

**COUNTRYSIDE PARTNERSHIPS (EASTERN HOME COUNTIES)**

**APP/M1520/W/24/3351658**

**LAND AT BROOK FARM, DAWS HEATH ROAD, SS7 2UD**

**PROOF OF EVIDENCE – IMPACTS ON GREEN BELT OPENNESS AND PURPOSES**

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**PROJECT** Land at Brook Farm, Daws Heath Road SS7 2UD

**REPORT TITLE** Proof of Evidence – Impacts on Green Belt openness and Purposes

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## CONTENTS:

1. QUALIFICATIONS AND APPOINTMENT.....	4
2. SCOPE AND STRUCTURE.....	5
3. DESCRIPTION OF THE SITE.....	7
4. DESCRIPTION OF THE PROPOSALS.....	8
5. PLANNING CONTEXT.....	13
6. OPENNESS OF THE GREEN BELT.....	14
7. PREDICTED EFFECTS ON THE PURPOSES OF THE GREEN BELT.....	18
8. GREY BELT.....	28
9. REASON FOR REFUSAL.....	30
10. CONCLUSIONS.....	32

## Figures

Figure 4.1	Daws Heath Road entrance (Landscape strategy CD 1.61)
Figure 4.2	Central greenspace (Landscape strategy CD 1.61)
Figure 4.3	Parkland (Landscape strategy CD 1.61)
Figure 7.1	Aerial image and proposed development
Figure 7.2	Extract of GBR1 CD 7.1 page 86

## LVIA Figures

LV-0001.	Site Location
LV-0002.	Landscape Character
LV-0003.	Landscape Designations
LV-0004.	Public Rights of Way
LV-0005.	Representative Viewpoint Locations
LV-0006.	Landscape and Open Space Strategy

## Appendices

1. Extract of Buckinghamshire Green Belt Review 2016
2. Extract of Tandridge District Council Green Belt Assessment (December 2015)

## **1. QUALIFICATIONS AND APPOINTMENT**

- 1.1 My name is Paul Gibbs. I am Managing Director of David Jarvis Associates Limited (DJA), a practice of Planners, Urban Designers, Environmental Assessors and Landscape Architects established in 1982. I have worked at DJA since 1994 and was made a Director in 2007.
- 1.2 I have a Diploma in Landscape Architecture (1994) and was made a Member of The Landscape Institute in 1998. I also have a Diploma in Urban Design (2007).
- 1.3 DJA has worked throughout the UK and Ireland, Continental Europe, the Caribbean and the Middle East ranging from national strategic planning, mineral planning and design to landscape assessment and detailed site-based design.
- 1.4 The majority of my work is related to residential development and mineral extraction at all scales. I have been involved in Inquiry work for many years and have appeared as an expert witness on landscape matters for both developers and local authorities.
- 1.5 The evidence which I have prepared and provide in this Proof of Evidence for this Appeal, reference Appeal APP/M1520/W/24/3351658, is true and I confirm that the opinions expressed are my true and professional opinions.

## 2. SCOPE AND STRUCTURE

### Introduction

- 2.1 DJA was first approached by Countryside Partnerships (Eastern Home Counties) with regard to the site in 2014. DJA was involved in the recent refused application advising on landscape matters. I was asked to act as an expert witness in June 2024.
- 2.2 The refused planning application 22/0484/FUL which is the subject of this Appeal was submitted in full included a detailed housing and landscape design, a Design and Access Statement and an LVIA. The application proposed the following:

*“Construct 173No. dwellings including public open space, landscaping, access, drainage, parking, servicing, utilities and all associated infrastructure and ancillary buildings.”*

- 2.3 My Proof of Evidence should be read in conjunction with the evidence of Mr Wood.

### Scope of Evidence

- 2.4 Castle Point Borough Council (CPBC) gave one reason for refusing the application. This Proof of Evidence addresses RfR 1 in respect of impacts on the openness and Purposes of the Green Belt:

1. **The proposal represents inappropriate development in the Green Belt as defined by the National Planning Policy Framework 2023. Such development will only be permitted if very special circumstances exist to justify its inappropriateness. It is not considered that any very special circumstances have been demonstrated which either in isolation or in combination carry sufficient weight to outweigh the harm to this part of the Green Belt. The proposed development is therefore contrary to Government advice as contained in the National Planning Policy Framework.**

- 2.5 This Proof of Evidence is structured as follows:

- In Section 3 I describe the site;
- In Section 4 I describe the proposed development;
- In Section 5 I review the planning context;
- In Section 6 I address the openness of the Green Belt;
- In section 7 I address the effect on the Purposes of the Green Belt;
- In Section 8 I examine the issue of grey belt;
- In section 9 I address the Reason for Refusal; and

- In Section 10 I draw my conclusions.

2.6 The figures from the LVIA are included following Section 10 for reference.

2.7 In preparing my evidence, I have reviewed a number of documents, the principal ones of which include the following:

- Application LVIA<sup>1</sup>
- Consultation Responses and Committee Report<sup>2</sup>
- Appellant's<sup>3</sup> and Council's Statements of Case<sup>4</sup>
- Relevant published Green Belt related reports
- Design and Access Statement<sup>5</sup>
- Application Landscape Strategy<sup>6</sup>
- Relevant Planning Policies
- Statement of Common Ground (draft)<sup>7</sup>
- Other documents but not necessarily referenced here

2.8 Where appropriate, I draw upon relevant information from these documents and seek to avoid unnecessarily repeating the same information and therefore I have summarised my analysis. I have also reviewed the LVIA as part of the suite of planning application documents. I have reviewed these documents and also assessed the scheme with reference to the LVIA viewpoints surrounding the site. Having reviewed the application LVIA, I understand the broad conclusions set out in that report as far as scale and nature of effect are concerned with regard to effects on landscape elements, landscape character and visual amenity.

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<sup>1</sup> CD 1.53

<sup>2</sup> CD 3.2

<sup>3</sup> CD 11.1

<sup>4</sup> CD 11.2

<sup>5</sup> CD 1.47

<sup>6</sup> CD 1.61

<sup>7</sup> CD 10.1

### **3. DESCRIPTION OF THE SITE**

- 3.1 The site is situated in a small, enclosed pocket of farmland bounded by the urban areas of Hadleigh to the south, the village of Daws Heath to the north, Daws Heath Road which lies to the west, and woodland associated with Belfairs Nature Reserve to the south east.
- 3.2 The Site comprises a series of small equestrian paddocks, totalling 18.9ha. The paddocks are generally well-defined by established hedgerows, some of which are substantial and include standard trees.
- 3.3 The site boundary to the north comprises rear garden boundaries of properties on Fairmead Avenue marked by a line of mature oaks with an inconsistent range of fencing and vegetation. Other boundaries are more substantially vegetated.
- 3.4 The highest point of the site is around 69m AOD at a point approximately central to the northern boundary of the site (at the boundary with 44 Fairmead Avenue). The land falls away from this point to the east, south and west towards Prittle Brook with the lowest point found in the south-eastern most part of the site at around 50m AOD.
- 3.5 There are no public rights of way within the site, the nearest being public bridleway BENF\_80.

#### **4. DESCRIPTION OF THE PROPOSALS**

- 4.1 The planning application submitted to Castle Point Borough Council, which is the subject of this appeal (reference 22/0448/FUL), is seeking full planning permission for 173 dwellings including public open space, landscaping, access, drainage, parking, servicing, utilities and all associated infrastructure and ancillary buildings.
- 4.2 Of the total site area of 18.91ha, only 6.4ha is proposed to be developed for residential use, with the remaining 12.5ha proposed to be given over to open space.
- 4.3 The dwellings will range from smaller (one-bedroom) apartments to larger (five-bedroom) detached houses. All residential dwellings are 2 storey housing, with intermittent single storey bungalows.
- 4.4 The density of the development would equate to approximately 27 dph within the developed area of the site which is at the lower end of the density scale, which I consider appropriate for the site given its development context, being edge of settlement.
- 4.5 The open spaces incorporate a LEAP play space, drainage infrastructure, orchards and wildflower and meadow parkland.
- 4.6 The site would be accessed via a revised junction on Daws Heath Road, with pedestrian / cycle access via Bramble Road to the north east, and on foot to the east of the site.
- 4.7 Further details of the proposed scheme are included in the Planning Statement and Design and Access Statement submitted with the application.
- 4.8 The scheme has been designed to limit / mitigate impact upon the local area by:
- Existing boundary vegetation retained where possible
  - Additional tree planting on the western and southern edges of proposals
  - The use of a consistent palette of street trees and hedgerows within the development.
  - Sympathetic use of locally appropriate building materials and colours.
  - Carefully designed lighting restricted to the minimum.
  - Creation of new footpaths, public open space and play facilities



4.9 The design of the scheme has been arrived at through the careful consideration of the constraints and opportunities presented by the site. The Ancient Woodland and boundary vegetation are protected, and the layout and heights of the buildings is informed by visual analysis to avoid any material visual effects on the wider landscape. The scheme designed by DPA has been informed by the relevant design guidance. I consider the scheme to be an appropriate, well considered and high quality design.

4.10 I describe below the key areas of the scheme from a landscape design perspective:

#### **Daws Heath Road entrance**



Figure 4.1 Daws Heath Road entrance (Landscape strategy CD 1.61)

4.11 The entrance from Daws Heath Road is proposed utilising the existing junction between 423 and 430 Daws Heath Road. The entrance road forms a tree lined approach to the main part of the site, with a footpath / cycleway to the southern side and footpath to the northern side. The area east of 430 would be significantly enlarged as a result. A pair of SuDS basins lie either side of the road.

4.12 The existing boundary hedgerows and tree line would be retained.

#### Central greenspace

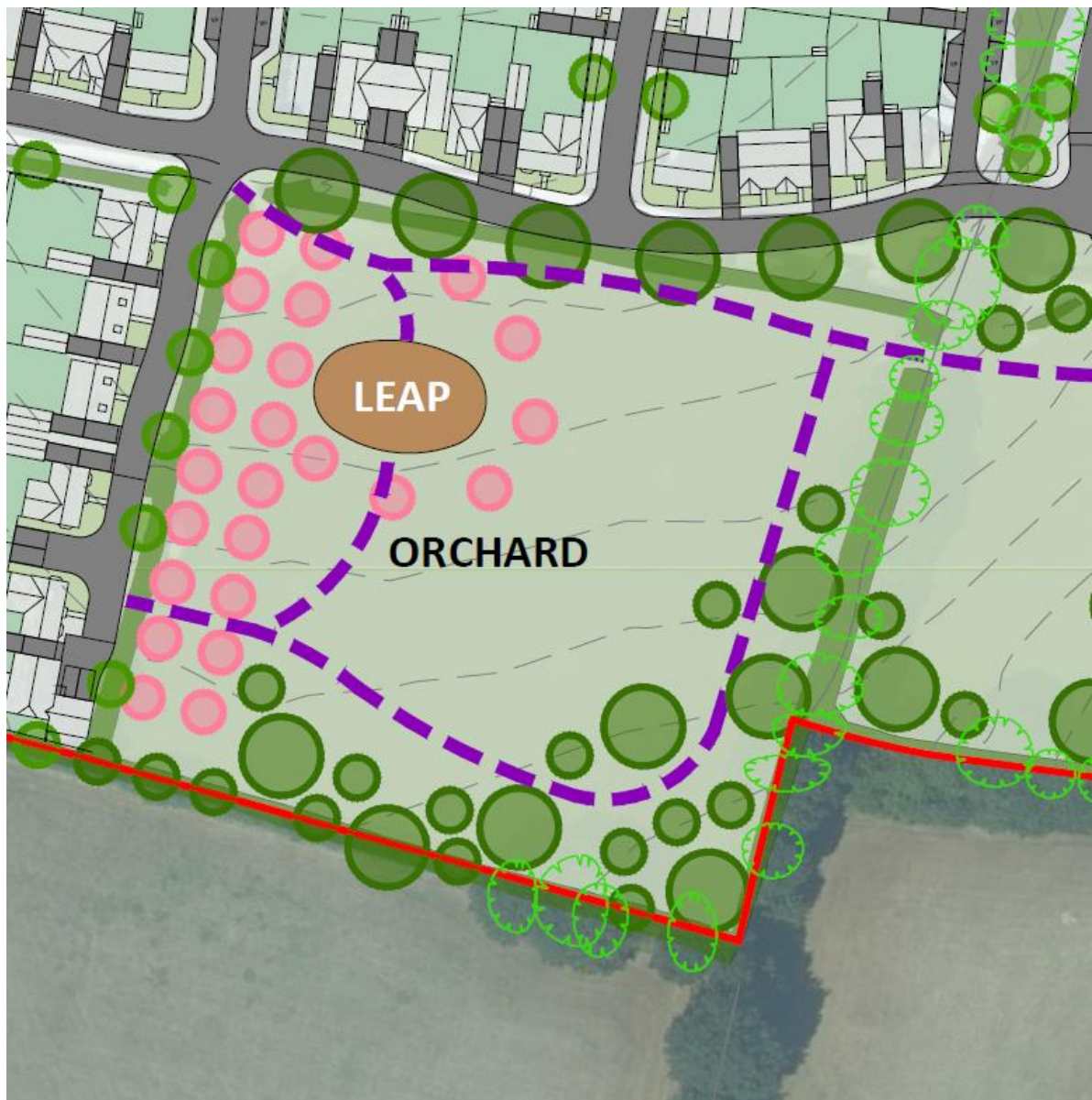


Figure 4.2 Central greenspace (Landscape strategy CD 1.61)

4.13 The central greenspace lies on the southern western boundary, south of the primary street. This space would be defined by the retained hedges and tree belts on all four sides, and managed as a mix of amenity grassland and species rich grassland, with an orchard, and further tree planting to reinforce the southern boundary. Paths meander through the space, providing pedestrian access to a Locally Equipped Area for Play (LEAP). The space is overlooked on two sides. The existing boundary planting would be retained and undisturbed by the proposed development.



## Parkland



Figure 4.3 Parkland (Landscape strategy CD 1.61)

- 4.14 The eastern half of the site is given over to wildflower meadow, areas of orchard and tree planting. The northern meadow is proposed to be a heath to replicate the historic land use of the area. The series of SuDS basins provide a biodiversity opportunity as well as helping to manage surface water. A series of interlinking paths creates a strong access network around the site with access to the north and east. All existing vegetation would be retained and former hedgerows reestablished.
- 4.15 Mitigation measures recommended in the LVIA to address adverse effects arising from the proposed development are incorporated into the landscape strategy and are shown below in Table 4.1.

**Table 4.1 Landscape Strategy**

Mitigation	Purpose
<b>Primary Mitigation (Inherent)</b>	
Existing boundary vegetation retained where possible	To maintain existing screening, landscape character and biodiversity of the site.
Additional tree planting on the western and southern edges of proposals	To increase enclosure of the site and improve biodiversity.
<b>Secondary Mitigation (Foreseeable)</b>	
The use of a consistent palette of street trees and hedgerows within the development.	To help soften the appearance of the development, provide a high-quality environment for residents and enhance biodiversity.
Sympathetic use of locally appropriate building materials and colours.	To create a consistency with the existing buildings within the local area and within the LCA.
Carefully designed lighting restricted to the minimum.	To reduce or prevent light spillage onto adjacent areas and limit the night time effect on the open landscape.
<b>Enhancements</b>	
Creation of new footpaths, public open space and play facilities	To improve and provide facilities for new and existing residents.

## 5. PLANNING CONTEXT

5.1 The appeal site has no relevant planning history. The site itself together with adjacent land has been considered by CPBC in various studies both as part of the Green Belt and in landscape planning terms in the preparation of the now withdrawn Emerging Local Plan.

5.2 The site was shown as a residential allocation in the 2014, 2016 and 2019 versions of the draft Plan.

### **Castle Point Local Plan Adopted (November 1998)**

5.3 The Development Plan for Castle Point is the adopted Local Plan<sup>8</sup> (1998). The Proposals Map<sup>9</sup> associated with the Plan identifies the site as Green Belt. It should be noted, however, that the adopted Local Plan contains no policies which establish the general principles for the control of development within the Green Belt.

5.4 For this, reliance is now placed on the provisions of the National Planning Policy Framework 2024 (NPPF).

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<sup>8</sup> CD 4.1

<sup>9</sup> CD 4.2

## 6. OPENNESS OF THE GREEN BELT

6.1 The site lies within the Green Belt.

6.2 Paragraph 137 of the Framework 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’.*

6.3 Planning Practice Guidance (Green Belt - GOV.UK<sup>10</sup> (www.gov.uk) states that:

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

*Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*

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

6.4 I consider each aspect in turn as they relate to the Appeal proposals.

### **Spatial aspect**

6.5 It is accepted that the introduction of the proposed residential development would inevitably introduce built form and reduce the spatial aspect of openness associated with the developed part of the site.

6.6 Currently there is 1,257m<sup>2</sup> of existing built form, previously developed land (PDL), equestrian facilities and 650m<sup>2</sup> of land used for caravan storage. These are not agricultural uses. These areas of existing development already affect the spatial openness of the site, it is not a “blank canvas”.

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<sup>10</sup> Paragraph: 001 Reference ID: 64-001-20190722

- 6.7 Of the total site area of 18.91ha, only 6.4ha is proposed to be developed for residential use, with the remaining 12.5ha proposed to be given over to open space. All residential dwellings are 2 storey housing, with intermittent single storey bungalows. The density of the development would equate to approximately 27 dph within the developed area of the site which is at the lower end of the density scale, which I consider appropriate for the site given its development context, being edge of settlement. The open spaces incorporate a LEAP play space, drainage infrastructure, orchards and wildflower and meadow parkland.
- 6.8 Any effect on spatial openness would only occur in the developed part of the site; the remainder of the site would remain open in perpetuity.
- 6.9 I consider that the effect on the openness of the developed area of the site would be significant, but the effect on the openness of the site as a whole would be limited.

#### **Visual aspect**

- 6.10 In terms of the visual perception of openness, there is already a strong sense of visual enclosure associated with the site. The site is situated in a small pocket of farmland bounded by the urban areas of Hadleigh to the south, Daws Heath to the North and woodland associated with Belfairs Nature Reserve to the south east.
- 6.11 The developed part of the site is defined by well vegetated rear garden boundaries to the northern edge, often associated with dense planting; residential development lies to the west; and a mix of existing and proposed hedge and treeline to the southern boundary. With the vast majority of the existing vegetation remaining in place, this aspect of strong enclosure would remain with the proposed residential development in place. The proposed development would be well contained within the landscape and screened from view save for those viewpoints that are in close proximity to the site access around VP1. The surrounding area has a largely intact landscape structure and areas of woodland which would limit visibility.
- 6.12 The LVIA<sup>11</sup> states at 7.10 that:
- “Generally, the site is well contained within the landscape and screened by existing built form, vegetation and topography. This results in only those receptors closest to the site being affected. Overall, it is considered that proposals will result in a minor adverse effect on visual amenity.”*

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<sup>11</sup> CD 1.53 page 20 para 7.10

6.13 It concludes at 8.6<sup>12</sup> that:

*“The site is enclosed by the urban areas of Daws Heath and Hadleigh and by woodland to the south and west. Effects of the development will be highly localised and seen within the context surrounding development in all views.”*

6.14 There are no PROW within the site, so there is no lost opportunity to gain an appreciation of the openness associated with the site.

6.15 With such limited views of the site the proposed development would not affect any appreciation of openness to any material extent.

6.16 Any reduction in visual openness would only be appreciated from locations within the site and in the immediate environs of the site to the west around VP1 which are highly localised. Where the change is experienced, there would be harm to the visual openness of the Green Belt.

6.17 This would be geographically limited but where it is experienced, there would be a limited degree of harm. Beyond this area there would be no material effect on visual openness.

#### **Duration of the development and remediability**

6.18 The proposed development would be permanent and it would be highly unlikely that the site would return to its original state in terms of openness. This element of the nature of the proposed development means that any impact on openness that it will have will be greater than a development which is temporary and/or where there is a likelihood that openness would be restored at some point in the future. I have taken this into account in considering the degree of harm that the proposed development may give rise to.

#### **Degree of Activity**

6.19 The proposed development would generate its own traffic movement, although the vast majority of this would relate to private vehicle use and movement within the site itself. The opportunity to appreciate this movement would be limited, restricted by the screening effect of existing landscape structure. The degree of activity associated with the proposed development would be limited, transient and not cause harm to the appreciation of openness.

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<sup>12</sup> CD 1.53 page 25 para 8.6



- 6.20 I conclude that the proposed development will give rise to a spatial impact upon openness but limited to the developed part of the Site .
- 6.21 The Site is very well contained and the impact of the proposed development upon visual openness would be limited to areas within the site boundary in locations immediately proximate to the site. There are no public views that would fall into this area, the remainder being either from adjacent private dwellings or the access from Daws Heath Road. Where the proposed development can be seen from these limited locations it will have a moderate degree of impact. However, beyond these limited locations, the proposed development will not have any material impact upon a viewer's perception of openness.
- 6.22 Overall, my view is that the impact on openness of the Green Belt would be limited.

## 7. PREDICTED EFFECTS ON THE PURPOSES OF THE GREEN BELT

7.1 The purposes of including land within the Green Belt are set out at paragraph 143 of the Framework:

*(a) to check the unrestricted sprawl of large built-up areas;*

*(b) to prevent neighbouring towns merging into one another;*

*(c) to assist in safeguarding the countryside from encroachment;*

*(d) to preserve the setting and special character of historic towns; and*

*(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

7.2 Purposes (c), (d) and (e) are not matters of dispute between us. I therefore focus on Purposes (a) and (b).

**Purpose (a) - to check the unrestricted sprawl of large built-up areas;**

7.3 Urban sprawl is typically considered to be development that is unplanned. This approach is typical of many Green Belt Reviews.

7.4 For example, in the Buckinghamshire Green Belt Review 2016<sup>13</sup> sprawl is considered to be: *"the outward spread of a large built-up area at its periphery in an untidy or irregular way"*. See Appendix 1.

7.5 Similarly, sprawl is defined at 3.19 of the Tandridge District Council Green Belt Assessment (December 2015), see Appendix 2, as:

*"the advancement of ad hoc, sporadic and unplanned development beyond the clear physical boundary of a developed settlement. If there is a clearly defined physical boundary line between the built form of the urban area and the countryside then this would suggest that any development has more than likely been planned and that the Green Belt has been effective in guiding and restricting it. If that line has been blurred by ad hoc infilling or patchy development and a clear boundary no longer exists that parcel may be less effective at restricting urban sprawl."*

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<sup>13</sup> The Buckinghamshire Authorities Buckinghamshire Green Belt Assessment Report: Methodology and Assessment of General Areas 7 March 2016 para 4.4.8

7.6 CPBC takes a similar approach at 5.24 of GBR1<sup>14</sup>:

*“Whether a parcel contains sprawl is therefore not so much an issue of whether it contains development but whether that development is a natural fit in the landscape and forms any logical pattern. The degree of permeability between the built-up area and the countryside is also an important consideration”, my underlining.*

7.7 6.23 of GBR2<sup>15</sup> notes that *“For development to constitute urban sprawl for the purposes of this Review, it must be linked to one of the defined built-up areas.”*

7.8 GBR1 notes at 5.25<sup>16</sup> in relation to Purpose (a) to check the unrestricted sprawl of large built-up areas, with my underlining, that:

*“It is noted that the purpose relates itself only to ‘large built-up areas’. It was previously stated that Castle Point do not have an adopted settlement hierarchy as its urban area is primarily comprised of the four large towns of Thundersley, South Benfleet, Hadleigh and Canvey Island. As such the definition of ‘large built-up areas’ is defined in the first instance as applying to these four towns within the Borough. Green Belt will also be positively assessed under this purpose if preventing urban sprawl into the Borough from large built-up areas in adjoining administrative areas.”*

7.9 It goes on to say at 5.27<sup>17</sup>:

*“With Daws Heath being the only distinctly urban settled area outside of the four main towns in the borough, it is considered appropriate to consider Daws Heath alongside the four main towns as being relevant to this Green Belt purpose...It is further noted that a Green Belt Review should take local context into account, and therefore it is considered that Daws Heath represents a ‘large built up area’ in the context of the administrative area.”*

7.10 I do not agree that Daws Heath is a large built up area.

7.11 Daws Heath is described as a small settlement at 8.11 of GBR1<sup>18</sup>.

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<sup>14</sup> CD 7.1 page 24 para 5.24

<sup>15</sup> CD 7.1 page 24 para 5.25

<sup>16</sup> CD 7.2 page 26 para 6.23

<sup>17</sup> CD 7.1 page 25 para 5.27

<sup>18</sup> CD 7.1 page 62 para 8.11

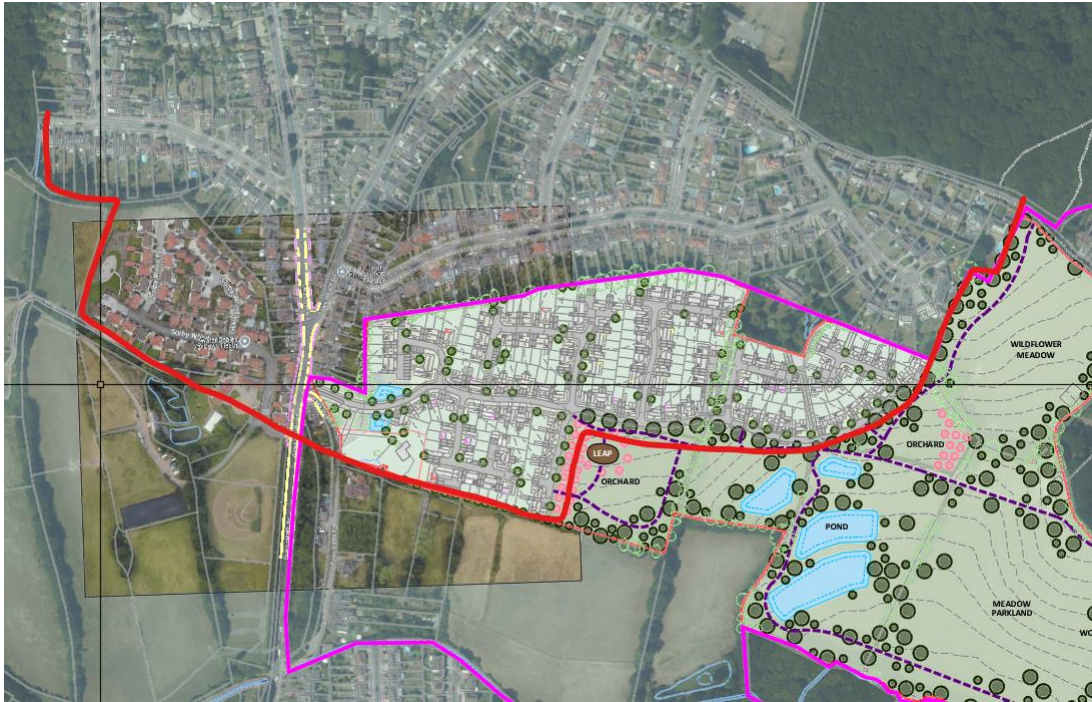
- 7.12 It is referred to as a village throughout the Issues and Options Consultation Document<sup>19</sup>. At page 10 it makes a clear distinction between the four main towns and Daws Heath “*Castle Point is formed of four towns: Canvey, Benfleet, Hadleigh and Thundersley, as well as the village of Daws Heath.*”
- 7.13 Correctly, it is not identified as possessing a town centre, in the plan of town centres at page 67 of the Issues and Options Consultation Document<sup>20</sup>.
- 7.14 Daws Heath is a small settlement, not a town, growing from modest beginnings, and still offering a limited range of services. To conclude that Daws Heath is a large built up area for the assessment of Purpose (a) is flawed.
- 7.15 GBR2 Addendum<sup>21</sup> assessed Proposed Housing Site Allocation HO14 under Purpose 1 in the first column of page 20. It noted that:
- “Land to the west of Daws Heath Road – known as the Solby Wood Farm site – has been developed, which has extended southward the settlement boundary and the southernmost boundary of the proposed site, Daws Heath Stables, broadly aligns with the southernmost development of that site. The field to the immediate south of the Stables is to remain within the Green Belt.”*
- 7.16 I agree that the southern extent of the Appeal site is broadly consistent with this newly expanded edge to the village.
- 7.17 The red line on the image below clearly shows that the Appeal site forms a logical, well defined expansion to the village. The developed area would be contiguous with the existing edge of the village, would retain the vast majority of existing vegetation and would be visually contained. It would be a natural fit in the landscape, defined to the north by the existing edge of the village, Daws Heath Road to the west, by existing hedges and tree lines to the east and by a hedge with occasional trees on the southern boundary of the Appeal site, forming a clearly defined boundary. The Appeal proposals form a logical pattern of development.

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<sup>19</sup> CD 7.21 page 10 first paragraph

<sup>20</sup> CD 7.21 page 67

<sup>21</sup> CD 7.3 page 20



*Figure 7.1 Aerial image and proposed development*

- 7.18 There is currently no public access into the wider site. The proposed development would create public access into the area, increasing permeability between the village and the countryside.
- 7.19 Daws Heath, by CPBC's own definition, is a village and not a large built up area.
- 7.20 If Daws Heath is anything less than a large built up area, CPBC's own definition of sprawl at 7.7 above is not met.
- 7.21 On this basis I do not believe that Purpose (a) is engaged.
- 7.22 Even if Purpose (a) were engaged, again informed by CPBC's own definition of, I do not consider that the proposed development would constitute sprawl as the development is a natural fit in the landscape and forms a logical pattern and increases permeability between the village and the countryside.
- 7.23 Rather than substantial harm to this purpose, I consider the proposed development to cause, at most, limited harm to the Green Belt with respect to Purpose (a).

**Purpose (b) - to prevent neighbouring towns merging into one another;**

7.24 GBR1 states at 5.32<sup>22</sup>, again with my underlining, that:

*“This purpose is defined in the NPPF as applying to towns only. It has previously been noted that Castle Point Borough do not operate a Settlement Hierarchy as the urban area is primarily comprised of Benfleet, Hadleigh, Thundersley and Canvey Island, and these are therefore all considered to fall under the definition of ‘towns’ for the purpose of this review.”*

7.25 The quotation of the PAS Guidance<sup>23</sup> at 5.33 of GBR1<sup>24</sup> “Green Belt is frequently said to maintain the separation of small settlements near to towns” is incomplete. The sentence finishes “*but this is not strictly what the purpose says.*” The remainder of the paragraph is correctly quoted at 5.35, but the omission of this wording is deliberate and misleading.

7.26 As discussed at 7.10 - 7.14 above, Daws Heath is referred to as a village throughout the Issues and Options Consultation Document<sup>25</sup>. It is not identified as a town.

7.27 To conclude that Daws Heath is a town for the assessment of Purpose b) is flawed.

7.28 The developed area of the Appeal site, outlined in yellow below, lies within Proposed Housing Allocation SH08<sup>26</sup>, outlined in red.

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<sup>22</sup> CD 7.1 page 27 para 5.32

<sup>23</sup> <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

<sup>24</sup> CD 7.1 page 27 para 5.33

<sup>25</sup> CD 7.21

<sup>26</sup> CD 7.3 page 67



Figure 7.2 Extract of GBR1 CD 7.1 page 86

7.29 It noted in the first column on page 69<sup>27</sup> that:

*"the land associated with Brook Farm jutting out from what otherwise would be a general rounding out of the south of Daws Heath, and forming a ribbon development along Daws Heath Road."*

7.30 The inference here is that if the land associated with Brook Farm were removed then the development would be seen as a “*general rounding off of the south of Daws Heath*”.

7.31 The assessment concludes at the second paragraph on page 70<sup>28</sup> that:

*“The proposed development site could be realigned along the unsurfaced road such that the land incorporating Brooks Farm is not included. This wouldn’t represent a significantly more robust boundary than what is currently proposed but would importantly omit most of the land in proximity to Daws Heath Road from potential development which would cause the merging of Hadleigh and Daws Heath.”*

7.32 It is clear from this that the omission of the land in proximity to Daws Heath Road is seen as fundamental to avoiding the merging of Hadleigh and Daws Heath. The proposed development does

<sup>27</sup> CD 7.2 page 69

<sup>28</sup> CD 7.2 page 70

not propose development in this area. It must therefore be concluded that by the Council's own assessment, the merging of the Hadleigh and Daws Heath would not occur as a result of the delivery of the developed part of the site.

7.33 The Addendum<sup>29</sup> notes at page 18 that:

*"The 2019 Assessment assessed a larger site than that proposed as allocation HO14 in the Pre-submission Local Plan 2019. The 2019 Assessment reviewed additional fields to the south of the site, this land was removed from allocation HO14.*

*The 2019 Assessment identified a 'very strong' degree of harm of towns merging together from the proposed boundary, the assessment found that the south-western fields would effectively lose the strategic gap between Daws Heath and Hadleigh, the review proposed that the development site could be realigned along the unsurfaced road such that the land incorporating Brooks Farm outbuildings is not included. It highlighted that this change would not represent a significantly more robust boundary than what is currently proposed but would importantly omit most of the land in proximity to Daws Heath Road from potential development which would cause the merging of Hadleigh and Daws Heath."*

7.34 This reinforces the conclusion reached in GBR2<sup>30</sup> and reflects the extent of the proposed developed area of the Appeal scheme.

7.35 Site Location Plan ref: 001.02 and the proposed new Proposals Map for the now withdrawn Local Plan<sup>31</sup> confirms that the appeal proposal has a similar extent to the developed area (red line) to the extent of the previous draft allocation (HO14). In considering the withdrawn Local Plan the Inspector's conclusions at paragraph 94 of their Report on the Examination of the New Castle Point Local Plan<sup>32</sup> concluded that the allocation of the site *"would cause some loss of openness to the Green Belt and would serve to reduce the strategic gap between Hadleigh and Daws Heath"*.

7.36 However, the Inspector added that *"a reasonable gap of open Green Belt land would be retained between the two settlements which would maintain a clear physical separation between them and ensure development of the proposed allocation would not lead to their coalescence."* My underlining.

7.37 The appeal proposals have been carefully evolved in line with the Inspector's conclusions and the requirements of the former draft allocation to ensure a high-quality development is realised for this

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<sup>29</sup> CD 7.3 page 18

<sup>30</sup> CD 7.2 page 70

<sup>31</sup> CD 6.2

<sup>32</sup> CD 6.4 para 94



site. This includes delivering a landscape strategy that comprises mature planting along the southern boundary of the site with the previous Local Plan Inspector (paragraph 94<sup>33</sup>) confirming that this boundary “*would be readily recognisable and likely to be permanent, preventing further encroachment into the countryside and the coalescence between Daws Heath and Hadleigh.*”

7.38 The Committee Report (paragraph 15.23<sup>34</sup>) states that:

*“In terms of the second purpose, whilst it is acknowledged that the area between Daws Heath and Hadleigh, of which the application site forms part, strongly performs the function of preventing the merging of those settlements, it is not considered that the release of the development site would unduly prejudice this objective. As with the development to the west at Solby Wood Farm, the development site is located immediately adjacent to the built up area and a substantial area of open land will be retained both within the site and beyond which will continue to perform the function of preventing the merging of the two settlements. It is not therefore considered that the proposal is significantly harmful in this regard.”*

7.39 GBR1<sup>35</sup> acknowledges that a substantial area of land with only a band of ribbon development along Daws Heath Road would remain between these settlements. It is important to note that such ribbon development already exists, and the proposals would not add to this presence.

7.40 The LVIA concludes that it is only from VP1 on Daws Heath Road that there would be opportunities for the proposed built development to be seen in the context of the ribbon development to the east of the road. From this viewpoint the site access and the first few properties would be visible at distance. There would be no perception of Daws Heath merging with the northern edge of Hadleigh.

7.41 In addition, the gap that already exists would be retained, and the two settlements would be no closer together than they currently are.

7.42 Even if Daws Heath were considered to be a town, which I do not, I agree with the comment in the Committee Report (paragraph 15.23<sup>36</sup>) that a substantial area of open land will be retained both within the site and beyond which will continue to perform the function of preventing the merging of the two settlements, causing limited harm, at most, to the Green Belt with respect to Purpose (b).

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<sup>33</sup> CD 6.4 para 94

<sup>34</sup> CD 3.2 page 18 para 15.23

<sup>35</sup> CD 7.1 page 40 para 6.7

<sup>36</sup> CD 3.2 page 18 para 15.23

**Purpose (c) - to assist in safeguarding the countryside from encroachment;**

7.43 It is accepted that there is common ground with the LPA and that the extent of harm to Purpose (c) is agreed to be limited. The following is provided for completeness.

7.44 With regard to Purpose (c) - to assist in safeguarding the countryside from encroachment, an important clarification is made at 5.44 of GBR1<sup>37</sup>, with my underlining:

*“Densely wooded areas are considered to be ‘open countryside’ as they are free from built development, and the role of the woodland from impeding lines of sight may aid the perception that one is in ‘open countryside’, should inappropriate development be screened from view.”*

7.45 The Committee Report<sup>38</sup> at Appendix 1 acknowledges that the site is largely bounded to the north and west by existing rear gardens. CPBC consider that the appeal site is still capable of being viewed as part of the wider area of undeveloped countryside to the east and south.

7.46 The presence of adjoining development in Daws Heath to the north and, to a lesser extent, Hadleigh to the south is clearly felt within the site, particularly in the developed area of the Appeal proposals. This lends the developed area of the site an urban fringe character, which erodes the perception of being in open countryside.

7.47 As described at Section 4 it is important to add that the appeal proposals have been carefully evolved in line with such Inspector conclusions and the requirements of the former draft allocation to ensure a high-quality development is realised for this site. This includes delivering a landscape strategy that comprises mature planting along the southern boundary of the site with the previous Local Plan Inspector (paragraph 94<sup>39</sup>) confirming that *“This would be readily recognisable and likely to be permanent, preventing further encroachment into the countryside and the coalescence between Daws Heath and Hadleigh.”*

7.48 The Committee Report<sup>40</sup> concludes at 15.24 that:

*“In terms of the third purpose of the Green Belt, development of the site would constitute a loss of countryside. However, the immediate surrounds are predominantly urban and semi-urban in appearance and this has a significant impact on the perception of the site being in countryside. In*

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<sup>37</sup> CD 7.1 page 31 para 5.44

<sup>38</sup> CD 3.2 page 82

<sup>39</sup> CD 6.4 para 94

<sup>40</sup> CD 3.2 page 18 para 15.24

*terms of the purposes of the Green Belt, the harm caused by the loss of this countryside is considered limited.*

7.49 I agree with this assessment, and it is a matter of Common Ground.

## 8. GREY BELT

8.1 Grey belt is defined in Annex 2: Glossary of the Framework as:

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

8.2 In the consideration of grey belt, the current contribution that the developed area of the site makes to Purposes (a) to check the unrestricted sprawl of large built-up areas, (b) to prevent neighbouring towns merging into one another and (d) to preserve the setting and special character of historic towns is of relevance.

8.3 Purposes (c) to assist in safeguarding the countryside from encroachment and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land are excluded.

8.4 GBR1 notes at 5.47<sup>41</sup>:

*“There are no towns in the borough which are considered to be historic in nature for the purposes of the application of this Green Belt Purpose. It is held that this purpose applies to a limited number of areas such as Oxford where the Green Belt specifically contributes to its historic significance. As such, this Purpose did not form part of this Review.”*

8.5 Consequently Purpose (d) is excluded from consideration in GBR1 and subsequent assessments, leaving only Purposes (a) and (b) to be considered here.

8.6 With regard to Purpose (a) I conclude at 7.19 above, and by CPBC’s own definition, that Daws Heath is a village and not a large built up area. The developed part of the site therefore makes, at most, a limited contribution to the Green Belt with respect to Purpose (a).

8.7 With regard to Purpose (b) the role of the developed part of the site in preventing coalescence of neighbouring towns is limited. Even if Daws Heath were considered to be a town, which I do not, I agree with the comment in the Committee Report (paragraph 15.23<sup>42</sup>) that the areas beyond the developed part of the site will be retained and will continue to perform the function of preventing the merging of the two settlements.

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<sup>41</sup> CD 7.1 page 33, para 5.47

<sup>42</sup> CD 3.2 page 18 para 15.23

- 8.8 In addition, the previous Local Plan Inspector noted<sup>43</sup> that *“a reasonable gap of open Green Belt land would be retained between the two settlements which would maintain a clear physical separation between them and ensure development of the proposed allocation would not lead to their coalescence.”* My underlining.
- 8.9 The developed part of the site therefore makes, at most, a limited contribution to the Green Belt with respect to Purpose (b).
- 8.10 It can therefore be concluded that the developed part of the site does not strongly contribute to either Purposes (a) or (b).
- 8.11 On this basis the developed area of the site can be considered to be grey belt.
- 8.12 With respect to paragraph 155a of the Framework, given the enclosed nature of the wider Appeal site and its lack of functional and visual connectivity with the wider landscape, the delivery of the developed part of the site would have no effect on the wider Green Belt locally. It would not *“fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan”*, namely the Castle Point Borough Council administrative area.
- 8.13 Paragraph 156c requires *“the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”*
- 8.14 As discussed at Section 4 above, the proposed development would deliver 12.5ha (66%) of the site as publicly accessible open space, where none currently exists. This provision of open space is far in excess of the 1.03ha of public open space required by CPBC<sup>44</sup> for 173 homes. The open spaces proposed incorporate a LEAP play space, drainage infrastructure, orchards and wildflower and meadow parkland.
- 8.15 This approach is wholly consistent with paragraph 159 of that Framework in that the scheme would *“contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan”*.

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<sup>43</sup> CD 6.4 para 94

<sup>44</sup> CD 4.1 page 190 Appendix 17 A17.2

## **9. REASON FOR REFUSAL**

9.1 I now turn to the Reason for Refusal. The key elements for discussion are underlined.

### **Reason for Refusal 1**

9.2 RfR1 reads:

**The proposal represents inappropriate development in the Green Belt as defined by the National Planning Policy Framework 2023. Such development will only be permitted if very special circumstances exist to justify its inappropriateness. It is not considered that any very special circumstances have been demonstrated which either in isolation or in combination carry sufficient weight to outweigh the harm to this part of the Green Belt. The proposed development is therefore contrary to Government advice as contained in the National Planning Policy Framework.**

9.3 It is agreed with CPBC that the differences between us lie in the extent of harm to the openness of the Green Belt and to Purposes (a) and (b).

9.4 I agree at 6.5 above that there would be harm to the spatial openness of the Green Belt.

9.5 As set out at 6.10 and following above, any reduction in visual openness would only be appreciated from the boundary of the settlement in the immediate environs of the site. This would be geographically limited but where it is experienced, there would be a limited degree of harm. Beyond this area there would be no material effect on visual openness.

9.6 As a result, my view is that the impact on openness of the Green Belt would be limited.

### **Purpose (a)**

9.7 As set out at 7.19 and following above, Daws Heath, by CPBC's own definition, is a village and not a large built up area.

9.8 If Daws Heath is anything less than a large built up area, CPBC's own definition of sprawl at 7.7 above is not met.

9.9 On this basis I do not believe that Purpose (a) is engaged.

9.10 Even if Purpose (a) were engaged, again informed by CPBC's own definition, I do not consider that the proposed development would constitute sprawl as the development is a natural fit in the

landscape and forms a logical pattern and increases permeability between the village and the countryside.

- 9.11 Rather than substantial harm to this purpose, I consider the proposed development to cause, at most, limited harm to the Green Belt with respect to Purpose (a).

**Purpose (b)**

- 9.12 As discussed above at 7.24 and following, even if Daws Heath were considered to be a town, which I do not, I agree with the comment in the Committee Report (paragraph 15.23<sup>45</sup>) that a substantial area of open land will be retained both within the site and beyond which will continue to perform the function of preventing the merging of the two settlements, causing limited harm, at most, to the Green Belt with respect to Purpose (b).
- 9.13 On this basis I conclude that there would be limited harm, at most, to the Green Belt arising from the proposed development.

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<sup>45</sup> CD 3.2 page 18 para 15.23

## 10. CONCLUSIONS

10.1 The site is situated in a small, enclosed pocket of farmland bounded by the urban areas of Hadleigh to the south, the village of Daws Heath to the north, the old route of Daws Heath Road which lies to the west, and woodland associated with Belfairs Nature Reserve to the south east.

10.2 Of the total site area of 18.91ha, only 6.4ha is proposed to be developed for residential use, with the remaining 12.5ha proposed to be given over to public open space.

### Openness

10.3 Any effect on spatial openness would only occur in the developed part of the site; the remainder of the site would remain open in perpetuity.

10.4 I consider that the effect on the openness of the development area of the site would be significant, but the effect on the openness of the site as a whole would be limited.

10.5 Any reduction in visual openness would only be appreciated from locations within the site and in the immediate environs of the site to the west around VP1 which are highly localised. Where the change is experienced, there would be harm to the visual openness of the Green Belt.

10.6 This would be geographically limited but where it is experienced, there would be a limited degree of harm. Beyond this area there would be no material effect on visual openness.

10.7 Overall, my view is that the impact on openness of the Green Belt would be limited.

### Purpose (a)

10.8 Daws Heath, by CPBC's own definition, is a village and not a large built up area.

10.9 If Daws Heath is anything less than a large built up area, CPBC's own definition of sprawl is not met.

10.10 On this basis I do not believe that Purpose (a) is engaged.

10.11 Even if Purpose (a) were engaged, again informed by CPBC's own definition of, I do not consider that the proposed development would constitute sprawl as the development is a natural fit in the landscape and forms a logical pattern and increases permeability between the village and the countryside.

10.12 Rather than substantial harm to this purpose, I consider the proposed development to cause, at most, limited harm to the Green Belt with respect to Purpose (a).



### **Purpose (b)**

- 10.13 Even if Daws Heath were considered to be a town, which I do not, I agree with the comment in the Committee Report (paragraph 15.23<sup>46</sup>) that a substantial area of open land will be retained both within the site and beyond which will continue to perform the function of preventing the merging of the two settlements, causing limited harm, at most, to the Green Belt with respect to Purpose (b).
- 10.14 On this basis I conclude that there would be limited harm, at most, to the Green Belt arising from the proposed development.

### **Purpose (c)**

- 10.15 It is accepted that there is common ground with the LPA that the extent of harm to Purpose (c) is agreed to be limited.

### **Grey Belt**

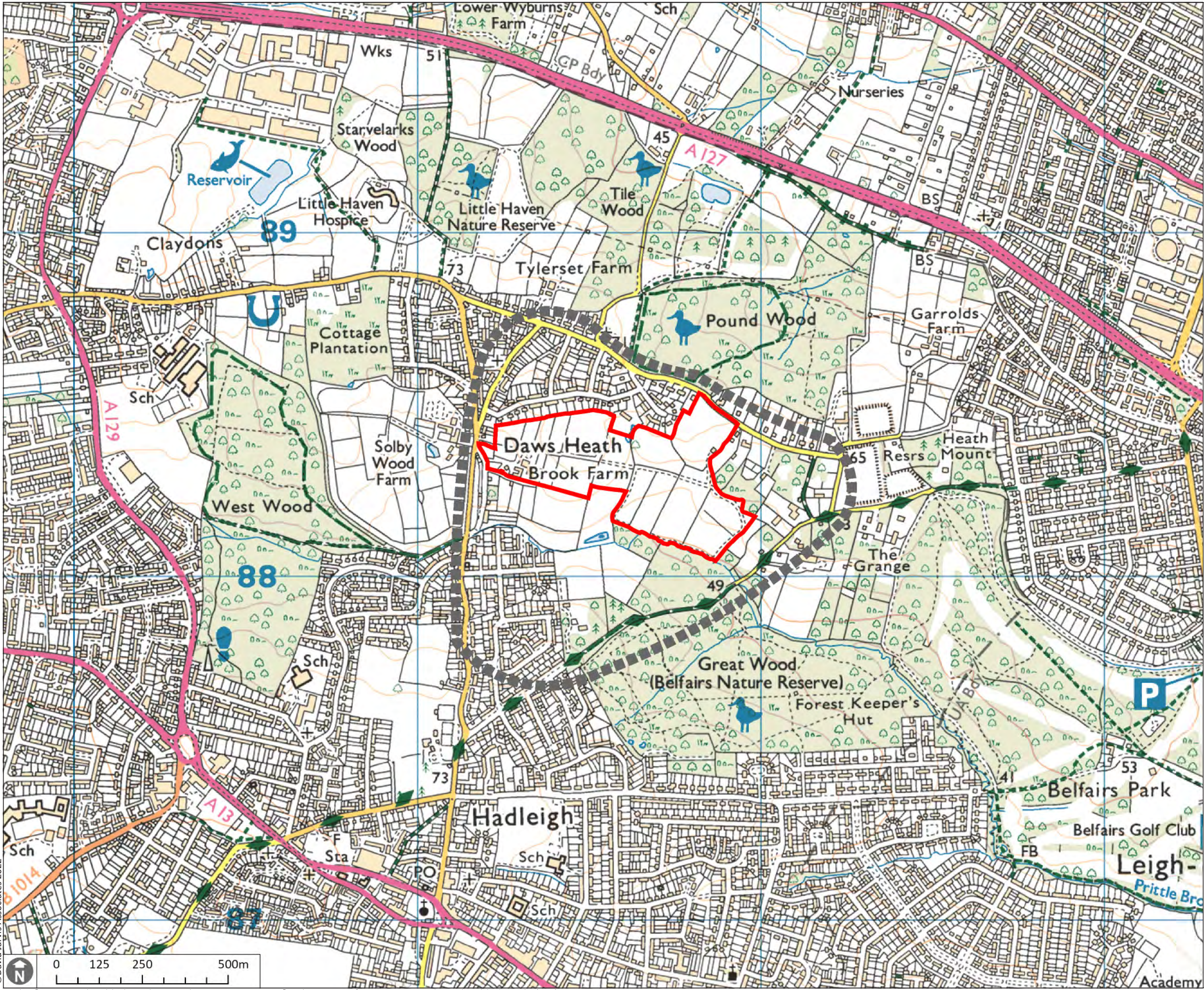
- 10.16 I conclude that the developed part of the site qualifies as grey belt and would meet the requirements of the “Golden Rules” as set out in paragraphs 155-159 of the Framework as they relate to landscape matters.

---

<sup>46</sup> CD 3.2 page 18 para 15.23

**LVIA FIGURES**





KEY

Boundary:  
Proposed Site

Boundary:  
Study Area

Status

PLANNING

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Client  
COUNTRYSIDE PARTNERSHIPS

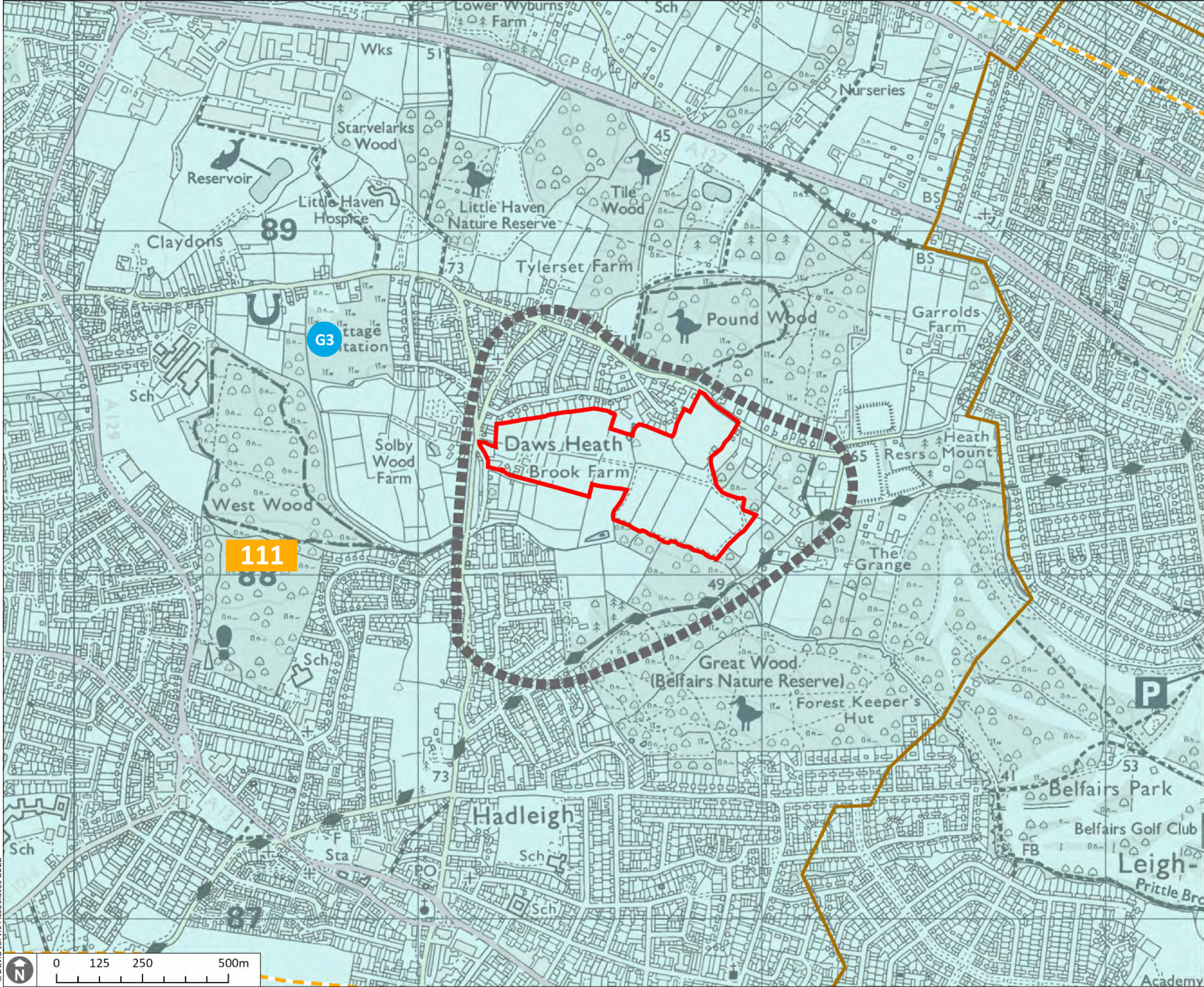
Project  
BROOK FARM, DAWS HEATH

Drawing Title  
SITE LOCATION

Scale 1:10,000	Sheet Size A3	Date May 2022
Client Ref. -	Drawing Ref. 3062-4-4-4	Drawing No. LV-0001
		Version S4-P1

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Boundary:  
Proposed Site

Boundary:  
Study Area

National Landscape Character

© Natural England 2022

81

National Character Area  
81: Greater Thames Estuary (NE473)  
111: Northern Thames Basin (NE466)

County Boundary

Landscape Character Types

(Source: Essex County LCT)

Urban Landscapes

Landscape Character Areas

(Source: Essex County LCA)

G3

South Essex Coastal Towns

Status

PLANNING

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Client

COUNTRYSIDE PARTNERSHIPS

Project

BROOK FARM, DAWS HEATH

Drawing Title

LANDSCAPE CHARACTER

Scale

1:10,000

Sheet Size

A3

Date

May 2022

Client Ref.

-

Drawing Ref.

3062-4-4-4

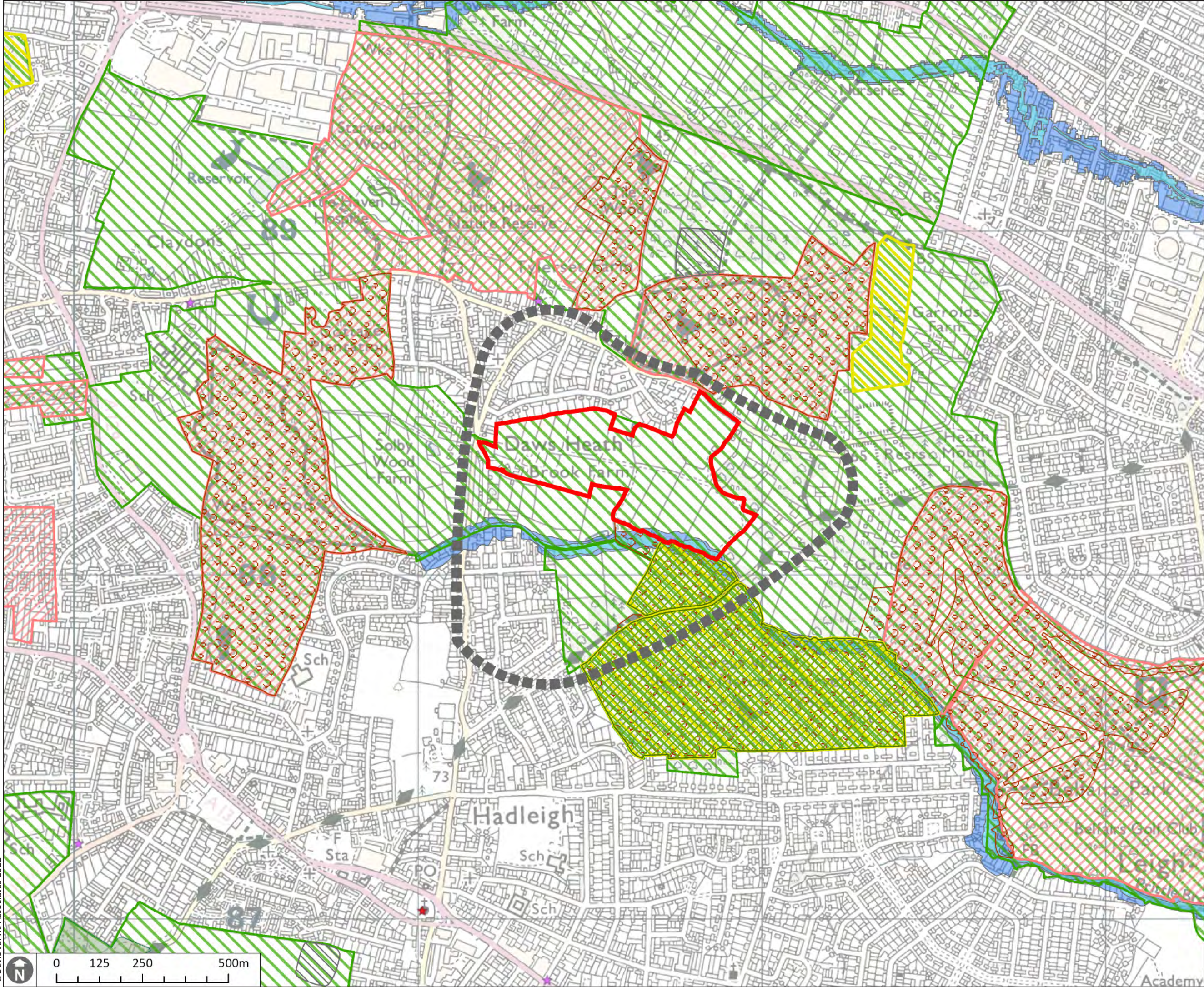
Drawing No.

LV-0002

Version

S4-P1





KEY

Boundary:  
Proposed Site

Boundary:  
Study Area

Landscape Designations  
© Historic England 2022

Listed Buildings

Grade I

Grade II

Scheduled Monument

Landscape Designations  
© Natural England 2022

Ancient & Semi-Natural Woodland

Sites of Special Scientific Interest

Local Nature Reserves

Country Parks

Green Belt Boundaries

Local Authority Designations  
(Source: Castle Point Borough Local Wildlife Sites Review 2012,  
prepared by Essex Ecology Services Ltd)

Local Wildlife Sites

Flood Zones  
© Environment Agency 2016

Flood Zone 2

Flood Zone 3

Status

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Client  
COUNTRYSIDE PARTNERSHIPS

Project  
BROOK FARM, DAWS HEATH

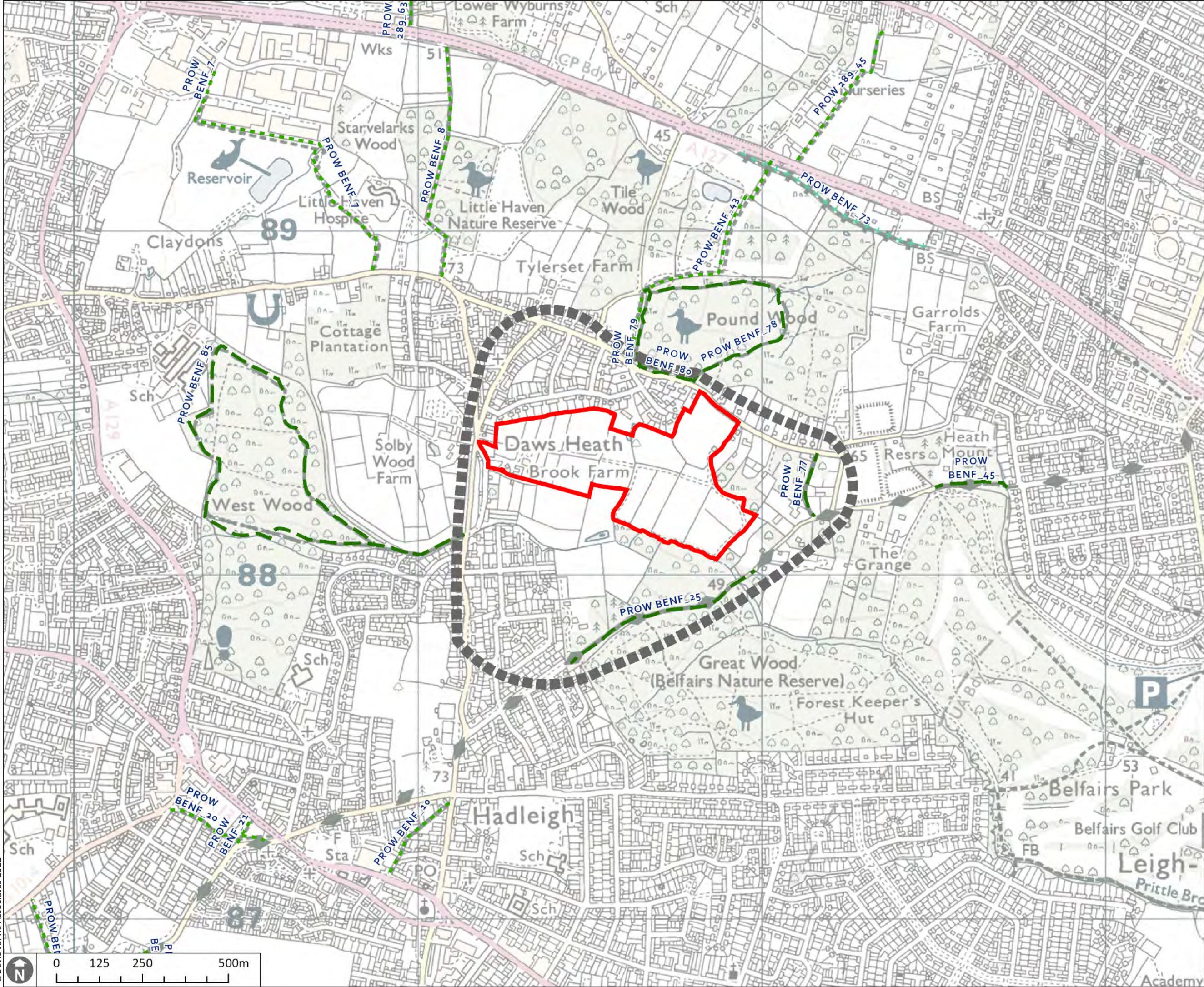
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Client Ref. -	Drawing Ref. 3062-4-4-4	Drawing No. LV-0003	Version S4-P1

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KEY

Boundary:  
Proposed Site

Boundary:  
Study Area

Public Rights of Way

Public Bridleway

Public Footpath

BOAT

Status

**PLANNING**

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Project

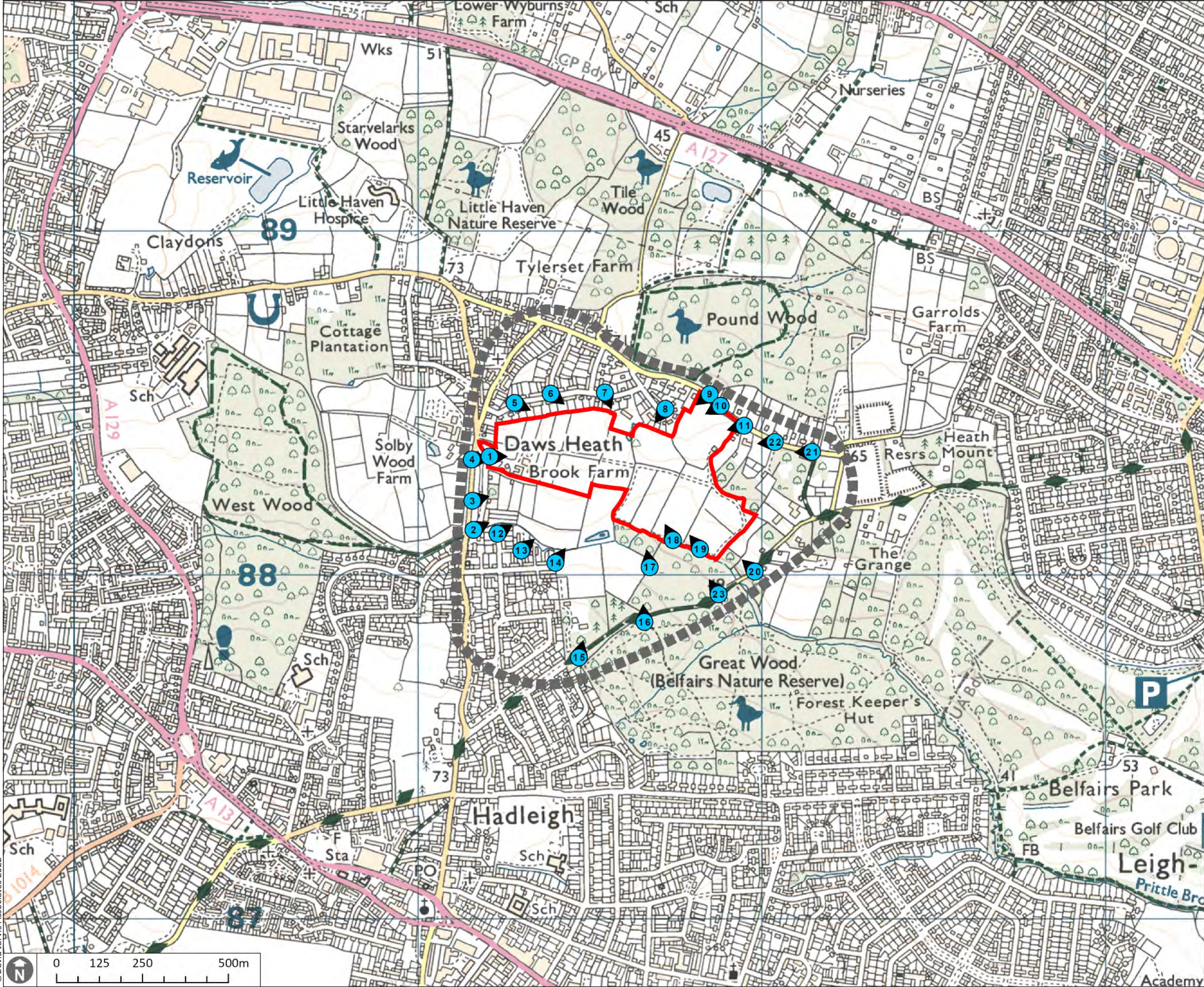
BROOK FARM, DAWS HEATH

Drawing Title

PUBLIC RIGHTS OF WAY (PROW)

Scale	Sheet Size	Date
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Client Ref.	Drawing Ref.	Drawing No.
-	3062-4-4-4	LV-0004
		Version
		S4-P1





KEY

Boundary:  
Proposed Site

Boundary:  
Study Area

Viewpoint Locations

1

Field Survey Viewpoint Location

Status

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Project  
BROOK FARM, DAWS HEATH

Drawing Title  
REPRESENTATIVE VIEWPOINT LOCATIONS

Scale  
1:10,000

Sheet Size  
A3

Date  
May 2022

Client Ref.  
-

Drawing Ref.  
3062-4-4-4

Drawing No.  
LV-0005

Version  
S4-P1





KEY

APPLICATION BOUNDARY

MEADOW GRASSLAND

POND

PARKLAND TREES

ORCHARD TREE

STREET TREE

FOOTPATH

EXISTING CONTOURS

LEAP

EXISTING VEGETATION

Drawing Revision					
Rev.	Date	Description	Drawn	Checked	
P3	31/05/2022	Trees added along southern boundary.	JB	PG	
P2	24/05/2022	Second draft.	JB	PG	
P1	11/05/2022	First draft issued to client.	MO	PG	

Status

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Client

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Project

BROOK FARM, DAWS HEATH

Drawing Title

LANDSCAPE AND OPEN SPACE STRATEGY

Scale	Sheet Size	Date Plotted	
1:1250	A1	24/12/2024	
Client Ref.	Drawing Ref.	Drawing No.	Version
-	3062-5-1	LV-0006	S3-P3

CONCEPT IMAGES





## **APPENDIX 1**

### **EXTRACT OF BUCKINGHAMSHIRE GREEN BELT REVIEW 2016**

The Buckinghamshire Authorities  
**Buckinghamshire Green Belt  
Assessment**

**Report: Methodology and  
Assessment of General Areas**

242378-4-05

Issue | 7 March 2016

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 242368-00

**Ove Arup & Partners Ltd**  
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**Figure 4.2: Criterion Scores**

Overall Strength of General Area against criterion	Score	Equivalent Wording
	0	Does Not Meet Purpose
	1	Meets Purpose Weakly
	2	Meets Purpose Relatively Weakly
	3	Meets Purpose
	4	Meets Purpose Relatively Strongly
	5	Meets Purpose Strongly

**4.4.6** The following sections examine the definition of each of the five purposes of the Green Belt in relation to local objectives and role of the Green Belt in terms of achieving its purpose locally; and set out the criteria and associated scoring applied. The criteria and scores were discussed and refined in collaboration with the Steering Group, as well as officers from neighbouring and partnering authorities following a workshop session on 1<sup>st</sup> April 2015.<sup>11</sup>

## Purpose 1 Assessment

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

**4.4.7** The original strategic purpose of the Metropolitan Green Belt was to check the sprawl of London. However, given only a relatively small part of Buckinghamshire is directly adjacent to Greater London, this assessment instead considered the role of General Areas in restricting the sprawl of large built-up areas within the four Buckinghamshire districts and within neighbouring local authorities. These were defined to correspond to the Tier 1 settlements identified in the respective Local Plans for each local authority, both within and outside Buckinghamshire, to ensure a robust and evidence-based approach to the assessment (see Map 4.4; Table 4.1)<sup>12</sup>.

**4.4.8** Although ‘sprawl’ is a multi-faceted concept and thus has a variety of different definitions, this Study has adopted a simple definition, considering sprawl as ‘*the outward spread of a large built-up area at its periphery in an untidy or irregular way*’. In order to appraise the extent to which the Green Belt keeps this in check, it is necessary to consider:

- Whether a General Area falls at the edge of one or more distinct large built-up areas;
- The degree to which the General Area is contained by built-form, and the nature of this containment, as well as the linkage to the wider Green Belt, as well as the extent to which the edge of the

<sup>11</sup> The following local authorities / stakeholders were represented at the workshop on 1<sup>st</sup> April 2015: Bracknell Forest Council; Central Bedfordshire Council; London Borough of Hillingdon; Milton Keynes Council; Oxfordshire County Council; Royal Borough of Windsor and Maidenhead; Slough Borough Council; Three Rivers District Council; Watford Borough Council; Buckinghamshire Thames Valley LEP.

<sup>12</sup> These were confirmed with officers from the respective neighbouring authorities at a workshop held on 1<sup>st</sup> April 2015.

## **APPENDIX 2**

### **EXTRACT OF TANDRIDGE DISTRICT COUNCIL GREEN BELT ASSESSMENT (DECEMBER 2015)**

# Tandridge Local Plan

## Green Belt Assessment

### Methodology



June 2015

## Contents

1.0	Introduction and Policy Context .....	3
2.0	The Green Belt over time.....	5
3.0	Methodology.....	8
	• Stage 1 – Defining the Assessment Area.....	10
	• Stage 2 – Assessment Process.....	13
4.0	Assessing villages and settlements in the Green Belt.....	17
5.0	Stage 3 – Conclusions.....	19
	Appendix 1 – Map of Assessment Parcels	

## **Stage 2 - Assessment process: How does each parcel perform against the purposes of the Green Belt?**

3.18 In order to determine how the Green Belt in Tandridge performs against the purposes set out in the NPPF the assessment process will be carried out as follows:

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

3.19 Urban sprawl can be defined as the advancement of ad hoc, sporadic and unplanned development beyond the clear physical boundary of a developed settlement. If there is a clearly defined physical boundary line between the built form of the urban area and the countryside then this would suggest that any development has more than likely been planned and that the Green Belt has been effective in guiding and restricting it. If that line has been blurred by ad hoc infilling or patchy development and a clear boundary no longer exists that parcel may be less effective at restricting urban sprawl.

3.20 This will be predominantly applicable where Green Belt land lies close to the periphery of the built environment within and adjacent to the District. Large built up areas for Tandridge are primarily defined as those which are inset from the Green Belt and would arguably apply to the main settlements of Oxted and Caterham etc. However, due to the dispersed nature of settlements throughout the District, a local application of this purpose is more appropriate and may also apply to those settlements with defined boundaries and those which have an identifiable built nature, such as Godstone, Bletchingley, Nutfield and Dormansland etc.

3.21 The following questions will be used to assist in the assessment process:

- What are the characteristics of development, if any? i.e. is the development which exists; planned, ad-hoc or sporadic?
  - Has this changed significantly since the Green Belt was first designated?
- Is any area of the parcel physically connected to a built up area/settlement?
- Is there a strong, defensible boundary between the existing built up area and the Green Belt, for example: main roads, built form, watercourses, etc.? Or is there another notable feature which is more effective in preventing urban sprawl i.e. a hilltop or ridgeline, or drainage ditch, etc.?

### **Purpose 2 - To prevent neighbouring towns / settlements merging into one another**

3.22 This purpose will apply where neighbouring towns or settlements could merge if the land between them did not remain in the Green Belt. This will also have consideration to the areas of Green Belt which sit between settlements within and outside of the District where applicable i.e. East Grinstead, New Addington and Biggin Hill etc. For the purpose of the GBA, the locations listed in Chapter 4 will be considered in the context of this purpose.

3.23 It is important to note that this purpose focusses on towns and settlements and does not make an allowance for sub-areas and neighbourhoods within the settlements, such as a cluster of roads, or a particular development. Sub-areas and locally recognised