



**Green Belt Review Part 2 Addendum**  
**Response to the Inspectors Initial questions**  
February 2021

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## Introduction

This assessment has been completed in response to the Castle Point Local Plan Inspectors initial questions to the Pre-submission Local Plan, received on 14<sup>th</sup> January 2021 ([INSP/02 – Further Questions](#)). The Inspector raised the following comments:

### Green Belt Review

*4. The National Planning Policy Framework (the Framework), in paragraph 136 states 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. The Castle Point Borough Green Belt Review - Part 2 Updated 2019 (GB-004) includes, amongst other things, individual site assessment proformas for the proposed housing allocations which would give rise to alterations to the boundary of the Green Belt.*

*5. It would appear that there are some inconsistencies between the boundaries of the sites assessed in the document and those shown on the submissions Policies Map. For example, Local Policy HO14 Land at Brook Farm, Hadleigh has been assessed in the Green Belt Review for a larger area which extends further south than that proposed to be allocated in the plan and shown on the Policies Map. It is possible for example, that an assessment for the site proposed in the plan, rather than that assessed, may score differently in respect of the Green Belt purpose to prevent towns merging into one another.*

*6. In terms of paragraph 136 of the Framework, it would be helpful if you could revisit GB-004 and update it as necessary so that the site assessments correlate with the proposed Green Belt boundary alterations.*

In response to these comments, this report updates specific sites in the *Green Belt Review – Part 2 Updated 2019 (GB-004)* ensuring the boundaries for strategic allocations as proposed in the *Pre-submission Local Plan 2019 (EXM-001)* and illustrated on the *Polices Map (EXM-002)* and their impact on the Green Belt have been fully assessed, taking the opportunity to include surrounding areas. This will be completed by comparing any of the differences between the boundaries and updating the previous assessment where necessary ensuring all changes to the Green Belt have been assessed.

# Proposed Housing Site Allocation - HO9

## Summary

There are three differences to the site boundary previously assessed in the Castle Point Borough *Green Belt Review - Part 2 Updated 2019 (GB-004)*, here on in known as the 2019 Assessment, and the proposed boundary of policy HO9 set out in the Pre-submission Local Plan 2019, these are:

- Removal of the allotments to the north east of the site from policy HO9
- Removal of the reservoir to the east of the site from policy HO9
- Minor amendments to the eastern boundary to exclude a dwelling and residential gardens from policy HO9

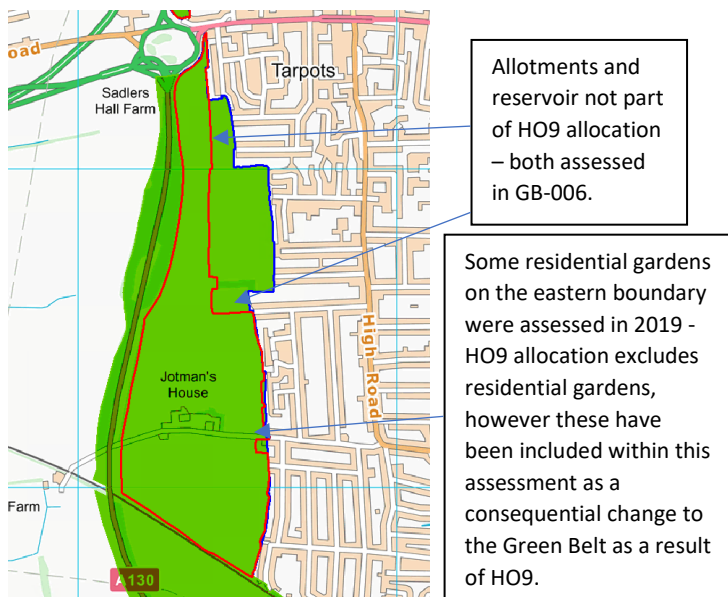
The three changes highlighted above from the 2019 Assessment to the allocated boundary of HO9 is a result of amendments of the boundary in line with the requirements set out in policy HO9. The allotments, reservoir and residential property and gardens stated above are intended to maintain their existing uses. Policy HO9 allocates homes, community uses, infrastructure and green spaces, all of which are achievable without the inclusion of these parcels of land.

The change in the boundary assessed in 2019 and that allocated as HO9 is unlikely to cause additional harm to the Green Belt, because the amendments have been made to the east of the site, between the proposed allocation HO9 and the existing urban area. Therefore, the loss of Green Belt land to the west as a result of allocation HO9 removes the contribution these areas of land make to the Green Belt, as they will be isolated from the wider Green Belt, these are therefore proposed to be removed from the Green Belt. Land to the east of HO9 has been assessed as an additional change to the Green Belt in *Proposed changes to the Green Belt in the Pre-submission Local Plan (GB-006)*.

## Updates to the 2019 Assessment

The red line boundary on the maps below is the boundary for allocation HO9 and the blue line represents the consequential change to the Green Belt as a result of the HO9 allocation, the annotations highlight the differences in boundaries from the 2019 Assessment. The 2019 Assessment has been updated through tracked changes below in light of the updated boundary.

### Context of HO9



### Aerial of HO9



## Description of Proposed Housing Site

The very northern portion of the proposed development site is covered by dense foliage with the rest of the site being predominantly open field separated by hedge rows. There is built development already within the parcel towards the south which takes the form of a collection of buildings primarily in agricultural use ~~as well as a reservoir~~. There is however an element of non-agricultural related commercial activity associated with the buildings predominantly in agricultural use.

Residential gardens back onto the site to the east, these are not allocated as part of allocation HO9, however would be a consequential change to the Green Belt as a result of its development.

## Relationship to Surrounding Area

The ~~northern, part of the eastern,~~ southern and western boundaries are adjacent to further Green Belt land. The northern part of the eastern boundary is currently Green Belt, and its release from the Green Belt is assessed in Proposed changes to the Green Belt in the Pre-submission Local Plan (GB-006).

The northern boundary of the parcel follows Sadlers Farm Roundabout, across from which is further fields. The eastern boundary of the development site follows the residential curtilage of properties, a reservoir and allotment gardens in South Benfleet, as well as a playing field until it meets the railway line which comprises the southern boundary. Beyond the railway line is further Green Belt land. The western boundary follows the administrative boundary of the borough, beyond which is further Green Belt land associated with the borough of Basildon.

## Performance of Relevant Parcel(s) under Part 1 Methodology

The proposed housing site is fully located within Parcel 10b. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 10b follows below:

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
The parcel is adjacent to curtilages associated with South Benfleet along the entirety of the eastern boundary. Although this boundary is not considered to be strong and robust, there has been no urban sprawl into the area.	The parcel represents a small proportion of the total strategic gap of approximately 550m between South Benfleet and North Benfleet. It is considered that there is no inter-visibility between South Benfleet and North Benfleet, with multiple lanes and slip roads of the A130 providing a robust barrier between the two urban areas.	The parcel primarily takes the form of pasture used as fields for horses. The only built development within the parcel is a collection of buildings primarily in agricultural use towards the south as well as a reservoir in the central portion. However, the parcel is a relatively narrow strip of land and is considered to be influenced by residential development to the east and the A130 to the west. The parcel is assessed as being cut

		off from the wider countryside by this peripheral development.
Degree of Contribution:  Very Strong	Degree of Contribution:  Minor	Degree of Contribution:  Minor

**Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?**

Parcel 10b is not considered to lie within a Locally Important Strategic Green Belt area as defined by Part 1 of the Castle Point Green Belt Review 2018.

**Degree of Harm of Releasing Whole Proposed Housing Site from the Green Belt**

<b>Purpose 1 – Check Unrestricted Sprawl</b>	<b>Purpose 2 – Prevent Towns from Merging</b>	<b>Purpose 3 – Safeguard Countryside</b>
The site is currently almost entirely free from built development. Future development would act as a westerly extension of South Benfleet and would be in keeping with the general settlement pattern, and allow for the Green Belt to be realigned with the A130 which would create a strong permanent boundary	The proposed development site represents a small proportion of the total strategic gap between South Benfleet and North Benfleet. It is considered that there is no inter-visibility between South Benfleet and North Benfleet, with multiple lanes and slip roads of the A130 providing a robust barrier between the two urban areas.	The site is currently almost entirely free from built development that is considered to be inappropriate development in the Green Belt. However, the area is cut off from the wider countryside by the A130 and its development would amount to the infilling of a relatively narrow strip of land inbetween South Benfleet and the A130.
Degree of Harm:  Minor	Degree of Harm:  Minor	Degree of Harm:  Minor

**Impact on Remaining Wider Green Belt**

Development of the proposed site would act to reduce the amount of Green Belt land between North Benfleet and South Benfleet but the A130 acts as a robust boundary feature which runs through the Green Belt in this area, and much of the development would be ‘away’ from North Benfleet. It is considered that the removal of this site from the Green Belt would not have a significant impact on the wider Green Belt system. The Green Belt boundary at this locality would be realigned away from residential curtilage to the more robust boundary feature of the A130.

**Potential Alternative Boundaries within the Proposed Housing Site**

The proposed development site primarily comprises of open field and foliage. The proposed development site is crossed by Jotmans Lane which could potentially act as a boundary but it is considered that the currently proposed boundaries of the A130 and railway line make for more appropriate robust boundaries that could act to define the Green Belt in the long term.

As a consequence of the allocation, four parcels of land – the Arthur Stevens Playing Field, the allotments, reservoir and the rear gardens of residential properties – will be isolated from the wider Green Belt by the new development and no longer serve a green belt function. Therefore, these parcels of land are also proposed to be removed from the Green Belt and retained in their existing uses.

#### **Options for the Mitigation of Harm on the Green Belt**

The introduction of landscaping and mature trees would help create the perception that this part of the A130 is cutting across a rural area but the full visual impact would be hard to mitigate due to the landform. Development would require a substantial belt of vegetation to be created or retained along the A130 to create a rural character on the approach to Canvey Island.

#### **Considering the Green Belt in the Longer Term**

The land comprising Parcel 10a to the north is a similar lateral strip that exists between the A130 and South Benfleet. Development of this site would constitute a similar westerly extension of South Benfleet that would be contained by the A130.

# Proposed Housing Site Allocation - HO10

## Summary

There are three main changes between the boundary in the 2019 Assessment and that allocated as HO10. The following differences are:

- Land to the north of the site is included within the allocation boundary of policy HO10.
- The north-western boundary in allocation HO10 differs to the 2019 Assessment by excluding existing houses and residential gardens.
- A residential property and garden in the south-western corner have been removed from the allocated boundary.

The land to the north of HO10 which is included in the proposed allocation boundary has been developed for 60 flats and a further 24 flats are under construction, these are made up of eight three-storey blocks. The 2019 Assessment stated that alignment of the Green Belt along Catherine Road would *'ensure the incorporation of the new housing development which not longer acts as Green Belt'* and ensure a more robust Green Belt boundary as well as identifying the A13 as a more defensible Green Belt boundary to the north.

Alterations to the western boundary in allocation HO10 to exclude residential properties represents a more accurate boundary for the development site HO10, as the residential properties are not proposed for redevelopment. However, as these parcels of land would be isolated from the Green Belt as a result of HO10 they are therefore included in the assessment and the degree of harm to the Green Belt.

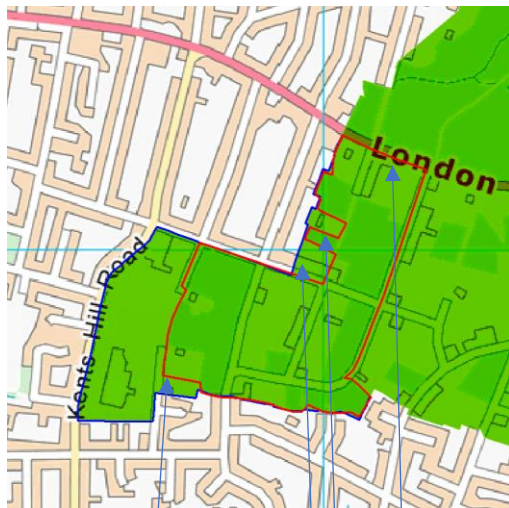
The 2019 Assessment suggests that the schools to the west would be isolated from the wider Green Belt and do not fulfil Green Belt purposes, removal of this site from the Green Belt has been assessed in *Proposed changes to the Green Belt in the Pre-submission Local Plan (GB-006)*.

## Updates to the 2019 Assessment

The red line boundary on the maps below is the development boundary for allocation HO10 and the blue line represents the consequential change to the Green Belt as a result of the HO10 allocation, the annotations highlight the differences in boundaries from the 2019 Assessment. The 2019 Assessment has been updated through tracked changes below in light of the updated boundary, this includes the residential properties that would be a consequential change to the Green Belt as a result of allocation HO10.



## Context of HO10



Dwellings and residential gardens on the western boundary were assessed in 2019 – the HO10 allocation excludes dwellings and gardens, however these are included in this assessment as a consequential change to the Green Belt as a result of development of HO10.

The northern parcel that has been built out or is being built out with three-storey flats and was not included in the 2019 assessment but is included within this assessment.

## Aerial of HO10



## Description of Proposed Housing Site

The proposed housing site is comprised of a mixture of woodland and residential development aligned with a number of local roads coming off London Road just to the north of the site. The north-east of the site along the frontage of the A13 is made up of three storey flats, to the west of that development a further set of three storey flats is under construction.

## Relationship to Surrounding Area

The northern, eastern and part of the western boundary are all adjacent to further land in the Green Belt. The current Green Belt to the west is proposed to be removed from the Green Belt as a consequence of allocation HO10 and has been assessed in *Proposed changes to the Green Belt in the Pre-submission Local Plan (GB-006)*.

The northern boundary is adjacent to housing and apartments that have recently been developed in the Green Belt the A13 with further Green Belt to the north of the road. The eastern boundary follows Catherine Road and a footpath, beyond which are further dwellings and tree rows, before following the curtilages of residential dwellings which makes up the southern boundary. The western boundary follows Felstead Road which is tree lined on both sides. Beyond this road lie two schools. The western boundary continues along Bowers Road before following the curtilages of properties associated with Downers Road. The majority of the site boundary is heavily tree lined which blocks views across much of the site.

### Performance of Relevant Parcel(s) under Part 1 Methodology

The proposed housing site is fully located within Parcel 3b. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 3b follows below:

<b>Purpose 1 – Check Unrestricted Sprawl</b>	<b>Purpose 2 – Prevent Towns from Merging</b>	<b>Purpose 3 – Safeguard Countryside</b>
The parcel contains urban sprawl from both Thundersley and South Benfleet. Sprawl is present along most of the northern boundary, with sporadic housing contained within much of the east and south of the parcel, and housing at greater densities associated with roads cutting through the northern and southern boundaries, particularly in the north eastern portion. As such the parcel lacks a strongly defined edge between the built up area and the parcel.	The parcel comprises of the entire gap between South Benfleet and Thundersley. The parcel already contains low density residential development across the entire parcel, with the density increasing in the north east. The wooded areas mean that there is limited visibility within the parcel and its development would lead to actual coalescence between these two urban areas.	The parcel contains a significant degree of residential development which, although sporadic, is present across the entirety of the parcel. Although areas are wooded, the overriding character of this parcel is semi-urban as there is no clear demarcation between the urban settlement and the parcel. Parts of the parcel help to form a corridor of countryside linking that to the north to the countryside to the south. This linkage is however fractured.
Degree of Contribution:  Moderate	Degree of Contribution:  Very Strong	Degree of Contribution:  Minor

### Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?

Parcel 3b lies within the Locally Important Strategic Green Belt area of the Central Corridor as defined by Part 1 of the Castle Point Green Belt Review 2018. These parcels of Green Belt serve to restrict the settlements of South Benfleet and Thundersley from merging and also create a connection between the northern Green Belt parcels within the borough to those in the south.

### Degree of Harm of Releasing Whole Proposed Housing Site from the Green Belt

<b>Purpose 1 – Check Unrestricted Sprawl</b>	<b>Purpose 2 – Prevent Towns from Merging</b>	<b>Purpose 3 – Safeguard Countryside</b>
The proposed development site lacks a strongly defined edge with the existing built-up area such that further	Removing this site from the Green Belt could potentially result in a continuation of the densities of development in	The proposed development site and the immediate surrounds are urban to semi-urban in appearance such that

<p>development would not be of a significant detriment to the character of this area. Although releasing this site from the Green Belt could result in residential development of higher densities, the footprint would be in keeping with the general settlement pattern and a new Green Belt boundary formed primarily along a local road. <u>Development to the north of the site has already occurred and therefore harm to the Green Belt has already taken place.</u></p>	<p>the north east and south, whilst also threatening the wooded areas which act to screen the development which already exists. However, other land forming part of the strategic gap between South Benfleet and Thundersley contains significant amounts of woodland which prevent inter-visibility between these towns. Whilst the strategic gap would nonetheless be reduced, it wouldn't be any narrower to that which exists along the frontage of Kiln Road.</p>	<p>this has a significant impact on the perception of the site being in the countryside. The proposed development site is not located in an area which would significantly impact on the countryside corridor between South Benfleet and Thundersley.</p>
<p>Degree of Harm: Minor</p>	<p>Degree of Harm: Minor</p>	<p>Degree of Harm: Minor</p>

### Impact on Remaining Wider Green Belt

Parcel 3b lies within the Locally Important Strategic Green Belt area of the Central Corridor as defined by Part 1 of the Castle Point Green Belt Review 2018. However, development of this site would not significantly impact on the strategic function of the wider Central Corridor as the width of the strategic gap which renders the parcels identified within the Central Corridor as performing a specific strategic function is already narrower across the majority of its extent. Development of the site would partly represent an infilling of land surrounded by development rather than placing more pressure on the corridor running between South Benfleet and Thundersley. Development of this site would also act to separate the Green Belt currently designated as school playing fields to the west from the wider Green Belt system. In terms of the re-alignment of the Green Belt boundary, a greater proportion of the boundary of Parcel 3b would be demarked by roads with a reduction demarked by residential curtilages.

### Potential Alternative Boundaries within the Proposed Housing Site

The parcel contains a number of internal roads which could be used to define an alternative boundary. This could include continuing a revised boundary along the remainder of Bowers Road which already acts to demark the extent of part of the Green Belt. Another option could be to reduce the east to west extent by re-aligning the boundary with Rhonda Road until it meets a footpath and eventually residential curtilages. However, these approaches are no more defensible than the one proposed by the allocation.

As a consequence of the allocation, Kents Hill Junior and Infants School, Holy Family Catholic Primary

School, residential properties and gardens to the west of the allocation will be isolated from the wider Green Belt and no longer serve a green belt function. Therefore, these parcels of land are also proposed to be removed from the Green Belt and retained in their existing uses.

### **Options for the Mitigation of Harm on the Green Belt**

The proposed housing site contains a significant number of mature trees, some of which could be retained and incorporated into sympathetic landscaping to ensure that development is well screened.

### **Considering the Green Belt in the Longer Term**

Much of the Green Belt in this locality is currently defined by residential curtilages. Development at this site would provide the opportunity to realign the Green Belt with the A13 and Catherine Road which would be a more defensible boundary and ensure the incorporation of the new housing development which no longer acts as Green Belt. ~~Consideration could also be given as to whether it would be appropriate to retain the schools to the west of the proposed site in the Green Belt as these would then be separated from the wider Green Belt.~~ Jarvis Road to the east of Catherine Road presents another realignment opportunity for the eastern boundary but this would act to further narrow the strategic gap between South Benfleet and Thundersley to the extent that the gap at this location would represent amongst the narrowest of gaps across the whole strategic area. As such, this proposed site does not offer a significant opportunity to consider a wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period of the emerging Local Plan.

# Proposed Housing Site Allocation - HO13

## Summary

The 2019 Assessment reviewed a larger area to be released from the Green Belt than that proposed in the Pre-submission Local Plan 2019 as a result of policy HO13. The previous assessment followed wider field boundaries and extended further east, including four dwellings in the south-eastern corner. The Pre-submission Local Plan omits these dwellings from allocation HO13 and follows field boundaries that create a triangular protrusion of the Green Belt into the site, adjacent to the lake on the eastern boundary. The alterations to the boundary are in light of landownership, land available for development and removing the local wildlife site from the development boundary, which lies to the east of the site.

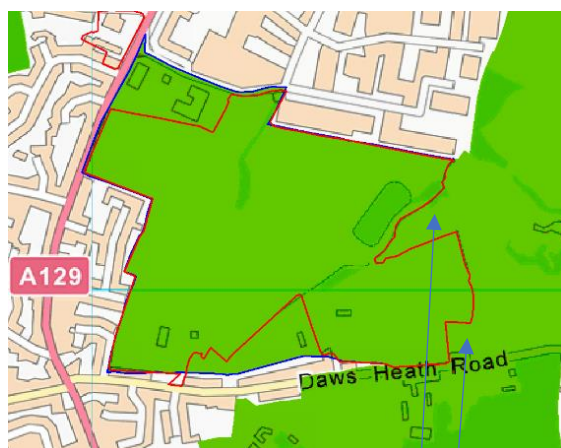
The updated boundary as per allocation HO13 provides a different eastern boundary, therefore an update to the previous assessment is essential to determine the harm to the Green Belt as a result of the change.

The 2019 Assessment recognised how the allocation would isolate further Green Belt to the west of the allocation, these parcels of land have been assessed in *Proposed changes to the Green Belt in the Pre-submission Local Plan (GB-006)*.

## Updates to the 2019 Assessment

The red line boundary on the maps below is the boundary for allocation HO13 and the blue line represents the consequential change to the Green Belt as a result of the HO13 allocation, these have been assessed in *Proposed changes to the Green Belt in the Pre-submission Local Plan (GB-006)*. The annotations highlight the differences in boundaries from the 2019 Assessment. The 2019 Assessment has been updated through tracked changes below in light of the updated allocation boundary.

**Context of HO13**



The eastern boundary in 2019 included the dwellings that front onto Daws Heath Road and included the triangular shaped field. HO13 excludes dwellings and the additional field.

**Aerial of HO13**



## Description of Proposed Housing Site

The proposed housing site is comprised of predominantly open field with internal field boundaries marked by hedgerows. The site contains a farm and an associated depot but is otherwise free of built development. The site also contains a reservoir and is crossed by tracks.

## Relationship to Surrounding Area

Part of the northern and southern boundary is adjacent to Green Belt land but if the site was developed this would result in isolated pockets of Green Belt detached from the wider system. The eastern boundary is entirely adjacent to Green Belt land and a local wildlife site.

To the immediate north of the area is a trading estate, a car showroom and a fire station. These developments are relatively well screened from the site by a tree line. The eastern boundary follows a path and a drain to the north, the boundary follows tree-lined fields, with countryside beyond ~~which is countryside, there are dwellings that lie adjacent to the boundary along Daws Heath Road to the south-east and this boundary is also tree lined. The southern eastern boundary follows Daws Heath Road, across from which are a small number of dwellings and open field, before wrapping around the curtilage of dwellings along the same road.~~ The western boundary ~~also~~ primarily follows residential curtilages and a small section of Rayleigh Road, across from which are dwellings. Parts of the southern boundary are also lined by trees whilst the western boundary is more open in nature.

## Performance of Relevant Parcel(s) under Part 1 Methodology

A significant majority of the proposed housing site is located within Parcel 4. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 4 follows below:

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>The Green Belt parcel is adjacent to New Thundersley, Daws Heath and Hadleigh. There is limited sprawl across the northern border and there is also ribbon development along the short stretch of Daws Heath Road which is in the Green Belt. However, outside of these examples, and despite the absence of permanent robust boundaries along much of the parcel, the parcel itself is free of built up development.</p>	<p>The parcel represents the full extent of the strategic gap between Thundersley to the west and Daws Heath to the east, as well as Daws Heath and Hadleigh, located to the south. These strategic gaps at their shortest extent are approximately 350m and 300m respectively, meaning that significant development would act to notably decrease the remaining gap between these urban areas.</p>	<p>The main land use in the parcel is agriculture. The industrial estate on the northern edge is reasonably well screened and set below the high ground in views from the south. The overall perception of this parcel is of agricultural land and woods.</p> <p>The parcel is considered large enough that it is not specifically influenced by its boundary features which take the form of development uncharacteristic to the countryside. The parcel also</p>

		links to wider countryside to the north and south west.
Degree of Contribution: Very Strong	Degree of Contribution: Very Strong	Degree of Contribution: Very Strong

A small proportion of the proposed housing site is located within Parcel 5. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 5 follows below:

<b>Purpose 1 – Check Unrestricted Sprawl</b>	<b>Purpose 2 – Prevent Towns from Merging</b>	<b>Purpose 3 – Safeguard Countryside</b>
The parcel is adjacent to a trading estate to the north east and Daws Heath to the south. It is also adjacent to development within Rayleigh across the A127. There has been no development in the parcel which amounts to sprawl from an existing large built up area.	Parcel 5 forms the entirety of the strategic gap between Thundersley and Daws Heath, and Rayleigh and Daws Heath. It also forms approximately 600m of the total 750m gap between Daws Heath and the urban settlement of Eastwood, Leigh-on-Sea.  There are no features which would block inter-visibility outside of the parcel and as such its contribution to this purpose is assessed as very strong.	There is extremely minimal built development in the parcel. Other than for a children’s hospice in the south west of the parcel and a place of worship, all other development is associated with the farms that are located in the north and south. The topography is gently rolling with a substantial area of woodland cover and more open fields. As such the parcel displays a distinctly rural character, and is of such a size as to not be influenced by periphery developments which are uncharacteristic of the countryside.
Degree of Contribution: Very Strong	Degree of Contribution: Very Strong	Degree of Contribution: Very Strong

**Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?**

Parcel 4 and Parcel 5 sit within the Locally Important Strategic Green Belt area of the Daws Heath Ring as defined by Part 1 of the Castle Point Green Belt Review 2018. This Green Belt area encircles the settlement of Daws Heath and has been effective in preventing urban sprawl and therefore preventing the settlement from merging with the surrounding settlements of Hadleigh, Thundersley, Rayleigh and Eastwood. The Green Belt area also has an important function of preventing urban

coalescence between these settlements more generally.

### Degree of Harm of Releasing Whole Proposed Housing Site from the Green Belt

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>The proposed development site is free from existing urban development. Future urban development would display a relationship with the general settlement pattern as the site is directly adjacent to built development to the north, south and west. It would act to propagate the ribbon development along Daws Heath Road further eastwards but also infill all land inbetween this lateral extension and the industrial estate to the north. Development would not however result in the realignment of Green Belt with an existing boundary feature.</p>	<p>The proposed site currently forms a significant part of the existing gap between Thundersley and Daws Heath. Development would act to reduce the gap between the two settlements, bringing a greater extent of Thundersley in closer proximity to Daws Heath whilst also narrowing the gap which exists between the two settlements along Daws Heath Road which is currently its narrowest point. In this area, the strategic gap would be reduced by approximately two thirds. The perception of merge would therefore be significantly increased.</p>	<p>The proposed development site is currently free of built development considered inappropriate in the Green Belt. Although there is build development around much of the periphery of the site, this is not assessed as being sufficient to compromise the rural integrity of the site as a whole due to its size.</p>
<p>Degree of Harm: Moderate</p>	<p>Degree of Harm: Very Strong</p>	<p>Degree of Harm: Strong</p>

### Impact on Remaining Wider Green Belt

Development of the proposed site would not have a significant negative impact on the robustness of Green Belt boundaries as it would act to realign a boundary that is already currently formed of residential curtilages with what would be a different set of residential curtilage.

Its development would act to cut off the small parcel of Green Belt land which is currently developed as a fire station and car show room from the wider Green Belt. This is not considered to have a significant impact on the purposes of the Green Belt as the land is already developed with inappropriate uses and of limited strategic importance. This along with residential gardens that are currently Green Belt to the east of the site are proposed to be removed from the Green Belt and are considered in Proposed changes to the Green Belt in the Pre-submission Local Plan (GB-006).

There is ~~however~~ a significantly negative impact in relation to the merging of urban settlements as



the strategic gap between Thundersley and Daws Heath will be significantly reduced in general, as well as narrow by approximately two thirds at the point where it is currently the narrowest. Development would act to exacerbate the perception of coalescence of the urban settlements in this area and reduce the contribution the Green Belt makes to the identified locally strategic priority of preventing the urban coalescence of Thundersley, Daws Heath and Hadleigh.

### **Potential Alternative Boundaries within the Proposed Housing Site**

The proposed development site largely comprises ~~of~~ open fields. Due to the irregular shape of the proposed eastern boundary, the alignment of the eastern boundary in the 2019 Assessment follows a more clearly defined tree-lined field boundary, as well as a more logical edge to the Green Belt, this therefore has the potential to provide a more robust Green Belt boundary than that proposed of allocation HO13.- The updated boundary of allocation HO13, however does follow the triangular shaped field to exclude a local wildlife site, as it is less suitable for development than the wider allocation, this parcel of land is also less accessible than the wider allocation reducing its suitability. and therefore there are no alternative boundaries that would act to more robustly define the boundary between the Green Belt and the development site. Nonetheless, should

If this site should be considered for release from the Green Belt, opportunities should be explored in terms of the configuration of the site in order to limit the propagation of ribbon development along Daws Heath Road.

### **Options for the Mitigation of Harm on the Green Belt**

The development site is currently open countryside and has particular significance to the Green Belt purpose of preventing urban coalescence and so therefore any development would need to be well screened.

### **Considering the Green Belt in the Longer Term**

Development of the proposed site would give rise to the need to consider the merit of keeping the land developed as a fire station and car show room in the Green Belt as this would be cut off from the wider Green Belt system and in any event no longer functions as Green Belt land. The impact to this parcel of land and rear residential gardens have been assessed in *Proposed changes to the Green Belt in the Pre-submission Local Plan (GB-006)*. These parcels of land are proposed to be removed from the Green Belt and retained in their existing uses as a consequence of allocation HO13.

Any further Green Belt realignment would have to consider extending into a local wildlife site to the east and woodland further south into Parcel 4 but this would further weaken the integrity of the Daws Heath Ring and act to exacerbate the perception of urban coalescence in this wider area. As such, this proposed site does not offer a significant opportunity to consider a wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period of the emerging Local Plan.

# Proposed Housing Site Allocation HO14

## Summary

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.

As a result of the 2019 Assessment, the southern fields were removed from allocation, in order to allow for suitable access, the realignment of the boundary to site HO14 included access from Daws Heath Road and around the Brook Farm field boundary.

## Updates to the 2019 Assessment

The red line boundary on the maps below is the boundary for allocation HO14, the annotations highlight the differences in boundaries from the 2019 Assessment. The 2019 Assessment has been updated through tracked changes below in light of the updated boundary.

**Context of HO14**



The 2019 Assessment included an additional field to the south of allocation HO14, this has been excluded from the allocation.

**Aerial of HO14**



## Description of Proposed Housing Site

The proposed housing site is comprised of open field with internal field boundaries marked by hedgerows and the Brook Farm buildings and associated hard standing complex in the south west.

## Relationship to Surrounding Area

The eastern, southern and part of the western boundary is adjacent to Green Belt.

The northern boundary follows the curtilages of dwellings associated with Fairmead Avenue in Daws Heath which is tree lined. The eastern boundary cuts through a hedge bound field. Part of the southern boundary follows an unsurfaced road, which has little boundary treatment, and beyond which continue fields. The southern boundary then wraps around Brook Farm Stables [buildings complex, but not the open field to the south](#) such that it is incorporated into the parcel and then runs adjacent to the curtilage of properties along Daws Heath Road. The western boundary continues following residential curtilages associated with dwellings on Daws Heath Road. This boundary has some screening provided by foliage but this is sporadic.

### Performance of Relevant Parcel(s) under Part 1 Methodology

The proposed housing site is fully located within Parcel 8. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 8 follows below:

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>The parcel is adjacent to Daws Heath at the northern boundary, Eastwood, Leigh-on-Sea to the east and Hadleigh to the south west.</p> <p>Although sprawl has occurred within the parcel in the form of ribbon development, the degree of sprawl compared to the size of the parcel, and its proximity to three separate urban settlements means that it is assessed as strongly contributing to checking unrestricted sprawl.</p>	<p>The parcel is adjacent to Daws Heath, Eastwood, Leigh-on-Sea, and Hadleigh and as such its development would lead to the physical merging of these three settlements.</p> <p><a href="#">Land to the west of Daws Heath Road – known as the Solby Wood Farm site – has recently been developed, which has extended southward the settlement boundary.</a></p>	<p>Other than for limited ribbon development, the parcel comprises of a number of farms and associated dwellings along with agricultural fields. The landscape is compartmentalised and also well screened by trees and hedges. The parcel adjoins significant expanses of countryside to the north and south but there is however residential development located along much of the boundaries in the eastern and western portion of the site. These influence the perception of the parcel being in open countryside, which is compounded by the ribbon developments in the centre.</p>
<p>Degree of Contribution: Strong</p>	<p>Degree of Contribution: Very Strong</p>	<p>Degree of Contribution: Moderate</p>

**Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?**

Parcel 8 lies within the Locally Important Strategic Green Belt area of the Daws Heath Ring as defined by Part 1 of the Castle Point Green Belt Review 2018. This Green Belt area encircles the settlement of Daws Heath and has been effective in preventing urban sprawl and therefore preventing the settlement from merging with the surrounding settlements of Hadleigh, Thundersley, Rayleigh and Eastwood. The Green Belt area also has an important function of preventing urban coalescence between these settlements more generally.

### Degree of Harm of Releasing Whole Proposed Housing Site from the Green Belt

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>Releasing this site would realign a Green Belt boundary that currently takes the form of residential curtilages with an unsurfaced road in the most part, but which also brings the boundary across the unsurfaced road meaning much of the south western boundary would be aligned against residential curtilage. The proposed site is free of development considered inappropriate in the Green Belt and would act as a southerly extension of Daws Heath. <u>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. However, this extension as a whole would not be well related to the existing settlement pattern, with the land associated with</u></p>	<p>Given the existing development within the Green Belt along Daws Heath Road, development of the proposed site would <del>reduce likely constitute a loss of</del> the current strategic gap between Hadleigh and Daws Heath. <del>along Daws Heath Road to the point where the general perception would be that these urban settlements had merged.</del></p> <p>In the wider context of the proposed development site, development would act to reduce the existing strategic gap between Hadleigh and Daws Heath, with boundaries or features which prevent inter-visibility between the two urban settlements being weak or non-existent in the land which would form the remainder of the strategic gap.</p> <p><u>Land to the west of Daws Heath Road – known as the Solby Wood Farm site – has recently been developed, which has extended southward the settlement boundary.</u></p>	<p>The proposed development site is currently free of built development considered inappropriate in the Green Belt and its development would therefore constitute a loss of countryside. However the immediate surrounds are predominantly urban to semi-urban in appearance and this has a significant impact on the perception of the site being in countryside.</p>

<del>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.</del>		
Degree of Harm: <del>Very</del> Strong	Degree of Harm: <del>Very</del> Strong	Degree of Harm: Minor

### Impact on Remaining Wider Green Belt

Development of the proposed site would not have a significant negative impact on the robustness of Green Belt boundaries as it would primarily act to realign the majority of a boundary that is currently formed of residential curtilages with new residential curtilage and an unsurfaced road.

There would however be a ~~very~~ strong degree of harm in relation to the merging of urban settlements as the area of Green Belt land between Daws Heath and Hadleigh will be reduced in extent, particularly in the south west where the strategic gap will be ~~reduced~~ effectively lost. Development would therefore act to ~~exacerbate~~ increase the perception ~~and reality~~ of coalescence of the urban settlements in this area and reduce the contribution this part of the Green Belt makes to the identified locally strategic priority of preventing the urban coalescence of Thundersley, Daws Heath and Hadleigh. ~~The southern part of the Daws Heath Ring would be all but severed along Daws Heath Road.~~

### Potential Alternative Boundaries within the Proposed Housing Site

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.

### Options for the Mitigation of Harm on the Green Belt

Development within this site will be required to be well screened along the southern edge such that it doesn't significantly contribute to the perception of Daws Heath merging with Hadleigh. The proposal includes the creation of new publicly accessible open space on fields to the South of the development site. This accords with paragraph 141 of the NPPF which states that 'local planning authorities should plan positively to enhance for their [Green Belt] beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity...'

### Considering the Green Belt in the Longer Term

Development of this site would give rise to the need to consider the realignment of the Green Belt

boundary further to the east such that it fully incorporates the field which the current boundary cuts through. There are no other boundaries in this area which offer the potential to form an alternative, robust Green Belt boundary to that which would result through development of this site. As such, this proposed site does not offer a significant opportunity to consider a wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period.

# Proposed Housing Site allocation – HO16

## Summary

The 2019 Assessment and allocated boundary of HO16 remained the same, however the isolated parcel of land to the west was not assessed. This review takes the opportunity to assess this additional parcel of land as development of HO16 would result in it being isolated from the wider Green Belt and no longer serve a Green Belt function. Therefore, this parcel of land is also proposed to be removed from the Green Belt and retain its existing uses.

## Updates to the 2019 Assessment

The red line boundary on the maps below is the boundary for allocation HO16, the blue line represents the consequential changes to the Green Belt as a result of allocation HO16. The annotation highlights this below. The 2019 Assessment has been updated through tracked changes below in light of the updated boundary.

### Context of HO16



Consequential change to the Green Belt was not assessed in 2019, this is included within this assessment.

### Aerial of HO16



## Description of Proposed Housing Site

The proposed site takes the form of ~~two~~four tree bound fields two larger fields to the east and two small fields to the west which contain farm buildings. within which sits Oak Tree Farm ~~which~~ comprises ~~of~~ a small number of buildings scattered along the south west border.

## Relationship to Surrounding Area

The northern, eastern, southern and part of the western border is adjacent to Green Belt.

The northern boundary follows a tree belt across from which is further field. The eastern boundary follows another tree line beyond which is further field. The southern boundary is heavily wooded and follows Poors Lane. The western boundary follows residential curtilage ~~and also wraps around a~~

~~farmhouse and its curtilage~~. Those areas adjacent to residential curtilage are also tree lined.

### Performance of Relevant Parcel(s) under Part 1 Methodology

The proposed housing site is fully located within Parcel 8. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 8 follows below:

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>The parcel is adjacent to Daws Heath at the northern boundary, Eastwood, Leigh-on-Sea to the east and Hadleigh to the south west.</p> <p>Although sprawl has occurred within the parcel in the form of ribbon development, the degree of sprawl compared to the size of the parcel, and its proximity to three separate urban settlements means that it is assessed as strongly contributing to checking unrestricted sprawl.</p>	<p>The parcel is adjacent to Daws Heath, Eastwood, Leigh-on-Sea, and Hadleigh and as such its development would lead to the physical merging of these three settlements.</p>	<p>Other than for limited ribbon development, the parcel comprises of a number of farms and associated dwellings along with agricultural fields. The landscape is compartmentalised and also well screened by trees and hedges. The parcel adjoins significant expanses of countryside to the north and south but there is however residential development located along much of the boundaries in the eastern and western portion of the site. These influence the perception of the parcel being in open countryside, which is compounded by the ribbon developments in the centre.</p>
<p>Degree of Contribution: Strong</p>	<p>Degree of Contribution: Very Strong</p>	<p>Degree of Contribution: Moderate</p>

### Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?

Parcel 8 lies within the Locally Important Strategic Green Belt area of the Daws Heath Ring as defined by Part 1 of the Castle Point Green Belt Review 2018. This Green Belt area encircles the settlement of Daws Heath and has been effective in preventing urban sprawl and therefore preventing the settlement from merging with the surrounding settlements of Hadleigh, Thundersley, Rayleigh and Eastwood. The Green Belt area also has an important function of preventing urban coalescence between these settlements more generally.

### Degree of Harm of Releasing Whole Proposed Housing Site from the Green Belt



Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>The proposed development site is adjacent to Hadleigh and currently contains no development considered inappropriate in the Green Belt. Its release for development would constitute an easterly extension of the urban area out into the countryside, rather than a more general rounding off of the urban edge, and will not result in the Green Belt boundary being aligned to an existing robust feature. Any realignment would be from existing curtilage to new curtilage.</p>	<p>The direction of the extension would not be towards Daws Heath which is the closest settlement to Hadleigh at the point where this proposed development site lies.</p> <p>Development would reduce the gap between Hadleigh and the ribbon development inbetween Daws Heath and Leigh-on-Sea but this ribbon development is not considered to be a ‘town’ with regard to this purpose. Nonetheless, the proposed site forms a small part of the existing gap between Hadleigh and Leigh-on-Sea although there is no inter-visibility which would lead to the perception of merge.</p>	<p>The proposed development site is currently <u>mostly</u> free of built development <u>and</u> considered inappropriate in the Green Belt, and development would be extended out into rural countryside where no boundary feature exists to contain such development.</p>
<p>Degree of Harm:  Strong</p>	<p>Degree of Harm:  Minor</p>	<p>Degree of Harm:  Strong</p>

### Impact on Remaining Wider Green Belt

Development of the proposed site would not have a significant negative impact on the robustness of Green Belt boundaries as it would act to realign a Green Belt boundary that currently takes the form of residential curtilage with new curtilage that would be developed as part of the release of this site. Other boundaries will continue to follow the field boundary and lane which they currently follow before taking the form of the new residential curtilage.

Parcel 8, within which this proposed development site lies, is part of the Locally Important Strategic Green Belt area of the Daws Heath Ring. Release of sites in this part of the Green Belt will reduce the extent of the rural break that currently exists between the settlements of Hadleigh, Daws Heath and Leigh-on-Sea, contributing to the general perception of urban coalescence. The width of Green Belt between Hadleigh and Daws Heath would not however be specifically reduced through the release of the proposed site, and there would still be a significant rural break between Hadleigh and Leigh-on-Sea. The intervening Green Belt between Hadleigh and the ribbon development along Bramble Road would however be materially reduced, although this intervening land contains features which

ensure there is no inter-visibility between settlements.

### **Potential Alternative Boundaries within the Proposed Housing Site**

The only boundary feature within the proposed development site is a field boundary which isn't considered a permanent feature for the purposes of realigning the Green Belt. The orientation of the proposed development site in the context of the general settlement pattern means that no alternative configuration would be more defensible.

### **Options for the Mitigation of Harm on the Green Belt**

The well-developed screening along the northern, eastern and southern edge should be retained but otherwise development would act as an extension of the existing urban area.

### **Considering the Green Belt in the Longer Term**

The wider available land in this area is comprised of open field with hedged or tree lined boundaries. As such there are no robust boundaries that could be used to realign the Green Belt as part of a larger strategic release. Further development in this wider area would also directly impact on the strategic function of the Daws Heath Ring and act to propagate the perception and reality of the merge between the three settlements of Hadleigh, Daws Heath and the ribbon development between Daws Heath and Leigh-on-Sea.

## Proposed Housing Site allocation HO18

### Summary

There are four main differences between the 2019 Assessment of this site and the proposed allocation HO18. The differences are as follows:

- The previously assessed boundary follows along the residential curtilages of properties that front onto Grasmere Road, whereas the proposed allocation aligns the Green Belt boundary with Grasmere Road.
- The northern boundary in the 2019 Assessment follows Grandview Road, whereas allocation HO18 excludes this northern parcel of land and follows across the field boundary connecting Windemere Road to the west and Silverdale Road to the east.
- The southern boundary of the 2019 Assessment reviewed the removal of the Green Belt along the existing residential properties, whereas policy HO18 allocates the land based on availability and therefore omits a field in the south-western corner and residential gardens.
- Similarly, to the southern boundary, the eastern boundary in policy HO18 excludes a piece of land that is not available for development that was previously assessed in the Green Belt Review Part 2 2019 update.

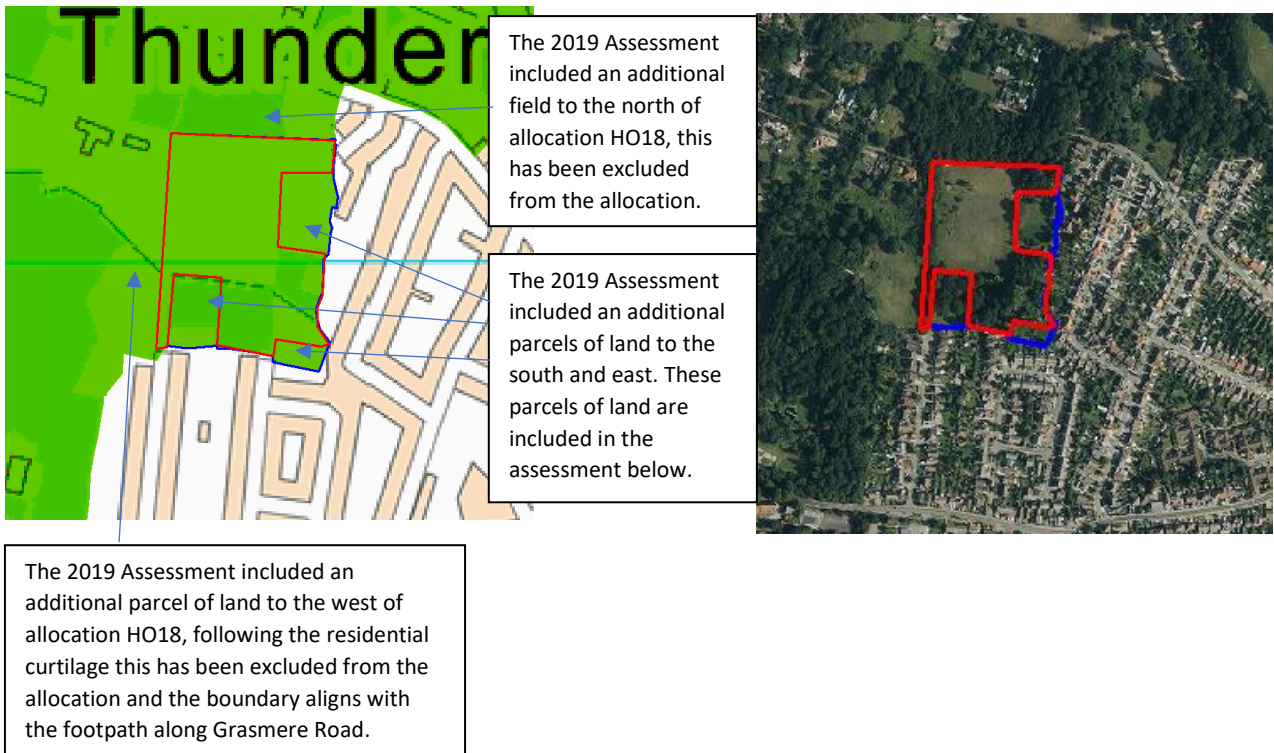
The changes from the 2019 Assessment and allocation HO18 are based on landownership and land available for development, as well as the locations of potential wildlife sites to the north and west of the site. Although land to the east and south of the allocation has been excluded from the development boundary of HO18, these parcels of land are proposed to be removed from the Green Belt as a consequence of HO18 isolating them from the wider Green Belt therefore making them unable to fulfil a Green Belt purpose.

### Updates to the 2019 Assessment

The red line boundary on the maps below is the boundary for allocation HO18 and the blue line represents the consequential change to the Green Belt as a result of the HO18 allocation, the annotations highlight the differences in boundaries from the 2019 Assessment. The 2019 Assessment has been updated through tracked changes below in light of the updated boundary this includes the parcels of land to the east and south as shown by the blue line, these are consequential changes to the Green Belt as a result of allocation HO18.

**Context of HO18**

**Aerial of HO18**



**Description of Proposed Housing Site**

The proposed development site is primarily comprised of open field, as well as, hedges and trees. The land is primarily unmanaged and is almost entirely free of built development.

**Relationship to Surrounding Area**

The northern and western boundaries are adjacent to Green Belt.

Both the southern and eastern boundaries follow a line of residential curtilage. The northern boundary ~~is edged with runs through an area of~~ mature vegetation, ~~to the north if beyond which~~ is further vegetation ~~and residential properties~~. The western boundary is also made up of mature vegetation with regular intervals of open field, before encompassing a residential property when meeting the northern border.

**Performance of Relevant Parcel(s) under Part 1 Methodology**

A significant majority of the proposed housing site is primarily located within Parcel 1. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 1 follows below:

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
The parcel is adjacent to Thundersley and South Benfleet at its southern boundary. The only residential	Whilst such a scale of development is recognised as being unlikely, developing the parcel would lead to the	There are many different uses within this parcel although a significant proportion are not considered to be inappropriate

<p>development in the parcel at the same density as the adjoining urban areas is in the south east corner. The rural / urban boundary is also relatively weakly defined in other areas with other residential dwellings and plotland development present in the parcel. These are considered to constitute sprawl. The majority of the parcel is however free from built development and the parcel lacks alternative features that could act as a strong, defensible boundary.</p>	<p>coalescence of South Benfleet and Thundersley.</p>	<p>to the Green Belt. In combination, the parcel is considered to represent a semi-rural character, although there are areas that are entirely rural (particularly in the centre and south west) and others more obviously developed (north and south east). Plotland dwellings, smallholdings, recreational buildings and stables are largely hidden by the vegetation.</p> <p>The parcel is considered large enough that it is not materially influenced by its peripheral features.</p>
<p>Degree of Contribution:  Strong</p>	<p>Degree of Contribution:  Very Strong</p>	<p>Degree of Contribution:  Moderate</p>

A small proportion of the proposed housing site is located within Parcel 3a. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 3a follows below:

<b>Purpose 1 – Check Unrestricted Sprawl</b>	<b>Purpose 2 – Prevent Towns from Merging</b>	<b>Purpose 3 – Safeguard Countryside</b>
<p>The eastern and western parcel boundaries are adjacent to urban development associated with South Benfleet and Thundersley. Whilst not considered to be robust boundaries, development within the parcel has been largely restricted. However, there is clear, albeit limited ribbon development following the route of Church Road which runs through the centre of the parcel and includes</p>	<p>The parcel takes the form of a strip of land which forms the entire gap between the settlements of South Benfleet and Thundersley. Views between the two settlements are currently blocked due to the presence of large wooded areas, and development would lead to physical coalescence. There is also very limited development within the parcel and as such, this parcel is very</p>	<p>The eastern and western parcel boundaries are adjacent to urban development associated with South Benfleet and Thundersley. Whilst not considered to be robust boundaries, development within the parcel has been largely restricted and the parcel is primarily characterised by wooded areas and open land. However, there is clear, albeit limited ribbon development following the route of Church Road which</p>

<p> dwellings, a church, a hall and carparking.</p>	<p>strongly contributing to this purpose.</p>	<p>runs through the centre of the parcel. There are further residential dwellings in the north associated with Windemere Road and in the south east associated with Lake Drive.</p> <p>Although the parcel is a relatively narrow strip, it is not considered to be strongly influenced by periphery development to the east and west due to its wooded nature, and it also acts to link countryside in the north of the borough to that in the south.</p>
<p>Degree of Contribution:</p> <p>Strong</p>	<p>Degree of Contribution:</p> <p>Very Strong</p>	<p>Degree of Contribution:</p> <p>Strong</p>

### Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?

Both Parcel 1 and Parcel 3a are located within the Locally Important Strategic Green Belt area of the Central Corridor as defined by Part 1 of the Castle Point Green Belt Review 2018. These parcels of Green Belt serve to restrict the settlements of South Benfleet and Thundersley from merging and create a connection between the northern Green Belt parcels within the borough to those in the south.

### Degree of Harm of Releasing Whole Proposed Housing Site from the Green Belt

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>The proposed development site is predominantly free from existing urban development. Future urban development would display a relationship with the general settlement pattern as the site is directly adjacent to built development to the south <del>and</del>, east <del>and</del> partially in the north. It would act to connect the ribbon</p>	<p>The proposed development site forms a relatively important part of the strategic gap between Thundersley and South Benfleet. Development of this site would partially act to reduce some of the existing strategic gap, The prevalence of plot land development to</p>	<p>The site is currently free from built development. However, the immediate surroundings of the site are partially developed, in part by residential uses, such that the rural integrity of the site is already compromised.</p>

development located along Windermere Road to the westerly boundary of Thundersley. Development would, result in the partial realignment of the Green Belt with a robust boundary feature <u>of the extension of Grasmere Road. This would be in the form of Grandview Road. It would however, continue to be formed primarily of residential curtilage, and would create a more logical boundary to Parcel 1 of the Green Belt.</u>	the immediate west of the site does reduce this.  <u>The strategic gap within Parcel 3a has been reduced by the residential area to the south of this site, development of this site would not reduce the strategic gap further but will align with existing development.</u>	
Degree of Harm:  Moderate	Degree of Harm:  Moderate	Degree of Harm:  Moderate

### Impact on Remaining Wider Green Belt

As noted above, much of the Green Belt in this locality is already developed with plot land style housing. It is also noted that both Parcel 1 and 3a, within which the proposed development site lies, is part of the Locally Important Strategic Area of the Central Corridor, which acts to prevent urban coalescence between South Benfleet and Thundersley whilst maintaining an unbroken chain of Green Belt through the centre of the borough. Whilst deallocation of Green Belt in this area would act to narrow the width of the strategic gap between South Benfleet and Thundersley, there has already been a significant amount of encroachment in the immediate locality such that the immediate Green Belt area is already not significantly contributing to the purposes of the Green Belt. This is despite the parcels having a clear role in preventing sprawl and urban coalescence. Consideration would need to be given to the balance of whether this land could be released d for further development as much of the surrounding land is already developed to varying degrees, or whether the localised impact on the strategic function that this part of the Green Belt is playing would be significantly detrimentally impacted by the release of this site, such that its Green Belt designation should be maintained for that reason.

### Potential Alternative Boundaries within the Proposed Housing Site

The northern boundary of this site is aligned by mature trees, this acts as a natural boundary however, alignment of the Green Belt boundary along Grandview Road would create a more robust physical boundary to the Green Belt, however it should be acknowledged that this site is a potential wildlife site. There are no alternative boundaries within the proposed development site that could provide an alternative configuration.

### **Options for the Mitigation of Harm on the Green Belt**

Any development within this parcel should be well screened from the Central Corridor to the west to preserve the rural feel of what largely functions as a small rural break between South Benfleet and Thundersley.

### **Considering the Green Belt in the Longer Term**

The release of this proposed development site from the Green Belt would result in a weaker boundary when considering long term development in the area. The location of the site and the nature of the Strategic Area within which it is situated, means that any release of Green Belt land would reduce the strategic gap in this locality, which currently acts to protect the countryside and prevent urban sprawl between South Benfleet and Thundersley, as noted this strategic gap has already been reduced by residential areas to the south of this site reducing the impact that this site would have to the Green Belt-. Potential local wildlife sites to the north and west of the site restrict further extensions to the urban area in this locality, notwithstanding this, the topography of the site would make further development to the west difficult due to the sharp decline in landscape. Therefore, opportunities for further urban extensions of this site are unlikely.



# Proposed Housing Site Allocation - HO19

## Summary

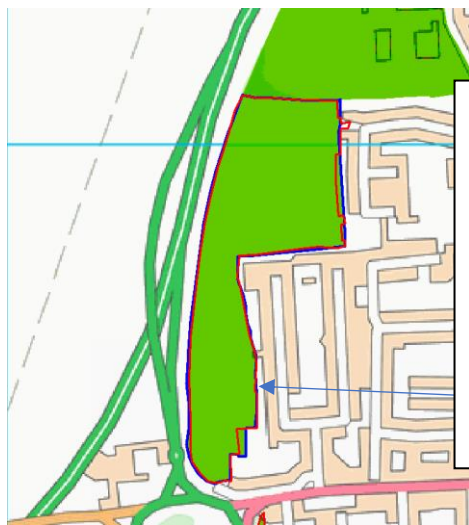
The differences between the boundary for this site in the 2019 Assessment and the proposed allocation HO19 in the Pre-submission Local Plan are minor. The allocation in the Pre-submission Local Plan is drawn around the rear of residential gardens to the east of the site, whereas the 2019 Assessment included small proportions of rear gardens. The boundary was slightly amended in the Pre-submission Local Plan to take into account landownership and the residential development area.

The 2019 Assessment took into account all Green Belt changes and as such remains relevant. Therefore, only minor changes to the 2019 Assessment are proposed.

## Updates to the 2019 Assessment

The red line boundary on the maps below is the boundary for allocation HO19 and the blue line represents the consequential change to the Green Belt as a result of the HO19 allocation, the annotations highlight the differences in boundaries from the 2019 Assessment. The 2019 Assessment has been updated through tracked changes below in light of the updated boundary this includes the residential properties that would be a consequential change to the Green Belt as a result of allocation HO19.

## Context of HO19



## Aerial of HO19



## Description of Proposed Housing Site

The proposed development site takes the form of open field and scrubland with a small number of trees in the northern portion and the rear of residential gardens to the east.

## Relationship to Surrounding Area

The northern, southern and western boundaries are adjacent to further Green Belt land.

The northern boundary is defined by a tree belt beyond which lies a school and playing fields which are both located within the Green Belt. Residential curtilages of dwellings in South Benfleet form the

eastern boundary, with the western boundary taking the form of foliage running along the A130. The A130 marks the boundary between the administrative areas of Basildon and Castle Point, beyond which is Green Belt.

**Performance of Relevant Parcel(s) under Part 1 Methodology**

The proposed housing site is fully located within Parcel 10a. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 10a follows below:

<b>Purpose 1 – Check Unrestricted Sprawl</b>	<b>Purpose 2 – Prevent Towns from Merging</b>	<b>Purpose 3 – Safeguard Countryside</b>
<p>The entirety of the eastern boundary follows the western edge of South Benfleet. There is very little built development within the parcel, with the sum of the development taking the form of a school and associated buildings in the north of the parcel, and a small collection of dwellings at the pinch point by the A130. This amount of sprawl is assessed as minor in the context of the level of urban development across the eastern boundary</p>	<p>The parcel represents approximately 100m of the total strategic gap of 500m between South Benfleet and North Benfleet. It is considered that there is no inter-visibility between South Benfleet and North Benfleet, with the A130 forming a strong permanent boundary.</p>	<p>The parcel is a relatively narrow strip of land and is considered to be strongly influenced by residential development to the east and the A130 to the west. The parcel is cut off from the wider countryside by these features and also contains a school in the north which is uncharacteristic of the countryside and relatively prominent given the size and configuration of the parcel.</p>
<p>Degree of Contribution: <b>Very Strong</b></p>	<p>Degree of Contribution: Minor</p>	<p>Degree of Contribution: Minor</p>

**Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?**

Parcel 10a is not considered to lie within a Locally Important Strategic Green Belt area as defined by Part 1 of the Castle Point Green Belt Review 2018.

**Degree of Harm of Releasing Whole Proposed Housing Site from the Green Belt**

<b>Purpose 1 – Check Unrestricted Sprawl</b>	<b>Purpose 2 – Prevent Towns from Merging</b>	<b>Purpose 3 – Safeguard Countryside</b>
<p>The site is currently free from existing urban development but future development would act as a westerly extension of</p>	<p>The parcel represents a small part of the strategic gap between South Benfleet and North Benfleet. It is however</p>	<p>The proposed development site is currently free of built development considered inappropriate in the Green</p>

South Benfleet and would be in keeping with the general settlement pattern and allow for the Green Belt to be realigned with the A130 which would create a strong permanent boundary.	considered that there is no inter-visibility between South Benfleet and North Benfleet, and the A130 would form a strong barrier to any further expansion and resultant reduction of that gap.	Belt. However, the area is cut off from the wider countryside by the A130 and its development would amount to the infilling of a relatively narrow strip of land inbetween South Benfleet and the A130.
Degree of Harm: Minor	Degree of Harm: Minor	Degree of Harm: Minor

### Impact on Remaining Wider Green Belt

Development of the proposed site would act to reduce the amount of Green Belt land between North Benfleet and South Benfleet but the A130 acts as a natural boundary feature which runs through the Green Belt in this area. It is considered that the removal of this site from the Green Belt would not have a significant impact on the wider Green Belt system. The Green Belt boundary at this locality would be realigned away from residential curtilage to the more robust boundary feature of the A130.

### Potential Alternative Boundaries within the Proposed Housing Site

The proposed development site comprises of open field and scrubland and therefore does not contain any robust boundary that would represent a logical realignment of the development site.

As a consequence of the allocation residential gardens to the east of the allocation will be isolated from the wider Green Belt and no longer serve a Green Belt function. Therefore, these parcels of land are also proposed to be removed from the Green Belt and retained in their existing uses.

### Options for the Mitigation of Harm on the Green Belt

The introduction of landscaping and mature trees would create the perception that this part of the A130 is cutting across a rural area.

### Considering the Green Belt in the Longer Term

The land comprising Parcel 10b to the south is a similar lateral strip that exists between the A130 and Benfleet. Any future development of this site would constitute a similar westerly extension of South Benfleet that would be contained by the A130.

Should it be considered appropriate to remove this site from the Green Belt, consideration should be given to the potential of removing the rest of the land to the north of this site bound by the A130 from the Green Belt such that the A130 forms the new boundary. Part of this land is already developed as a school and is therefore not performing a Green Belt function.

## Proposed Housing Site Allocation - HO20

### Summary

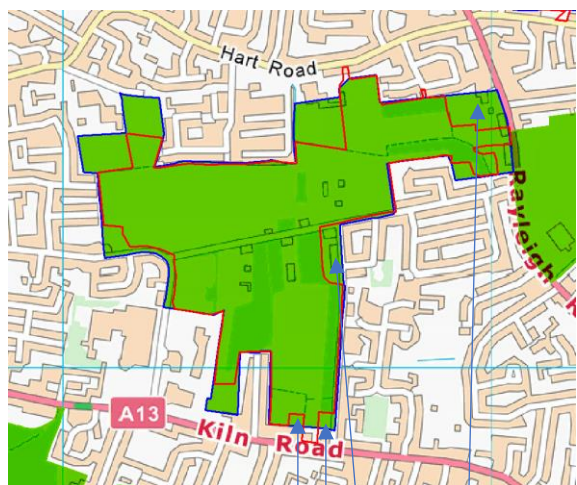
The 2019 Assessment reviewed a wider area than the proposed allocation HO20 in the Pre-submission Local Plan 2019. The boundaries to the north-east, south and east of the site were slightly amended around existing properties.

The boundary in the 2019 Pre-submission Local Plan took into account developable area and excluded land not available for development. Consequential changes to the Green Belt in the surrounding area of HO20 can be found in *Proposed changes to the Green Belt in the Pre-submission Local Plan January 2021 update* ([GB-006](#)).

### Updates to the 2019 Assessment

The red line boundary on the maps below is the boundary for allocation HO20 and the blue line represents the consequential change to the Green Belt as a result of the HO20 allocation, these areas have been assessed in *Proposed changes to the Green Belt in the Pre-submission Local Plan January 2021 update* ([GB-006](#)). The annotations below highlight the differences in boundaries from the 2019 Assessment. The 2019 Assessment remains largely the same however has been updated through tracked changes below in light of the updated allocation boundary.

### Context of HO20



### Aerial of HO20



The 2019 Assessment included small areas of residential gardens and properties along the eastern and southern boundary. These have been assessed within the *Proposed changes to the Green Belt in the Pre-submission Local Plan January 2021 update* ([GB-006](#)).

### Description of Proposed Housing Site

The site is predominantly open field, including playing fields. Field boundaries are marked with mature vegetation and there are a number of densely wooded areas in the southern portion. There is sporadic residential development primarily taking the form of ribbon development along The Chase and roads leading off it. Dwellings are typically bungalows with large garden plots.

## Relationship to Surrounding Area

Part of the eastern boundary is adjacent to Green Belt although this is relatively narrow.

The majority of the northern, ~~part of~~ the eastern as well as the entirety of the southern and western boundaries are adjacent to residential curtilages. Whilst the density of development is clearly different between those areas that are within and outside of the Green Belt in this location, development has sprawled into the parcel such that there is not a clear demarcation in some areas. The parts of the northern boundary which are adjacent to Green Belt land are adjacent to school playing fields which then abut residential curtilage. The eastern boundary largely runs behind residential curtilage however abuts the A129 for a small section, and this portion is made up of further school playing fields.

## Performance of Relevant Parcel(s) under Part 1 Methodology

The proposed housing site is fully located within Parcel 6. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 6 follows below:

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>Much of the boundaries are formed by residential curtilages but nonetheless, high density residential development has been resisted across all of the parcel. There is however ribbon development and much of the parcel is comprised of development inappropriate in the Green Belt. There is a lack of a strongly defined edge between the built-up area and the parcel.</p>	<p>The parcel is almost entirely encircled by Thundersley. Across much of the eastern boundary, Thundersley and Hadleigh can be seen to have already merged. All of the undeveloped land within the parcel is within Thundersley such that its development would represent infilling of land within Thundersley.</p>	<p>There are plotland developments across much of the centre of the parcel which amount to inappropriate development and a semi-rural perception, whilst the eastern portion contains a school and a leisure facility and displays no countryside character. The parcel is surrounded by residential or other built development uncharacteristic to a rural location which strongly influences the perception of this parcel being in the countryside.</p>
<p>Degree of Contribution:  Moderate</p>	<p>Degree of Contribution:  None</p>	<p>Degree of Contribution:  Minor</p>

## Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?

Parcel 6 is not considered to lie within a Locally Important Strategic Green Belt area as defined by

**Degree of Harm of Releasing Whole Proposed Housing Site from the Green Belt**

<b>Purpose 1 – Check Unrestricted Sprawl</b>	<b>Purpose 2 – Prevent Towns from Merging</b>	<b>Purpose 3 – Safeguard Countryside</b>
Although much of the proposed development site is rural in nature, in places the proposed development site lacks a strongly defined edge with the existing built-up area as it contains ribbon development running through the centre. Any development would constitute an infill of land within Thundersley and therefore be in keeping with the existing settlement pattern.	The proposed development site is not considered to fall within a strategic gap between two neighbouring towns.	Whilst a greater proportion of land at this relatively large site is undeveloped, the site does not display a strong rural character due to parts of the proposed development site having already been encroached and due to the fact that development has already taken place around the vast majority of its borders. In terms of the impact on the wider countryside system in the Borough, the impact is considered minimal as the site is largely cut off from this wider rural system. However, in the local context the site represents a rural break, albeit one which has been relatively significantly encroached.
Degree of Harm:  Moderate	Degree of Harm:  None	Degree of Harm:  Moderate

**Impact on Remaining Wider Green Belt**

The proposed development site does not lie within a Locally Important Strategic Green Belt area as defined by Part 1 of the Castle Point Green Belt Review 2018. The release of land comprising [SH18 HO20](#) from the Green Belt would amount to the residential infilling of Thundersley and it is assessed that this would not impact on the integrity of the wider Green Belt system as this area of land is already relatively isolated from the wider Green Belt. Any new boundary would be formed of residential curtilage which mirrors the nature of the current boundary such that there would be no change in their robustness, but the extent of such boundaries would be significantly reduced. Development of the site would however sever the land currently developed as playing fields associated with educational facilities from the Green Belt, [as per the Proposed changes to the Green Belt in the Pre-submission Local Plan January 2021 update \(GB-006\) these and other isolated parcels of land are proposed to be removed from the Green Belt as a consequence of allocation HO20.](#)

### **Potential Alternative Boundaries within the Proposed Housing Site**

Land to the north of The Chase is of a more rural character than that to the south where much of the ribbon development exists. As such it may be considered appropriate to realign the proposed housing site to just incorporate the land to the south of The Chase. This would however leave a strip of Green Belt which is even more isolated than that which exists now.

### **Options for the Mitigation of Harm on the Green Belt**

The release of land comprising ~~SH18-HO20~~ from the Green Belt would amount to residential infilling and would leave just part of the eastern and north western boundary adjacent to Green Belt. The harm arising from this development proposal could be managed through the appropriate design and layout of development on the site, accompanied by the use of strong landscaped boundaries. Much of the site boundary and land within the site already benefits from mature trees which could be retained.

### **Considering the Green Belt in the Longer Term**

Should this site be developed, it would amount to the infilling of land surrounded by residential development in the settlement of Thundersley. ~~Release of this site from the Green Belt would require a consideration of whether it would be more apt to slightly extend the release eastwards such that the new boundary is aligned with Rayleigh Road which would present a more logical boundary than what would otherwise be residential curtilage. The release of this site would result in a significant opportunity for accommodating housing need. Further, it would be appropriate to consider the removal of the Green Belt designation from the land occupied by the primary school and nursery as these would become small, isolated pockets of Green Belt entirely detached from the wider system.~~

As a consequence of the allocation, land surrounding HO20 including the schools to the north will be isolated from the wider Green Belt by the new development and no longer serve a Green Belt function. Therefore, these parcels of land are also proposed to be removed from the Green Belt and retained in their existing uses.

Any wider Green Belt release would need to be to the east of the site, crossing the robust boundary of Rayleigh Road. Such a release would see the boundary aligned away from Rayleigh Road to either a hedged field boundary or the edge of woodland. These boundaries are less robust and would therefore be against the grain of national policy, but such development would equate to a rounding off of the general settlement pattern.

# Proposed Housing Site Allocation HO23

## Summary

Proposed allocation HO23 in the Pre-submission Local Plan 2019 was assessed in the *2018 Green Belt Review Part 2 (GB-002)* and in the *Green Belt Review Part 2 2019 Update (GB-004)*. In both instances the HO23 allocation boundary is smaller than the assessed boundaries. The 2018 assessment spanned further north of the proposed allocation site towards the Waterside Farm Leisure Centre and the 2019 assessment included a wider area that spanned to the east and included the adjacent school.

The *Proposed changes to the Green Belt in the Pre-submission Local Plan January 2021 update (GB-006)* assesses the harm of releasing Green Belt land at the school to the east under reference *PGB-12- Cornelius Vermuyden School*.

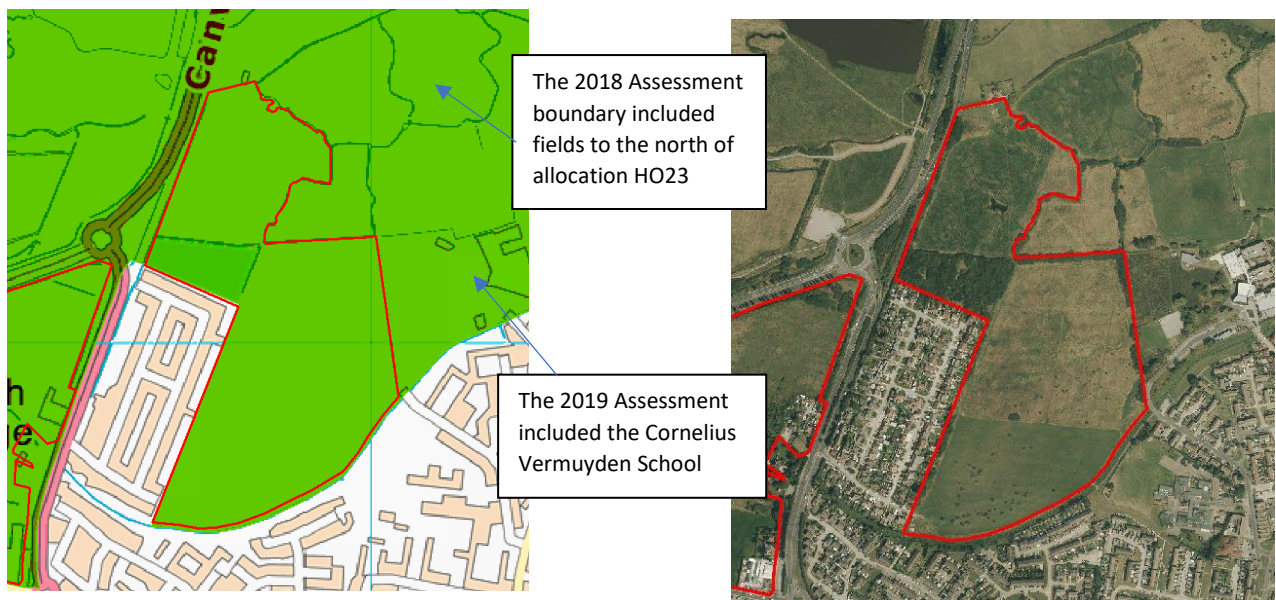
Allocation HO23 follows land ownership and land available for development, whilst minimising the degree of harm to the Green Belt as the 2018 Green Belt Review Part 2 highlighted that the extent of the boundary within that assessment encroached and would cause greater harm to the countryside. The boundary within the *Pre-submission Local Plan 2019 (EXM-001)* would allow access onto the site from Canvey Road and reduces encroachment into the countryside further north.

## Updates to the 2019 Assessment

The red line boundary on the maps below is the boundary for allocation HO23, the annotations highlight the differences in boundaries from the 2018 and 2019 Assessment. The 2019 Assessment has been updated through tracked changes below in light of the updated allocation boundary.

## Context of HO23

## Aerial of HO23



## Description of Proposed Housing Site

~~The site contains woodland in the west but otherwise comprises of open field. The site contains woodland in the west and also the Cornelius Vermuyden School along the south eastern boundary.~~

## Relationship to Surrounding Area



The northern and half of the western boundary are adjacent to Green Belt.

The northern boundary briefly follows the curtilage of a single residential dwelling before continuing around hedged field boundaries ~~to the north and to the east. located north/north-east of the Cornelius Vermuyden School is to the east of the site and Northwick Park Primary School and Nursery Academy is to the south-east., the eastern boundary follows the back of residential curtilages before encompassing the school building and its playing fields.~~ The southern ~~and western~~ boundary ~~continues with follows~~ residential curtilages ~~and meets Canvey Road in the north west. to where it meets the western which continues to do the same, before jutting in to follow Canvey Road back to the single dwelling.~~

### Performance of Relevant Parcel(s) under Part 1 Methodology

The proposed housing site is fully located within Parcel 26. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 26 follows below:

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>The eastern, southern and part of the western boundary either follow residential curtilages or a drain in very close proximity to the western urban edge of Canvey Island. There is no residential sprawl into the parcel. The only development within the parcel which is not considered to be appropriate development in the Green Belt is a single school. As such the parcel does not display significant urban characteristics.</p>	<p>The parcel is between Canvey Island and South Benfleet. At its closest point, the current strategic gap between these two settlements is approximately 1200m. Development of this parcel would cause a different part of Canvey Island to come within approximately 1100m of South Benfleet, although there would still be another two parcels between them. One of these parcels contains Benfleet Creek which would be a strong boundary between the two settlements.</p>	<p>The area includes the grounds of a school and is bounded by metal fencing. The housing bordering the site to the east, south and part of the west is partially screened. The northern portion is of a different quality to the rest and is used for formal recreation. The overall character is of a relatively extensive rural area close to large areas of housing, but one influenced to some degree by the presence of the school in the east. The parcel contains linkages to further countryside to the north and west, but these are intervened by a leisure centre and Canvey Road respectively.</p>
<p>Degree of Contribution: Very Strong</p>	<p>Degree of Contribution: Minor</p>	<p>Degree of Contribution: Moderate</p>

**Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?**

Parcel 26 lies within the Locally Important Strategic Green Belt area of Canvey Island as defined by Part 1 of the Castle Point Green Belt Review 2018. The Green Belt on Canvey Island effectively prevents the urban settlement from expanding to the extent of the coastal wall or urban encroachment disrupting the ecological value and landscape character of the west of the island.

**Degree of Harm of Releasing Whole Proposed Housing Site from the Green Belt**

<b>Purpose 1 – Check Unrestricted Sprawl</b>	<b>Purpose 2 – Prevent Towns from Merging</b>	<b>Purpose 3 – Safeguard Countryside</b>
<p>There is no built development currently in the proposed development site.</p> <p>Development in the southern portion of proposed site would primarily amount to an infilling of open land within Canvey Island due to the built footprint of the Dutch Village.</p> <p><del>The inclusion of the school as well as its playing fields in addition to the open fields to the east would result in development broadly reflecting the existing settlement pattern.</del></p> <p>Other than to the west where the boundary would continue along Canvey Road, development of this site would not result in the Green Belt being realigned to a robust boundary and it would continue to be primarily residential curtilage.</p>	<p><del>The proposed development site is between Canvey Island and South Benfleet. Due to the extent of the proposed development, the strategic gap between the two settlements would be noticeably reduced between the two settlements and would essentially result in the entire removal of Parcel 26 from the Green Belt. However, Benfleet Creek lies between South Benfleet and Canvey Island and would continue to act as a strong boundary between the two.</del></p> <p><u>The proposed development site is between Canvey Island and South Benfleet. Due to the extent of the northern portion of the proposed development site, the strategic gap would be noticeably reduced between the two settlements. This reduction would leave the remaining gap broadly similar to the narrowest extent that currently exists at proximal locations. However, Benfleet Creek lies between South Benfleet and Canvey Island and this acts as a strong</u></p>	<p>The proposed development site is currently free of built development considered inappropriate in the Green Belt, <del>apart from the school located in the southern portion, with the northern portion continuing into an open expanse of countryside.</del></p> <p>The southern portion of the site is bounded by residential development and a school which impacts on the perception of the area being a rural locality.</p>

	<u>boundary between the two settlements.</u>	
Degree of Harm: Moderate	Degree of Harm: Moderate	Degree of Harm: Strong

### Impact on Remaining Wider Green Belt

The proposed development site falls within the Locally Important Strategic Green Belt Area of Canvey Island. This strategic area acts to prevent the urban settlement of Canvey Island from expanding to the extent of the coastal wall or urban encroachment disrupting the ecological value and landscape character of the west of the island. Whilst the southern portion of the proposed site would largely amount to residential infilling around the school, the northern portion would encourage ribbon development along Canvey Road causing a greater impact on the wider countryside in this. Its development would also act to begin the encirclement of a parcel of Green Belt comprising of a school and further fields, and also bring development significantly closer to Benfleet Creek. ~~As well as this, Parcel 26 would be almost completely removed reducing the overall continuity of the Locally Important Strategic Green Belt area of Canvey Island.~~

### Potential Alternative Boundaries within the Proposed Housing Site

The proposed development site is predominantly open field with a general absence of boundary features beyond hedged fields such that there are no alternative boundaries that could act to more robustly define the extent of the Green Belt. Nonetheless, re-aligning the development site to the hedgerow which extends from the wooded area to the school would result in a development site which more closely reflects the existing settlement pattern. ~~Re-aligning the development site to the hedgerow which extends from the wooded area to the school would result in a development site which more closely reflects the existing settlement pattern. This would however significantly reduce the capacity of the site, whose current configuration is not assessed as being largely out of conformity with the existing settlement pattern.~~

### Options for the Mitigation of Harm on the Green Belt

The northern and eastern boundaries of the site would need to be effectively landscaped as this will be immediately adjacent to rural Green Belt. Development at the western boundary will continue the urban form up to Canvey Road where existing vegetation acts to screen the properties in the Dutch Village that are already in close proximity to the road. Such screening should be retained and further developed as necessary. ~~The northern boundary of the site would need to be effectively landscaped as this will be immediately adjacent to rural Green Belt. Development at the western boundary will continue the urban form up to Canvey Road where existing vegetation acts to screen the properties in the Dutch Village that are already near the road.~~

### Considering the Green Belt in the Longer Term

~~Any further Green Belt release would need to be north of the proposed site otherwise urban~~

~~development would sprawl across Canvey Road, although to the south west any development that did cross Canvey Road would be subsequently bound by Roscommon Way which could act as an alternative robust boundary.~~

~~Somnes Avenue is some distance north from the proposed site and this represents the only feature that could act as a robust boundary feature in this area. It is however noted that Canvey Island has already crossed over Somnes Avenue in some areas. Such a Green Belt release would amount to a sizeable release in this locality. As such, this proposed site does not offer a significant opportunity to consider a wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period of the emerging Local Plan, unless such a sizeable release is considered appropriate.~~

This proposed allocation extends into an area of Green Belt that sits to the east of Canvey Road, and to the south of Somnes Avenue. There is therefore the potential for further Green Belt release within the proximity of this allocation which could be contained by robust boundaries whilst maintaining the openness and purpose of the Green Belt to the west and north.

Somnes Avenue is however some distance north from the proposed site allocation HO23. Allocation HO23 predominately sits behind the existing development facing onto the A130 Canvey Road, and will not encroach significantly from a visual perspective into this area of Green Belt. Consequently, despite the lack of a robust boundary, the area of remaining Green Belt will maintain a largely open character. Further Green Belt release to the north of the proposed allocation would be significantly more harmful in terms of openness and would need to be assessed separately, if a deliverable scheme was to be proposed. However, in light of the landownership and land uses to the north – sports facilities and pitches owned by the Council, and due to constraints such as flood risk it is not considered that the area to the north of this site offers a significant opportunity for wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period of the emerging Local Plan.

## Proposed Employment Allocation - EC2

### Summary

The 2019 Assessment reviewed a wider area of land in the southern portion of this site in comparison to policy EC2 – extension to Manor Trading Estate as an employment allocation. In addition to this the removal of land adjacent to the site in the south-west, made up of The Robert Drake Primary School and Heston Lodge Day Centre was omitted from the assessment.

Since the 2019 Assessment, which inherited this site from the *2018 Green Belt Review Part Two (GB-002)*, the proposed use of the site has changed from part residential and employment to solely employment. The southern portion of the site in the 2019 Assessment took into account the need for residential highway access from Church Road and therefore the site extended to the south. The proposed access for the employment site as per policy EC2 is through the existing Manor Trading Estate which eliminates the need for vehicular access directly onto Church Road.

The inclusion of the proposed road in the previous assessments isolated land to the west, the 2019 Assessment highlighted that consideration should be given as to whether the land accommodating the school situated to the south west of the parcel should also be removed from the Green Belt. Being developed, this land would not contribute to the purposes of the Green Belt and would also become cut off should the proposed site be released. In addition to this the Council believe that in order to allow suitable development at educational facilities within the borough, re-designating educational facilities to community facilities would allow necessary reconfiguration or development at these establishments to facilitate local needs as required. As per paragraph 139 in the NPPF, this enables the Council to meet identified requirements for sustainable development in the area by allowing such facilities to be updated in accordance with local needs.

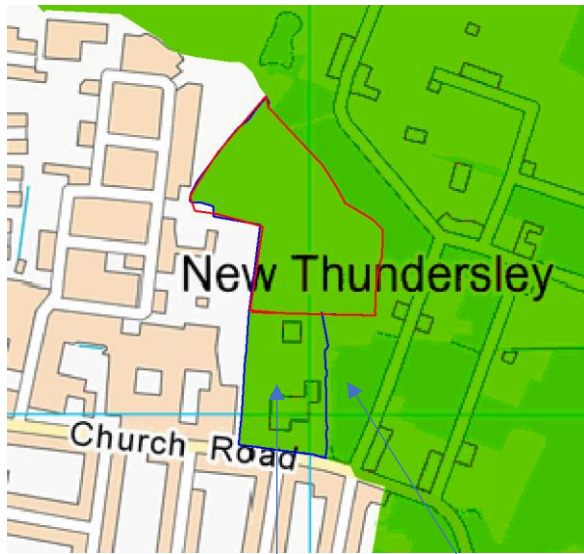
Heston Lodge Day Centre sits between The Robert Drake School and proposed allocation EC2 and is proposed to be maintained as community uses in the Pre-submission Local Plan 2019. The Plan proposes to remove this land from the Green Belt and would align the Green Belt along the access to the east.

The new assessment takes account of the proposed boundary of the employment allocation, but also the removal from the Green Belt of the Robert Drake School and the Heston Lodge Day Centre.

### Updates to the 2019 Assessment

The red line boundary on the maps below is the boundary for allocation EC2 and the blue line represents the additional land proposed to be removed from the Green Belt, the annotations highlight the differences in boundaries from the 2019 Assessment. The 2019 Assessment has been updated through tracked changes below in light of the updated boundary.

**Context of EC2 and adjacent land**



**Aerial of EC2 and adjacent land**



The 2019 Assessment did not include Heston Lodge or the Robert Drake School, this parcel of land has been included within this assessment.

The 2019 Assessment included an access road onto Church Road and parcels of land fronting onto Keswick Road, these have been removed from this assessment.

**Description of Proposed ~~Housing~~ Site**

The proposed development site ~~is open fields~~ is primarily comprised of some hedges and trees ~~on the field boundaries~~. The land is primarily unmanaged and is free of built development ~~to the north~~. ~~In the south-west of the site is The Robert Drake Primary School and associated playing fields and Heston Lodge Day Centre.~~

**Relationship to Surrounding Area**

The northern ~~and~~ eastern ~~and south-west~~ boundary is adjacent to Green Belt.

The northern boundary follows a tree line beyond which are further trees. The eastern boundary also follows a tree line then runs along ~~rear~~ residential curtilage in the south east ~~of before joining~~ Keswick Road. Beyond this boundary are further trees and other vegetation as well as residential properties. The boundary then ~~runs along~~ joins Church Road ~~at its southernmost point~~ to the south ~~before running around a school~~ before adjoining the boundary of Manor Trading Estate which forms the western boundary.

**Performance of Relevant Parcel(s) under Part 1 Methodology**

The ~~proposed housing~~ site is fully located within Parcel 1. A summary of the Green Belt Review 2018 Part 1 assessment as it relates to Parcel 1 follows below:

<p><b>Purpose 1 – Check Unrestricted Sprawl</b></p>	<p><b>Purpose 2 – Prevent Towns from Merging</b></p>	<p><b>Purpose 3 – Safeguard Countryside</b></p>
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<p>The parcel is adjacent to Thundersley and South Benfleet at its southern boundary. The only residential development in the parcel at the same density as the adjoining urban areas is located in the south east corner. The rural / urban boundary is also relatively weakly defined in other areas with other residential dwellings and plotland development present in the parcel. These are considered to constitute sprawl. The majority of the parcel is however free from built development and the parcel lacks alternative features that could act as a strong, defensible boundary.</p>	<p>Whilst such a scale of development is recognised as being unlikely, developing the parcel as a whole would lead to the coalescence of South Benfleet and Thundersley.</p>	<p>There are a large number of different uses within this parcel although a significant proportion are not considered to be inappropriate to the Green Belt. In combination, the parcel is considered to represent a semi-rural character, although there are areas that are entirely rural (particularly in the centre and south west) and others more obviously developed (north and south east). Plotland dwellings, smallholdings, recreational buildings and stables are largely hidden by the vegetation.</p> <p>The parcel is considered large enough that it is not materially influenced by its peripheral features.</p>
<p>Degree of Contribution:  Strong</p>	<p>Degree of Contribution:  Very Strong</p>	<p>Degree of Contribution:  Moderate</p>

### Is the Parcel in a Strategic Area as defined by Part 1 of the Green Belt Review?

Parcel 1 lies within the Locally Important Strategic Green Belt area of the Central Corridor as defined by Part 1 of the Castle Point Green Belt Review 2018. These parcels of Green Belt serve to restrict the settlements of South Benfleet and Thundersley from merging and also create a connection between the northern Green Belt parcels within the borough to those in the south.

### Degree of Harm of Releasing Whole Proposed ~~Housing~~ Site from the Green Belt

Purpose 1 – Check Unrestricted Sprawl	Purpose 2 – Prevent Towns from Merging	Purpose 3 – Safeguard Countryside
<p>Although the release of this land from the Green Belt would not result in the formation of more defensible Green Belt boundaries, it would not weaken them</p>	<p>The proposed development site forms a relatively important part of the strategic gap between Thundersley and South Benfleet. However, development of this site would</p>	<p>The site is currently free from built development <u>to the north and densely wooded</u>. However, the immediate surroundings of the site is predominantly developed, in</p>

<p>relative to the boundaries that currently exist. The site itself is free of built development <u>to the north</u>-but is encircled by a trading estate, local roads <u>and</u> dwellings <u>and a school</u>. <u>The southern portion of the site is built out by the school and day centre</u>. Development would therefore broadly constitute urban infilling although it is noted that the densities associated with true urban development are only prevalent in the residential area to the south and the industrial estate to the west.</p>	<p>not act to reduce any existing strategic gap due to the prevalence of plot land development to the immediate east of the site.</p>	<p>part by industrial uses, such that the rural integrity of the site is compromised. <u>Part of the site is also developed as a school and day centre and therefore the perception of being in the countryside is lost.</u></p>
<p>Degree of Harm: Moderate</p>	<p>Degree of Harm: Minor</p>	<p>Degree of Harm: Minor</p>

### Impact on Remaining Wider Green Belt

As noted above, much of the Green Belt in this locality is already developed with plot land style housing and an industrial estate. It is noted that Parcel 1, within which the proposed development site lies, is part of the Locally Important Strategic Area of the Central Corridor, which acts to prevent urban coalescence between South Benfleet and Thundersley whilst maintaining an unbroken chain of Green Belt through the centre of the borough. Whilst deallocation would act to narrow the width of the strategic gap between Thundersley and South Benfleet, there has already been a significant amount of encroachment in the immediately locality such that the immediate Green Belt area is already not significantly contributing to the purposes of the Green Belt. This is despite the parcel as a whole having a clear role in preventing sprawl and urban coalescence. Consideration would need to be given to the balance of whether this land could be released for further development as much of the surrounding land is already developed to varying degrees, or whether the localised impact on the strategic function that this part of the Green Belt is playing would be significantly detrimentally impacted by the release of this site, such that its Green Belt designation should be maintained for that reason.

~~The land developed as a school and associated playing field to the south west of the site is currently allocated as Green Belt and this would become cut-off from the wider Green Belt.~~

### Potential Alternative Boundaries within the ~~Proposed Housing Site~~

There are no alternative boundaries within the proposed development site that could provide an alternative configuration.



### **Options for the Mitigation of Harm on the Green Belt**

Any development within this parcel should be well screened from the proximal road network to preserve the rural feel of what largely functions as a small rural break inbetween the industrial estate and surrounding residential dwellings.

### **Considering the Green Belt in the Longer Term**

The release of this proposed development site from the Green Belt would present the opportunity to consider whether a further release to the extent of Windermere Road and Keswick Road may represent more robust and defensible Green Belt boundaries in the long term.

~~Consideration should also be given as to whether the land accommodating the school situated to the south west of the parcel should also be removed from the Green Belt. Being developed, this land does not contribute to the purposes of the Green Belt and would also become cut off should the proposed site be release~~