **Figure 3.5**).
- 3.27 Site visits were undertaken to verify the Stage 1 desk-based judgements during the site visits for the Stage 2 Green Belt assessment.

Summary of Findings

- 3.28 As outlined above, by combining the lines marking variations in contribution to each purpose, a list of land parcels were generated, each of which has a reference number and rating for their contribution to each NPPF purpose. The parcels are shown in **Figure 3.7** and their contribution to each purpose is set out in **Table 3.1** below. The detailed Stage 1 assessment of each parcel is included in **Appendix 3**, and this sets out why each parcel achieved the ratings that it did. The table below also sets out which potential development sites from the Councils' 'Call for Sites' processes fall within each Stage 1 parcel. These sites have been considered further in the Stage 2 assessment.
- 3.29 As can be seen from **Table 3.1** there are significant variations in both the size of the parcels and contribution ratings to the Green Belt purposes.

- 3.30 Table 3.2 below provides a summary of the parcels which make a weaker contribution to the Green Belt purpose 1-4 (i.e. they do not include a 'strong' rating). These weaker performing parcels have been considered further in the Stage 2 assessment.
- 3.31 Although a parcel may not make a strong contribution (as assessed in the Stage 1 Study) to any one Green Belt purpose, the release of the parcel of land may still have the potential to have a significant effect on the surrounding Green Belt and/or on the residual Green Belt boundary which could lead to high overall harm. This has been assessed in the Stage 2 assessment. Likewise, there are some parcels and sites which make a strong contribution to the Green Belt purposes and their release would result in a high degree of harm. However, there may be overriding sustainability or viability considerations which mean that the land is the most appropriate location for development.

Table 3.1: Contribution of Green Belt parcels to the Green Belt purposes

Parcel no.	Parcel size (ha)	P1	P2	P3	P4	P5	Sites which fall within parcel
		Contribution to Green Belt purposes					
1	133.2	Weak	Moderate	Strong	Weak	Strong	222, 223, 224, 238, 239, 264
2	11.5	Weak	Moderate	Moderate	Weak	Strong	
3	212.7	Weak	Strong	Strong	Weak	Strong	144, 145, 168, 225, 226, 227, 228, 229, 230, 231, 232, 264, 92
4	1.1	Weak	Moderate	Moderate	Weak	Strong	16
5	1.9	Weak	Moderate	Moderate	Weak	Strong	
6	2.4	Weak	Moderate	Moderate	Weak	Strong	
7	4.8	Weak	Moderate	Moderate	Weak	Strong	137
8	1.0	Moderate	Moderate	Moderate	Weak	Strong	152
9	2.5	Moderate	Moderate	Moderate	Weak	Strong	
10	11.0	Moderate	Moderate	Moderate	Weak	Strong	05
11	399.7	Weak	Moderate	Strong	Weak	Strong	06, 137, 148, 149, 171, 177, 233, 245, 246, 99
12	10.4	Moderate	Weak	Moderate	Weak	Strong	
13	2.5	Moderate	Weak	Weak	Weak	Strong	
14	8.4	Moderate	Weak	Moderate	Weak	Strong	87
15	1.7	Moderate	Moderate	Moderate	Weak	Strong	
16	4.7	Moderate	Moderate	Moderate	Weak	Strong	108, 109, 110, 15

Parcel no.	Parcel size (ha)	P1	P2	P3	P4	P5	Sites which fall within parcel
		Contribution to Green Belt purposes					
17	0.02	Weak	Weak	Moderate	Weak	Strong	
18	7.1	Weak	Weak	Weak	Weak	Strong	
19	1023.7	Moderate	Moderate	Strong	Weak	Strong	100, 106, 107, 120, 121, 136, 139, 143, 146, 147, 148, 15, 154, 162, 163, 164, 167, 170, 171, 197, 198, 199, 200, 201, 202, 203, 204, 206, 220, 221, 23, 234, 235, 236, 237, 24, 241, 243, 244, 247, 248, 249, 25, 252, 26, 30, 31, 41, 42, 55, 64, 77
20	11.8	Strong	Moderate	Strong	Weak	Strong	53, 86, 98
21	41.2	Strong	Moderate	Strong	Weak	Strong	127, 256, 44, 48, 54, 68, 69
22	4.1	Moderate	Moderate	Moderate	Weak	Strong	
23	92.8	Moderate	Strong	Strong	Weak	Strong	105, 40
24	11.1	Weak	Moderate	Moderate	Weak	Strong	
25	1.2	Strong	Weak	Strong	Weak	Strong	
26	5.9	Moderate	Moderate	Moderate	Weak	Strong	160
27	1.6	Moderate	Weak	Moderate	Weak	Strong	
28	2.2	Strong	Moderate	Moderate	Weak	Strong	
29	11.3	Strong	Strong	Strong	Weak	Strong	127, 182, 250, 254
30	4.4	Weak	Moderate	Moderate	Weak	Strong	
31	17.8	Strong	Moderate	Strong	Weak	Strong	
32	1.0	Moderate	Moderate	Moderate	Weak	Strong	01, 102
33	80.2	Strong	Weak	Strong	Weak	Strong	

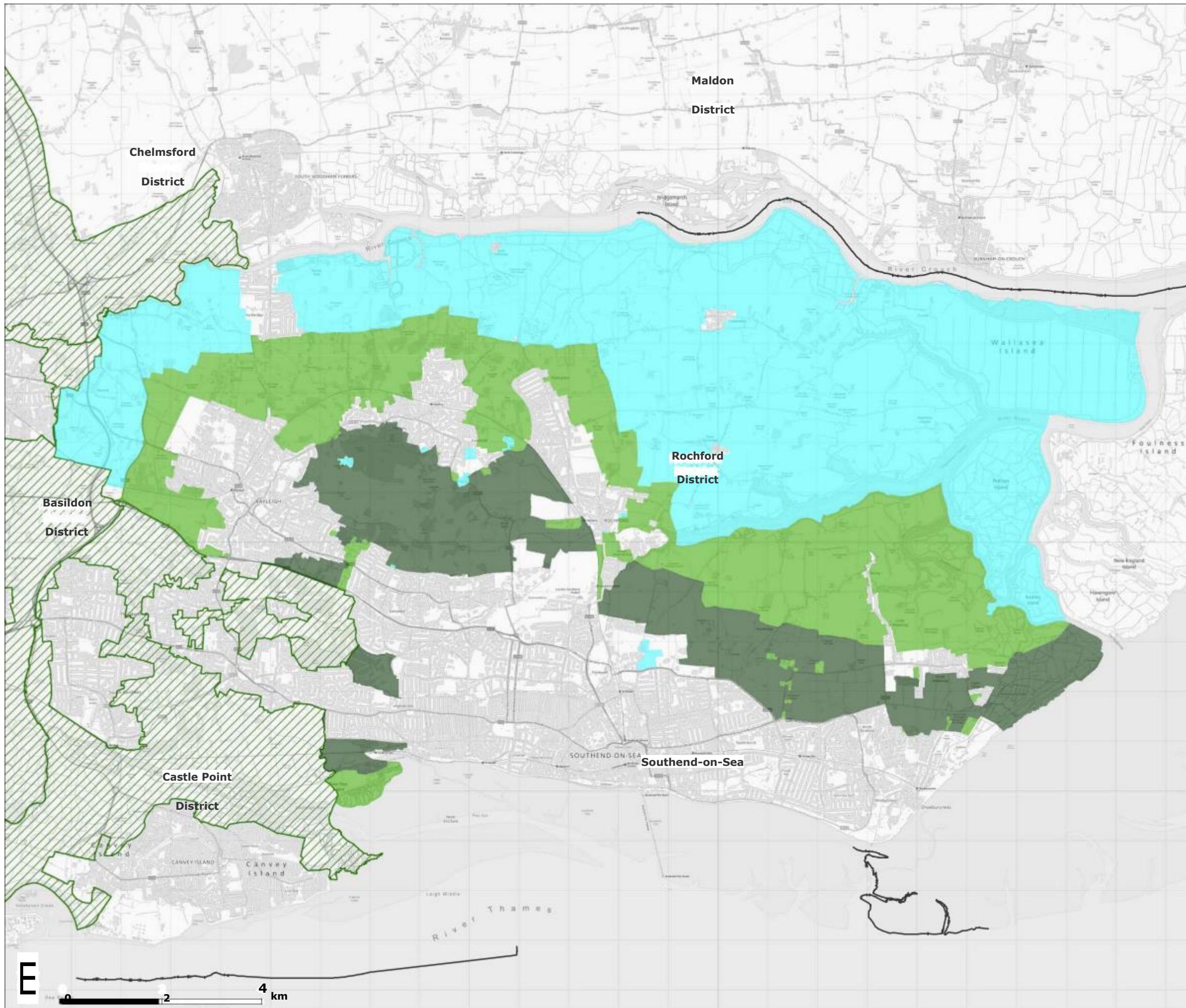
Parcel no.	Parcel size (ha)	P1	P2	P3	P4	P5	Sites which fall within parcel
		Contribution to Green Belt purposes					
34	23.7	Moderate	Strong	Moderate	Weak	Strong	01, 03, 102, 127, 14, 178, 181, 207, 212, 250, 47, 89
35	77.3	Moderate	Weak	Strong	Weak	Strong	
36	8.8	Strong	Moderate	Strong	Weak	Strong	
37	67.5	Strong	Weak	Strong	Weak	Strong	
38	0.5	Weak	Weak	Weak	Weak	Strong	59
39	4.8	Weak	Moderate	Moderate	Weak	Strong	
40	718.8	Weak	Moderate	Strong	Weak	Strong	101, 128, 151, 172, 19, 190, 193, 216, 33
41	1.6	Weak	Weak	Weak	Weak	Strong	
42	9.8	Strong	Moderate	Strong	Weak	Strong	45a
43	0.4	Moderate	Weak	Moderate	Weak	Strong	45a
44	1018.9	Strong	Strong	Strong	Weak	Strong	02, 03, 132, 134, 135, 160, 161, 18, 183, 191, 219, 22a, 22b, 240, 251, 255, 27, 29, 36, 37, 45b, 59, 74, 78, 79, 80, 81, 82, 83, 84, 85, 98
45	2.5	Moderate	Moderate	Moderate	Weak	Strong	49
46	2.4	Moderate	Moderate	Moderate	Weak	Strong	23
47	4.8	Weak	Weak	Weak	Weak	Strong	02
48	1.7	Weak	Moderate	Moderate	Weak	Strong	
49	4.6	Moderate	Moderate	Strong	Weak	Strong	242, 88
50	4.9	Weak	Weak	Weak	Weak	Strong	
51	6.1	Moderate	Moderate	Moderate	Weak	Strong	
52	2.6	Moderate	Moderate	Moderate	Weak	Strong	140
53	1.9	Weak	Moderate	Moderate	Weak	Strong	

Parcel no.	Parcel size (ha)	P1	P2	P3	P4	P5	Sites which fall within parcel
		Contribution to Green Belt purposes					
54	203.5	Moderate	Strong	Strong	Weak	Strong	08a, 08b, 133, 150, 159, 169, 17, 194, 20, 259, 39, 93
55	4.6	Weak	Weak	Weak	Weak	Strong	194
56	1.6	Moderate	Moderate	Moderate	Weak	Strong	
57	1.0	Moderate	Weak	Moderate	Weak	Strong	
58	13.5	Moderate	Moderate	Moderate	Weak	Strong	35, 85
59	10.4	Moderate	Moderate	Moderate	Weak	Strong	66
60	0.3	Weak	Weak	Weak	Weak	Strong	
61	376.0	Moderate	Weak	Strong	Weak	Strong	07, 104, 111, 112, 113, 114, 116, 119, 124, 126, 129, 13, 130, 131, 180, 217, 218, 265, 266, 28, 50
62	0.8	Moderate	Moderate	Weak	Weak	Strong	63
63	20.4	Moderate	Moderate	Moderate	Weak	Strong	63, 67
64	1.4	Weak	Weak	Weak	Weak	Strong	50
65	97.2	Strong	Strong	Strong	Weak	Strong	266, 95, 165,
66	17.2	Weak	Weak	Weak	Weak	Strong	260
67	16.3	Moderate	Strong	Strong	Weak	Strong	76, 123, 266
68	388.0	Strong	Moderate	Strong	Weak	Strong	155, 165, 260, 262, 266, 267, 268, 269
69	390.8	Moderate	Moderate	Strong	Weak	Strong	266, 267, 268
70	1.4	Moderate	Moderate	Moderate	Weak	Strong	269
71	1.0	Moderate	Weak	Moderate	Weak	Strong	269
72	0.9	Moderate	Moderate	Moderate	Weak	Strong	269
73	1.0	Moderate	Weak	Moderate	Weak	Strong	
74	1.9	Moderate	Moderate	Moderate	Weak	Strong	263, 269

Parcel no.	Parcel size (ha)	P1	P2	P3	P4	P5	Sites which fall within parcel
		Contribution to Green Belt purposes					
75	1.0	Moderate	Weak	Moderate	Weak	Strong	
76	1.5	Moderate	Weak	Moderate	Weak	Strong	
77	3.1	Moderate	Weak	Moderate	Weak	Strong	269, 71
78	3.9	Moderate	Weak	Moderate	Weak	Strong	270
79	5496.7	Weak	Weak	Strong	Weak	Strong	10a, 10b, 12, 122, 141, 166a, 166b, 173, 184, 187, 188, 21, 213, 215, 265, 266, 32, 38, 43, 46, 51, 52, 58, 61, 62, 72, 73, 75, 90, 94
80	31.6	Weak	Weak	Moderate	Weak	Strong	
81	0.3	Moderate	Weak	Moderate	Weak	Strong	
82	1117.5	Moderate	Weak	Strong	Weak	Strong	04, 60, 103, 142, 153, 192, 258, 268, 270
83	2.8	Moderate	Weak	Moderate	Weak	Strong	
84	775.6	Strong	Weak	Strong	Weak	Strong	195, 257, 261, 263, 268, 269, 270, 271, 34, 56, 57, 65, 70, 71, 97
85	2.0	Moderate	Weak	Moderate	Weak	Strong	56
86	6.9	Moderate	Weak	Moderate	Weak	Strong	
87	2.7	Strong	Weak	Moderate	Weak	Strong	11
88	2.7	Moderate	Moderate	Moderate	Weak	Strong	163, 164






Table 3.2: Weaker contributing parcels

Number of weak ratings	Number of moderate ratings	Area (ha)	Parcels
4	0	42.3	P18, P38, P41 P47, P50, P55, P60, P64, P66
3	1	34.2	P13, P17, P80
2	2	94.4	P02, P04, P05, P06, P07, P12, P14, P24, P27, P30, P39, P43, P48, P53, P57, P62, P70, P71, P72, P73, P74, P75, P76, P77, P78, P81, P83, P85, P86, P87
1	3	98.3	P08, P09, P10, P15, P16, P22, P26, P32, P45, P46, P51, P52, P56, P58, P59, P63, P88
0	4	0	-



**Rochford and Southend
Green Belt Study**

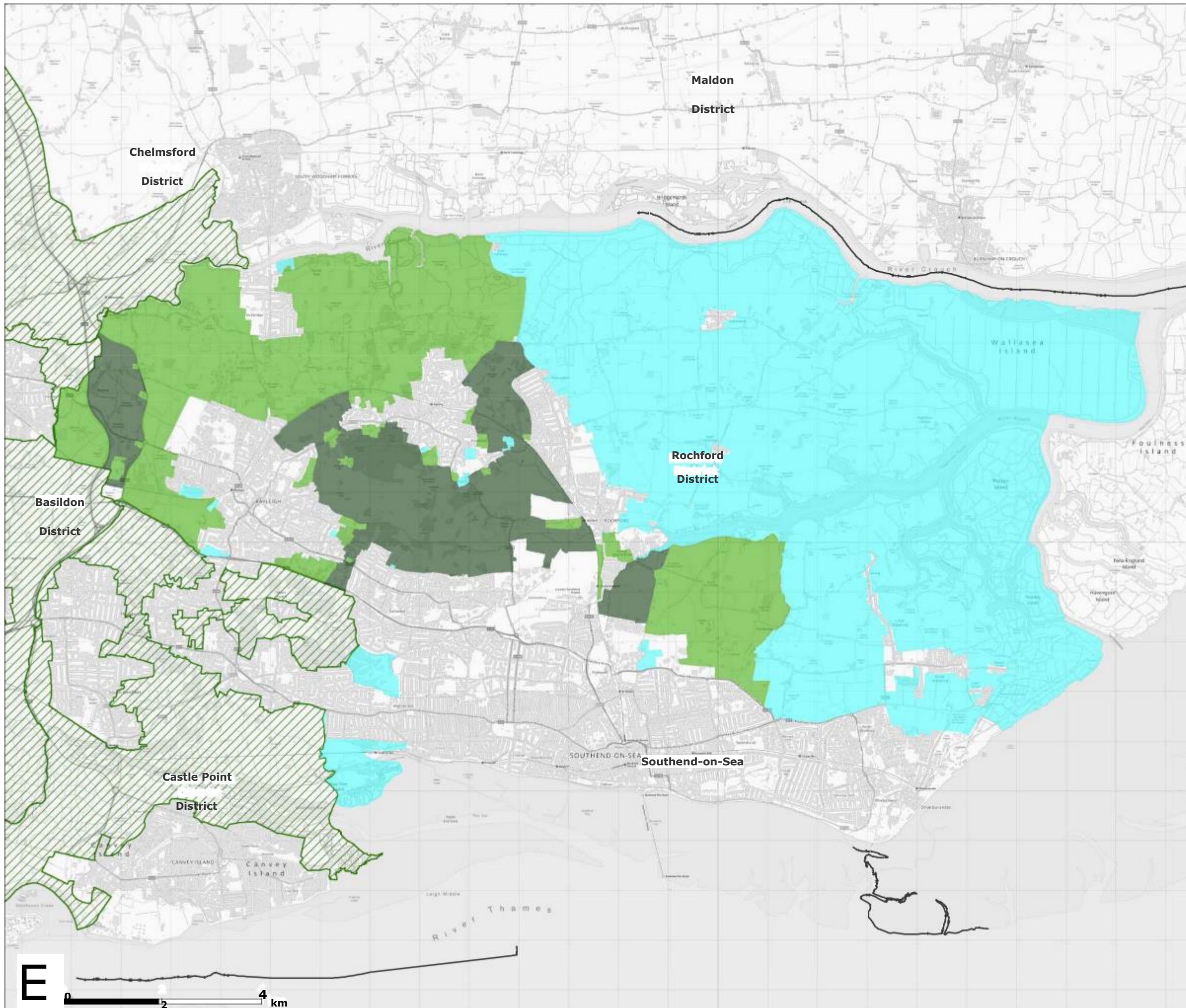
**Figure 3.1: Purpose 1 Assessment -
To Check the Unrestricted Sprawl of
Large Built Up Areas**

-  District Boundaries
-  Other Green Belt
- Purpose 1 Assessment**
-  Strong
-  Moderate
-  Low

Map Scale @A3: 1:75,000








Source: LUC, DCLG, OS



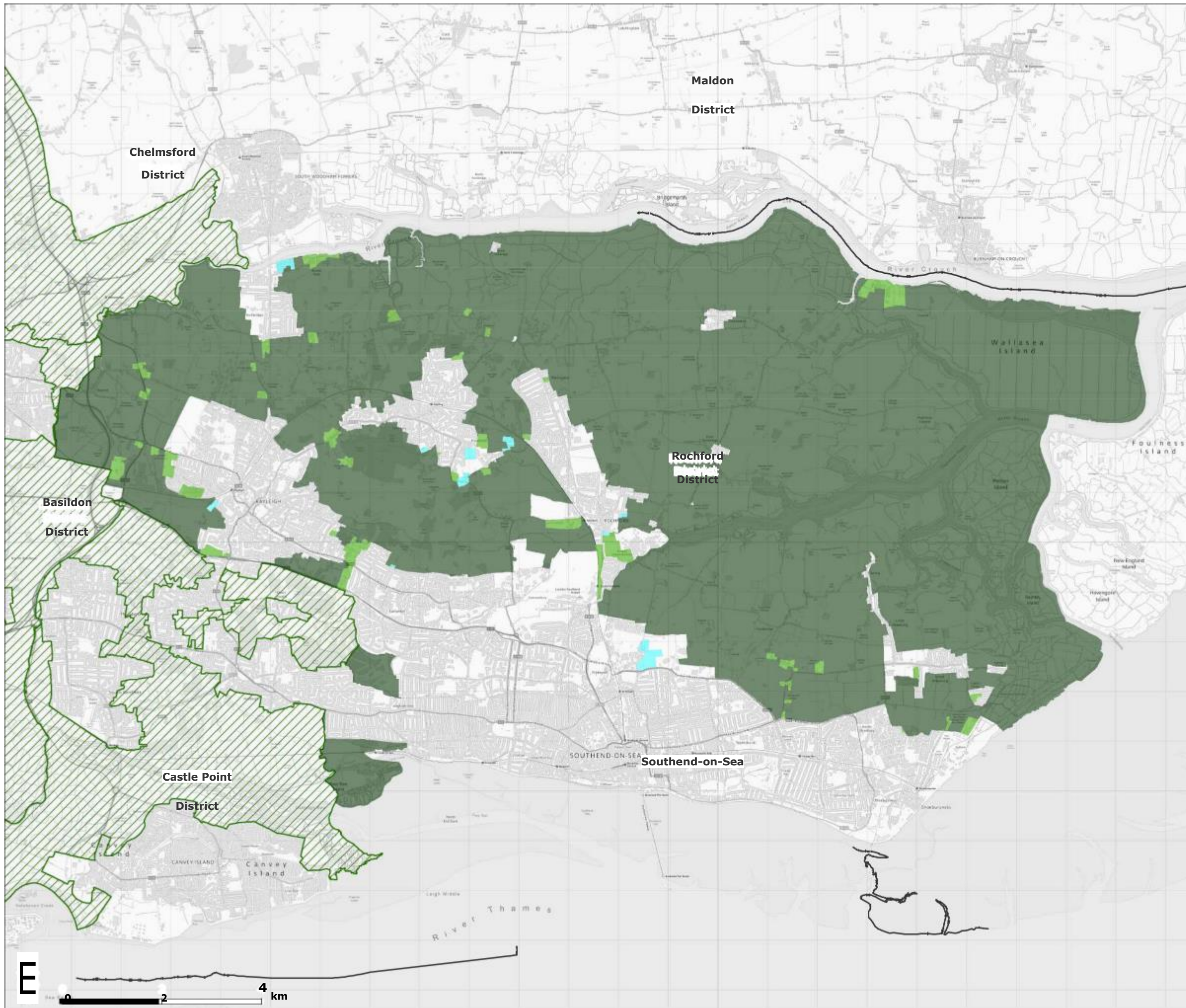
**Rochford and Southend
Green Belt Study**

**Figure 3.2: Purpose 2 Assessment -
To Prevent Neighbouring Towns
From Merging Into One Another**

-  District Boundaries
-  Other Green Belt
- Purpose 2 Assessment**
-  Strong
-  Moderate
-  Low

Map Scale @A3: 1:75,000





Rochford and Southend
Green Belt Study

Figure 3.3: Purpose 3 Assessment - To Assist in Safeguarding the Countryside from Encroachment

- District Boundaries
- Other Green Belt
- Purpose 3 Assessment**
- Strong
- Moderate
- Low

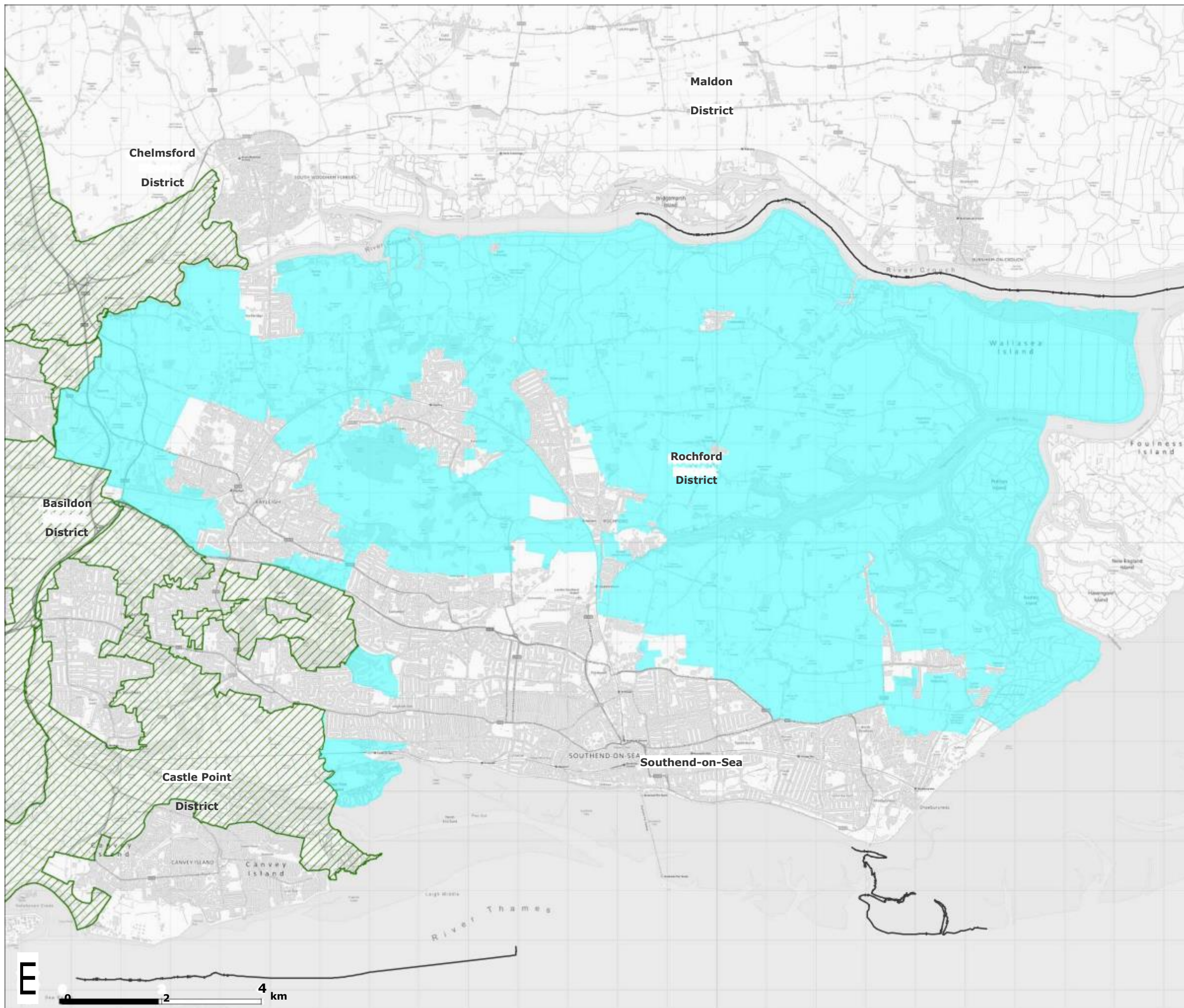
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Rochford and Southend

Green Belt Study

Figure 3.4: Purpose 4 Assessment - To Preserve the Setting and Special Character of Historic Towns

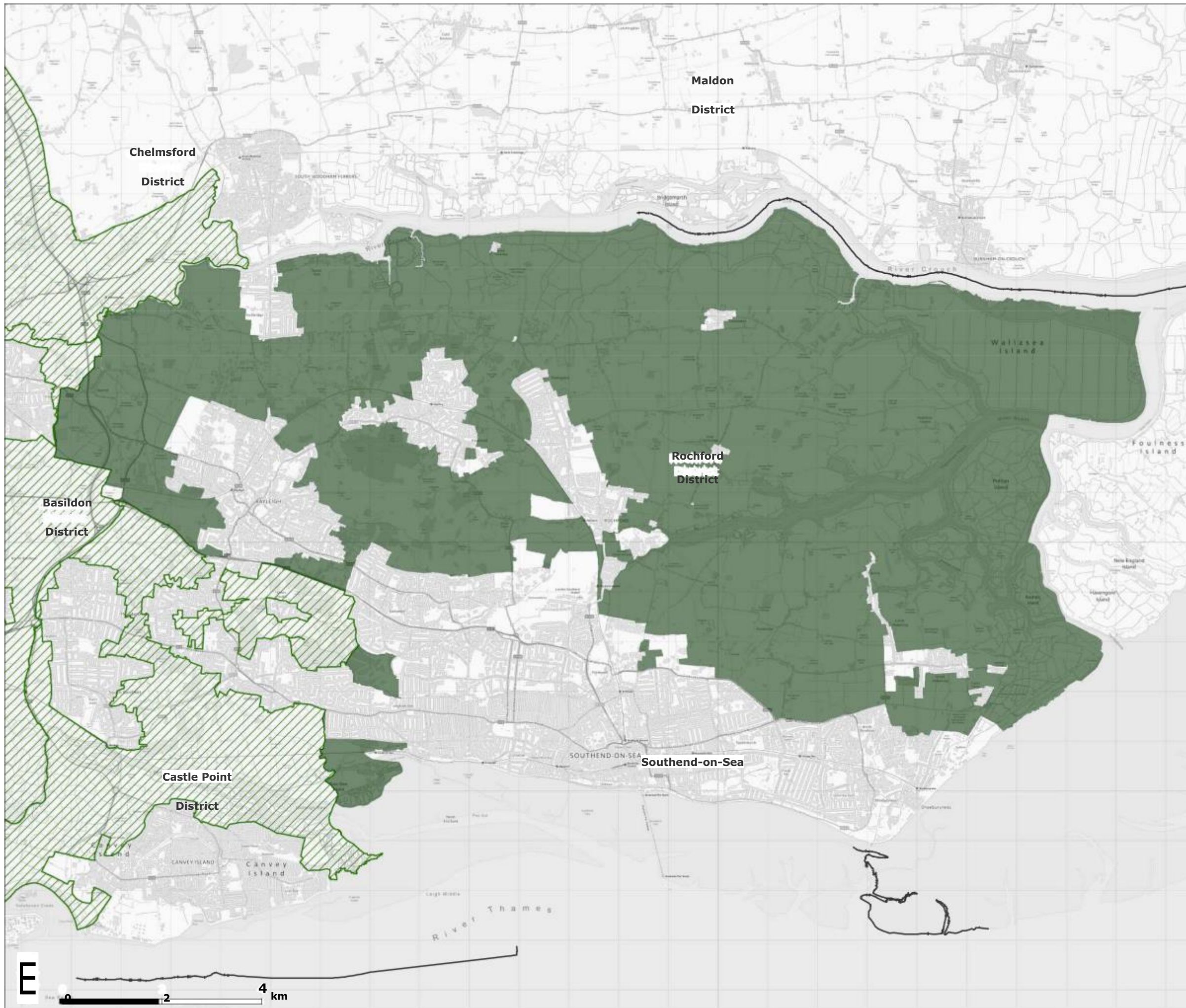


- District Boundaries
- Other Green Belt
- Purpose 4 Assessment**
 - Strong
 - Moderate
 - Low

Map Scale @A3: 1:75,000



Source: LUC, DCLG, OS



**Rochford and Southend
Green Belt Study**

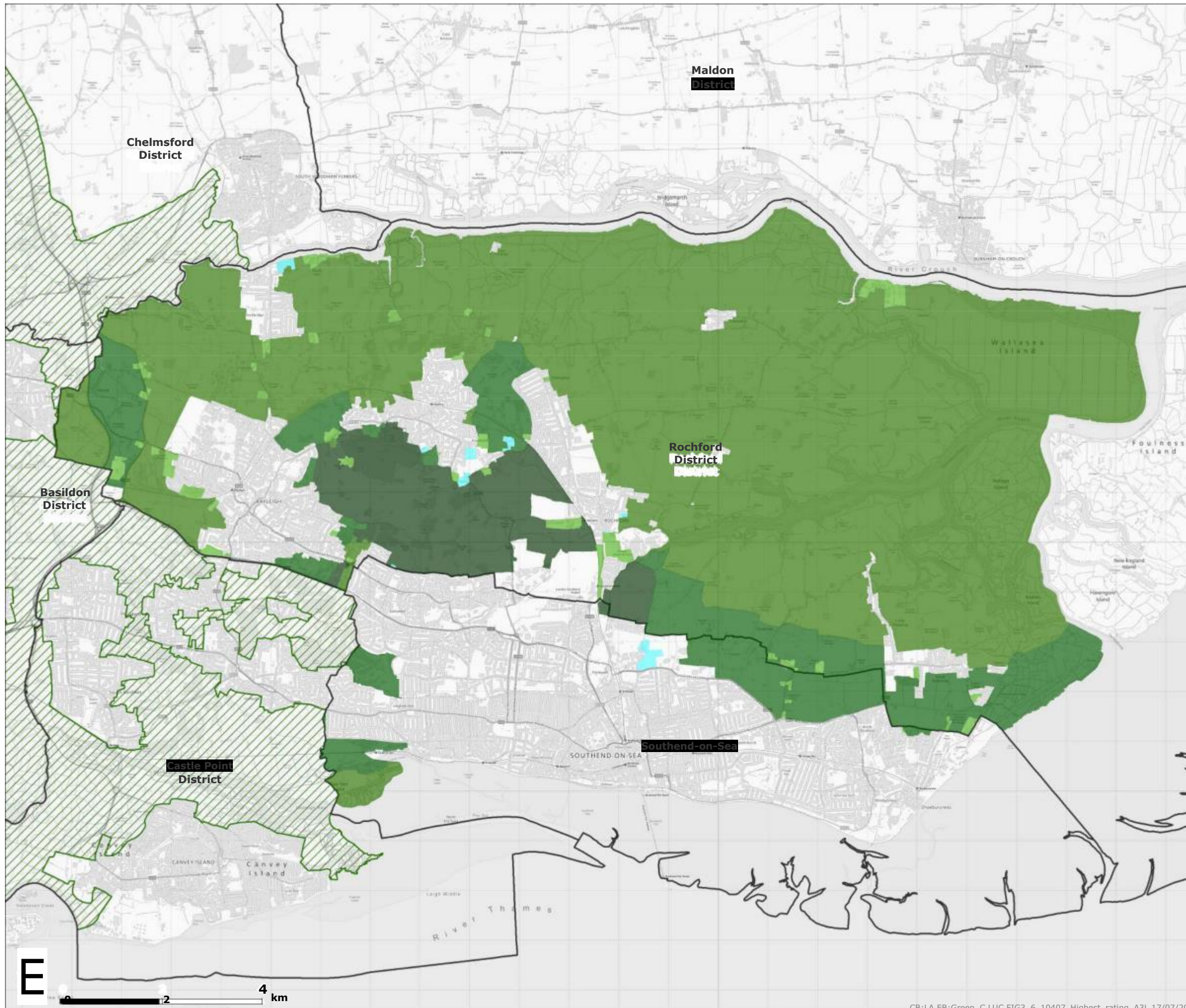
**Figure 3.5: Purpose 5 Assessment
- To Assist in Urban Regeneration
by Encouraging the Recycling of
Derelict or Other Urban Land**

- District Boundaries
- ▨ Other Green Belt
- Purpose 5 Assessment**
 - Strong
 - Moderate
 - Low

Map Scale @A3: 1:75,000



Source: LUC, DCLG, OS



**Rochford and Southend
Green Belt Study**

**Figure 3.6: Highest Contribution to
Green Belt Purposes (Purpose 1 - 4)**

- District Boundaries
- Other Green Belt
- Highest Rating (Purpose 1-4)**
 - Three Strong Ratings
 - Two Strong Ratings
 - One Strong Rating
 - Moderate
 - Low

All Green Belt land within the study area was judged to make a Strong contribution to Purpose 5. Consequently, Purpose 5 has been purposefully excluded from this figure in order to illustrate the variations in contribution identified at Stage 1.

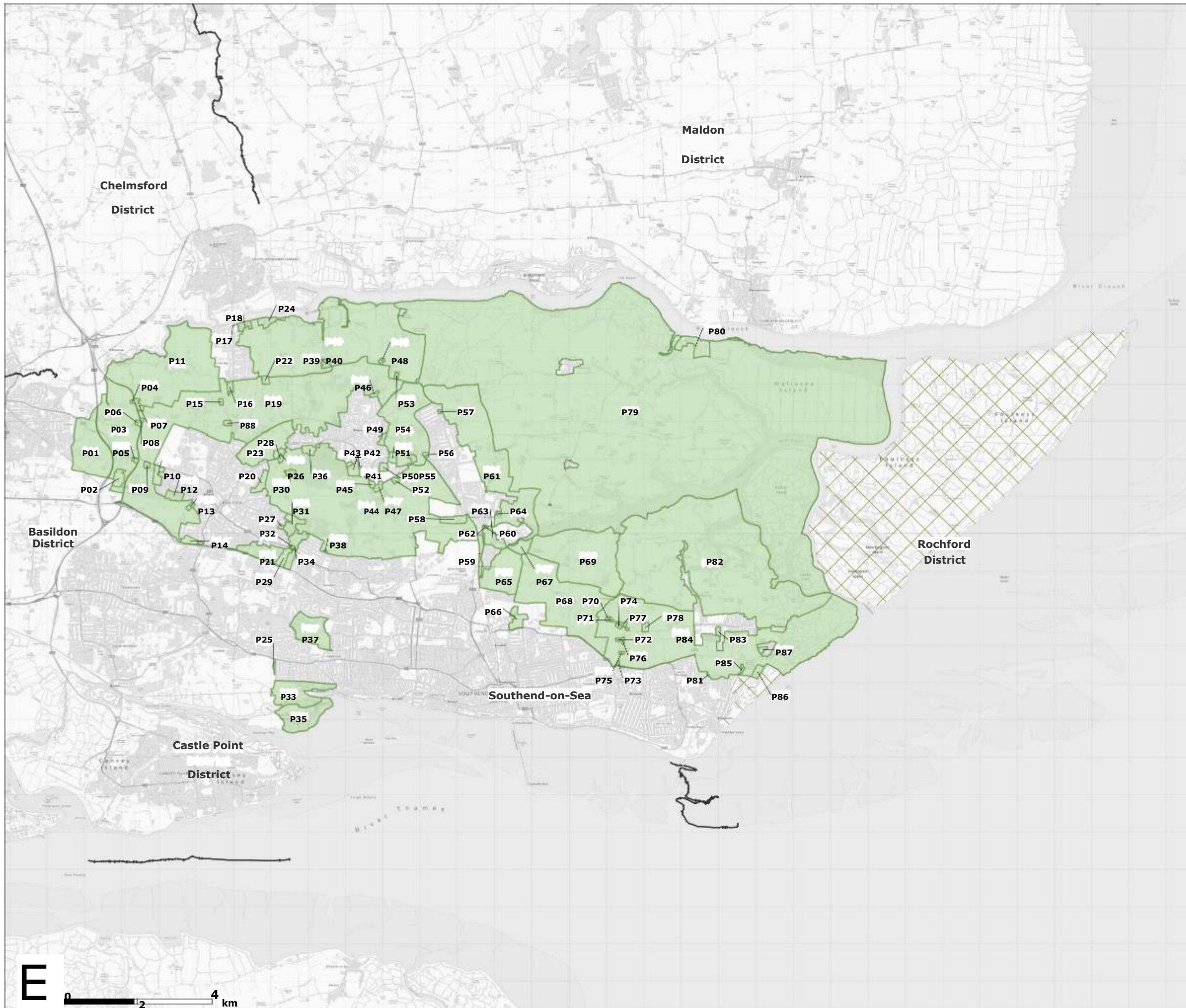
Map Scale @A3: 1:75,000



Figure 3.7: Stage 1 Contribution

Parcels

- District Boundaries
- Green Belt Parcels
- Potential New Green Belt



Map Scale @A3: 1:100,000



Assessment of the Potential for Designating New Green Belt





- 3.32 Paragraph 135 of the NPPF states that the general extent of Green Belt across the country is already established and that new Green Belts should only be established in exceptional circumstances, when planning for larger scale development such as new settlements or major urban extensions. Once the spatial strategy for Rochford District and Southend-on-Sea Borough has been confirmed, the Councils will be in a position to consider how the designation of new Green Belt land could help promote the sustainable pattern of development proposed in the plan period and in the longer term.
- 3.33 The NPPF clearly states what is required of local planning authorities defining new Green Belt boundaries. Paragraphs 135 and 139 state that local planning authorities should:
- *"demonstrate why normal planning and development management policies would not be adequate;*
 - *set out whether any major changes on circumstances have made the adoption of this exceptional measure necessary;*
 - *show what the consequences of the proposal would be for sustainable development;*
 - *demonstrate the necessity for the Green Belt and its consistency with local plan for adjoining areas;*
 - *show how the Green Belt would meet the other objectives of the framework;*
 - *... not include land which it is unnecessary to keep permanently open;*
 - *be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
 - *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."*
- 3.34 There are two significant pockets of open countryside contiguous with the existing Green Belt in Rochford and Southend-on-Sea which are currently not designated as Green Belt and could therefore be considered for designation in the future:
- **Foulness Island in Rochford** is located on the east coast, with the North Sea to the east, the River Crouch to the north and the River Roach to the west, separating it from the mainland. The island is almost entirely open countryside but contains a couple of very small settlements – Churchend and Courtsend, a number of isolated dwellings and farms and Ministry of Defence (MOD) buildings. The island is currently owned and used exclusively by the MOD. All land on and within the immediate vicinity of the island is also designated as Flood Zone 3 and much of the island is designated to protect national and European protected habitats and species. It is therefore considered that existing planning and development management policies facilitate the protection of this area without the need for its designation as Green Belt. There is therefore no strategic justification to designate Foulness Island as Green Belt at the present time.
 - **Land to the east of Southend-on-Sea**, bordered by the North Sea to the east, the boundary of Rochford District to the north and the developed area of Southend-on-Sea / Shoeburyness to the west and south. The land is predominantly open and well vegetated by woodland and scrubland. Much of the open land in the northern portion (north of Blackgate Road) is peppered with buildings and railway tracks associated with the old railway terminus. Like Foulness Island, this area is currently owned and used exclusively by the MOD and designated as Flood Zone 3. Therefore, for the same reasons set out above, there is currently considered to be no strategic justification to designate the land to the east of Southend-on-Sea as Green Belt.
- 3.35 **Figure 3.8** illustrates the location of these broad areas of potential.

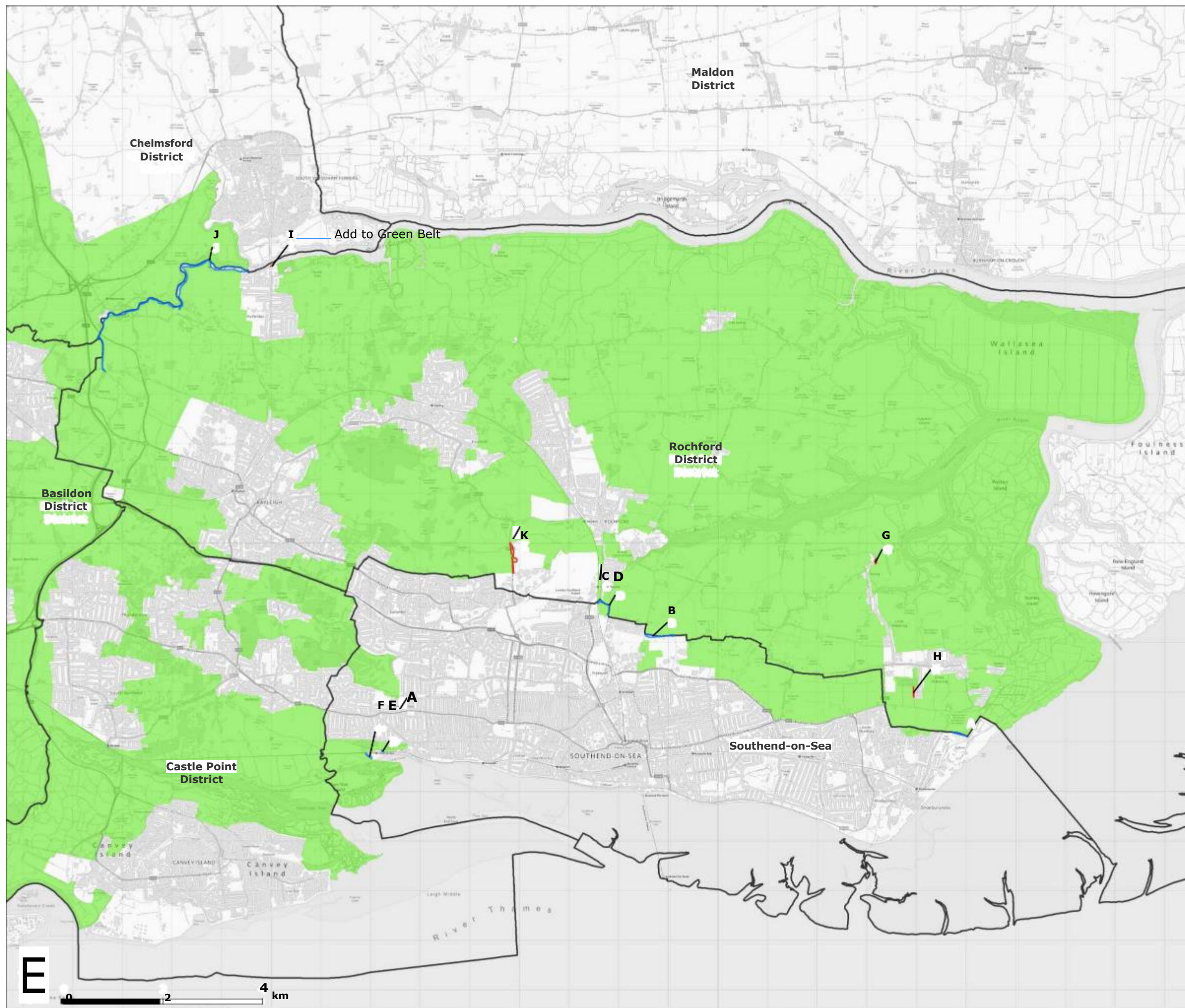
Minor Green Belt Realignments

- 3.36 As part of the Stage 1 assessment, consideration was given to the accuracy and robustness of the Councils' existing Green Belt boundaries, with a view to highlighting areas of potential for realignments along alternative permanent and readily recognisable physical features where necessary, or just to resolve digital mapping errors. These potential minor Green Belt boundary adjustments are set out in detail in **Appendix 2**. An overview map of the potential adjustments is included as **Figure 3.8**.
- 3.37 In some locations, it is proposed that the Green Belt boundary is re-aligned so that it is consistent with the settlement edge. Where the existing boundary cuts through the large residential gardens, but follows the urban edge and is robust and regular, it is not proposed that the boundary is re-aligned (as it assumed that the Green Belt boundary was drawn in these locations to limit the potential for further development within residential gardens). Where the Green Belt boundary would be more consistent if re-aligned along the rear of reasonably small gardens, it is recommended that the boundary should be amended.

**Rochford and Southend
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Figure 3.8: Potential Minor Green Belt Boundary Realignments

-  District Boundaries
-  Green Belt
-  Add to Green Belt
-  Remove from Green Belt



Map Scale @A3: 1:75,000



Stage 1 Conclusions

- 3.38 This Stage 1 Green Belt study is an important part of the Councils' Local Plan evidence base. The study highlights variations in the contribution of Green Belt land to the Green Belt purposes, identifying areas which make a relatively stronger or weaker contribution to the Green Belt.
- 3.39 The vast majority of the Green Belt in Rochford and Southend-on-Sea continues to serve the Green Belt purposes well, in particular with regard to maintaining the openness of the countryside. However, there are several pockets of Green Belt adjacent to the existing urban edges that make a weak contribution to the majority of the Green Belt purposes. Although these locations are likely to represent the most appropriate locations for Green Belt release and development in Green Belt terms, there are other important planning considerations that need to be taken into account before sites are selected for allocation. Indeed the most sustainable growth within the Green Belt may be located in places that make a strong contribution to the Green Belt purposes. In each location where alterations to Green Belt boundaries are being considered, planning judgement will be required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.
- 3.40 In addition, there are several potential minor boundary adjustments that could be made to the existing Green Belt boundary GIS data layer held by the Councils, to correct digitisation errors and realign boundaries along more permanent and readily recognisable features.
- 3.41 The only significant areas of open countryside currently not designated as Green Belt – Foulness Island and the land to the east of Southend-on-Sea – are currently under the ownership and operation of the MOD and designated as Flood Zone 3. A significant proportion of Foulness Island is also designated for national and European nature conservation reasons. It is, therefore, concluded that existing planning and development management policies would enable the protection of these areas without the need for their designation as Green Belt.
- 3.42 The detailed Stage 1 assessments are included in **Appendix 3**.

4 Stage 2 Assessment Methodology

- 4.1 The primary aim of the Stage 2 assessment is to establish the potential harm of Green Belt release. This assessment is undertaken for specific promoted sites identified by Rochford and Southend-on-Sea Councils, in addition to the areas that made the weakest contribution to the Green Belt purposes as identified in the Stage 1 strategic assessment (see **Table 3.2**).

Identification of areas for Stage 2 assessment

- 4.2 In discussion with the Councils, the areas making the weakest contribution to the Green Belt purposes and the sites identified through the Councils' 'Call for Sites' exercises were assessed in the Stage 2 assessment. These were overlaid with a set of 'absolute' environmental constraints – i.e. areas within which the Council would not permit development.²⁴ The following environmental designations were considered absolute constraints to development in the Study:
- Registered Parks and Gardens.
 - Scheduled Monuments.
 - Special Areas of Conservation.
 - Special Protection Areas.
 - Ramsar Sites.
 - Sites of Special Scientific Interest.
 - National Nature Reserves.
 - Local Nature Reserves.
 - Local Wildlife Sites.
 - Ancient Woodland.
- 4.3 These are illustrated in the context of Rochford District and Southend Borough on **Figure 4.1**.
- 4.4 It is acknowledged that there are other important environmental and planning designations that represent significant constraints to development, for example Flood Zone 3; however, generally, not all forms of development are considered to be inappropriate in the environmental and planning designations that remain. Therefore, it would be inappropriate to disregard the potential for development in such locations at this stage in the plan-making process.
- 4.5 The weakest areas of Green Belt identified at Stage 1, or promoted sites that do not fall wholly within with the 'absolute' constraints were assessed in in Stage 2. These areas are shown on **Figure 4.2**.

²⁴This approach is consistent with the Inspector's comments on the Welwyn Hatfield Green Belt Study (October 2017): "There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites however they are defined."

- 4.6 A precautionary approach has been taken to defining the areas of Green Belt land considered to make the weakest contribution to the Green Belt purposes. Pockets of Green Belt land which make a weak or moderate contribution to Green Belt purposes (with the exception of Purpose 5, against which all Green Belt is considered to make a strong contribution) have been identified as making the weakest contribution to the Green Belt purposes (see **Table 3.2**).

Development of assessment areas

- 4.7 The weaker performing parcels and promoted sites were assessed as 'assessment areas'. 158 assessment areas were identified and are shown on **Figure 4.3**.
- 4.8 The assessment areas consist of either single promoted sites, or weaker performing parcels or, where appropriate, a group of sites and / or weaker performing parcels.
- 4.9 Sites and weaker performing parcels were grouped into 'assessment areas' in order to streamline the assessment process. Sites and parcels were grouped together where they overlapped or lay directly adjacent to one another, while being reasonably similar in character, as well making a similar contribution to the Green Belt purposes. Isolated sites and weaker performing parcels, or sites and parcels separated by significant boundary features, or sites and parcels which made significantly different contributions to the Green Belt purposes were not grouped together, and were assessed individually.
- 4.10 Any differences in the harm associated with the release of specific smaller areas within an assessment area, individual sites or parcels, or portions of sites or parcels, are identified through differing 'harm scenarios'. An absence of multiple harm scenarios within an assessment area means that the harm of Green Belt release is broadly the same for the entire assessment area or its smaller constituent parts, including individual sites and parcels, within it.
- 4.11 Where a 'call for sites' submission by an individual promoter contained multiple adjoining sites the Councils requested these sites to be assessed as a group as well as individually. Other 'call for sites' having a direct relationship with these grouped sites were also incorporated into this assessment. Although these additional assessment area assessments do not change the overall findings of the sites in these locations, they present the results at a more user friendly scale.
- 4.12 **Table 4.1** below shows which sites and / or parcels form each assessment area. These assessment areas were agreed with the Councils prior to the assessment of Green Belt harm. A similar table organised by site is included in **Appendix 6**.

Table 4.1: Sites and parcels that form assessment areas

Assessment Area	Sites	Parcels	Assessment Area	Sites	Parcels
1	222, 223, 238, 239		80	242	
2	224		81	23, 197, 198, 199, 200, 201, 202, 203, 204, 206, 236	P46
3	225		82		P48
4	226, 227		83		P50
5	144, 145, 168, 228, 229, 230, 231		84	88	
6	232		85	235	
7		P02	86	17, 93	P51
8	233		87	259	
9	16	P04	88	140	P52

Assessment Area	Sites	Parcels
10	92	
11		P05
12		P06
13	143	
14	137, 177	P07
15		P09
16	5	P10
17	146, 147, 152, 167	P08
18	55, 77, 121	
19	171	
20		P12
21	136, 148, 154, 170	
22	87	P14
23		P13
24	31, 162, 220, 221	
25	25	
26	139	
27	6, 99, 149	
28	247	
29	243, 244	
30	245, 246	
31	163, 164, 248, 249	P88
32		P15
33	15	
34	106, 107, 108, 109, 110	P16
35	26, 120	
36		P18
37	241	
38	105	
39	68	
40	33, 151, 172, 190, 193	
41	69	
42	48	
43	100	
44	86	
45	128	
46		P22
47	27, 29, 53, 98	
48		P24
49	44, 54, 256	
50	41, 42, 234, 237	

Assessment Area	Sites	Parcels
89	39	
90	19	P53
91	18	
92	36	
93	78, 79, 83	
94	132, 219, 240	
95	20, 150, 169, 194	P55
96	2, 81, 82	
97	216	
98	80	
99	133	
100	38, 51, 215	
101	08a, 08b	
102		P56
103	159	
104	46, 184, 187, 188, 10a, 10b	
105	84	
106	21	
107		P57
108	180	
109	255, 22a, 22b	
110	35, 85	P58
111	13, 119, 129, 130, 131	
112	7, 126	
113	28	
114	218	
115	66	P59
116	63, 67	P60, P62, P63
117	217	
118	52	
119	32	
120	50, 116, 117, 124	P64
121	111	
122	260	P66
123	104, 112, 113	
124	114	
125	43	
126	141	
127	94	
128	58	
129	75	

Assessment Area	Sites	Parcels	Assessment Area	Sites	Parcels
51		P26	130	72	
52		P27	131	213	
53	127, 182, 250, 254		132	73	
54	101		133	61, 62	
55	212		134	12	
56	160, 161		135	71, 76, 95, 103, 123, 155, 165, 192, 258, 261, 262, 263, 266, 267, 268, 269, 270, 271	P70, P71, P72, P73, P74, P75, P76, P77, P78
57		P30	136	173	
58	47, 89, 178		137	166a, 166b	
59	40		138	4	
60	1, 102	P32	139		P80
61	181		140		P81
62	3, 183		141	34, 97	
63	252		142		P83
64	207		143	122	
65	14		144	90	
66	64		145	57, 65, 70	
67	134		146	56, 195	P85
68	59	P38	147	153	
69	37		148		P86
70		P39	149	257	
71	24		150	11	P87
72	251		151	222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 238, 239, 264	
73	135		152	7, 28, 111, 126, 217, 218, 265	
74		P41	153	266	
75	191, 45a, 45b	P43	154	267	
76	74		155	268	
77	30		156	269	P70, P71, P72, P74, P77
78	49	P45	157	270	P78
79		P47	158	261, 271	P73, P73, P76

Stage 2 assessment process

- 4.13 LUC has a tried and tested methodology for assessing the harm of releasing Green Belt. The release of an area that makes a strong contribution to any one Green Belt purpose will potentially result in a high level of harm; conversely, the release of an area that makes a weak contribution to all Green Belt purposes will potentially result in a low level of harm. However, in order to conclude what the impact of release would be on the integrity of the

remaining Green Belt, consideration must be given to the relationship between the area being considered for release and the impact on the adjacent Green Belt land and the potential form of the residual Green Belt boundaries.

- 4.14 If Green Belt release significantly weakens the contribution of the adjacent Green Belt to the Green Belt purposes, then the harm is likely to be greater; conversely, if there is no or limited impact on the contribution of the adjacent Green Belt, then the harm is likely to be less.
- 4.15 If the new Green Belt boundary results in a longer, more varied edge, or creates a less distinct boundary between settlement and countryside, the Green Belt release under assessment is likely to weaken the Green Belt.
- 4.16 The Stage 2 assessment is comprised of the following steps:
- Step 1: Considered Stage 1 contribution ratings to determine the loss of contribution to the Green Belt purposes that would result from the release of land.
 - Step 2: Assessed potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
 - Step 3: Assessed overall Green Belt harm.
 - Step 4: Considered harm resulting from alternative Green Belt release 'scenarios' – i.e. any variations in harm within the assessment areas.
- 4.17 These steps are explained in further detail below.
- 4.18 Site visits were made to provide field verification of the desktop findings.

Criteria for assessment of harm resulting from Green Belt release

Step 1: Considered Stage 1 contribution ratings

- 4.19 The greater the contribution of Green Belt land to the Green Belt purposes the greater the potential harm of Green Belt release. The release of land that makes a strong contribution to one or more purpose is likely to result in higher harm than the release of land that makes only a moderate or low contribution to the Green Belt purposes.

Step 2: Assess potential impact of release on the integrity of the remaining Green Belt

- 4.20 The assessment of contribution at Stage 1 already considered the relationship between a parcel and adjacent Green Belt land, but at the assessment area level it is possible to address how the loss of a specific area of land will affect Green Belt boundaries and the strength / integrity of the adjacent Green Belt.
- 4.21 If Green Belt release significantly weakens the contribution of the adjacent Green Belt to the Green Belt purposes, then the harm is likely to be greater than identified in step 1. However, if there is no, or limited impact on the contribution of the adjacent Green Belt then the harm is likely to be less.
- 4.22 If Green Belt release results in a longer, more varied Green Belt boundary, or creates a less distinct boundary between settlement and countryside, the Green Belt release under assessment is likely to weaken the wider Green Belt. Even if a strong alternative boundary can be defined, there is potential for the remaining Green Belt to be weaker, for example where a narrow strip of Green Belt remains between settlements or at the Green Belt fringe. Harm is lowest where release would have no adverse impact on the adjacent Green Belt and the boundary would be strengthened, either through creation of a shorter, simpler

boundary, or through use of a feature that marks a stronger or more widely consistent distinction between an urban area and countryside.

- 4.23 With respect to purposes 1, 3 and 4, the assessment considered harm to adjacent Green Belt by assessing whether the contribution made by that land would be weakened as a result of release of the assessment area. For purpose 2 it is the robustness of the gap that would remain after release that was the key consideration, rather than impact on the contribution of the adjacent Green Belt as the latter will increase as the gap becomes more fragile.
- 4.24 The considerations that were taken into account when assessing the impact of release on the strength of adjacent Green Belt included:
- **Purpose 1:** Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?
 - **Purpose 2:** How strong would the remaining settlement gap be if the Green Belt land were released? In order to answer this question consideration must be given to the size of the gap, the role of constraints and the location of separating and connecting features.
 - **Purpose 3:** Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside? Unless detailed development proposals are being considered the urbanising influence of future development is difficult to judge, so it is assumed that land beyond a new boundary that currently makes a significant contribution to Purpose 3 will continue to make a significant contribution to Purpose 3.
 - **Purpose 4:** Would the role of remaining Green Belt in forming a distinctive setting to a historic town be diminished by loss of openness in the parcel/site under assessment?
 - **Purpose 5:** As outlined above, all Green Belt land within the Study area is considered to make an equal **Strong** contribution to Purpose 5, therefore harm to Green Belt Purpose 5 will be the same throughout the Borough.

Step 3: Assess overall Green Belt harm

- 4.25 Step 3 represents a drawing together of the findings of Steps 1 and 2 collectively considering:
- Openness – i.e. absence of urbanising development.
 - Containment by urbanising influences – e.g. other development.
 - Distinction between the Green Belt and the inset urban edge.²⁵
- 4.26 The guidelines below provide an indication as to how the contribution to the Green Belt, the impact on adjacent Green Belt and the strength of the boundary influence the overall harm of Green Belt release. However, **professional judgement** is required in each individual case to consider how much weight to attach to each contributing element. For example:
- Where land makes a relatively strong contribution to multiple Green Belt purposes and where its release would weaken the adjacent Green Belt (for example by leaving a narrow gap between towns, or increasing its containment by urban areas), harm is likely to be **high**.
 - Where land makes a moderate contribution to at least one of the Green Belt purposes but where its release would significantly weaken the adjacent Green Belt (for example by isolating an area of Green Belt that makes a stronger contribution), or where land makes a strong contribution to the Green Belt purposes but its release would not

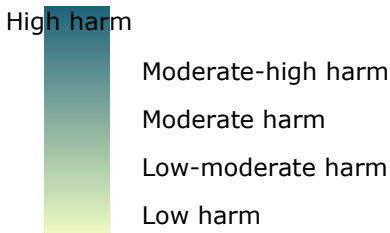
²⁵ Further detail with regards to these concepts can be found in **Chapter 2**.

significantly weaken adjacent Green Belt due to its containment and/or the creation of a stronger or more consistent alternative Green Belt boundary, harm is likely to be **moderate-high**.

- Where land makes a moderate contribution to at least one of the Green Belt purposes, but where its release would only partially weaken the adjacent Green Belt (for example by increasing containment of adjacent open land, or by creating a less consistent boundary line), harm is likely to be **moderate**.
- Where land makes a moderate contribution to one of the Green Belt purposes, but where its release would create a simplified, more consistent boundary and/or would not weaken the adjacent Green Belt due to its containment and lack of distinction from the existing settlement edge, harm is likely to be **low-moderate**.
- Where land makes a weak contribution to the Green Belt purposes and release would create a simplified, more consistent boundary and/or would not weaken the adjacent Green Belt, harm is likely to be **low**.

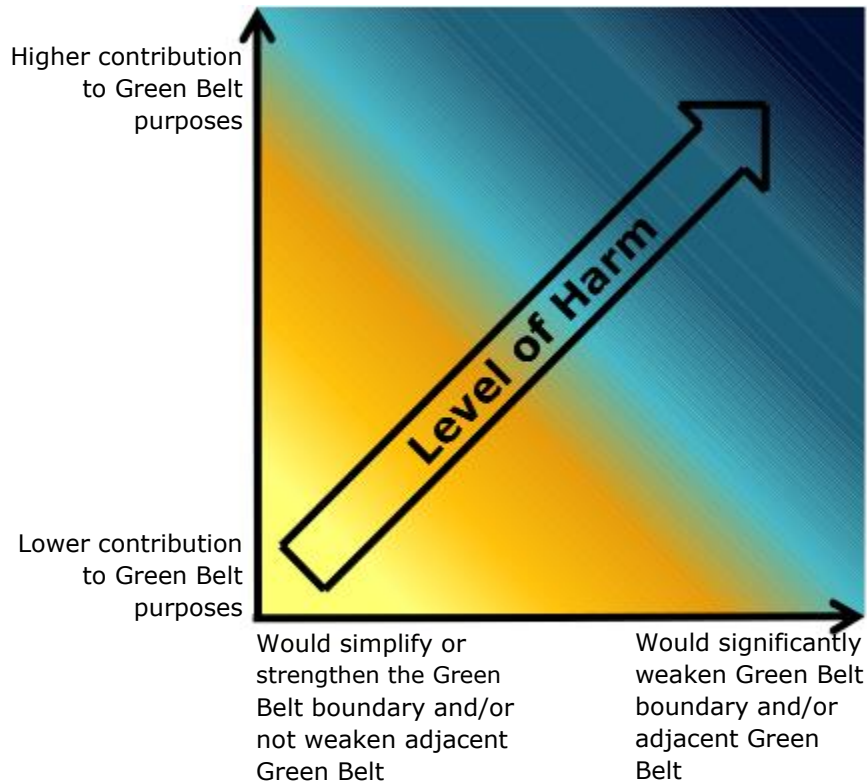
4.27 These example judgements represent broad generalisations of the types of scenarios that would result in each rating to aid understanding of the rating system, but there will always be exceptions to these general rules. The professional judgements exercised on each assessment area are clearly reported in the assessment pro forma in **Appendix 4**.

4.28 Green Belt harm has been rated using a five point scale ranging from high to low harm.



4.29 Clear and detailed justification is provided for all ratings (see **Appendix 4**) in relation to how the overall judgement of Green Belt harm was reached.

Guidelines for rating harm on the basis of contribution to Green Belt purposes and impact of release on adjacent Green Belt



Step 4: Consider harm resulting from alternative release 'scenarios'

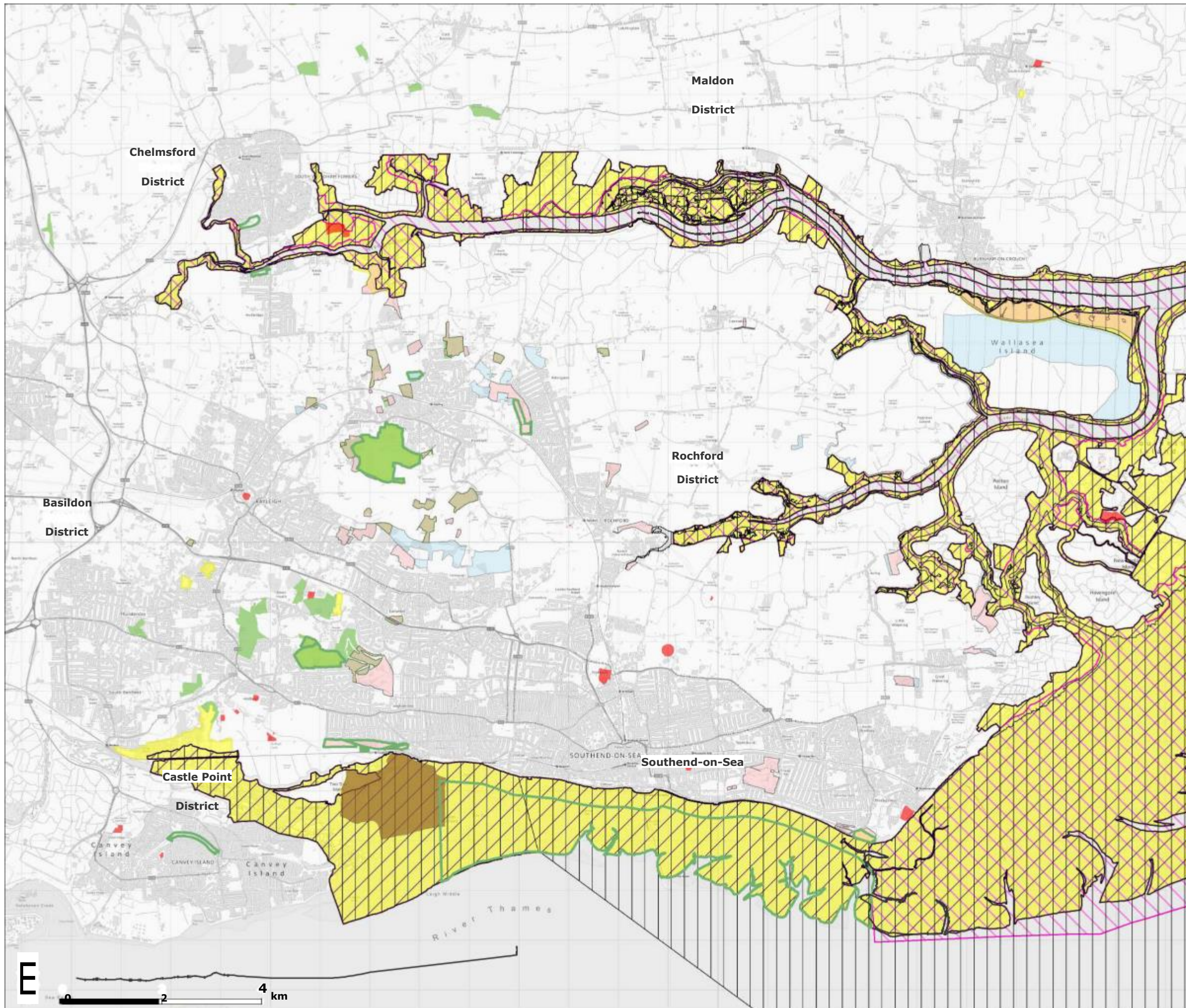
- 4.30 Assessors first considered the release of the assessment area as a whole, to identify which area(s) within the assessment area would result in the highest harm if released. Where sites and parcels were located adjacent to inset settlements it was assumed that land would be released out from an inset settlement edge, with harm typically increasing with greater distance from the existing inset urban edge (if it is not already judged to be high immediately beyond the settlement edge).
- 4.31 Assessment areas located in isolated locations away from inset settlements in the Green Belt were assessed as new inset areas.
- 4.32 Consideration was then given as to whether the release of a smaller part or parts of an assessment area would result in less harm to Green Belt purposes. Where this was the case, separate release scenarios were mapped, with separate ratings given for each lower level of harm identified, supported by text setting out the reason(s) for the reduced level of Green Belt harm.

Stage 2 assessment outputs

- 4.33 As outlined above, the Stage 2 study assesses the relative harm that will result from release of different potential development sites, or parcels identified in the Stage 1 study as making a weaker contribution to Green Belt purposes. For each assessment area (a parcel, a site, or a group of related sites and/or parcels), an assessment report has been produced (see **Appendix 4**). This includes the following information:
- Assessment area reference and brief description.

- Ordnance Survey map showing the sites and parcels within the assessment area and the surrounding context including absolute development constraints and any nearby parcels and sites.
 - An aerial view of the mapped area.
 - A list of the sites that fall within the Stage 2 assessment area.
 - A list of the Stage 1 parcels that overlap with the Stage 2 assessment area.
 - A representative photograph taken during a visit to the assessment area.
 - Reference to whether the land within the assessment area has been assessed as an extension to a settlement inset within the Green Belt, or as a potential new inset settlement.
 - Text setting out the analysis of harm that would result from release of the whole assessment area, together with a harm rating;
 - Harm analysis and rating for any alternative 'harm scenarios' identified for the assessment area – for example where potential harm could be reduced through the release of smaller areas of land within the assessment area, including specific sites and parcels, or parts of sites or parcels as appropriate.
- 4.34 Without a clear definition of the scale, type and design of development which will come forward following Green Belt release, the harm assessment is based on the assumption that the openness (in Green Belt terms) of a defined area will be lost. It does not take into account specific development proposals. This approach ensures consistent in the assessment of assessment areas across the Study area.

Figure 4.1: Absolute Constraints



- District Boundaries
- Scheduled Monument
- Local Nature Reserve
- Local Wildlife Site
- Ancient Woodland Inventory
- National Nature Reserve
- Site of Special Scientific Interest
- Special Protection Area
- Special Area of Conservation
- Ramsar

Map Scale @A3: 1:75,000



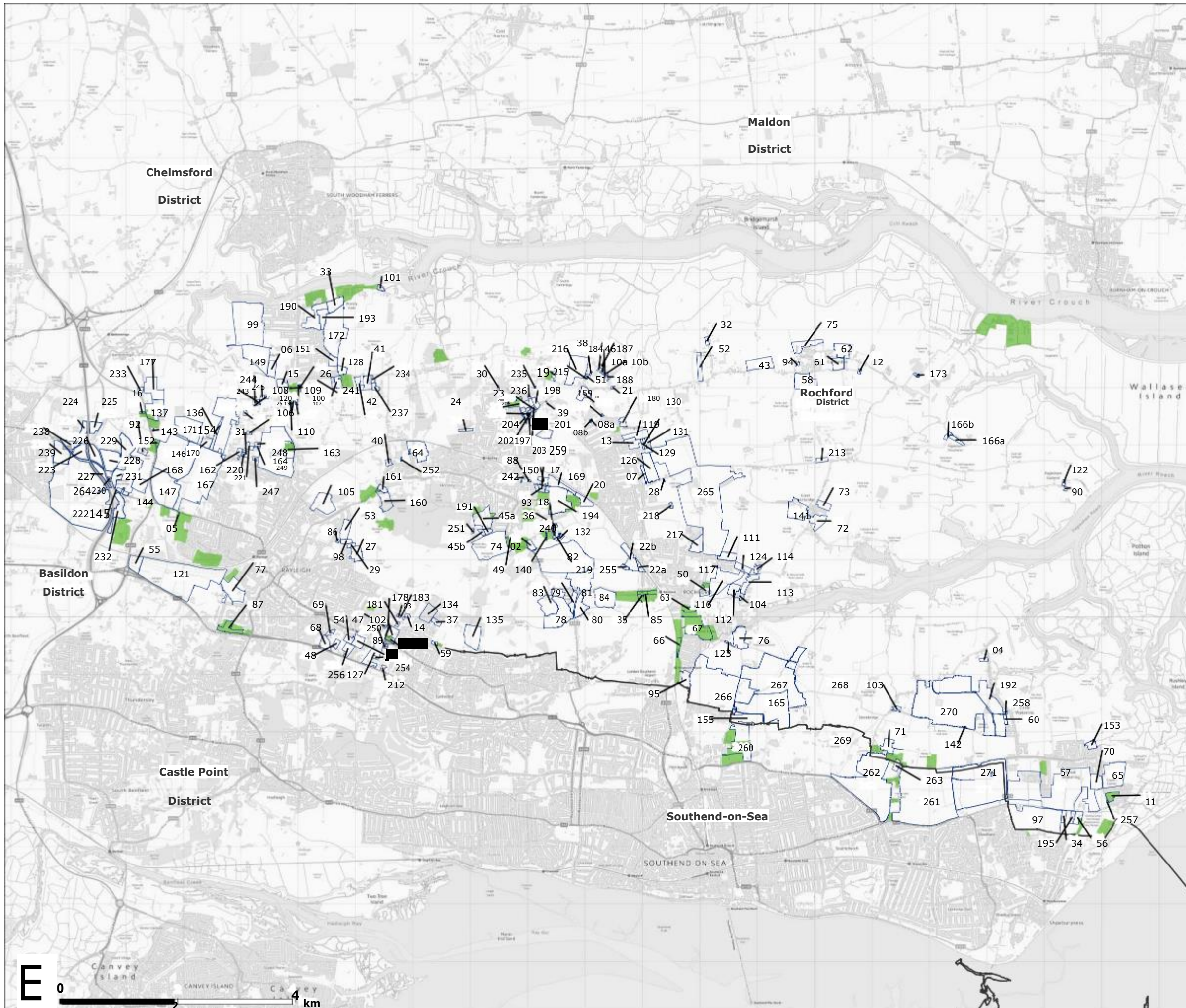
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Figure 4.2: Stage 2 Sites and Weaker Performing Parcels

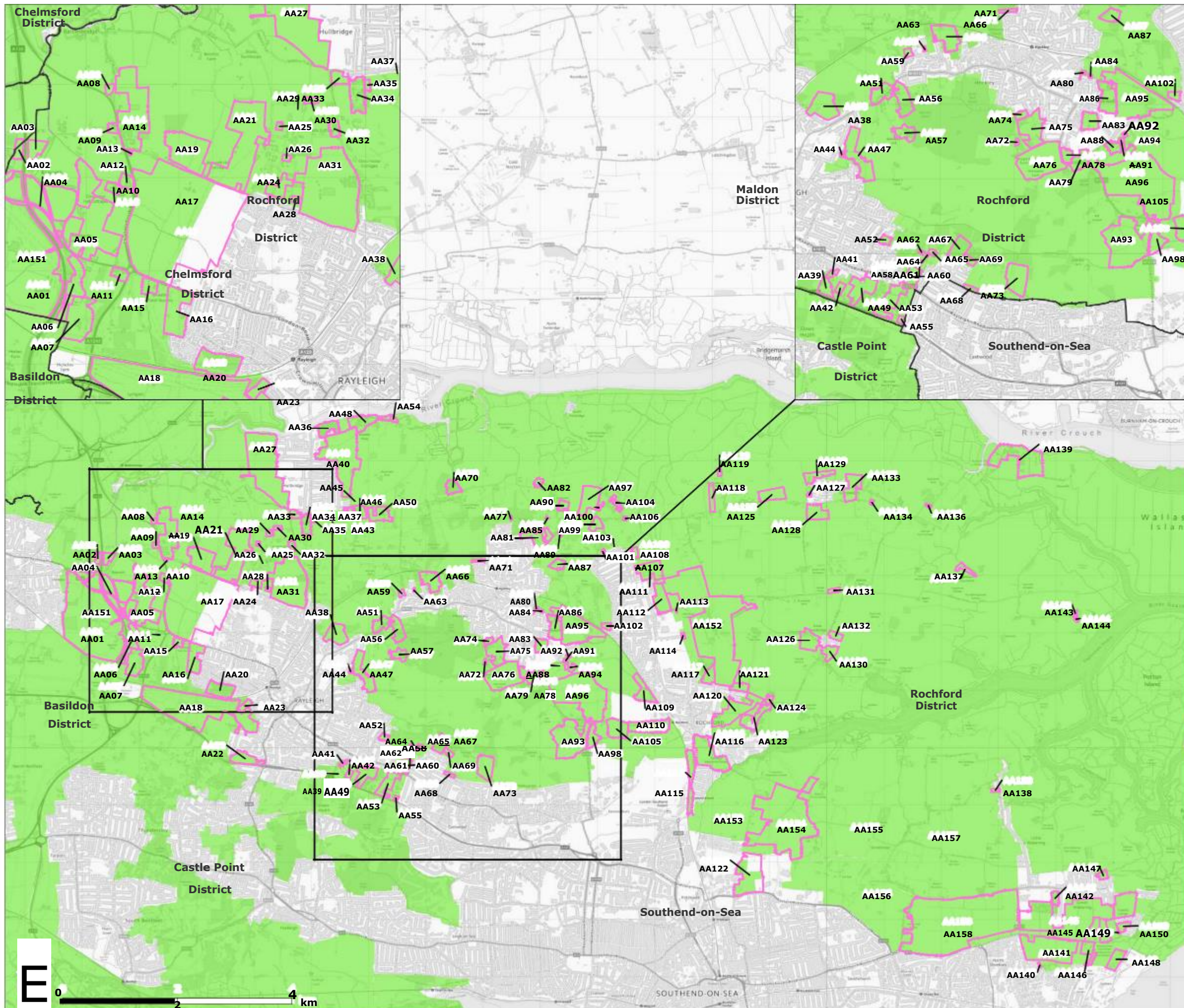
- District Boundaries
- Stage 2 Sites

Highest Rating (Purpose 1-4)
Weaker Performing Parcels



Map Scale @A3: 1:65,000






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Figure 4.3: Stage 2 Assessment Areas

- Assessment Areas
- District Boundaries
- Green Belt

Map Scale @A3: 1:65,000



5 Stage 2 Assessment Findings

- 5.1 This chapter sets out the findings of the assessment of Green Belt harm.
- 5.2 As outlined in the previous chapter the assessment of harm included the following steps:
- Step 1: Consideration of contribution ratings in more depth.
 - Step 2: Assessment of potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
 - Step 3: Assessment of overall Green Belt harm.
 - Step 4: Consideration of harm resulting from alternative Green Belt release 'scenarios'.
- 5.3 Where there were variations in the three factors influencing Green Belt harm across assessment areas, different harm scenarios were identified. This took into account the fact that harm may vary if development is constrained to a smaller area within a given assessment area, including promoted sites and/or weaker performing Stage 1 parcels.
- 5.4 The findings for the Stage 2 assessment of harm are presented in detail in **Appendix 4**. Although the detailed Stage 2 findings are organised by assessment area, all the sites and lower performing parcels that fall within assessment areas are clearly mapped so that it is possible to see the likely harm of releasing specific sites or parcels within an assessment area. Ratings and commentary are provided for each release scenario considered.
- 5.5 The findings are summarised in **Table 5.1** below. Assessment areas, sites and parcels assessed as urban extensions are coloured red; assessment areas, sites and parcels assessed as new inset areas are shaded in blue. **Figure 5.1** illustrates the harm of release within all the identified assessment areas across the Study area.
- 5.6 The assessment findings represent a point in time based on the land uses, separating and connecting features at the time of assessment. Changes in land use, the creation of new or the loss of existing features have the potential to significantly affect the contribution of Green Belt land to the Green Belt purposes. For example, to loss of woodland block has the potential significantly increase the relationship of Green Belt land sandwiched between the woodland and settlements with the wider countryside.
- 5.7 Where assessment areas (sites / weaker performing parcels) have been assessed as having lower harm on the Green Belt if they were to be removed from the Green Belt, this does not necessarily mean that those areas should be released. Any release of Green Belt land requires consideration of the 'exceptional circumstances' justifying its release. The relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that can justify release of land from the Green Belt. Other factors, such as the sustainability and the ability to meet development needs outside of the Green Belt need to be taken into consideration.

Table 5.1: Assessment areas within which no variation in harm was identified

Stage 2 AA	Sites / Parcels	Harm
AA01	222	High
	223	High
	238	High
	239	High
AA02	224	High
AA03	225	High

Stage 2 AA	Sites / Parcels	Harm
AA83	P50	Low
AA84	88	Moderate-High
AA85	235	High
AA86	See Table 5.2 for scenarios	
AA87	259	High
AA88	140	Moderate-High

Stage 2 AA	Sites / Parcels	Harm
AA04	226	High
	227	High
AA05	144	High
	145	High
	168	High
	228	High
	229	High
	230	High
	231	High
AA06	232	High
AA07	P02	High
AA08	233	High
AA09	16	Moderate-High
	P04	Moderate-High
AA10	92	High
AA11	P05	High
AA12	P06	High
AA13	143	Moderate-High
AA14	See Table 5.2 for scenarios	
AA15	P09	High
AA16	05	Moderate
	P10	Moderate
AA17	146	Moderate-High
	147	Moderate-High
	152	Moderate-High
	167	Moderate-High
	P08	Moderate-High
AA18	See Table 5.2 for scenarios	
AA19	171	High
AA20	P12	Low-Moderate
AA21	136	High
	148	
	154	
	170	
AA22	See Table 5.2 for scenarios	
AA23	P13	Moderate
AA24	162	High
	220	High
	221	High
	31	High
AA25	25	High
AA26	139	High
AA27	See Table 5.2 for scenarios	
AA28	247	High
AA29	243	High
	244	High
AA30	245	High

Stage 2 AA	Sites / Parcels	Harm
	P52	Moderate-High
AA89	39	High
AA90	See Table 5.2 for scenarios	
AA91	18	Moderate-High
AA92	36	Moderate-High
AA93	78	High
	79	High
	83	High
AA94	132	High
	219	High
	240	High
AA95	See Table 5.2 for scenarios	
AA96	See Table 5.2 for scenarios	
AA97	216	High
AA98	80	High
AA99	133	High
AA100	215	High
	38	High
	51	High
AA101	08a	Moderate-High
	08b	Moderate-High
AA102	P56	Low-Moderate
AA103	159	Moderate-High
AA104	10a	High
	10b	High
	184	High
	187	High
	188	High
	46	High
AA105	84	High
AA106	21	High
AA107	P57	Low-Moderate
AA108	180	High
AA109	See Table 5.2 for scenarios	
AA110	35	Moderate-High
	85	Moderate-High
	P58	Moderate-High
AA111	See Table 5.2 for scenarios	
AA112	See Table 5.2 for scenarios	
AA113	28	High
AA114	218	Moderate-High
AA115	See Table 5.2 for scenarios	
AA116	63	Moderate
	67	Moderate
	P60	Moderate
	P62	Moderate
	P63	Moderate

Stage 2 AA	Sites / Parcels	Harm
	246	High
AA31	See Table 5.2 for scenarios	
AA32	P15	High
AA33	15	Moderate-High
AA34	See Table 5.2 for scenarios	
AA35	120	High
	26	High
AA36	P18	Low-Moderate
AA37	241	Moderate-High
AA38	105	Moderate-High
AA39	68	Moderate-High
AA40	See Table 5.2 for scenarios	
AA41	69	Moderate-High
AA42	48	High
AA43	100	Moderate-High
AA44	86	High
AA45	128	High
AA46	P22	Moderate-High
AA47	See Table 5.2 for scenarios	
AA48	P24	Moderate-High
AA49	See Table 5.2 for scenarios	
AA50	234	High
	237	High
	41	High
	42	High
AA51	P26	Moderate-High
AA52	P27	Low-Moderate
AA53	127	High
	182	High
	250	High
	254	High
AA54	101	High
AA55	212	Moderate-High
AA56	160	High
	161	High
AA57	See Table 5.2 for scenarios	
AA58	See Table 5.2 for scenarios	
AA59	40	Moderate-High
AA60	01	Moderate-High
	102	Moderate-High
	P32	Moderate-High
AA61	181	High
AA62	03	High
	183	High
AA63	252	Low-Moderate
AA64	207	High
AA65	14	High

Stage 2 AA	Sites / Parcels	Harm
AA117	217	Moderate-High
AA118	52	High
AA119	32	High
AA120	See Table 5.2 for scenarios	
AA121	See Table 5.2 for scenarios	
AA122	260	Low
	P66	Low
AA123	104	High
	112	High
	113	High
AA124	114	High
AA125	43	High
AA126	141	High
AA127	94	Low-Moderate
AA128	58	High
AA129	75	High
AA130	See Table 5.2 for scenarios	
AA131	213	High
AA132	73	High
AA133	61	High
	62	High
AA134	12	High
AA135	See Table 5.2 for scenarios	
AA136	173	High
AA137	166a	High
	166b	High
AA138	See Table 5.2 for scenarios	
AA139	P80	Moderate-High
AA140	P81	Low-Moderate
AA141	34	High
	97	High
AA142	P83	Low
AA143	122	High
AA144	90	High
AA145	See Table 5.2 for scenarios	
AA146	56	High
	195	High
	P85	High
AA147	153	Moderate
AA148	P86	Moderate-High
AA149	257	High
AA150	11	Low-Moderate
	P87	Low-Moderate
AA151	222	High
	223	High
	224	High
	225	High

Stage 2 AA	Sites / Parcels	Harm
AA66	64	Moderate-High
AA67	134	High
AA68	59	Moderate
	P38	Moderate
AA69	37	High
AA70	P39	Moderate-High
AA71	24	Low-Moderate
AA72	251	High
AA73	135	High
AA74	P41	Low-Moderate
AA75	See Table 5.2 for scenarios	
AA76	74	High
AA77	30	High
AA78	49	Low-Moderate
	P45	Low-Moderate
AA79	See Table 5.2 for scenarios	
AA80	242	Moderate-High
AA81	See Table 5.2 for scenarios	
AA82	P48	Moderate-High

Stage 2 AA	Sites / Parcels	Harm
	226	High
	227	High
	228	High
	229	High
	230	High
	231	High
	232	High
	238	High
	239	High
	264	High
AA152	See Table 5.2 for scenarios	
AA153	See Table 5.2 for scenarios	
AA154	267	High
AA155	268	High
AA156	See Table 5.2 for scenarios	
AA157	See Table 5.2 for scenarios	
AA158	See Table 5.2 for scenarios	

- 5.8 A number of sites and weaker performing parcels were identified as having more than one harm scenario as described in paragraph 5.3. These are shown in the table below.

Table 5.2: Assessment areas within which variations in harm were identified

Stage 2 AA	Sites / Parcels	Harm Scenario	Harm Rating
AA14	137, 177 and P07	Release of whole assessment area or sites in isolation	High
	P07 and part of 137	Release of the housing development	Moderate-High
AA18	55, 77 and 121	Release of whole assessment area or sites 55 and 121 in isolation	Moderate-High
	77	Release of easternmost site, site 77	Moderate
AA22	87 and P14	Release of whole assessment area or site 87 in isolation	Low-Moderate
	Part of P14	Release of easternmost end north of the A127 and A129 junction	Low
AA27	06, 99 and 149	Release of whole assessment area or sites 99 and 149 in isolation	High
	06 and part of 149	Release of south eastern half of the assessment area (site 06 and the eastern third of site 149)	Moderate-High
AA31	P88, 163, 164, 248, 249	Release of all land within assessment area	High
	P88, 163, 164	Release of south eastern half of assessment area, including site 163	Moderate-High
AA34	106, 107, 108, 109, 110 and P16	Release of the whole assessment area, including the undeveloped land (Sites 106 and 107)	High

Stage 2 AA	Sites / Parcels	Harm Scenario	Harm Rating
	108, 107, 110 and P16	Release of developed land within the assessment area (including Sites 108, 109 and 110)	Moderate-High
AA40	33, 151, 172, 190 and 193	Release of whole assessment area (sites 190, 193, 33, 172 and 151 in combination)	High
	190 and 193	Release of sites 190 and 193	Moderate
	151	Release of site 151	Moderate-High
	Part of 190	Release of the small field to the south of the junior school in the westernmost corner of site 190	Low-Moderate
AA47	27, 29, 53 and 98	Release of whole assessment area, or sites in isolation	High
	Part of 27	Release of western end of site 27	Moderate-High
AA49	44, 54 and 256	Release of the whole assessment area, or sites in isolation	High
	Part of 44	Release of the northern portion of site 44	Moderate-High
AA57	P30	Release of whole assessment area	High
	Part of P30	Release of eastern half of the assessment area	Moderate-High
AA58	47, 89 and 178	Release of whole assessment area, or sites 89 and 178 in isolation	Moderate-High
	47	Release of site 47	Moderate
AA75	45a, 45b, 191 and P43	Release of whole assessment area or sites 45b and 191 in isolation	High
	45a and P43	Release of eastern half of site 45a	Moderate-High
	P43	Release of P44	Low-Moderate
AA79	P47	Release of whole assessment area	Moderate-High
	Part of P47	Release of northern half of assessment area north of Main Road	Low-Moderate
AA81	23, 197, 198, 199, 200, 201, 202, 203, 204, 206 and 236	Release of whole assessment area, or sites in isolation	High
	P46	Release of north western corner of assessment area retained by Beckney Wood	Moderate
AA86	17, 93 and P51	Release of whole assessment area, or release of site 17 in isolation	High
	93	Release of site 93	Moderate-High
	P51	Release of P51	Moderate
AA90	19 and P53	Release of whole assessment area or site 19 in isolation	High
	P53	Release of just the garden centre	Moderate-High
AA95	20, 150, 169, 194 and P55	Release of whole assessment area or sites 20, 150, 169 or 194 in isolation	High
	Parts of 194	Release of the south eastern portions of Site 194	Moderate-High

Stage 2 AA	Sites / Parcels	Harm Scenario	Harm Rating
	P55	Release of P55	Moderate
AA96	81, 82, 02	Release of any land within the assessment area	High
	P47, 02, 82	Release of Site 02 in isolation	Moderate-High
AA109	22b	Release of all land within the assessment area	High
	22a, 22b	Release of Site 22a in isolation	Moderate
	22b, 255, 22a	Release of Site 22a, 255 and the southern half of 22b.	Moderate-High
AA111	119, 129, 13, 130, 131	Release of all land within the assessment area	High
	13	Release of central southern portion of Site 13, retaining woodland	Moderate
AA112	07 and 126	Release of all land within assessment area, including any land within site 126	Moderate-High
	07	Release of only site 07	Moderate
AA115	66 and part of P59	Release of Green Belt to the east of the railway track (east of Southend Airport Rail Station)	Moderate
	Part of P59	Release of land to the north and south of the detached and semi-detached dwellings on the western side of Southend Road in between the road and the railway line	Low-Moderate
AA120	P64, 116, 117, 124, 50	Release of all land within the assessment area	High
	P64, 116, 50	Release of any land within the curtilage of the Castle Point and Rochford Adult Community Centre	Low-Moderate
	P64, 116, 50	Release of Castle Point and Rochford Adult Community Centre and associated land in site 51	Moderate-High
AA121	111	Release of all land within the assessment area (all of site 111).	High
	111	Release of the more contained southern portion of the area (half of site 111).	Moderate-High
AA130	72	Release of all land within the assessment area	High
	72	Release of the contained northern half of the area, adjacent to Great Stambridge	Moderate-High
AA135	60, 71, 76, 95, 103, 123, 142, 155, 165, 192, 258, 261, 262, 263, 266, 267, 268, 269, 270, 271, P70, P71, P72, P73, P74, P75, P76, P77, P78	Release of whole assessment area or individual promoted sites	High

Stage 2 AA	Sites / Parcels	Harm Scenario	Harm Rating
	P71, P72, P73, P74, P75, P76, P77, P78	Release of land to the west of Sutton Road and/or the weaker performing parcels P71, P72, P73, P74, P75, P76, P77 or P78 in isolation (not in combination)	Moderate-High
AA138	04	Release of eastern half of the area	Moderate
	04	Release of all land within the assessment area	Moderate-High
AA145	57, 65, 70	Release of all land within the assessment area	High
	57	Release of contained northern portions of site 57	Moderate-High
AA152	265, 111, 218, 28	Release of whole assessment area.	High
	07, 126	Release of only site of 07	Moderate
	217, 07, 126	Release of land within sites 07, 126, 217	Moderate-High
AA153	266	Release of all land within the assessment area	High
	266	Release of the land to the west of Sutton Road	Moderate-High
AA156	P71, P77, P70, P74, P72, 269	Release of whole assessment area.	High
	P71, P77, P70, P74, P72	Release of weaker performing parcels P70, P71, P72, P74 or P77 in isolation (not in combination)	Moderate-High
AA157	142, 270, 60	Release of whole assessment area.	High
	P78, 270	Release of weaker performing parcel P78 in isolation	Moderate-High
AA158	261, 271	Release of whole assessment area.	High
	P76, P75, P73	Release of weaker performing parcels P73, P75 or P76 in isolation (not in combination)	Moderate-High

5.9 **Table 5.3** and **Table 5.4** summarises the area of land which falls within each category of harm (excluding any identified absolute constraints).

Table 5.3: Total area of Rochford Green Belt land assessed at each harm rating

Harm Rating	Total Area of Land (excluding constraints)	
	Area (Ha)	Percentage of Site/Parcel Area
High	1510.03	70.49
Moderate - High	490.12	22.88
Moderate	86.53	4.04
Low - Moderate	47.02	2.19
Low	8.55	0.40

Table 5.4: Total area of Southend-on-Sea Green Belt land assessed at each harm rating

Harm Rating	Total Area of Land (excluding constraints)	
	Area (Ha)	Percentage of Site/Parcel Area
High	280.57	92.14
Moderate - High	6.50	2.13
Moderate	0.00	0.00
Low - Moderate	0.28	0.09
Low	17.15	5.63

Role of Green Belt Harm Assessment

- 5.10 Consideration of the harm to Green Belt that could result from the release of land for development is an essential aspect of establishing the exceptional circumstances for making alterations to Green Belt boundaries. However, there are other important factors that need to be considered in order to establish the necessary exceptional circumstances, most notably the environmental and sustainability effects of development. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in high harm to the Green Belt. Conversely, the release of Green Belt land likely to result in low harm may not be appropriate or sustainable. In each location where alterations to Green Belt boundaries are being considered, planning judgement will be required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.
- 5.11 In light of the above, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies relative variations in the harm to the designation.
- 5.12 The Study does not assess the cumulative impact of the release of multiple sites and/or parcel scenarios on the Green Belt as a whole. That lies outside the scope of this Study as there are numerous permutations of the scenarios and sites that could be considered for release.

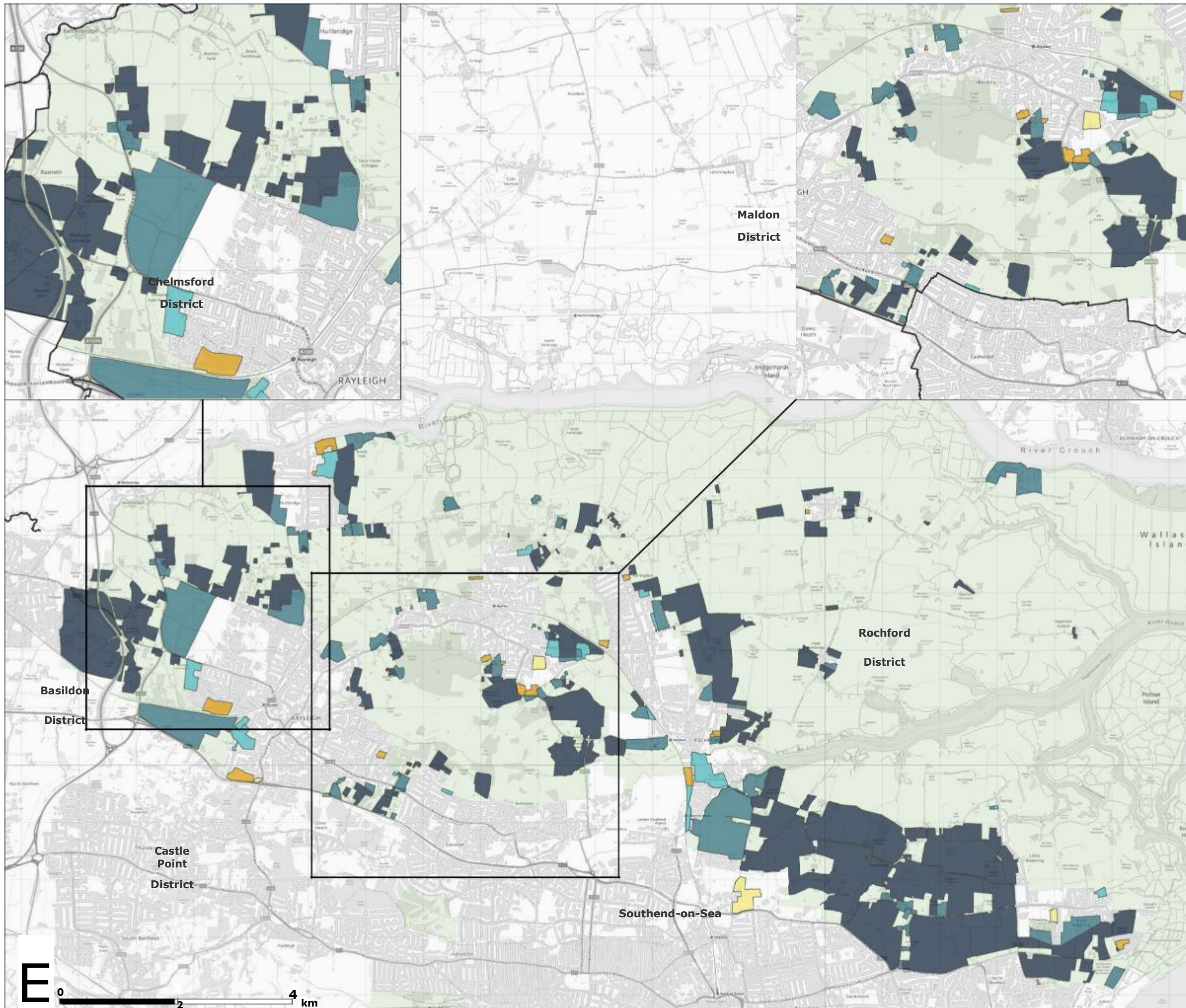
**Rochford and Southend
Green Belt Study**

Figure 5.1: Harm Assessment

□ District Boundaries
□ Green Belt

Stage 2 Harm Assessment

- High
- Moderate high
- Moderate
- Moderate low
- Low



Map Scale @A3: 1:65,000



Figure 5.1: Harm Assessment

6 Making Changes to the Green Belt

- 6.1 This chapter sets out the key steps that need to be considered if the Councils consider there is a need to release land from the Green Belt. The chapter also sets out some potential mitigation measures that could be applied to reduce the potential harm to the Green Belt, if land is released. This is followed by a discussion of the potential opportunities for enhancing the beneficial use of the Green Belt (in line with paragraph 141 of the NPPF). However, it should be noted that this chapter does not contain an exhaustive list of potential mitigation measures or enhancement opportunities. It is therefore recommended that mitigation and enhancement are carefully considered in the context of what development is finally proposed when more detailed information is available.

Making changes to the Green Belt

- 6.2 The NPPF requires changes to the Green Belt to be made through the Local Plan process. If such changes are made, the process should include demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience.
- 6.3 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless the benefits of the most sustainable locations are outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes²⁶. In other words the relatively poor performance of the land against the Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. In fact the release of Green Belt land likely to result in low harm may not be appropriate or sustainable.
- 6.4 In developing an 'exceptional circumstances' case it will be necessary to look at the objectively assessed needs for development, the needs to promote sustainable patterns of development and whether these needs can be accommodated without releases from the Green Belt. The NPPF sets out clear steps that local authorities need to consider, specifically:
1. making effective use of suitable brownfield sites and underutilised land;
 2. optimising the density of development in town and city centres and other locations well served by public transport; and
 3. exploring whether other authorities can help meet some of the identified development requirement.²⁷
- 6.5 Should the Councils conclude "*that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport.*"²⁸ Furthermore, careful consideration will also need to be given to the form of the amended Green Belt boundaries. As set out in paragraph 139 of the NPPF:

²⁶ Planning on the Doorstep: The big Issues – Green Belt Planning Advisory Service (PAS), 2015.

²⁷ Paragraph 137 of the NPPF.

²⁸ Paragraph 138 of the NPPF.

"When defining Green Belt boundaries, plans should:

- a. ensure consistency with the development plans 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."*

- 6.6 Further guidance on establishing the necessary 'exceptional circumstances' for making alterations to Green Belt boundaries is set out in the recent High Court judgement: *Compton Parish Council and others v Guildford Borough Council and others (2019)*. This involved an appeal opposed to the principle and extent of land proposed for release from the Green Belt in the Council's submitted Local Plan. The judge concluded there is no definition of the policy concept of 'exceptional circumstances' for altering Green Belt boundaries. *"This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case."*:

"The 'exceptional circumstances' can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary...there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy."

- 6.7 It is suggested that outline policy guidance or masterplans could be prepared as part of, or following on from the local plan process. Masterplans could draw on the findings of the Green Belt study and any detailed site-based Green Belt assessment work to indicate precise development areas, new permanent Green Belt boundaries (existing or new features) and appropriate considerations for the layout and design of new developments. Such an approach, together with specific policies for the development of the land, would help to minimise harm to the remaining Green Belt.

Mitigation to reduce harm to the Green Belt

The concept of mitigation

- 6.8 One of the factors weighed up in the judgement of harm resulting from release of a Green Belt area is the impact that the loss of openness would have on other Green Belt land. This is assessed by considering how neighbouring land would rate in terms of its contribution to Green Belt purposes were the area in question to be urbanised i.e. would its contribution be lessened? In many cases this is a key factor in the judgement: a site might in itself be small, but its development could represent a more significant change than its physical area might suggest if, for example, this resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land.

- 6.9 There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect the relationship between the remaining Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the case for release of a particular area. Although release of Green Belt land will still require 'exceptional circumstances' to be demonstrated.
- 6.10 Mitigation relates to land under the control of the site developer, and could therefore apply either to land being released or land being retained as Green Belt. There is an overlap between the latter and the concept of beneficial use of Green Belt land as set out in the NPPF, in that mitigation can also present an opportunity to enhance beneficial use.

Mitigation themes

- 6.11 The extent to which harm can be mitigated will vary from site to site, but potential measures can be considered under different themes. The Green Belt purposes are considered to relate to the relationship between the land area in question, developed land and the countryside. This relationship is influenced by: the location of the area; the extent of openness within it; and the role of landscape / physical elements, including boundary features (in either separating the area from or connecting it) to built-up areas and the wider countryside.
- 6.12 **Table 6.1** below lists some mitigation measures that could be considered as part of the planning and development process. Which mitigation measures are the most appropriate will vary depending on local circumstances and will need to be defined as part of the masterplanning process.

Table 6.1: Potential measures to mitigate harm to Green Belt

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

Mitigation measure	Benefits	Considerations
and landscaping to create a more permeable edge.		
Consider ownership and management of landscape elements which contribute to Green Belt purposes.	Ensuring permanence of Green Belt.	Trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (e.g. within back gardens).
Enhance visual openness within the Green Belt.	Increasing perception of Countryside.	Although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
Preserve / enhance landscape elements which contribute to the setting of historic settlements and views which provide an appreciation of historic setting and special character.	Preserving setting and special character of historic towns.	Landscape character and historic settings assessment can help to identify valued characteristics that should be retained and if possible strengthened, and intrusive elements that should be diminished and where possible removed.
Enhance access within the Green Belt.	Increasing perception of countryside.	Uses of the countryside that permit an appreciation of it as a connected area with value characteristics can counter urbanising influences – e.g. enhancement of connectivity of rights of way to avoid truncation by major roads, or provision of access along the Green Belt boundary to strengthen its role.
Improve management practices to enhance countryside character.	Increasing strength of countryside character.	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and

Mitigation measure	Benefits	Considerations
		intrusive elements that should be diminished and where possible removed.
Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings.	Maintaining perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements.	Analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit.
Maintain / create separation between existing washed-over settlements and new inset settlement.	Minimising urbanising influences that could weaken the justification for retaining the washed over settlement's status.	Ensure the gap is sufficiently wide to maintain a sense of separation.
Design road infrastructure to limit perception of increased urbanisation associated with new development.	Reducing perception of urbanisation.	Increased levels of 'activity' can increase the perception of urbanisation.
Use sustainable drainage features to define / enhance separation between settlement and countryside.	Strengthening separation between urban and open land.	Need to determine if local topography and ground conditions are suitable.

Beneficial use of Green Belt

- 6.13 The purposes of Green Belt do not make any reference to the quality or use of land falling within the designation, but the NPPF, at paragraph 141, states that:
- "Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."*
- 6.14 Furthermore, paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should *"set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land"*. This could be achieved through legal agreements in conjunction with the release of land and planning consent for development, or through strategic enhancement initiatives e.g. creation of community woodland.
- 6.15 The NPPF suggests types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary / buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes.

- 6.16 The accompanying Planning Practice Guidance elaborates on paragraph 138 of the NPPF, endorsing the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, including:
- *'new or enhanced green infrastructure;*
 - *woodland planting;*
 - *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
 - *improvements to biodiversity, habitat connectivity and natural capital;*
 - *new or enhanced walking and cycle routes; and*
 - *improved access to new, enhanced or existing recreational and playing field provision.'*
- 6.17 Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.
- 6.18 Some of the mitigation measures listed in the previous section which relate to Green Belt land can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land that (by adding to its value) will strengthen the case for that land's future protection, regardless of whether it is classified as Green Belt. Some examples are provided in **Table 6.2** below.
- 6.19 Beneficial uses could be achieved through planning conditions, section 106 obligations and/or the Community Infrastructure Levy. The Planning Practice Guidance stresses the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance.

Table 6.2: Potential beneficial uses of Green Belt

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open space provision.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
Increasing biodiversity	Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins and provision of habitat connectivity. Linkages could be provided to identified environmental networks.
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect of avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics /

Beneficial use	Considerations
	qualities which help it contribute to Green Belt purposes.

- 6.20 Many of the beneficial uses outlined in **Table 6.2** are likely to be identified through the strategic green and blue infrastructure study jointly commissioned by the South Essex local planning authorities, including Rochford and Southend-on-Sea. Furthermore, there are a number of strategy documents that have already been prepared by the Councils (e.g. Southend Green Spaces Strategy, Southend Local Biodiversity Action Plan, South Essex Green Grid Strategy, Rochford Environmental Capacity Study, Essex Landscape Character Assessment and Rochford Open Space Strategy). Together these studies will help identify the key opportunities for landscape, access, recreation and biodiversity enhancements within the Green Belt and beyond.

Conclusion

- 6.21 This study has assessed contribution to the five Green Belt purposes and the harm to these Green Belt purposes of releasing land for development. The findings of this study will form an important piece of evidence for the emerging Local Plan.
- 6.22 However, as outlined above there are other important factors that need to be considered when establishing exceptional circumstances for making alterations to Green Belt boundaries, most notably sustainability, viability and deliverability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in high harm to the Green Belt.
- 6.23 In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation. In addition, consideration will also need to be given to potential measures to mitigate harm to the Green Belt, as well as potential opportunities to enhance the beneficial use of the Green Belt. It is noted that many potential enhancement opportunities may relate to land which is in private ownership and therefore careful consideration will need to be given to how and if these opportunities can be delivered.
- 6.24 Should the Council decide to release land from the Green Belt, it is suggested that outline policy guidance or masterplans could be prepared as part of, or following on from the Local Plan process. Masterplans could draw on the findings of the Green Belt Study and any detailed site-based Green Belt assessment work to indicate precise development areas, new permanent Green Belt boundaries (existing or new features) and appropriate considerations for the layout and design of new developments and opportunities to enhance beneficial use. Such an approach, together with specific policies for the development of the land, may help to minimise harm to the remaining Green Belt.

Appendix 1

Green Belt Policy and Guidance

Origins of the Metropolitan Green Belt

The Green Belt land within Rochford and Southend-on-Sea forms part of the Metropolitan Green Belt. The principle of maintaining a ring of open country around London can be traced back to the 16th century when, by royal proclamation, Elizabeth I forbade any building on new sites within three miles of the city gates of London. This was motivated by public health reasons, to prevent the spread of the plague, and to ensure a constant supply of food for the metropolis.

The importance of these considerations was later recognised by Ebenezer Howard, a pioneer of British town planning, in his book of 1898 *Tomorrow: a Peaceful Path to Real Reform* in which he referred to “*an attractive setting within the town could develop and which would maintain, close at hand, the fresh delights of the countryside- field, hedgerow and woodland*”.

The only mechanism available at the time to realise this vision, however, was the acquisition of land by public authorities. The most active agency in this field was the City of London Corporation whose programme of acquisition, initiated in 1878, included Hampstead Heath, Epping Forest and Kenley Common.

The Metropolitan Green Belt as a standalone concept was first suggested by Raymond Unwin in 1933 as a ‘green girdle’. In 1935 the London County Council put forward a scheme ‘*to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable*’. This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act, under which 14,400 hectares of land around London were purchased by the London County Council and adjacent counties, either individually or jointly.

During the Second World War, the newly formed Ministry of Town and Country Planning commissioned Professor Patrick Abercrombie to prepare an advisory plan for the future growth of Greater London. The Ministry gave its formal approval of Abercrombie’s Green Belt proposals and the 1947 Town and Country Planning Act enabled local authorities to protect Green Belt land without acquiring it.

In 1955 the Government established (through Circular 42/55) the three main functions of the Green Belt as:

- Checking growth of large built-up areas;
- Preventing neighbouring settlements from merging; and,
- Preserving the special character of towns

Emphasis upon the strict control of development and the presumption against building in the Green Belt except in special circumstances was set out through further Government Green Belt guidance in 1962. The essential characteristic of Green Belts as permanent with boundaries only to be in exceptional circumstances was established through Circular 14/84.

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

- to safeguard the surrounding countryside from further encroachment; and,
- to assist in urban regeneration (subsequently replaced in 1995 and further amended in 2001).

PPG2 was replaced through the publication of the National Planning Policy Framework (NPPF) in March 2012²⁹, revised and re-published in July 2018 and February 2019, and this document currently provides national Green Belt policy. The current and evolving Green Belt position of the Government in relation to Green Belt provided through the NPPF is detailed later in this report.

²⁹ Department of Communities and Local Government, 2012, National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

The Greater London Development Plan³⁰, approved in 1976, defined the full extent of the London Metropolitan Green Belt. It stated that "The Green Belt gives definition to the built-up area as a whole, limits urban sprawl and provides an area where open recreational activities can take place. At the same time it plays an important role in the retention of areas of attractive landscape on London's fringes".

As of March 2017 the entirety of the Metropolitan Green Belt covers around 514,000 hectares, across London, the East and South East of England. Roughly 40% of the Metropolitan Green Belt falls in London. Land within the Metropolitan Green Belt accounts for approximately 31% of the total 1,634,700 hectares of Green Belt land in England³¹.

National Planning Policy

Government policy on Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF)³² and associated National Planning Practice Guidance³³. Paragraph 133 of the NPPF states that '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*'.

This is elaborated in NPPF paragraph 134, which states that Green Belts should serve five purposes, as set out below.

The purposes of Green Belt

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

The NPPF emphasises in paragraph 135 and 136 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It goes on to state 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. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.*'

Paragraph 137 of the NPPF requires that the 'strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development' before concluding that the exceptional circumstances exist (paragraph 137), specifically whether the strategy:

- 'makes as much use as possible of suitable brownfield sites and underutilised land;
- optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and

³⁰ Greater London Council, 1976, Greater London Development Plan.

³¹ GIS data from the Department for Communities and Local Government, 2017.

³² Ministry of Housing, Communities and Local Government, 2019, National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733637/National_Planning_Policy_Framework_web_accessible_version.pdf

³³ Ministry of Housing, Communities and Local Government, 2019, National Planning Practice Guidance [online] available at: <https://www.gov.uk/guidance/green-belt>

- 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 138 of the NPPF indicates that *'when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'*³⁴

Paragraph 139 of the NPPF suggests that Local Planning Authorities may wish to identify areas of 'safeguarded land' between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period.

Paragraph 135 of the NPPF indicates that, if proposing new Green Belt, local planning authorities should:

- Demonstrate why normal planning and development management policies would not be adequate;
- Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- Show what the consequences of the proposal would be for sustainable development;
- Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- Show how the Green Belt would meet the other objectives of the Framework.

Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states *"local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land"* (Paragraph 141).

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

Paragraph 143 and 144 state that *"inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."*

Paragraphs 145 sets out the types of development that are appropriate in the Green Belt:

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

³⁴This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling in villages;*
- *limited affordable housing for local community needs under policies set out in the development plan; and*
- *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - *not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*
 - *Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:

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

Planning Practice Guidance

The NPPF's Green Belt policies are supplemented by additional planning practice guidance. The guidance sets out some of the factors that can be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations born out through specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects³⁵. Other circumstances which have the potential to affect judgements on the impact of development on openness include the duration of development and its remediability to the equivalent, or an improved state of, openness, and the degree of activity likely to be generated by development, such as traffic.

The guidance also elaborates on paragraph 138 of the NPPF which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, including:

- *'new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*

³⁵Two important planning appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect. Further details are set out in Chapter 2 and in the case law section in Appendix 1 below.

- *improved access to new, enhanced or existing recreational and playing field provision.*'

Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.

Other Relevant Guidance and Case Law

Planning Advisory Service Guidance

Neither the National Planning Policy framework (NPPF) nor National Planning Practice Guidance (NPPG) provides guidance on how to undertake Green Belt reviews. However, the Planning Advisory Service (PAS) have published a useful advice note that discusses some of the key issues associated with assessing Green Belt.

The PAS Guidance³⁶ considers the way in which the five purposes of Green Belt should be addressed, as follows:

- Purpose 1: To Check the Unrestricted Sprawl of large built up areas – this should consider the meaning of the term 'sprawl' and how this has changed from the 1930s when Green Belt was conceived.
- Purpose 2: To Prevent Neighbouring Towns from merging into one another – assessment of this purpose will be different in each case and a 'scale rule' approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged. Landscape Character Assessment is therefore a useful analytical tool to use in undertaking this purpose.
- Purpose 3: To assist in safeguarding the countryside from encroachment – the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.
- Purpose 4: Preserving the Setting and Special Character of Historic Towns – this applies to very few places within the country and very few settlements in practice. In most towns, there is already more recent development between the historic core and the countryside.
- Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.

It also states that the assessment of the performance of Green Belt should be restricted to the Green Belt purposes and not consider other planning considerations, such as landscape, which should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.

- The guidance goes on to list the types of areas of land that might make a relatively limited contribution to the Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes:
- 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,

³⁶Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisor Service (2015).

- a strong boundary could be created with a clear distinction between 'town' and 'country'.

The Planning Advisory Service has since updated their 'Plan Making Question and Answer' advice with regard to the assessment of Green Belt within Local Plans³⁷. The service advises that Green Belt Reviews should be considered in the context of its strategic role. This indicates that Green Belts should not necessarily be just reviewed for each authority, and could include a joint methodology.

Planning Inspectorate Local Plan Examination Reports

Since the adoption of the National Planning Policy Framework in March 2012, there have been several important Planning Inspectorate Local Plan Examination Reports which have informed Green Belt planning³⁸. These include:

- The Inspector's preliminary conclusions (S Emerson) to Bath and North East Somerset Council (June 2012) highlighted the importance of having an *"up-to-date and comprehensive review of the Green Belt in the district is necessary to see whether all the land so designated fulfils the Green Belt purposes"*.
- The Inspector's report (A Thickett) to Leeds City Council (September 2014) emphasised that Green Belt studies should be *"fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations"*, i.e. Green Belt reviews should be 'comprehensive' rather than 'selective'.
- The Inspector's interim views (S J Pratt) to Cheshire East Council (October 2014) and further interim views (December 2015) highlighted several flaws in the approach to the Council's Green Belt assessment:
 - Contribution to the Green Belt purpose were not the only factors used to inform the assessment, land ownership, availability and deliverability were also considered, weighting overall Green Belt judgements against the purposes of the designation.
 - The Green Belt was divided-up in to assessment parcels inconsistently: large areas were assessed in the same way as small sites and some areas of Green Belt were not assessed.
 - Green Belt Purposes 4 and 5 were not assessed.
 - The Council's two stage Green Belt assessment update involving an initial assessment of large general areas followed by smaller parcels for a five Green Belt purposes, was subsequently approved by the Inspector. However, the Inspector emphasised the needs for consistency and transparency: *"This is a complex process, which needs to be undertaken in a consistent and transparent manner using available and proportionate evidence, involving professional judgements; it was not simply a desk-based study, but one which involved many site visits by CEC's officers or consultants to confirm the assessments and judgements."*
 - With regard to the assessment of Purpose 4 the Inspector commented that *"the assessment utilises a variety of historical evidence, which enables a full assessment of the smaller settlements; this could be criticised as being too detailed for a Green Belt assessment which focuses on the larger historic towns, but is not necessarily inappropriate or irrelevant"*.
 - With regard to the assessment of Purpose 5 which focussed on the area of brownfield land within the settlement nearest to the Green Belt land under assessment, the Inspector found the approach to be *"consistent, transparent and proportionate."*
- The Inspector's interim findings (H Stephens) to Durham City Council (November 2014) clarified that assessments against the Green Belt purposes should form the basis of any justification for releasing land from the Green Belt, and in reviewing land against the purposes Green Belt studies should consider the reasons for a Green Belt's designation.

³⁷ <http://www.pas.gov.uk/pm-q-a-green-belt#Q>: When should you carry out a Green Belt review?

³⁸ Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

- The Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015) emphasised that Green Belt studies should make clear "*how the assessment of 'importance to Green Belt' has been derived*" from assessments against the individual purposes of Green Belt and highlighted the importance of revisions to Green Belt boundaries to "*take account of the need to promote sustainable patterns of development, as required by paragraph 85 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process.*"
- The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) highlighted that the Council has supplied insufficient justification to not allocate sufficient housing development proposals in the Local Plan. The Council's primary source of justification was the Council's Green Belt review. Then inspector found the Phase 1 of the review was too strategic to draw out finer grained variations in Green Belt performance and Phase 2 of the review, although more detailed, failed to assess all potential development sites and did not examine all potentially suitable areas and did not assess the extent to which the Green Belt would be harmed by the loss of a parcel in part, in its entirety or in combination with other parcels. The inspector noted the Green Belt review had incorrectly incorporated an examination of landscape character into the consideration of openness, which "*should only be concerned about the absence of built development and other dominant urban influences*". In addition, the inspector noted that if the quantum of development required can't be met adjacent to urban areas, the Council should assess other locations that are large enough to accommodate a new settlement.
- The Inspector's report (D Smith) to the London Borough of Redbridge (January 2018) supported the Council's decision not assess the Borough's Green Belt against Purpose 4 on the grounds that there are no historic towns in the Borough. The inspector also noted that contribution to Purpose 5 had not been assessed because all brownfield sites with reasonable prospects of development had been identified. The inspector concluded that this reasoning was "*flawed as a matter of principle because the aims of the Green Belt are long-term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites*".

Planning Appeal Decisions

Since the adoption of the National Planning Policy Framework in March 2012, there have been several important planning appeal decisions that have informed general interpretation of national Green Belt policy³⁹. These include:

- *Heath & Hampstead Society v Camden LBC & Vlachos (2008)* concerned a proposal to demolish an existing residential building on Metropolitan Open Land and replace it with a new, larger building which represented a spatial intrusion upon the openness of the MOL but which did not intrude visually on that openness. The inspector concluded that "*while it may not be possible to demonstrate harm by reason of visual intrusion as a result of an individual – possibly very modest – proposal, the cumulative effect of a number of such proposals, each very modest in itself, could be very damaging to the essential quality of openness of the Green Belt and Metropolitan Open Land*". Although the case related to previous policy in relation to the Green Belt as set out in Planning Policy Guidance 2 (PPG 2), this portion of the judgement was cited in *Turner v Secretary of State for Communities and Local Government & East Dorset District Council* (see below) as relevant guidance in relation to the concept of openness of the Green Belt in the NPPF.
- *Calverton Parish Council v Greater Nottingham Councils & others (2015)* indicates that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent':

"the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity

³⁹ Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent."

- Timmins and Lymn Family Funeral Service v Gedling Borough Council and Westerleigh Group Limited (2015) clarifies that any material change of use of land in the Green Belt generally (and the use of land as a cemetery in particular) should be regarded as inappropriate unless listed in paragraphs 89 and 90 of the NPPF.
- Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016) was an appeal heard in the High Court relating to a previous appeal judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The High Court appeal was dismissed, but the judgement concluded that:
 - *"openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt presents"*
 - *"The question of visual impact is implicitly part of the concept of 'openness of the Green Belt' as a matter of the natural meaning of the language used in para. 89 of the NPPF... There is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' and the merging of neighbouring towns...openness of aspect is a characteristic quality of the countryside, and 'safeguarding the countryside from encroachment' includes preservation of that quality of openness. The preservation of 'the setting ... of historic towns' obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields."*
 - *"The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result of the location of a new or materially larger building there."*
- Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016) found that glasshouse development in the Green Belt is appropriate since it is a 'building for agriculture' under the first bullet of paragraph 89 of the NPPF and therefore not capable of generating harm to the Green Belt designation.
- Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) involved a challenge to a planning permission for a 6 hectare quarry extension in the Green Belt. Although paragraph 90 of the NPPF states that "mineral extraction" is not "inappropriate development" in the Green Belt, it was found that the Council failed to take into account visual impacts when considering whether the proposal would "preserve the openness of the Green Belt" as required in paragraph 90 of the NPPF. Lord Justice Lindblom found that the council had limited its consideration of the effects of the proposed development on the openness of the Green Belt to spatial impact and nothing more, despite the fact that, on the council's own assessment of the likely effects of the development on the landscape, visual impact on openness was "quite obviously" relevant to its effect on the openness of the Green Belt. This judgement was subsequently overturned in the Supreme Court (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3. Contrary to Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018), visual impact was found not to be an obligatory consideration when assessing Green Belt. It was found that *"a proper reading of the NPPF in its proper historic context, visual quality of landscape is not in itself an essential part of openness for which the Green Belt is protected."* *"The concept of "openness" in paragraph 90 of the NPPF is a broad policy concept which is the counterpart of urban sprawl and is linked to the purposes to be served by the Green Belt. Openness is not necessarily a statement about the visual qualities of the land, nor does it imply freedom from all forms of development."*

- Compton Parish Council and others v Guildford Borough Council and others (2019) was a High Court judgement involving an appeal opposed to the principle and extent of land proposed for release from the Green Belt in the Council's submitted Local Plan. The judgement includes the following helpful guidance on establishing the necessary 'exceptional circumstances' for making alterations to Green Belt boundaries:

"The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary...there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy. The analysis in Calverton PC of how the issue should be approached...is not exhaustive or a checklist. The points may not all matter in any particular case, and others may be important especially the overall distribution of development, and the scope for other uses to be provided for along with sustainable infrastructure."

- Mr C Luke v Tonbridge & Malling Borough Council (2020) was a High Court judgement involving an appeal against a refusal to grant outline planning permission for the erection of a detached dwelling for an agricultural worker relating to a nursery business to replace a mobile home. The appeal was allowed and outline planning permission granted on the grounds that the appellant had presented an appropriate 'very special circumstances' case. The existing mobile home was found not to be a building or 'previously developed land' as defined in the NPPF, so the scheme was not considered to be an 'exception' under paragraph 145 of the NPPF and therefore 'inappropriate' and harmful to the Green Belt by definition. However, the inspector concluded that there would be "limited to negligible effect on the visual aspect of the Green Belt's openness." And, while "the spatial reduction in the Green Belt's openness...would remain", the benefits of the scheme – visual improvement, energy efficiency, quality of life – were "persuasive and thus worthy of sufficient weight to tip the balance in favour of the appeal scheme."

Rochford District Development Plan

The Rochford Development Plan is formed of a number of documents including:

- The Core Strategy, adopted 2011⁴⁰
- The Development Management Plan, adopted 2014⁴¹
- The Site Allocations Plan, adopted 2014⁴²

These documents are supported by the Essex and Southend Replacement Waste Local Plan, a number of Area Action Plans and Supplementary Planning Documents.

These documents will be replaced by a new Local Plan which is currently in the process of being prepared, and is due for adoption in Summer 2021. This Green Belt Study will form part of the evidence base for the new Local Plan.

Core Strategy

Rochford's Core Strategy is the main document of the Local Development Framework. It sets out the overall strategy for the District up to 2025 and explains how the Council will deliver the spatial aspects of the Council's vision as well as how regional and national policies will be applied locally.

Green Belt policy is set out in section 6. Policy GB1 requires development to be directed away from the Green Belt and prioritises its protection based on how well the land helps to achieve the

40 https://www.rochford.gov.uk/sites/default/files/planningpolicy_cs_adoptedstrategy.pdf

41 https://www.rochford.gov.uk/sites/default/files/documents/files/planning_jaap_dpadopted_0.pdf

42 https://www.rochford.gov.uk/sites/default/files/documents/files/planning_all_allplan.pdf

purposes of the Green Belt. Policy GB2 sets out allowances for rural diversification including: conversion of existing buildings for small scale employment use or small scale hotels; green tourism; and outdoor recreation and leisure activities.

Development Management Plan

Rochford's Development Management Plan sets out the day to day planning policies through which development in the district will be delivered.

Chapter 3 addresses appropriate development in the Green Belt. Policy DM10 relates to development of previously developed land in the Green Belt and states that the Council will favour proposals for the redevelopment of previously developed land which accord with Policy GB2 of the Core Strategy. Proposals for development of other uses on previously developed land may be considered appropriate if it can be demonstrated that this would constitute sustainable development. Any development should not undermine the five purposes of Green Belt and should not impact its openness. Policies DM11 to DM23 set out forms of development that may be permitted in the Green Belt and the conditions and restrictions on these.

The Site Allocations Plan

Rochford's Site Allocations Plan sets out policies for allocated sites in the Green Belt and the revised Green Belt boundary created following the allocation of land for development. The number of dwellings required on Green Belt land is recorded at 775 by 2015, 1,010 by 2021 and 1,000 post 2021.

Area Action Plans

Area Action Plans (AAP) have been prepared for Hockley, London Southend Airport and Environs, Rochford Town Centre and Rayleigh Town Centre.

The Hockley AAP⁴³, prepared in 2014, guides development of Hockley centre as well as the adjoining industrial areas and the rail station. Central to the AAP is balancing the need to protect the village character of Hockley against the need to attract new investment.

The London Southend Airport and Environs AAP⁴⁴, prepared in 2014, was jointly prepared by Rochford District Council and Southend-on-Sea Borough Council in response to the challenges and opportunities raised by the airport. The plan integrates land use, transport, environmental and regeneration proposals with mechanisms for delivery.

The Rochford Town Centre AAP⁴⁵, prepared in 2015, is designed for use as a framework for the redevelopment of Rochford town centre and the determination of associated planning applications. The AAP provides a framework for carefully managed change that respects the town's historic fabric.

The Rayleigh Town Centre AAP⁴⁶, prepared in 2015, is designed for use as a framework for the redevelopment of Rayleigh. It guides development of the town centre, also considering the immediate surroundings. The AAP provides a framework that builds on the towns existing strengths and allows for development that enhances its offer.

Southend-on-Sea Borough Development Plan

The current development plan documents for Southend-on-Sea include:

- The Core Strategy, adopted 2007⁴⁷.
- The Development Management Policies, adopted 2015⁴⁸

43 https://www.rochford.gov.uk/sites/default/files/documents/files/planning_haap_adopted.pdf

44 https://www.rochford.gov.uk/sites/default/files/documents/files/planning_jaap_adoptedversion.pdf

45 https://www.rochford.gov.uk/sites/default/files/documents/files/planning_RocAAPAdopted.pdf

46 https://www.rochford.gov.uk/sites/default/files/documents/files/Rayleigh_Centre_AAP_Adopted_Version.pdf

47 http://www.southend.gov.uk/downloads/file/1540/core_strategy_dpd1.pdf

48 http://www.southend.gov.uk/downloads/file/3737/southend_development_management_document_adopted_version

These are supported by the Essex and Southend Replacement Waste Local Plan and Area Action Plans.

These documents will be replaced by a new Local Plan which is currently in the process of being prepared, and is due for adoption in 2021. This Green Belt Study will form part of the evidence base for the new Local Plan.

Core Strategy

Southend-on-Sea's Core Strategy provides the vision, objectives and broad strategy for the spatial development of Southend. It sets out key policies against which all planning applications will be assessed.

Green Belt policy is set out in Policy KP1 which states that a Green Belt will be maintained around the urban area and that minor amendments may only be allowed where this would enable delivery of specific objectives and policies in the Core Strategy that could not otherwise be achieved in a sustainable manner. The openness of the remaining Green Belt must be maintained. Policy CP4 requires the maintenance of the function and open character of a sustainable Green Belt.

Development Management Document

Southend -on-Sea's Development Management Document sets out the Council's policies for positively managing development in Southend-on-Sea and is used to assess and determine planning applications. This document does not set out any specific policies regarding the Green Belt but protecting the openness and function of the Green Belt is mentioned as a priority for the Two Tree Island, Leigh Marshes and Belton Hills Seafront Character Zones.

Area Action Plans

The Southend Central Area Action Plan⁴⁹, prepared in 2018, acts as a driver for inward investment and for the delivery of the remaining proportion of planned regeneration and growth in the Southend Central area.

The London Southend Airport and Environs AAP⁵⁰, prepared in 2014, was jointly prepared by Rochford District Council and Southend-on-Sea Borough Council in response to the challenges and opportunities raised by the airport. The plan integrates land use, transport, environmental and regeneration proposals with mechanisms for delivery.

Safeguarded Land

There are a number of areas of open land in Rochford and Southend-on-Sea that are not designated as Green Belt. However, these have not been considered further for potential extensions to the Green Belt as they are designated Safeguarded Land in the Council's current Local Plan. The majority of the areas are earmarked for future residential development as part of strategic settlement extensions. These include:

- Land west of Hullbridge (one area allocated for settlement extension post 2021 and one area pre 2021)
- Land north west of Rayleigh (allocated post 2021)
- Land east of Rochford (one area allocated pre 2021 and one post 2021)
- Land west of Rochford (pre 2021)
- Land north of Southend at Fossetts Farm (pre 2021)
- Land west of Great Wakering (two areas allocated post 2021 and one area allocated pre 2021)

⁴⁹ http://www.southend.gov.uk/downloads/file/5409/southend_central_area_action_plan_-_2018

⁵⁰ https://www.rochford.gov.uk/sites/default/files/documents/files/planning_jaap_adoptedversion.pdf

Other designations include the London Southend Airport and Environs Joint Area Action Plan Area and employment land allocations, one of which is located south of Rochford town and one of which is located east of Rayleigh on the Rochford District boundary.

Neighbouring Authority Green Belt Reviews

Chelmsford City Council

Chelmsford City Council has not undertaken a review of their Green Belt.

Current protection for Green Belt is set out in Policy DC1 of the Core Strategy, which requires all development proposals to preserve the openness of the Green Belt and not conflict with the purposes of including land within it.

Once adopted, the new Local Plan will continue this protection through Strategic Policies S1 and S13 as well as directly through policies: CO1 – Green Belt, Green Wedges, Green Corridors and Rural Areas; CO2 – New Buildings and Structures in the Green Belt; CO5 – Infilling in the Green Belt; and CO7 – Extensions to Existing Buildings Within the Green Belt.

Basildon Borough

Basildon Council undertook a review of Green Belt land within the Borough in 2016 and 2017⁵¹, to inform the preparation of a new Local Plan, determining permanent Green Belt boundaries that can endure for the long term and setting the framework for Green Belt and settlement policy.

The purpose of the review was to enable the Council to understand how the Borough's Green Belt land contributes to the fundamental aim, characteristics and purposes of the Green Belt. The assessment was undertaken in four stages: Stage 1 – identifying the assessment areas; Stage 2 – carrying out the assessments; Stage 3 – identifying the contribution to Green Belt purposes; Stage 4 – drawing out the conclusions. The main stage of the review was the assessment of the contribution of each of the parcels defined in Stage 1 against the first four purposes of the Green Belt. Purpose 5 was not included as it was considered that Green Belt by nature contributes to the recycling of derelict and urban land.

The study identified the major urban area of Basildon, the large towns of Billericay and Wickford, the serviced settlements of Bowers Gifford, Crays Hill and Ramsden Bellhouse and the un-serviced settlement of Noak Hill as 'large built up areas' in regards to Purpose 1 of the Green Belt. These settlements, along with others outside of the administrative boundary were also defined as 'neighbouring towns' for the assessment of Purpose 2.

In regards to Purpose 4, the Borough has no nationally recognised 'historic towns' therefore, designations such as Conservation Areas, Ancient Woodlands, Scheduled Monuments and Listed Buildings have been considered as offering 'special character'.

All Green Belt was considered to contribute equally to Purpose 5.

Castle Point Borough

Castle Point Borough Council has undertaken a number of Green Belt assessments which will inform the preparation of their new Local Plan. This includes a Green Belt Functions Assessment, Green Belt Landscape Assessment and a Green Belt Boundaries Review.

The Green Belt Functions Assessment⁵², 2010, assesses the Green Belt within Castel Point at the local and strategic level to evaluate whether the functions of the Green Belt are being fulfilled. The study was carried out in three stages: Stage 1 identified the Green Belt to be assessed; Stage 2 identified the assessment parcels of Green Belt based on clear physical features or boundaries; and Stage 3 analysed and classified each of the functions of the Green Belt parcels at the local level and evaluated the strategic context of these functions, i.e. the five Green Belt purposes.

51 <http://www.basildon.gov.uk/CHttpHandler.ashx?id=8032&p=0>

52 <https://www.castlepoint.gov.uk/download.cfm?doc=docm93jjjm4n833.pdf&ver=981>

The functions assessment defines 'large built up areas' under Purpose 1 and 'towns' under Purpose 2 of the Green Belt as: Benfleet, Thundersley, Hadleigh and Canvey Island. The assessment did not consider Purpose 4 with the reasoning that the towns in Castle Point are not characteristically historic.

Green Belt land adjacent to urban settlements which are designated for long term growth, redevelopment or regeneration are considered to contribute to Purpose 5.

The Green Belt Landscape Assessment⁵³, 2010, was prepared to provide additional information to inform the Green Belt policy of the Borough. The methodology was informed by Landscape Character Assessment guidance. The assessment was both desk and field based and considered the landscape and visual sensitivity of areas identified.

The Castle Point Green Belt Boundaries Review⁵⁴, 2013, recommends amendments to the extent of the Borough's Green Belt as part of the new Local Plan process. A series of sites were assessed with consideration given to; whether the Green Belt in the vicinity of the site would continue to fulfil its purposes, whether development could occur without significant impact on the visual sensitivity of the landscape and, whether the Green Belt boundary could be clearly redefined, using physical features that are readily recognisable and likely to be permanent.

53 <https://www.castlepoint.gov.uk/download.cfm?doc=docm93jjjm4n833.pdf&ver=981>

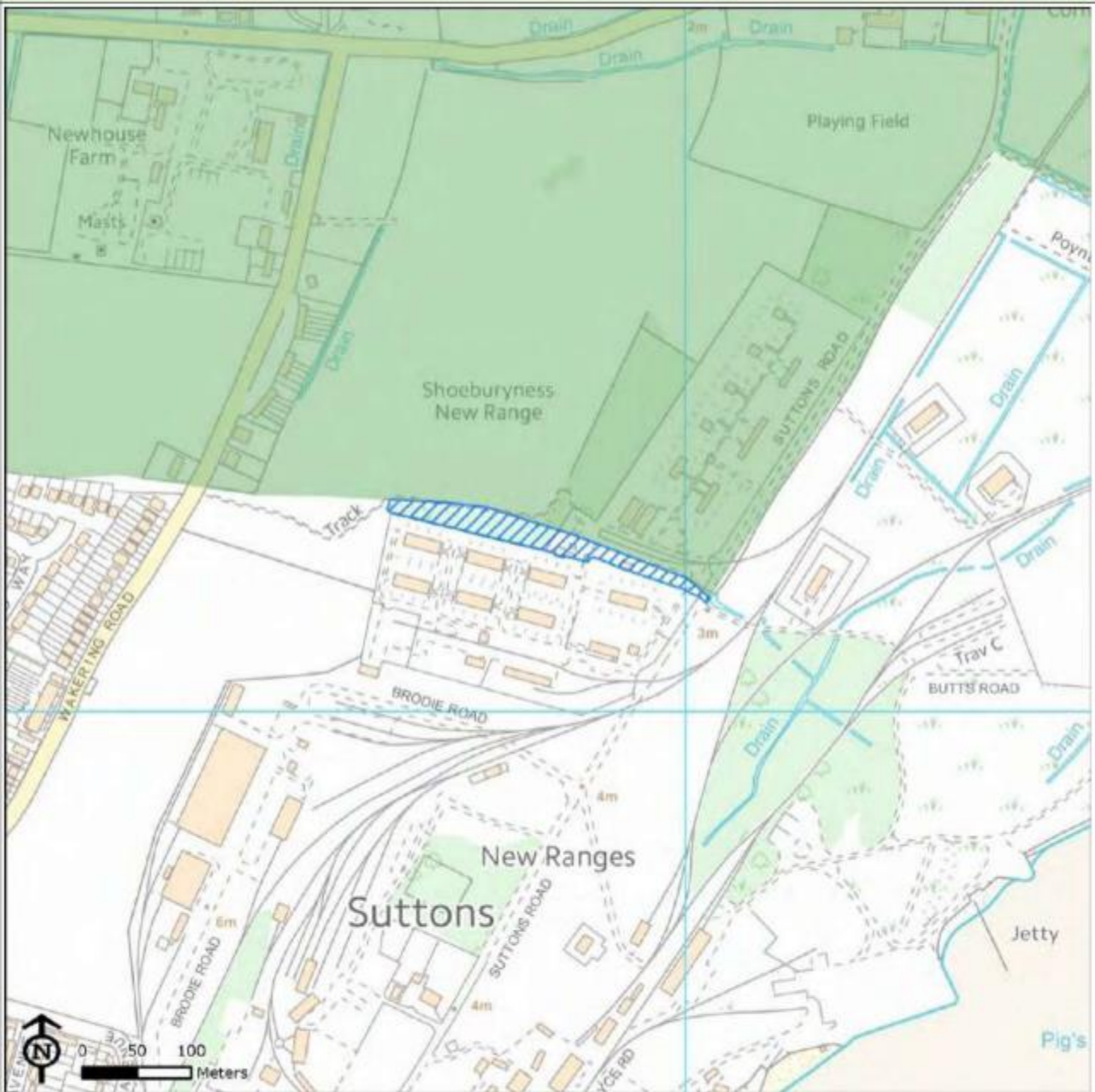
54 <https://www.castlepoint.gov.uk/download.cfm?doc=docm93jjjm4n834.pdf&ver=982>

Appendix 2

Potential Minor Green Belt Realignmentments

A

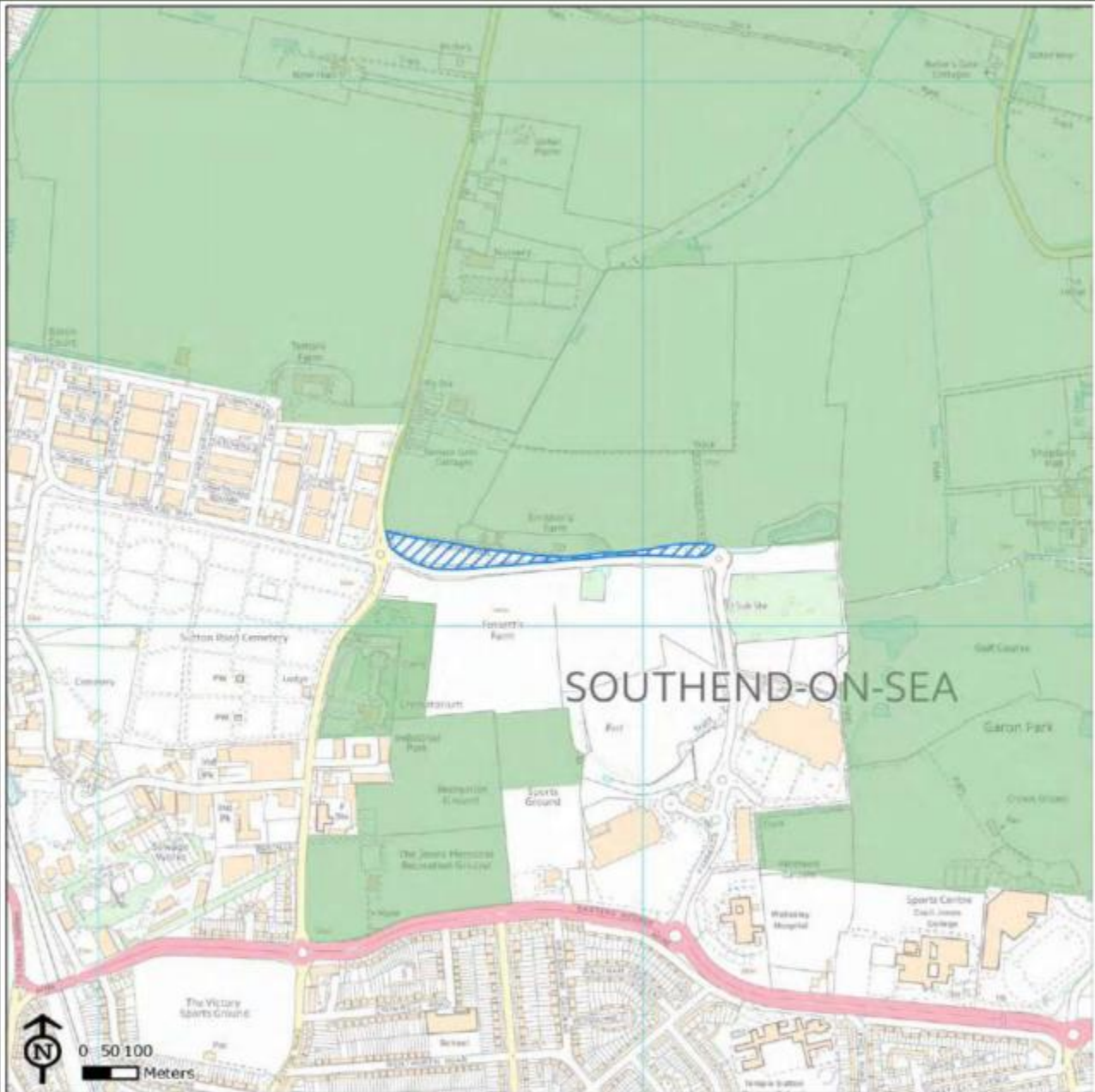
Green Belt addition to the north of Shoeburyness.



Green Belt boundary realigned along the property perimeter, which forms a more readily recognisable Green Belt boundary.

B

Green Belt addition to the north of Fossetts Way, Southend.



Green Belt boundary realigned to abut with Fossetts Way, which forms a more readily recognisable Green Belt boundary.

C

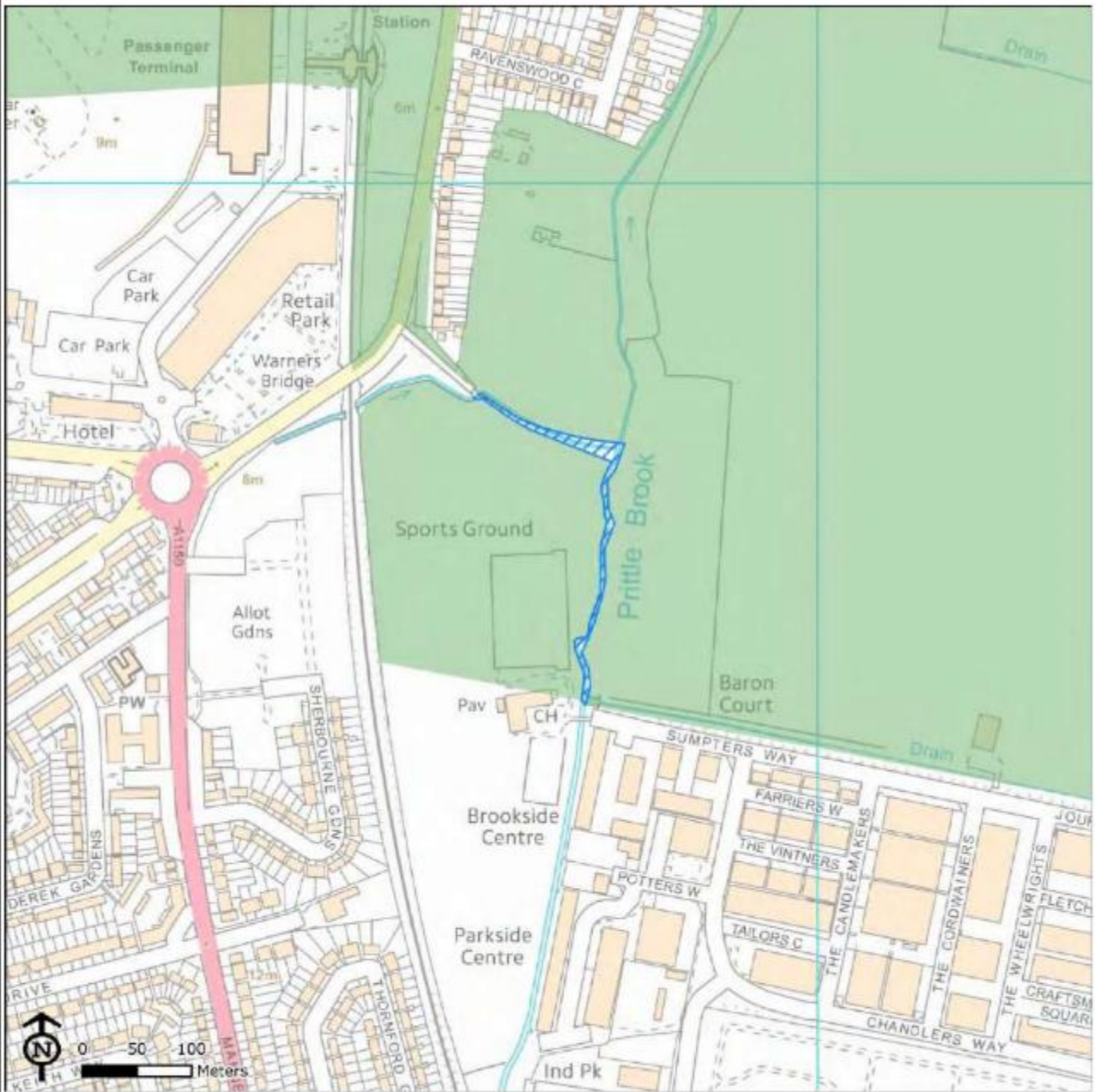
Green Belt addition south of Southend Road.



Green Belt boundary realigned along Southend Road, which forms a more readily recognisable Green Belt boundary.

D

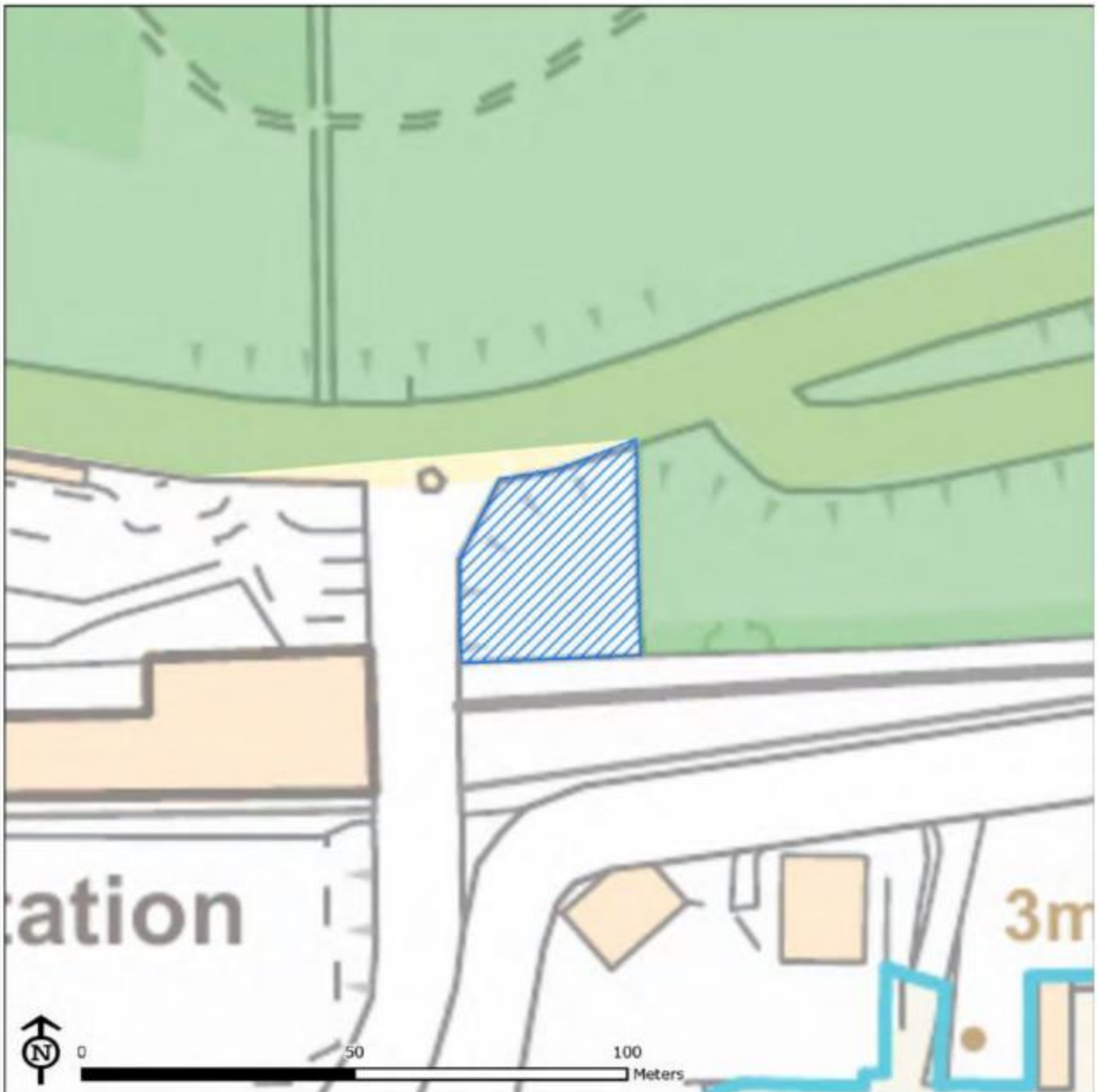
Green Belt addition along the Prittle Brook, north of Temple Farm Industrial Estate.



Green Belt boundary realigned to include the narrow gap.

E

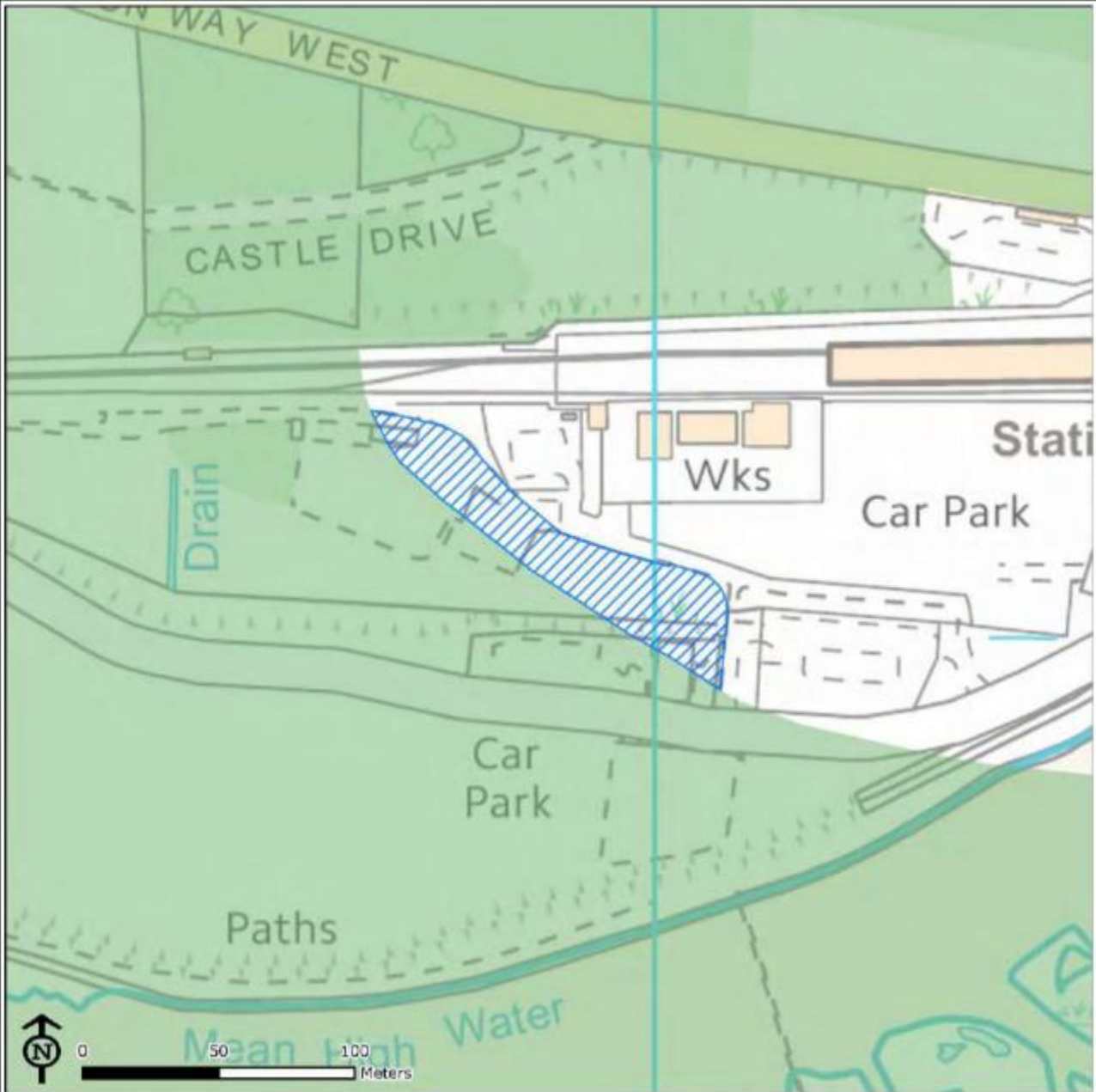
Green Belt addition south of Belton Way, Leigh-on-Sea rail station.



Green Belt boundary realigned to Belton Way and adjacent road, which form a more readily recognisable Green Belt boundary

F

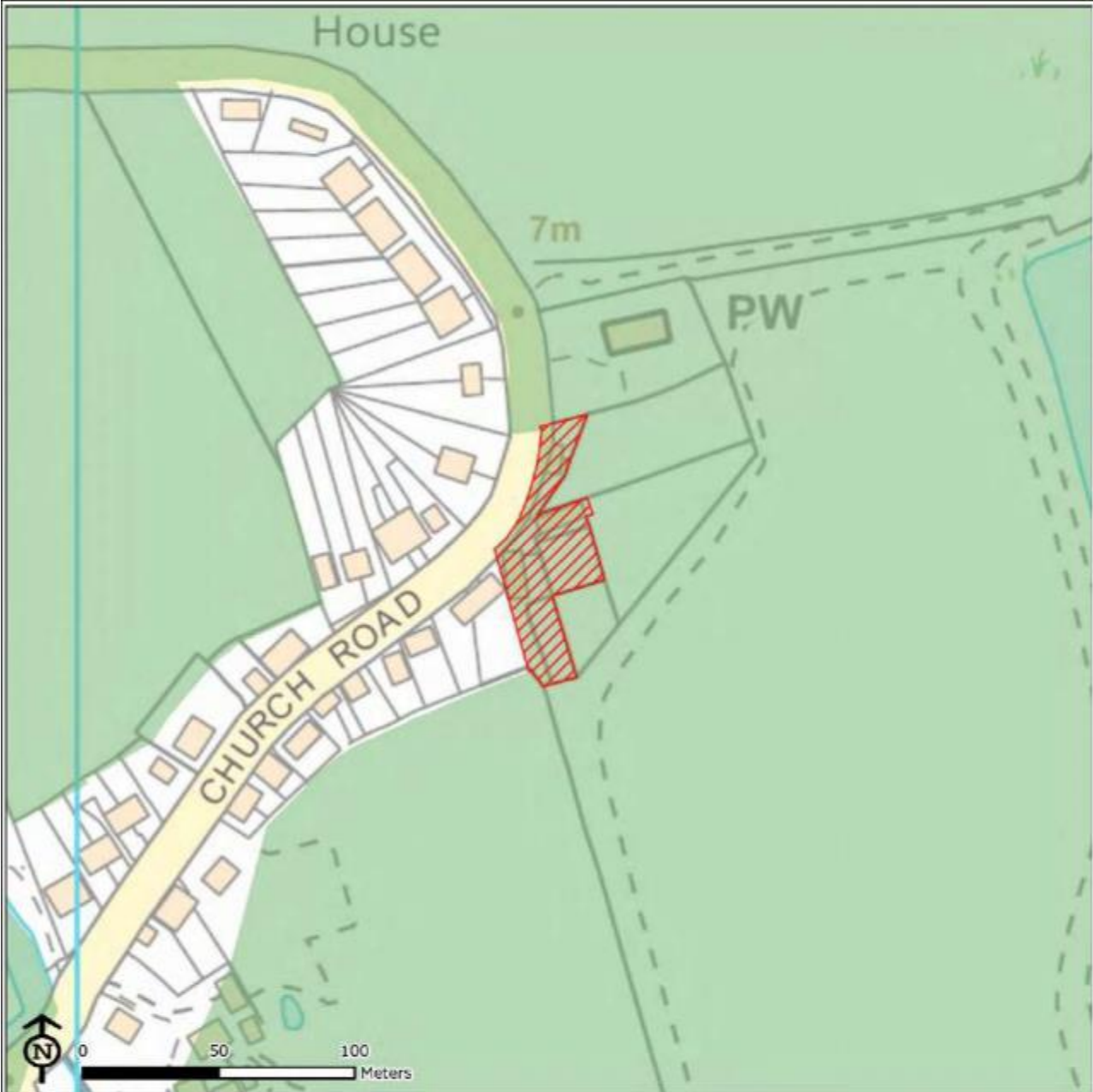
Green Belt addition south of Leigh-on-Sea rail station.



Green Belt boundary realigned along the access track which acts as a boundary feature.

G

Green Belt removal east of Church Road, Barling.



Green Belt boundary realigned along the settlement edge which forms a more readily recognisable Green Belt boundary.

H

Green Belt removal west of Milton Close, Great Wakering.



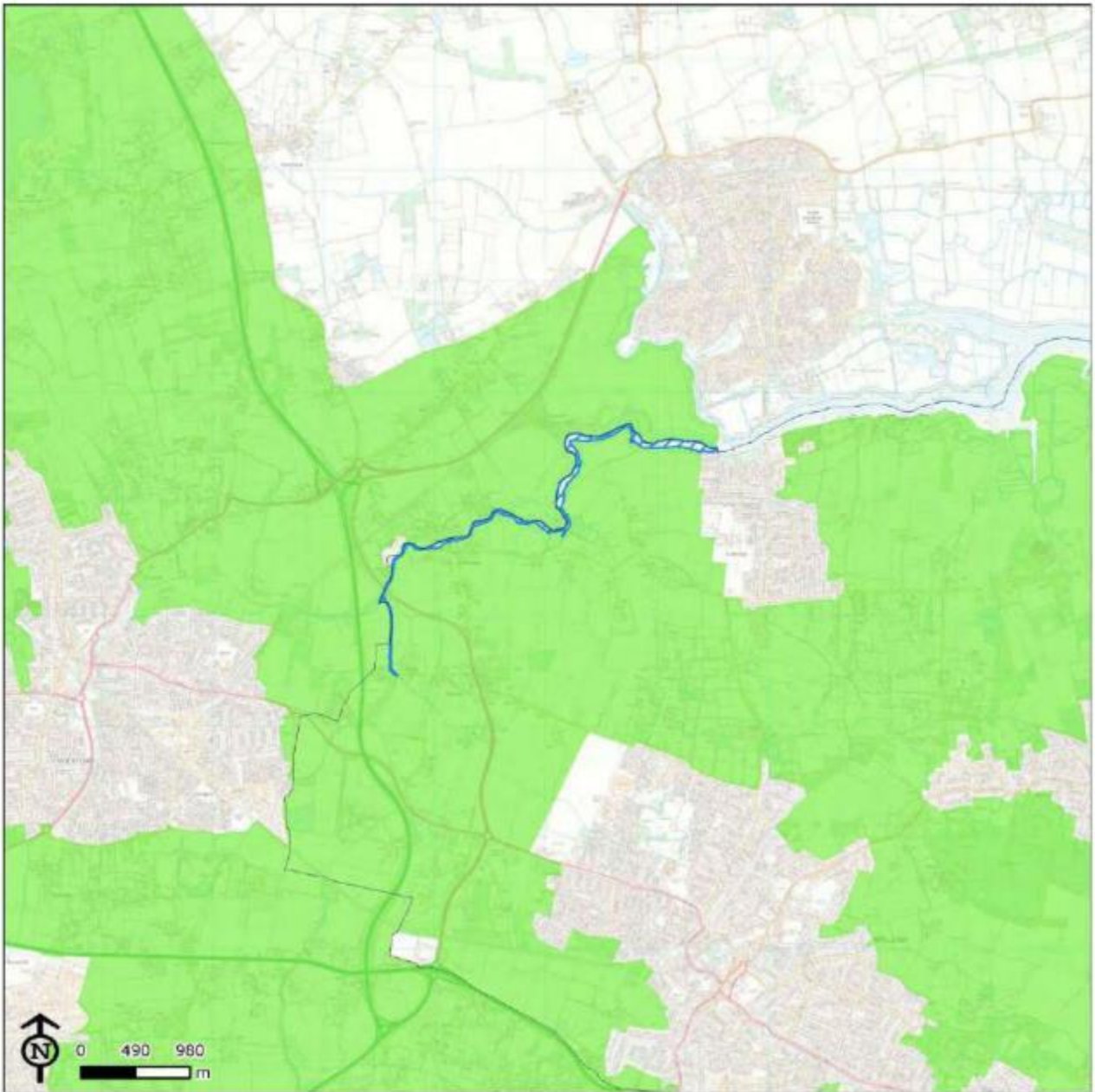
Green Belt boundary realigned along the rear gardens of residential properties which forms a more regular and consistent boundary feature.

Green Belt removal north of Hullbridge.

Small area of Green Belt removed as this is separated from the wider Green belt, only covers an extremely small area and falls on the river bank.

J

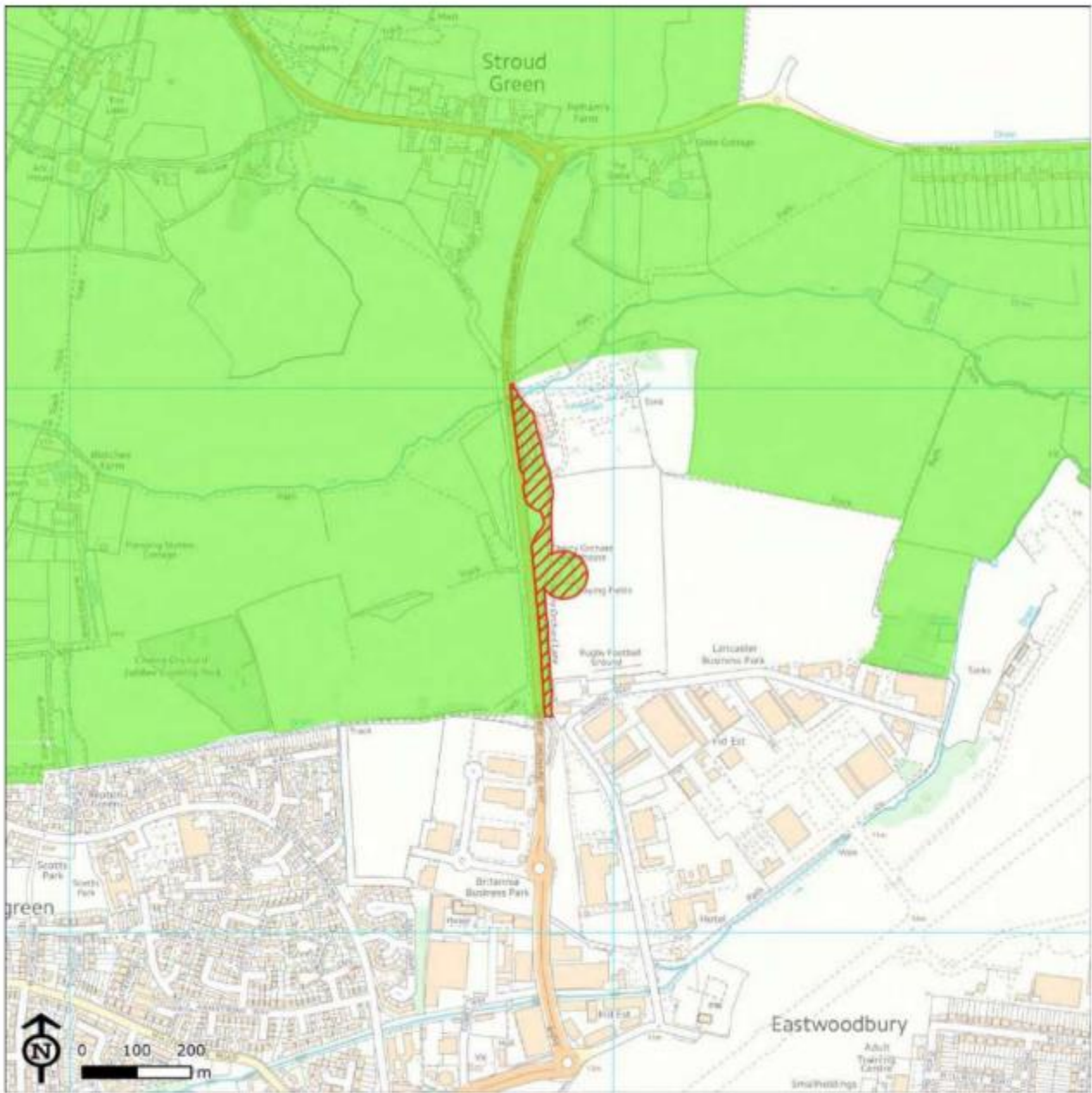
Green Belt addition to include River Crouch in between Green Belt in Rochford and Chelmsford to the north



Including the river within the Green Belt creates a more regular Green Belt boundary.

K

Green Belt removal east of B1013



Green Belt boundary realigned along the eastern edge of the B1013, which forms a more regular and consistent boundary feature.