

DAC Planning

Green Belt Assessment for Castle Point Borough Council

July 2025



DAC Planning

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Prepared For	Castle Point Borough Council
Project Director(s)	David Coleman
Prepared By	DAC Planning Limited Hop House, Colchester Road, West Bergholt, Colchester, CO6 3TJ United Kingdom dacplanning.com

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Appendices

Appendix A: Green Belt Boundary Review: proforma for each potential major anomaly

Appendix B: Structure of the Green Belt Assessment proforma

Appendix C: Green Belt Assessment proforma for each sub-area

Refer to accompanying document for Appendices

1.0 Introduction

1.1 Scope and Purpose

- 1.1.1 More than half of the Borough of Castle Point is covered by Green Belt designation. The Green Belt in the Borough was last amended in 1998.
- 1.1.2 DAC Planning was commissioned by the Council to undertake a Green Belt Assessment in September 2024 to inform the emerging Castle Point Plan. The assessment has been produced to supplement and update the Council's existing Green Belt evidence base. Throughout the course of the commission DAC Planning has worked iteratively with the Council to produce the Green Belt Assessment to inform the plan-making process whilst responding constructively to changes which have occurred to national planning policy and guidance in respect of Green Belt.
- 1.1.3 The Green Belt Assessment includes an appraisal of national planning policy alongside the Borough's existing Green Belt evidence. It also provides a Green Belt Assessment of sub-areas being considered for potential release for development in the plan-making process with clear recommendations to the Council as to whether or not sub-areas should be taken forward for further consideration through the plan-making process. DAC Planning's work supplements the Council's Green Belt Review Part 1 (2018) which considers the Borough's entire Green Belt as a series of parcels. The Green Belt Assessment of sub-areas is therefore a finer grained assessment of sub-areas within a number of these parcels. The assessment also includes a review of the Borough's Green Belt boundary. As above, the Green Belt boundary in the Borough was last amended in 1998 and so this exercise involves identifying potential anomalies in the Green Belt boundary, including appraising potential major anomalies where development has taken place, and where the land may be deemed to no longer fulfil the purposes of the Green Belt.
- 1.1.4 DAC Planning refers to this commission as a Green Belt Assessment, although elements within it are often referred to as a Green Belt Review and so there is interchangeability in these terms within the report. It is important to also note that findings from Green Belt Assessments or Reviews are used alongside other evidence to inform the spatial strategy and site allocations of emerging Local Plans. They are not a policy or decision-making document, they provide a starting point to inform the Council's potential changes to the Green Belt (alongside all other evidence and considerations) and cannot be used to release land, which is a matter for the emerging Local Plan.

1.2 Structure

- 1.2.1 The Green Belt Assessment is structured as follows:

- Section 2 sets out the context for the Green Belt Assessment including the national planning policy position, summary of best practice for Green Belt Assessments and the Borough's current Green Belt evidence;
- Section 3 presents the output of a review of the current Green Belt boundary in Castle Point (which was last amended in 1998) identifying potential 'major anomalies' and providing guidance to the Council on where the boundary may warrant alteration through the Local Plan process;
- Section 4 sets out the methodology for the Green Belt Assessments of sub-areas identified by the Council during the plan-making process, including a detailed appraisal of the NPPF's Green Belt purposes;
- Section 5 presents the findings of the Green Belt Assessments of sub-areas with recommendations for the Council supported by the detailed assessment proforma for each sub-area in Appendix C. It also considers which sub-areas may be considered as potential Grey Belt land; and
- Section 6 outlines the conclusions and recommendations from the Green Belt Assessment and how the findings can inform the Council's plan preparation process and next steps.

2.0 Green Belt Assessment Context

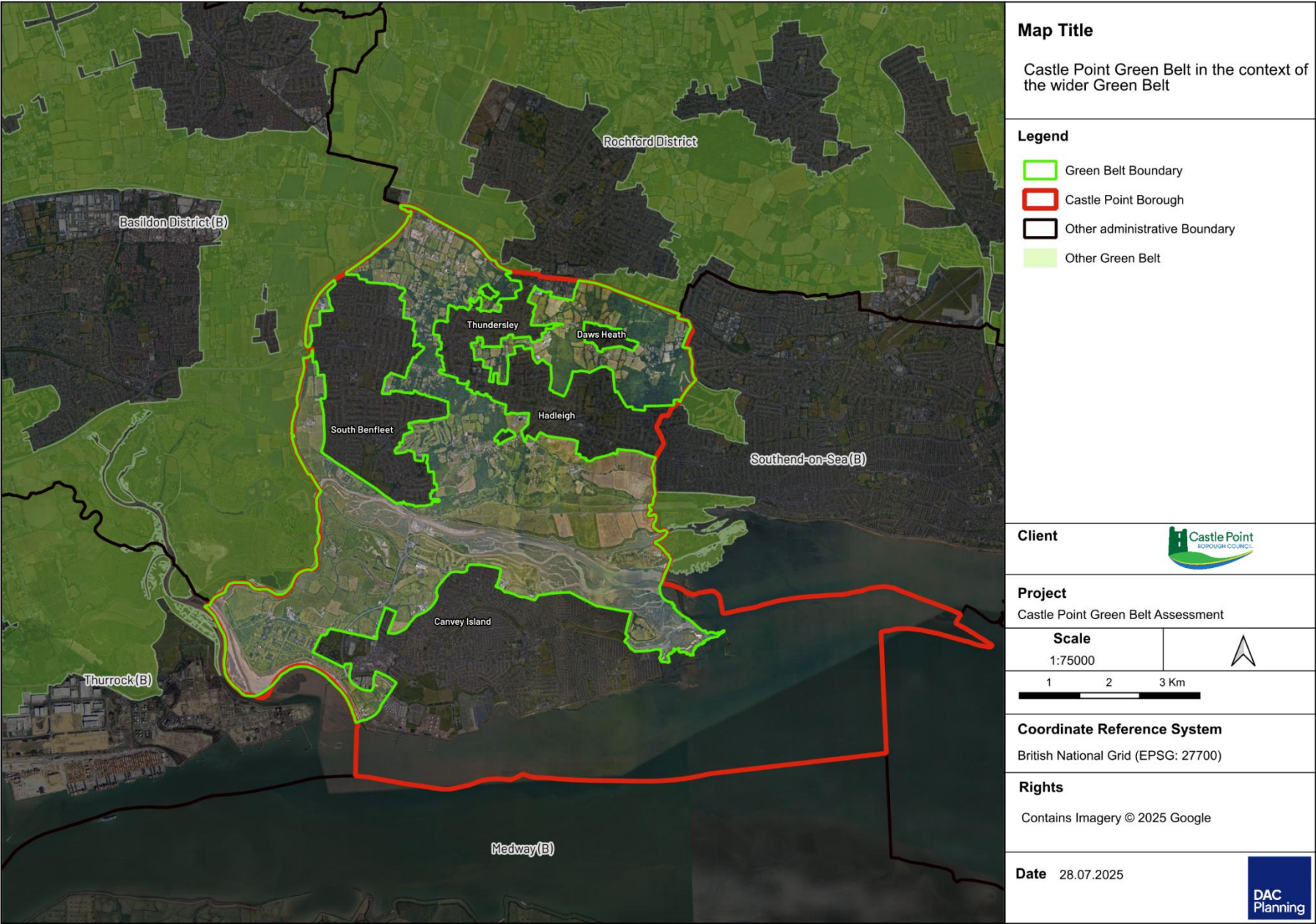
2.1 Castle Point Green Belt

- 2.1.1 More than half of the Borough of Castle Point is covered by Green Belt designation. This is illustrated spatially in Figure 1. Castle Point's Green Belt is part of a wider network of Green Belt extending across South Essex. This extended network of Green Belt has been largely effective in maintaining the separation between the towns in South Essex and within Castle Point by ensuring that the open land between towns has remained undeveloped.
- 2.1.2 The Borough is characterised by its two urban areas; Canvey Island and the mainland towns of Benfleet, Hadleigh and Thundersley. These towns have distinctively different landscapes and are bound by the Thames Estuary to the South and Green Belt. The Green Belt in Castle Point comprises 2,750ha and is tightly drawn around the existing urban area, incorporating most of the undeveloped land within the Borough.

Figure 1: Extent of Green Belt in Castle Point Borough



Figure 2: Castle Point Green Belt in the context of the wider Green Belt



2.2 National Planning Policy

- 2.2.1 The NPPF (December 2024) emphasises the importance of Green Belts in preventing urban sprawl, safeguarding the countryside from encroachment, preserving the setting and special character of historic towns, and assisting in urban regeneration by encouraging the recycling of derelict and other urban land.
- 2.2.2 Paragraph 145 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through Local Plan preparation. Paragraph 146 sets out that exceptional circumstances for reviewing the Green Belt boundaries include where an authority cannot meet its identified need for homes, commercial or other development through other means. It states that where this is the case local authorities should review their Green Belt boundaries in accordance with the policies in the Framework. And further, that alterations proposed should meet needs in full, unless the review clearly evidences that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. This marks a considerable change in emphasis in national policy compared to the previous December 2023 NPPF.
- 2.2.3 NPPF Paragraph 148 reads that, where it is necessary to release Green Belt land for development, Local Plans should give priority to previously developed land, then consider Grey Belt which is not previously developed, and then other Green Belt locations. It adds that when reviewing boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 in the 'Promoting sustainable transport' section of the Framework.
- 2.2.4 NPPF paragraph 149 notes a number of important considerations when defining Green Belt boundaries, including that land which it is unnecessary to keep permanently open should not be included in the Green Belt, and that boundaries should be clearly defined using physical features that are readily recognisable and likely to permanent.
- 2.2.5 NPPF paragraph 150 outlines that a village in the Green Belt should retain its Green Belt status if it makes an important contribution to the openness of the Green Belt.
- 2.2.6 The December 2024 NPPF outlines "Grey Belt", a new classification for potentially developable Green Belt land as we have already referred in the context of paragraph 148 of the Framework. The Framework defines Grey Belt as:

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

2.2.7 Footnote 7 of the NPPF reads as follows:

The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and

2.2.8 In assessing whether and the extent to which the application of policies relating to footnote 7 land provides a strong reason for refusing or restricting development we have had regard to the above and a range of relevant appeal decisions. A consistent theme from the reviewed appeal decisions is the streamlined nature of reasoning and justification provided, insofar as the presence or absence of footnote 7 land was largely deemed sufficient to conclude that strong reasons do or do not exist, respectively.

2.3 Green Belt Planning Practice Guidance (PPG)

2.3.1 The Green Belt PPG was updated in February 2025 to reflect the above policy changes in the December 2024 NPPF. The PPG emphasises that national policy requires the review and alteration of Green Belt boundaries where necessary as part of the plan-making process and the expectation that Grey Belt will be identified to inform the review.

2.3.2 Paragraph 013 of the PPG highlights the fundamental role of openness in assessing the extent to which Green Belt land contributes to the Green Belt purposes. Openness can be understood as having spatial and visual elements.

2.3.3 Paragraph 003 of the PPG outlines recommended steps to be followed in preparing a Green Belt Assessment, as follows:

- identify the location and appropriate scale of area/s to be assessed
- evaluate the contribution each assessment area makes to Green Belt purposes using the criteria in paragraph 005
- consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area
- identify Grey Belt land
- identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan

- 2.3.4 Paragraph 004 identifies the principles that should be considered when defining areas of Green Belt to assess, including:
- consider all Green Belt land in the first instance
 - assessment areas should be sufficiently granular
 - subdividing assessment areas into smaller areas should be considered if different results may otherwise arise
- 2.3.5 Paragraph 005 outlines that villages should not be considered large built-up areas or towns. In arriving at reasoned judgements, paragraph 005 also identifies the illustrative features that should be considered when assessing the contribution Green Belt land makes to purposes a), b), and d). The PPG provides no guidance as to the application of purposes c) or e).
- 2.3.6 In considering whether and the extent to which parcels strongly contribute to Green Belt purposes a) and b) regard has been had to the above and a range of relevant appeal decisions. From this analysis, appeal decisions can be broken down into two parts, firstly whether the relevant settlements are villages, towns or large built-up areas, about which settlement size and the number of services and facilities are key determinants, and secondly, the extent to which land strongly contributes to checking unrestricted sprawl and the prevention of merging, which is commonly determined through an assessment of physical containment and visual separation. These considerations have been incorporated into our assessments.
- 2.3.7 Paragraph 006 states that in identifying Grey Belt land, authorities should consider where areas of Grey Belt would be covered by or affect other designations in footnote 7. Where this is the case, it may only be possible to provisionally identify such land as Grey Belt in advance of more detailed specific proposals.
- 2.3.8 Paragraph 008 of the PPG reiterates the requirement set out in paragraph 146 of the NPPF to consider whether there is clear evidence that releasing land from the Green Belt would fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan.
- 2.3.9 The PPG is addressed in greater detail in respect of the methodology for the assessment of sub-areas in section 5.

2.4 Green Belt Assessment

- 2.4.1 The purpose of a Green Belt Assessment is to provide evidence on how areas of the Green Belt perform against the five purposes defined in the NPPF, ensuring they continue to meet their intended functions such as preventing urban sprawl and protecting the countryside. The five purposes of the Green Belt as set out in paragraph 143 of the NPPF are:

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

- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

- 2.4.2 Green Belt Assessments are usually split across two stages. Part 1 of the assessment involves a review of the entire Green Belt (divided into appropriate-sized parcels) against the Green Belt purposes. Part 2 of the assessment then involves a more detailed evaluation of specific parcels of land within the Green Belt mainly adjacent to urban areas or locations for proposed new settlements as part of an emerging spatial strategy. Part 2 of the assessment identifies areas that may be suitable for development if exceptional circumstances justify boundary changes and considers the potential impacts and sustainability of such changes.
- 2.4.3 As already outlined, Green Belt Assessments form part of the evidence base for Local Plans and can help inform a Council's consideration of the extent of harm to the Green Belt if land were to be released and development were to come forward. Findings from Green Belt Assessments are used alongside other evidence to inform the spatial strategy and site allocations of emerging Local Plans. Green Belt Assessments are not a policy or decision-making document, they provide a starting point to inform potential changes to the Green Belt (alongside other evidence and considerations) and cannot be used to release land, which is a matter for the emerging Local Plan.
- 2.4.4 Green Belt Assessments do not present exceptional circumstances arguments, which are required if a Council proposes to release land from the Green Belt. Instead, outcomes from an assessment will form part of any exceptional circumstances case to support Green Belt alterations.
- 2.4.5 Green Belt is a strategic policy and should be treated as a strategic matter in terms of the Duty to Cooperate. Engagement with stakeholders is therefore an important stage in Green Belt Assessments and considering potential amendments to boundaries if justified through the emerging Local Plan. Green Belt land should be considered strategically, and may need to be assessed beyond a local authority boundary.

2.5 Best Practice for Green Belt Assessments

- 2.5.1 The NPPF and PPG have historically remained silent on how a local planning authority should undertake a Green Belt Assessment. As already outlined however, the revised Green Belt PPG published in February 2025 does address this to the extent of identifying Grey Belt.

2.5.2 In the absence of guidance local planning authorities have over time adopted differing approaches to Green Belt Assessment and it is helpful therefore to review best practice in the sector to ensure a robust approach. We have reviewed the outcomes arising from the previous Castle Point Plan Examination, Green Belt evidence in neighbouring authorities and a number of prominent Local Plan examinations and their respective Green Belt evidence (including Redbridge Local Plan 2015-2030, Runnymede 2030 Local Plan and Welwyn Hatfield Local Plan (2016-2036)), as well as the Planning Advisory Guidance Green Belt guidance. Within Table 1, we draw upon some of the key principles and learning points from our best practice research which is factored into our methodology in section 5.

Table 1: Key principles and learning points from best practice research into Green Belt Reviews

Key principles/ learning points from research	Factoring into methodology for the Green Belt Assessment of sub-areas
The NPPF requires local planning authorities to work collaboratively on strategic matters that cross administrative boundaries (page 10). The PAS guidance recognises that Green Belt is a strategic policy and therefore a strategic matter in terms of the duty to cooperate.	The Council has engaged with Duty to Cooperate partners in respect of the approach to the Green Belt Assessment.
Detailed Green Belt Assessment is not required for land covered by major policy constraints , for example flood zone 3b or sites of international or national nature conservation importance, which would preclude development in any case.	This is factored into the methodology as an early step.
The Green Belt should be appraised against the purposes of Green Belt as outlined in the NPPF . If any purpose is excluded this must be robustly justified. We note exclusion of certain purposes within assessments in other authorities.	<p>The Green Belt Review Part 1 (2018) omitted purposes d) and e) from its assessment on the following grounds: Purpose d) (to preserve the setting and special character of historic towns) was omitted because it was considered that there are no towns in the borough which are considered to be historic in nature for the purposes of the application of this Green Belt Purpose.</p> <p>Section 2.6 considers Purpose d) in further detail. It is considered justified for the current Green Belt Assessment of sub-areas to be undertaken on a consistent basis with the previous Green Belt Review work.</p> <p>Purpose e) (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land), PAS Guidance states that <i>'If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land</i></p>

Key principles/ learning points from research	Factoring into methodology for the Green Belt Assessment of sub-areas
	<i>parcels is unlikely to be distinguished by the application of this purpose.</i> As such each parcel would receive the same assessment, rendering the process unnecessary.
The methodology must provide a detailed explanation and justification of our interpretation of the Green Belt purposes in respect to the Borough's local context.	This is factored into the methodology. Key terms defined and a detailed explanation and justification outlined.
Notable case law in respect of the assessment of harm : Calverton Parish Council v Greater Nottingham Councils & others (2015) - planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.'	These elements are factored into the methodology.
<p>The Government's PPG offers guidance in respect of assessing openness. It outlines that 'openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume'.</p> <p>Openness considerations in a Green Belt context should only be concerned about the absence of built development and other dominant urban influences. They should not be concerned about the character of the landscape. We can also draw on numerous planning appeals in respect of the importance and the interpretation of openness of the Green Belt which can be applied to Green Belt Assessments.</p>	These elements are factored into the methodology.

Sources: NPPF and PPG, the previous Castle Point Plan Examination and other Local Plan Examinations and respective Green Belt Reviews (including Redbridge Local Plan 2015-2030, Runnymede 2030 Local Plan and Welwyn Hatfield Local Plan (2016-2036)), Planning Advisory Service guidance for Green Belt Assessment, Planning on the Doorstep: The Big Issues (2015) and numerous case law examples.

2.6 Purpose d): to preserve the setting and special character of historic towns

- 2.6.1 In the absence of a definition of 'historic town' within the NPPF we rely largely upon its interpretation in case law, planning appeals, and local planning policies. The new Green Belt PPG however, does seek to provide limited clarification, emphasising firstly that this Green Belt purpose relates to historic towns and not villages, reflecting that this has been a point of debate. Secondly, the PPG outlines that 'where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose'. This therefore clarifies that not all plan areas will contain a historic town and that it is a matter for local interpretation. PAS Green Belt Guidance 2015 provided limited observations on the matter as follows: 'This purpose is generally accepted as relating to very few settlements in practice. In most towns there already

are more recent developments between the historic core, and the countryside between the edge of the town’.

- 2.6.2 It is considered that a historic town is one which contains a significant volume of historic buildings, streets and spaces and has a distinct historic character connected to surrounding landscape elements, which it may be impractical to protect solely through Conservation Area designations. The connection between a historic town’s historic character and the wider countryside may be visual as opposed to physical, reflecting that the succession of development often isolates core historic areas from the surrounding countryside.
- 2.6.3 Frequently cited examples of historic towns in England in respect of this purpose include Oxford, Cambridge, Bath, York, Durham, Chester, Winchester, St Albans and Warwick. Whilst Castle Point has a number of important heritage assets such as Hadleigh Castle and the Dutch Cottage these assets alone are not indicative of a historic town and the Borough’s townscapes relate largely to the 20th Century. As such, this purpose did not form part of the Castle Point Green Belt Review Part 1 (2018) and was not considered within the current Green Belt Assessment of sub-areas in the Borough. Heritage Impact Assessments can be undertaken separately to assess the significance of heritage assets affected by development and identify measures to minimise any harm in accordance with the provisions of the NPPF.

2.7 Castle Point Borough Green Belt Review Part 1 (2018)

- 2.7.1 The Castle Point Borough Green Belt Review Part 1 (2018) was produced to inform the preparation of the South Essex Joint Strategic Plan and the Borough’s Local Plan that were both being progressed at that time. Subsequently work on the Joint Strategic Plan stopped to enable the production of Local Plans in South Essex to be prioritised, and the Castle Point Plan was withdrawn in 2022. The Green Belt Review Part 1 (2018) superseded all previous Reviews prepared by the Council.
- 2.7.2 The approach taken by the Green Belt Review Part 1 (2018) involved a structured, four-stage methodology to assess Green Belt land according to the purposes defined in the NPPF. The main steps can be summarised as follows:
- 1. Identification of Green Belt Parcels*
- 2.7.3 The Council divided the entire Green Belt area into 30 separate parcels, as shown in Figure 3 below, based on natural and artificial boundaries, such as roads, rivers, and other prominent landscape features. This was intended to provide clearly defined assessment units and ensure consistency across the evaluation.

Figure 3: Castle Point Green Belt as divided into Parcels within the Green Belt Review Part 1 (2018)



2. Assessment Against Green Belt Purposes

2.7.4 Each parcel was assessed individually to determine its contribution to three relevant NPPF Green Belt purposes:

- Purpose a): To prevent urban sprawl from large built-up areas;
- Purpose b): To prevent towns from merging; and
- Purpose c): To protect the countryside from encroachment.

2.7.5 For each purpose, a qualitative grading system rated the parcels' contributions, ranging from "Not Relevant" to "Very Strong." The review did not evaluate purpose d (preserving historic settings) as it was not deemed applicable to the specific context in Castle Point. The review also did not evaluate purpose e (encouraging urban regeneration) as it was deemed that all Green Belt contributes to this purpose to the same extent and hence each parcel would receive the same assessment.

3. Combined Assessment of Green Belt Purposes

2.7.6 After assessing each purpose individually, the Council mapped out the cumulative contributions of each parcel. This process highlighted parcels with the highest overall significance to the Green Belt, factoring in how each parcel performed across the multiple purposes collectively.

4. Strategic Context Assessment

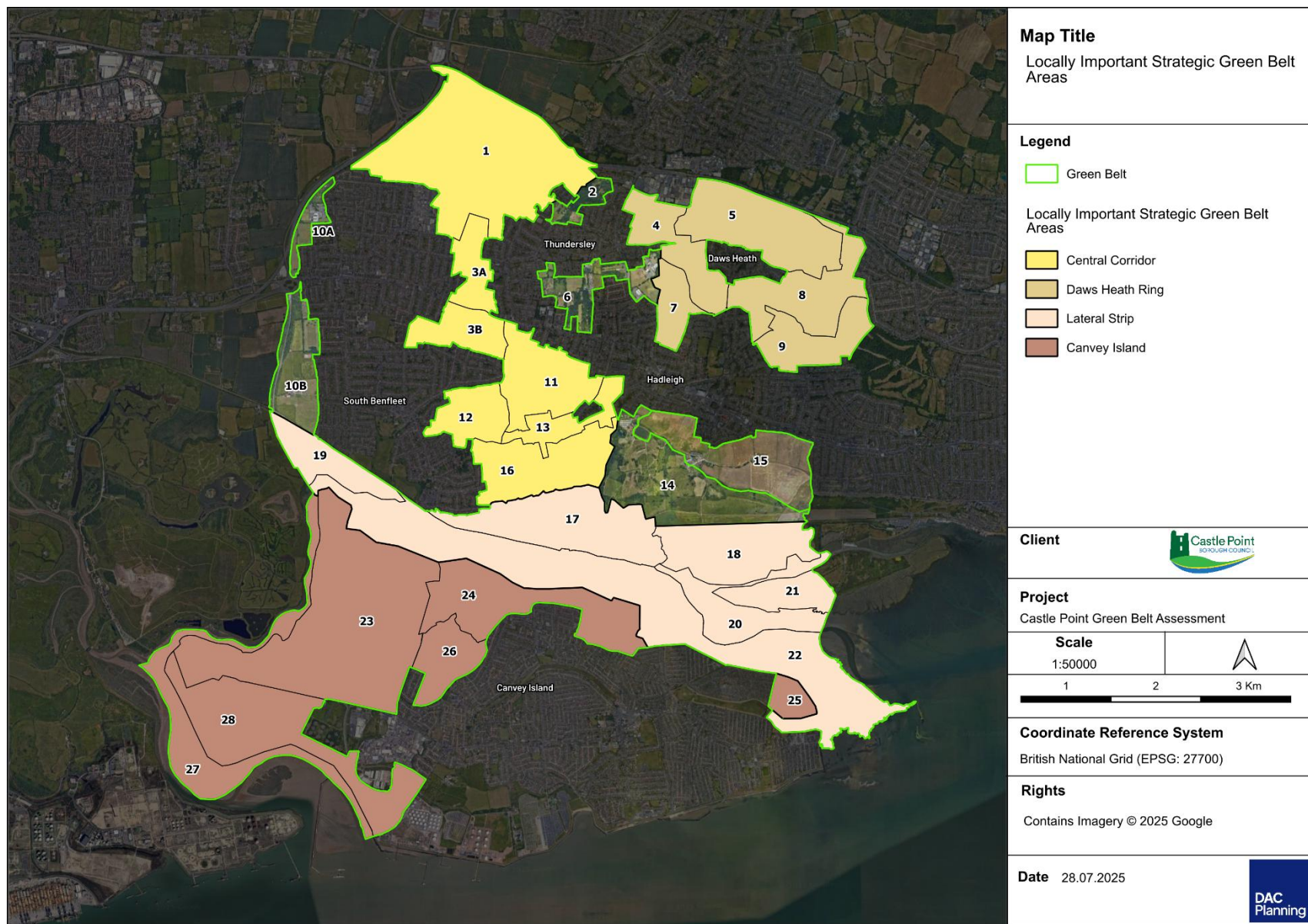
2.7.7 The final stage looked at each parcel's role within the broader Green Belt network in Castle Point and adjacent areas, emphasising strategic linkages that maintain separation between distinct urban centres and preserve open land continuity at a regional level.

2.7.8 Through the above assessment the Review identified four strategic areas of Green Belt in Castle Point as outlined in Table 2 and Figure 4. The focus of the identified Daws Heath Ring is on preventing neighbouring settlements from merging with Daws Heath. In light of the updated PPG's clarification regarding the distinction between towns, villages and large built-up areas when applying purposes a) and b), the strategic role and importance of the Daws Heath Ring may require revisiting.

Table 2: Locally Important Strategic Green Belt Areas in Castle Point

Locally Important Strategic Green Belt Area	Explanation from Green Belt Review (2018) Part 1
Daws Heath “Ring”	<p>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. It also has an important function of preventing urban coalescence between these settlements more generally. As a result, Daws Heath has a more rural character compared to other settlements within Castle Point and neighbouring districts.</p>
Central Corridor	<p>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. Without this linkage, the demarcation of these two urban areas would be indistinct and the wider Green Belt of Castle Point would become additionally fragmented.</p> <p>At a sub-regional level this corridor is particularly important as it plays a role in linking the strip of Green Belt running along the Thames Estuary to the Green Belt extending between Rayleigh and Wickford and across towards Basildon.</p>
Lateral Strip	<p>This strategic unit takes the form of a large area of uninterrupted Green Belt extending east to west through the centre of the borough. This area of Green Belt has been effective in protecting a unique area of countryside from encroachment and plays a positive role at a sub-regional level in promoting biodiversity as well as creating opportunities for recreation in the countryside. This area is well connected to the small area of Green Belt remaining in Leigh-on-Sea, and to the larger area of Green Belt stretching between and around settlements in the administrative areas of Basildon and Thurrock.</p>
Canvey Island	<p>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. The designation of Green Belt on Canvey Island has been particularly effective in limiting encroachment into the countryside, as there are very few developments in the Green Belt on Canvey compared to the mainland. It would be difficult to accommodate low density development in the Green Belt on Canvey without affecting its openness due to the topography and vegetation cover, whereas woodland and scrubland hide low density development in some areas of the Green Belt in Benfleet and Thundersley.</p>

Figure 4: Locally Important Strategic Green Belt Areas in Castle Point



- 2.7.9 This structured methodology allowed the Council to generate a detailed, purpose-based analysis of the Green Belt land in Castle Point.
- 2.7.10 According to the Council’s Matter 3 hearing statement in the Examination of the previous and withdrawn Castle Point Plan, no representations were received by the Council which questioned or criticised the methodology utilised by the Green Belt Review.
- 2.7.11 The Inspector’s Report on the Castle Point Local Plan (2022) concluded that the Council’s Green Belt Review Part 1 provided a clear and adequate approach for subdividing the Green Belt into assessment parcels. The review used a multi-stage methodology that allowed for a meaningful comparison of different Green Belt areas, aligning with the National Planning Policy Framework (NPPF) guidelines. The Inspector found this approach appropriate, including the granularity of parcel assessments, which facilitated robust evaluations of Green Belt land’s performance in fulfilling its purposes.
- 2.7.12 The Green Belt Review Part 1 (2018) was examined under the NPPF 2021 with the Inspector satisfied that it provided a robust evidence base to support plan-making at that time. The Review has been a material consideration in development management decision-making on various occasions since this time. The Part 1 is considered a valid point of reference in undertaking the Green Belt Assessment, although it is reflected that aspects will require review in the longer term to fully reflect changes in the updated Green Belt PPG as well as changes which have occurred on the ground since 2018.

2.8 Neighbouring authority Green Belt Assessments

- 2.8.1 The below outlines the latest position of neighbouring authorities in respect of their respective Green Belt evidence and the stage they are at in plan-making.

Table 3: Position of neighbouring authorities in respect of Green Belt evidence and plan-making

Basildon	Basildon Borough Plotland Growth Potential Study, October 2024 Basildon Green Belt Study Final Report, December 2023 Basildon Council consulted on its Local Plan Regulation 18 Part 2 in March and April 2025 and is seeking to publish its Draft Submission Local Plan (Regulation 19) in Autumn 2025 before submitting to the Secretary of State in January 2026.
Southend on Sea	Rochford District and Southend-on-Sea Borough Joint Green Belt Study Final Report, February 2020 Rochford District Council’s Local Development Scheme (January 2025) (LDS) outlines that the Council is targeting consultation on its Regulation 18 Local Plan in Summer 2025, Regulation 19 in Winter/Spring 2026 and submission to the Secretary of State in Autumn/ Winter 2026.
Rochford	

	<p>Southend-on-Sea City Council's LDS (January 2025) outlines that the Council is targeting consultation on its Regulation 18 Local Plan in quarter 2/quarter 3 2025, Regulation 19 in quarter 2/quarter 3 2026 and submission of its Local Plan to the Secretary of State in December 2026.</p>
Thurrock	<p><u>Thurrock Strategic Green Belt Assessment Stages 1a and 1b, January 2019</u> <u>Thurrock Strategic Green Belt Assessment Stages 1a and 1b, January 2019 – appendices E and F</u></p> <p>Thurrock Council outlined in its LDS (March 2025) that the Council is seeking to undertake Regulation 19 consultation in Spring 2026 and targeting submission of its Local Plan to the Secretary of State in Summer 2026.</p>

3.0 Review of the Green Belt Boundary

3.1 Introduction

- 3.1.1 The Green Belt in the Borough of Castle Point was last amended in 1998. Producing a new local plan presents the Council with the opportunity to consider whether the Borough's Green Belt boundaries require alteration subject to the demonstration of exceptional circumstances. The preparation of the Plan itself may not equate to exceptional circumstances.
- 3.1.2 The review of the Green Belt boundary identifies potential 'major' anomalies where the Council may wish to consider changes. This may be for a range of reasons including, where development has taken place and the land no longer fulfils the purposes of the Green Belt, where the Green Belt does not seem to follow a logical boundary or to reflect historic digitisation errors. The review provides guidance on where the boundary may warrant alteration and whether it can be strengthened to ensure a robust and defensible boundary. The review also considers whether it may be justified to propose any additions to the Green Belt.
- 3.1.3 The NPPF outlines at paragraph 145 that 'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans'. NPPF paragraph 149 further notes a number of important considerations when defining Green Belt boundaries, including that land which it is unnecessary to keep permanently open should not be included in the Green Belt, and that boundaries should be clearly defined using physical features that are readily recognisable and likely to be permanent. Table 4 considers what constitutes an appropriate Green Belt boundary reflecting upon paragraph 149 f).

Table 4: Consideration of what constitutes an appropriate Green Belt boundary reflecting upon paragraph 149 f) of the NPPF

Boundary type	Strength	Description
Motorways and Major Roads	Strong	Highways, motorways, or other main roads that are wide, permanent, and easy to identify.
Rivers, canals and Water Bodies	Strong	Natural rivers, canals, lakes, or reservoirs are clear and relatively permanent boundaries, although some may shift slightly over time.
Railway Lines	Strong	Railways are durable, highly recognisable, and usually provide a clear separation between areas.
Existing development	Strong	Established developed areas can serve as distinct boundaries.
Woodlands and Forests	Moderate to Strong	Large, established forests and dense woodlands are usually well-defined and can be used as boundaries, though they may change with forest management.

Boundary type	Strength	Description
Walls and Hedgerows	Moderate	Well-established, continuous walls or hedgerows are moderately recognisable, though hedgerows can deteriorate over time.
Farmland Boundaries	Moderate	Recognisable farmland divisions, like fences or ditches, are somewhat reliable but can be modified by land management practices.
Paths and Trails	Weak to Moderate	Trails and public rights of way may serve as boundaries but are often narrow and less prominent.
Un-made or private roads	Weak	These are less prominent and may be more subject to change, making them less reliable as long-term boundaries.
Field Boundaries	Weak	Boundaries between fields, particularly where unmarked, are often temporary and can shift with agricultural practices.
Vegetation Lines	Weak	Lines of trees or shrubs without other defining markers are often difficult to recognise and can change over time.

3.2 Methodology

- 3.2.1 There is no specific published guidance on how to undertake a Green Belt boundary review. In determining our methodology, we have therefore reflected upon equivalent reviews in other areas and relevant best practice. For instance, Ashfield District Council undertook a Green Belt boundary review in 2021 updating a previous review from 2016. Its aims were to identify existing anomalies to the Green Belt boundary and to assess whether there had been any change which constitutes exceptional circumstances and should result in an amendment to the Green Belt. The methodology adhered to the following key principles: the Green Belt boundary should not be amended unless there are exceptional circumstances (NPPF 2021 paragraph 140); if green spaces at the urban edge meet the purposes of the Green Belt (NPPF 2021 paragraph 138) they should be included; and any changes recommended should follow a physical feature on the ground that is readily recognisable and likely to be permanent (NPPF 2021 paragraph 143) creating a strong and logical boundary.
- 3.2.2 As part of the review, we have completed a desk-based mapping exercise reviewing the Green Belt boundary at a granular level to identify where there are potential anomalies (e.g. where development has taken place or it does not seem to follow a logical boundary) and where changes may need to be considered subject to further review.
- 3.2.3 Our subsequent focus was upon what we have termed ‘potential major anomalies’, where development has taken place and where the land may no longer fulfil the purposes of the Green Belt which are to be the key focus of the boundary review. In addition to reviewing mapping, we

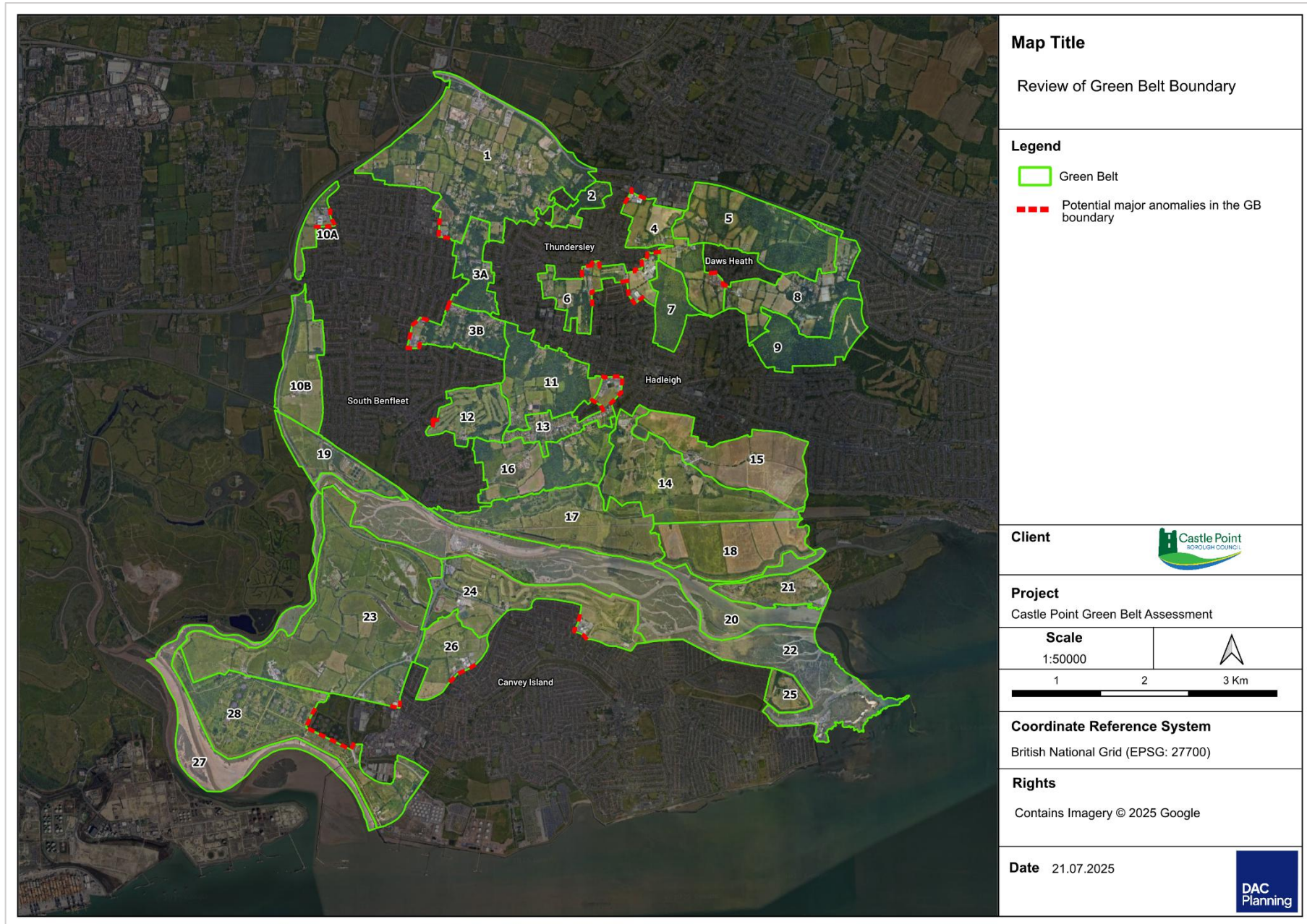
have also studied the Council's records of planning applications, completions and appeals within the Green Belt dating back to 1998 to identify relevant sites on the boundary of the Green Belt.

- 3.2.4 We have assessed each potential major anomaly in turn, and where an alteration to the Green Belt is judged to warrant consideration by the Council robust and defensible boundary features have been identified as an alternative to the current boundary. The boundary review has been largely undertaken as a desk-based exercise.

3.3 Findings of the Green Belt boundary review

- 3.3.1 This section summarises the findings of the review of the Green Belt boundary and outlines our recommendations to the Council.
- 3.3.2 Following our desk-based review of boundaries at a granular level we have identified a number of potential anomalies. 17 of these are considered to represent 'potential major anomalies' in the Green Belt boundary and have been subject to detailed assessment. The location of these potential major anomalies is shown on Figure 5 below.

Figure 5: Potential major anomalies in the Green Belt Boundary



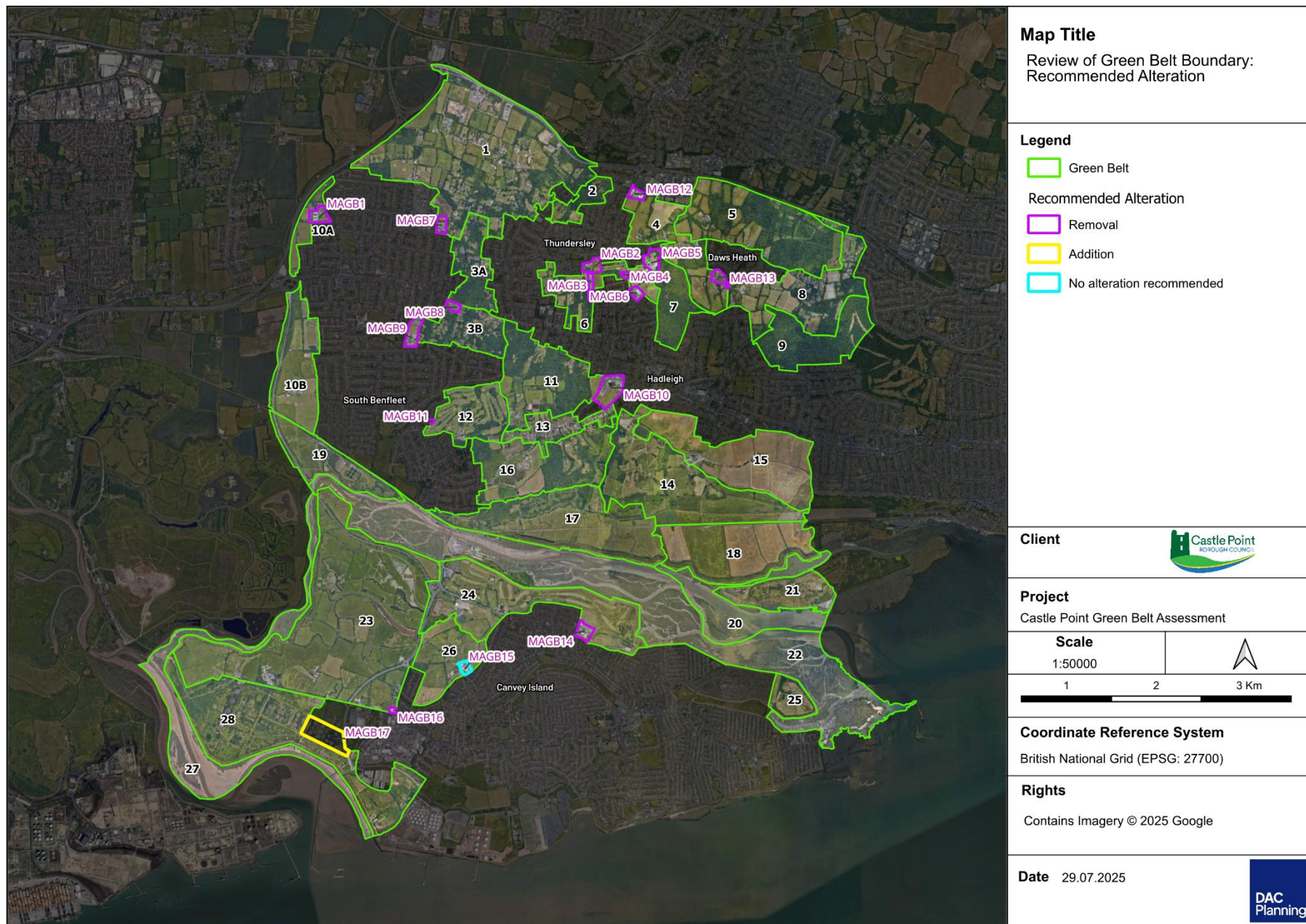
- 3.3.3 A proforma which details the appraisal of each potential major anomaly and justification for our recommendation can be found in Appendix A.
- 3.3.4 Table 5 summarises each of the identified potential major anomalies, our recommendation to the Council and scale of alteration if an alteration is proposed. In summary, this includes 15 potential alterations to remove major anomalies from the Green Belt, one recommended addition to the Green Belt and one instance where a potential major anomaly has been assessed although it is not recommended any alteration is made to the boundary of the Green Belt. Figure 6 spatially illustrates our recommendations in respect of alterations to the Green Belt boundary. For reference, the net change in Green Belt if all these potential alterations were implemented would be a 25.5 ha reduction in Green Belt area.

Table 5: Potential major anomalies on Green Belt Boundary and recommendations to the Council following appraisal

ID	Potential anomaly	Recommendation	Size of potential alteration
MAGB1	Glenwood School and Montgomerie Primary School, Benfleet	Alteration recommended	Removal of 3.2 Ha
MAGB2	Cedar Hall School and land to rear of 248 Hart Road Thundersley	Alteration recommended	Removal of 2.6 Ha
MAGB3	287-291 The Chase and Chase Mews	Alteration recommended	Removal of 1.6 Ha
MAGB4	259 – 275 Rayleigh Road	Alteration recommended	Removal of 0.5 Ha
MAGB5	The Deanes School, Thundersley	Alteration recommended	Removal of 4.0 Ha
MAGB6	Virgin Active Health Club, Thundersley	Alteration recommended	Removal of 1.6 Ha
MAGB7	The Robert Drake Primary School and ECL Benfleet Learning Disabilities Day Centre, South Benfleet	Alteration recommended	Removal of 2 Ha
MAGB8	396-408 London Road, South Benfleet	Alteration recommended	Removal of 1.5 Ha
MAGB9	Kents Hill Junior School & Holy Family Catholic Primary School, South Benfleet	Alteration recommended	Removal of 4.2 Ha
MAGB10	The King John School, Hadleigh	Alteration recommended	Removal of 7.9 Ha

ID	Potential anomaly	Recommendation	Size of potential alteration
MAGB11	Land at Crescent Road, South Benfleet	Alteration recommended	Removal of 0.2 Ha
MAGB12	Rayleigh Weir Fire Station and Car Dealership, Thundersley	Alteration recommended	Removal of 1.8 Ha
MAGB13	Solby Wood, Daws Heath	Alteration recommended	Removal of 2.1 Ha
MAGB14	USP College XTEND Digital Campus and Jewish Community and School, Canvey Island	Alteration recommended	Removal of 2.8 Ha
MAGB15	Cornelius Vermuyden School, Canvey Island	No alteration recommended	N/A
MAGB16	Land North of Northwick Road, Canvey Island	Alteration recommended	Removal of 0.5 Ha
MAGB17	Land South of Northwick Road and West of Roscommon Way, Canvey Island	Alteration recommended	Addition of 11 Ha

Figure 6: Potential major anomalies in relation to the Green Belt Boundary and recommendations to the Council following appraisal



Schools in the Green Belt

- 3.3.5 Eight of the potential major Green Belt anomalies relate to schools. In the case of each, it is considered that the school's built form means that the potential anomaly makes little or no contribution to the purposes of the Green Belt. Our recommendation is generally to retain school playing fields within the Green Belt where it is practical to do so. Instances where this may not be practical include where playing fields are sandwiched between school buildings. In the interests of proposing a logical revised boundary within such cases our recommendation is to include the playing fields within the proposed alteration and remove them from the Green Belt alongside the school buildings. It is acknowledged that this approach is generally consistent with the conclusions of the examining Inspector of the Borough's previous and withdrawn Local Plan.

Wider implications arising from recommended alterations

- 3.3.6 Recommendations are made above relating to each of the 17 potential major anomalies following our assessment of each in turn. However, it should be acknowledged that in determining whether or not to alter the boundaries the Council will need to consider the potential wider implications arising from the recommended alterations particularly when the proposed alterations are considered cumulatively and taken alongside recommendations relating to the sub-area assessments (see section 5 below). The Council will need to consider that relatively small alterations may have unintended consequences having regard to the wider role and function of the Green Belt across the plan area as a whole – for instance through the erosion of a gap between built up areas.
- 3.3.7 As such, there may also be instances where our recommendations suggest that alterations to the Green Belt boundary could potentially be justified in light of changing circumstances since 1998 (for instance, where new developments have been fully built out) but such alterations may be considered to be illogical or undesirable having regard to wider planning considerations. For example, the proposed alteration associated with MAGB8 would lead to a clear incursion into the Green Belt. It is difficult to draw a firm conclusion either way in this instance on the appropriateness of altering the boundary, particularly where such an alteration could arguably be extended further to encompass existing development adjacent to the proposed revised boundary.
- 3.3.8 Similarly, there is a notable cluster of potential major anomalies within the area identified as Parcel 6 within the Green Belt Review Part 1 (2018). Figure 7 is an enlarged version of Figure 6 with the addition of the outline of Parcel 6. Whilst our recommendations as summarised in Table 5 indicate that three separate boundary alterations may potentially be justified at this location (MAGB2, MAGB3 and MAGB4) such alterations would effectively sever connections from east to west and act to create an 'island' of remaining Green Belt land. Clearly this may have wider strategic implications for the role and function of the Green Belt in the central area of the Borough.

- 3.3.9 Our recommendation to the Council is that Parcel 6, in particular the part to the west of Rayleigh Road, requires careful consideration in a coordinated manner in light of the boundary review, its assessment in the Green Belt Review Part 1 (and particularly whether its assessment might be further weakened by development in the Parcel subsequent to 2018) and its potential Grey Belt status having regard to the evidence and changing context of the Parcel.

Figure 7: Potential major anomalies in relation to the Green Belt Boundary within Green Belt Review Part 1 (2018): Parcel 6



3.3.10 It is for the Council to consider the outputs of this boundary review exercise as part of its plan-making process and in conjunction with the evidence base as a whole. This will include careful consideration of the implications of the boundary review together with the outputs from the sub-area assessment in section 5. The Council will be required to set out the exceptional circumstances case for alterations that it is wishing to take forward as part of the Local Plan examination.

4.0 Green Belt Assessment of sub-areas: Methodology

4.1 Introduction

- 4.1.1 DAC Planning's work supplements the Council's Green Belt Review Part 1 (2018) which considers the Borough's entire Green Belt as a series of parcels. Within this section we undertake a finer grained assessment of smaller sub-areas of the Borough's Green Belt within a number of these parcels to establish the potential harm of potential Green Belt release. As part of its plan-making process, the Council has proactively undertaken two Call for Sites exercises. This included an initial Call for Sites in January to February 2024 and a further Call for Sites alongside the Regulation 18 Issues and Options Consultation from July to September 2024. The Call for Sites has been in addition to the Council's own assessments to identify potential land for development across the Borough.
- 4.1.2 In developing the methodology for our assessment of sub-areas, we have researched and analysed a number of sources as follows and summarise this detail as context within section 2 of the report:
- The NPPF and Green Belt PPG to understand the latest national planning policy context for the production of Green Belt Assessments;
 - The evidence base and conclusions from the withdrawn Local Plan examination in relation to the earlier Green Belt Review work;
 - Best practice in the production of Green Belt Assessments; and
 - Recent Green Belt Assessment work undertaken by neighbouring authorities to Castle Point.
- 4.1.3 The NPPF requires local planning authorities to work collaboratively on strategic matters that cross administrative boundaries. The Council has engaged with its Duty to Cooperate partners on the approach to be taken to Green Belt Assessment, and engagement has informed the development of the methodology utilised.
- 4.1.4 The methodology for the Green Belt Assessment of sub-areas is set out in Steps A to D below.

4.2 Step A: Identification of sub-areas

- 4.2.1 This step has included agreement with the Council on which sub-areas are to be taken forward for assessment and whether sub-areas required either grouping or to be broken down further into smaller sub-areas for assessment as deemed appropriate.

- 4.2.2 We have identified suitable defensible boundaries for the sub-areas for assessment drawing upon Paragraph 148(f) of the NPPF and reflecting that in some instances readily recognisable, although not necessarily permanent features may be required. This task has been informed by a desk-based study using Google Earth and OS maps. We have then tested the sub-areas during site visits. We have also removed potential major anomalies in the Green Belt from sub-areas where an alteration is recommended to the Council in section 3). Each sub-area has been given a reference number and mapped.

4.3 Step B: Major policy constraints

- 4.3.1 Detailed Green Belt Assessment does not need to be carried out for land covered by major policy constraints. These are set out in Figure 9 and considered as Flood zone 3b, Sites of Special Scientific Interest (SSSI) and other sites of international and national nature conservation importance (i.e. Special Protected Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites), Scheduled Monuments, Registered Parks and Gardens and Ancient Woodland. Sub-areas have been reviewed against these constraints.

4.4 Step C: Assessment of Sub-areas

- 4.4.1 Site visits were carried out to each of the identified sub-areas. Through site visits and our desk-based study we:

1. Appraised how the identified sub-areas fulfil each of the purposes of the Green Belt as outlined in the NPPF. The methodology for the Green Belt Review Part 1 (2018) considered Green Belt purposes a), b) and c) and this approach has been retained in our assessment of sub-areas. Green Belt purpose d) (to preserve the setting and special character of historic towns) is not deemed applicable to Castle Point as discussed within section 2.6. Although the Borough contains heritage assets such as Hadleigh Castle and the Dutch Cottage these assets alone are not indicative of a historic town and the Borough's townscapes relate largely to the 20th Century. In respect of Green Belt purpose e) (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land), it is considered that if Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose. This purpose has therefore been excluded from our assessment.

The performance of the sub-areas has been assessed to determine the extent to which each of the Green Belt purposes a), b) and c) are fulfilled using defined assessment criteria and a scoring system of: None/ Weak/ Moderate/ Strong. Explanation on each of the purposes a) to c) is provided in the following section. Each of the three purposes has been considered equally with no weighting or aggregation applied. Following appraisal against each purpose a

composite judgement has determined one of the following overall ratings for each sub-area reflecting its overall performance against the purpose criteria: Weak/ Moderate/ Strong.

2. Considered the potential for revised Green Belt boundaries if the sub-area were to be released from the Green Belt and potential options for mitigation of harm. In instances where it is considered that Green Belt harm may be reduced by considering a lesser area within an identified sub-area, this has been specified within the assessment conclusion and further articulated through commentary and mapping which follows. Where there is no such commentary it can be taken that the harm of Green Belt release is considered similar across the sub-area. Cross reference is also made to the review of major anomalies in the Green Belt evidence base work where this is relevant to the sub-area.
3. Provided observations in respect of the wider Green Belt. This does not inform the sub-area assessment conclusion but is provided to assist the Council with the application of paragraph 146 of the NPPF and the review of Green Belt boundaries which outlines that *'authorities should review Green Belt boundaries in accordance with policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan'*. It is considered that this assessment of the potential to *'fundamentally undermine'* is a test that should be applied most appropriately at a plan level rather than within the assessment of individual sub-areas as it requires a consideration of the cumulative implications of decisions taken *'across the area of the plan'*. It is intended that our observations within this section on a sub-area level will be helpful for the Council to factor into this higher-level exercise when it is conducted.

- 4.4.2 Site visits have been used to study and photograph the sub-areas in detail and in relation to their wider context (where accessible) to inform our assessment against the purposes of the Green Belt. Field notes of our observations of the sub-areas have been captured.

Proforma for assessing sub-areas

- 4.4.3 A proforma has been used to appraise each sub-area to ensure transparency and consistency in approach across all sub-areas. A completed proforma for each sub-area is included in Appendix C. Appendix B sets out the structure of the proforma. Completed assessment proforma have been informed by our desk-based assessment as well as our site visits.

4.5 Step D: Drawing conclusions from the assessment of sub-areas

- 4.5.1 Following the completion of Step C above we have considered the sub-areas according to their overall performance against the purposes of the Green Belt. In respect of assessment of performance against the purposes of the Green Belt, considering the release of a sub-area which

makes a strong contribution may potentially result in a high level of harm and at the other end of the spectrum the release of a weak sub-area may potentially lead to a low level of harm.

4.5.2 Assessments conclude with one of the three following recommendations to the Council:

- Recommend sub-area for further consideration;
- Sub-area not recommended for further consideration; or
- Entire sub-area not recommended for further consideration. Reduced area recommended for further consideration as outlined.

4.6 Green Belt Purposes

4.6.1 The long-established Green Belt purposes set out in paragraph 143 of the NPPF are as follows:

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

4.6.2 As set out in section 4.4, purposes d) and e) are not relevant in the context of Castle Point, and have therefore been excluded from assessment.

4.6.3 The PPG provides guidance on the approach that should be taken to considering the relevant Green Belt purposes and to openness, which along with permanence are the fundamental aims of Green Belt policy. Paragraph 013 appears to lean rather more towards the consideration of development proposals as opposed to plan-making, although bullet point one is of most relevance. This outlines that 'openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume'.

4.6.4 Spatial impacts on openness could be considered as the sub-area's volume/scale/size. The larger the sub-area, the greater its potential impact on the Green Belt's spatial openness.

4.6.5 Visual impacts on openness could be considered to include the extent to which the sub-area is visually exposed, with reference to its topography, boundary features, and neighbouring uses, as well as the extent to which the sub-area is considered to have a countryside character, with reference to its relationship to adjacent or nearby development.

4.6.6 It is important to note that our assessment of a sub-area may differ from the wider parcel assessment in the Green Belt Review Part 1 (2018) owing to the different characteristics of the land under assessment.

Green Belt Purpose a) - to check the unrestricted sprawl of large built-up areas

- 4.6.7 National policy outlines the first purpose of the Green Belt as being ‘to check the unrestricted sprawl of large built-up areas. This was fundamental to the conception of Green Belt policy in the 1930s with its goal to manage urban growth by maintaining a clear boundary between rural and urban areas thereby preventing unchecked growth of cities and towns into the countryside.
- 4.6.8 It is necessary to define what is meant by ‘sprawl’ and ‘large built-up areas’ to be able to effectively consider this purpose.
- 4.6.9 Definitions of ‘sprawl’ vary across different sources. PAS guidance¹ suggests that well-planned development may not constitute sprawl, while RTPI research² notes the term encompasses diverse patterns, including suburban growth, strip development, and scattered development.
- 4.6.10 Paragraph 005 of the Green Belt PPG outlines that villages should not be considered ‘large built-up areas’ or ‘towns’. Reflecting this guidance and upon consideration of a range of appeal decisions which address this matter, including the Brook Farm appeal decision³, we conclude that the four large built-up areas relevant in respect of purpose a) are Thundersley, South Benfleet, Hadleigh and Canvey Island. For clarity, it should be noted that this differs from the Green Belt Review Part 1 (2018) which, preceding the 2025 Green Belt PPG, also considered Daws Heath as a large built-up area.
- 4.6.11 Assessment of sub-areas against purpose a) has been undertaken on a basis consistent with the Green Belt PPG which outlines illustrative features and a scoring system of Strong/ Moderate/ Weak/ None as follows:

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: <ul style="list-style-type: none">- be adjacent or near to a large built up area- if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose, such as (but not limited to): <ul style="list-style-type: none">- having physical feature(s) in reasonable proximity that could restrict and contain development- be partially enclosed by existing development, such that new development

¹ Planning on the Doorstep: The Big Issues – Green Belt

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

² RTPI Research Briefing No.9 (2015)

³ [Brook Farm, Daws Heath appeal decision – 15 April 2025 \(APP/M1520/W/24/3351658\)](#)

	<p>would not result in an incongruous pattern of development</p> <ul style="list-style-type: none"> - contain existing development - being subject to other urbanising influences
Weak or None	<p>Assessment areas that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none"> - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Green Belt Purpose b) - to prevent neighbouring towns merging into one another

- 4.6.12 As noted in respect of purpose a), paragraph 005 of the Green Belt PPG outlines that villages should not be considered 'towns'. This guidance clarifies therefore that purpose b) in the context of the Borough of Castle Point applies to the four towns of Thundersley, South Benfleet, Hadleigh and Canvey Island. For clarity, it should be noted that this differs from the Green Belt Review Part 1 (2018) which, preceding the 2025 Green Belt PPG, considered Daws Heath as a town.
- 4.6.13 Our assessment against this purpose has considered the existing gap between any towns and then compared this to the gap that would remain if a sub-area were to be developed. Reflecting upon the Green Belt Review Part 1 (2018) and PAS Green Belt Guidance, the notion of preventing neighbouring towns from merging is about perception as well as distance between the two towns.
- 4.6.14 Assessment of purpose b) has been undertaken on a basis consistent with the Green Belt PPG which outlines illustrative features and a scoring system of Strong/ Moderate/ Weak/ None as follows:

Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
Moderate	<p>Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	<p>Assessment areas that contribute weakly are likely to include those that:</p> <ul style="list-style-type: none"> - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Green Belt Purpose c) - to assist in safeguarding the countryside from encroachment

- 4.6.15 The Green Belt PPG makes no explicit reference to purpose c), assumedly reflecting that purpose c) is not relevant to determining if land is Green Belt or not.
- 4.6.16 Encroachment can be defined as the gradual advancement of an urban area beyond an acceptable or established limit. The Inspector at the Welwyn Hatfield Plan Examination⁴ observed in respect of encroachment that *'it is again openness that is the most important consideration. It is therefore not simply the countryside characteristics of a particular site but how that site contributes to the wider countryside with which it is a constituent part.'* Adding that *'In this context the analysis of some of the larger potential development areas as single sites may not be appropriate. Parts of them may contribute more to the value of the surrounding countryside than the analysis to date suggests.'*
- 4.6.17 The Green Belt PPG does not include any scoring guidance for purpose c). Assessment guidance has therefore been formulated in a manner consistent with the PPG (Strong/ Moderate/ Weak/ None). The illustrative features against which purpose c) is assessed are as follows:

Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely to be:</p> <ul style="list-style-type: none"> - Almost wholly free of urbanising development and/or of a substantial size, and - Visually open to the wider Green Belt by virtue of no or weak boundary features and/or elevated topography, and/or <p>Of a rural character by virtue of its immediate surrounds</p>
Moderate	<p>Assessment areas that contribute moderately are likely to be:</p> <ul style="list-style-type: none"> - Largely free of urbanising development and/or of at least a moderate size, and - Visually enclosed to the wider Green Belt by strong boundary features and/or depressed topography, and/or <p>Of a semi-urban or urban character by virtue of its immediate surrounds</p>
Weak or None	<p>Assessment areas that contribute weakly are likely to be:</p> <ul style="list-style-type: none"> - Predominantly previously developed, and/or - Visually enclosed to the wider Green Belt by strong boundary features and/or depressed topography, and <p>Of a semi-urban or urban character by virtue of its immediate surrounds</p>

⁴ Mel Middleton, Inspector (December 2017) Welwyn Hatfield Local Plan Examination: Green Belt Review

5.0 Green Belt Assessment of sub-areas: Findings

5.1 Identification of sub-areas (Step A)

- 5.1.1 The sub-areas considered in this section have been submitted to the Council during the plan-making process and have been assessed within the Green Belt Assessment in order to inform work on the emerging Castle Point Plan. The sub-areas are outlined in Table 6.

Table 6: Sub-areas for assessment

Sub-area reference and name	Sub-area location
GB 1 West of Canvey Road	Canvey Island
GB 2 East of Canvey Road	Canvey Island
GB 3 Land south of Charfleets	Canvey Island
GB 4 Land off Glebelands	South Benfleet
GB 5 West of Benfleet	South Benfleet
GB 6 Land between Felstead Road and Catherine Road	South Benfleet
GB 8 South of Hadleigh	Hadleigh
GB 9 Oak Tree Farm	Hadleigh
GB 10 South East of Daws Heath	Daws Heath
GB 11 South West of Daws Heath	Daws Heath
GB 12 The Chase	Thundersley
GB 13 East of Rayleigh Road	Thundersley
GB 14 South of Daws Heath Road	Thundersley
GB 15 North of Grasmere Road	Thundersley
GB 17 Land off Grange	North West Thundersley
GB 18 Land off Goldfinch Lane	North West Thundersley
GB 19 Land North of Thundersley Church Road and East of Downer Road North	South Benfleet
GB 20 Land to the East of St Michaels Road	Daws Heath
GB 21 Land off Hilltop Avenue	South Benfleet
GB 22 Land Between Essex Way and Vicarage Hill	South Benfleet
GB 23 Land to the rear of 329 Benfleet Road	South Benfleet
GB 24 Land off Shipwrights Close	Hadleigh
GB 25 Land to rear of Beaucroft and Sunray, Bassenthwaite Road	North West Thundersley
GB 26 Land between Glen Haven and Ye Oaks, Bassenthwaite Road	North West Thundersley
GB 27 Land Adjacent 298 Church Road	South Benfleet
GB 28 170 Bramble Road	Daws Heath

Sub-area reference and name	Sub-area location
GB 29 Ragwood Riding Centre	Daws Heath
GB 30 Land off Netherfield	Hadleigh
GB 31 Land off Glyders	South Benfleet
GB 32 Land south of Fleet Roundabout, Roscommon Way	Canvey Island
GB 33 Land west of Kingsley Lane	Thundersley
GB 34 Grandview Stables, Grandview Road	Thundersley
N3 East of Manor Trading Estate	South Benfleet

- 5.1.2 The Council has also previously identified GB 16 (North West of Thundersley) as a potential Green Belt site option through the plan-making process. However, this area extends to approximately 160ha north of the Benfleet urban area and has been assessed at a parcel level (as parcel 1) in the Green Belt Review Part 1 (2018). Parcel 1 possesses a complicated fabric with fragmented land ownership and a varied planning history and contexts relating to individual sites. It is therefore deemed to be inappropriate to assess this as a sub-area within our assessment and instead sub-areas have been assessed at a more appropriate level of granularity.
- 5.1.3 It was determined with the Council that sub-areas GB 10 and GB 28 should be combined for the purpose of assessment and similarly GB 14 with GB 29. As per Step A in the methodology, we also undertook a high-level review of sub-areas to seek to ensure that they possess suitable defensible boundaries for assessment. The minor alterations made to sub-areas in this respect are highlighted in Figure 10 and the final sub-areas for assessment following Steps A and B are outlined in Figure 11. An example of a minor alteration would be if a sub-area's boundary cuts across a field with no boundary features evident. In this case a judgment is made as to an appropriate field boundary to be used. We also removed potential major anomalies in the Green Belt (consistent with recommendations in section 3) from sub-areas and again, this is shown in Figure 10. It is reflected that sub-area GB 12 includes a number of potential major anomalies (as outlined in section 3), although it was not feasible to remove these without splitting the sub-area. This matter is addressed further within the assessment proforma for sub-area GB 12 in Appendix C.

5.2 Major policy constraints (Step B)

- 5.2.1 We reviewed the sub-areas against the following major policy constraints as per Figure 8:
- Flood zone 3b (functional floodplain)
 - Sites of Special Scientific Interest (SSSI), Special Protected Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites
 - Scheduled Monuments
 - Registered Parks and Gardens (note: there are none in Castle Point's Green Belt)
 - Ancient Woodland.
- 5.2.2 Although no sub-areas have been excluded entirely from assessment as a consequence of the presence of major policy constraints there are several instances (as indicated in Figure 9) where it was deemed appropriate to redraw a sub-area to exclude an area of major policy constraint where this adjoined the boundary of a sub-area.

Figure 8: Major policy constraints

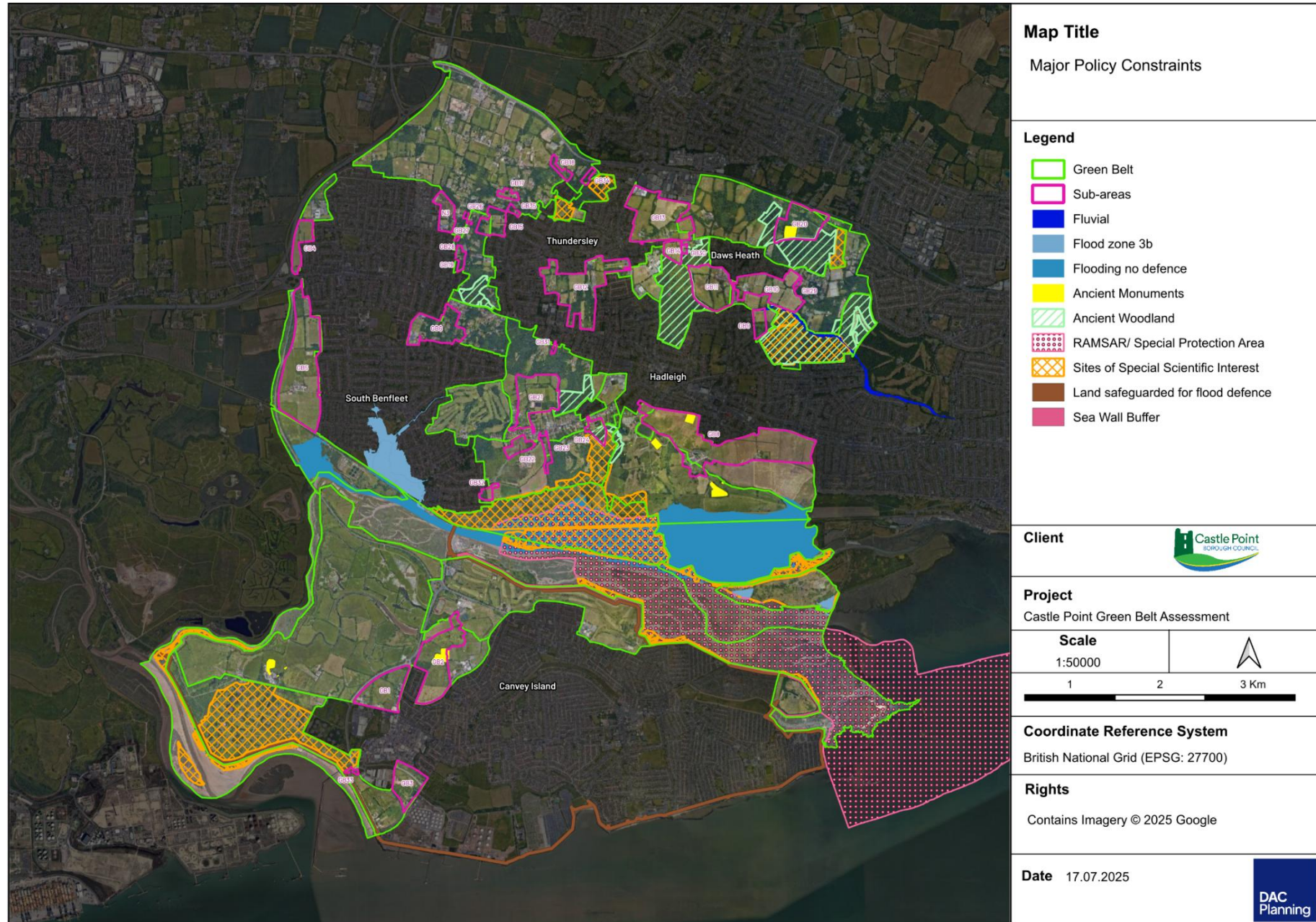
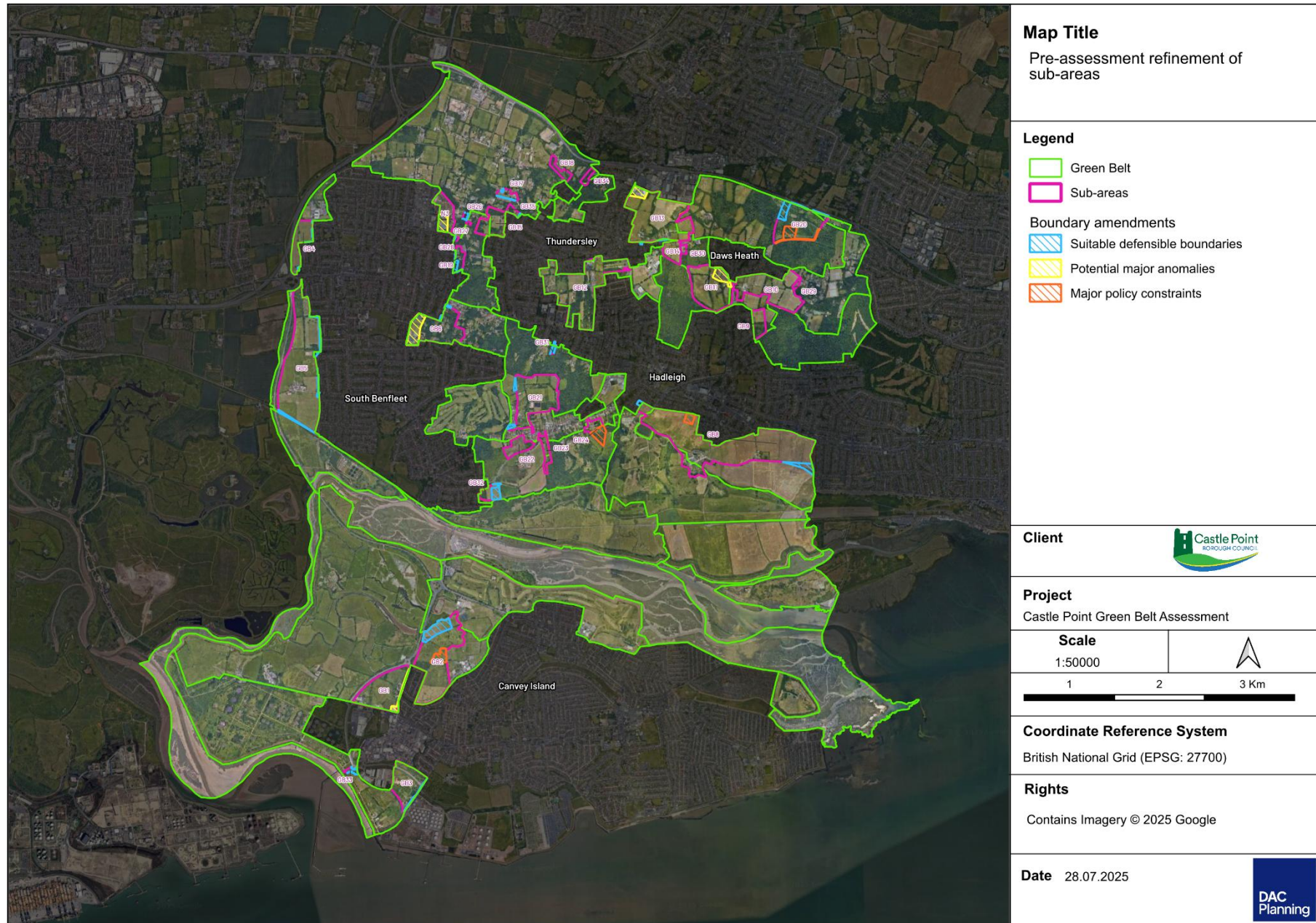


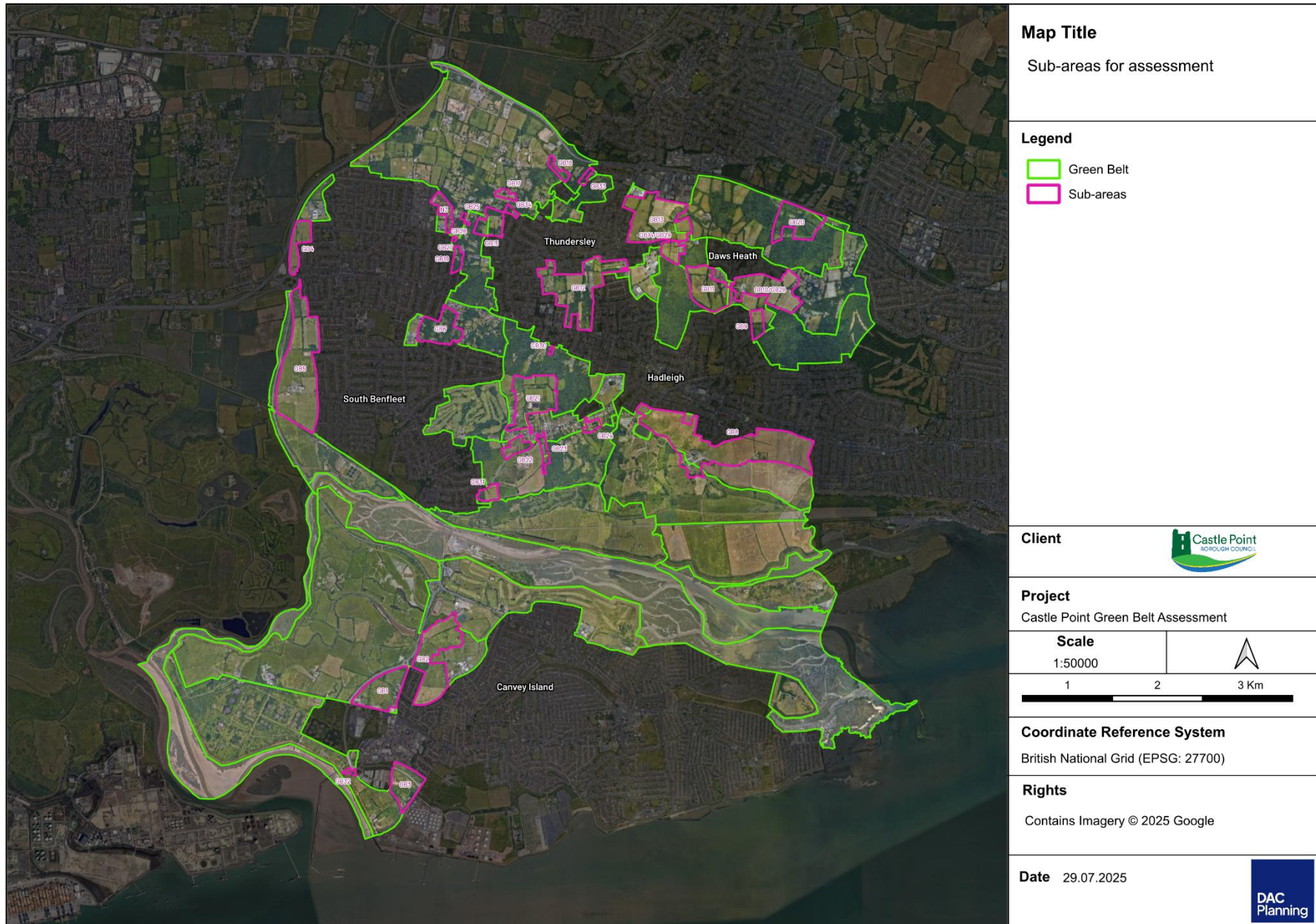
Figure 9: Outputs of Step A and Step B in refining the sub-areas prior to assessment



5.3 Assessment of sub-areas (Step C)

- 5.3.1 Figure 10 outlines the final sub-areas for assessment following the completion of Step B. The remainder of this section summarises the findings from the assessment of the sub-areas. Appendix C includes the detailed assessment proforma for each sub-area.

Figure 10: Sub-areas for Green Belt Assessment



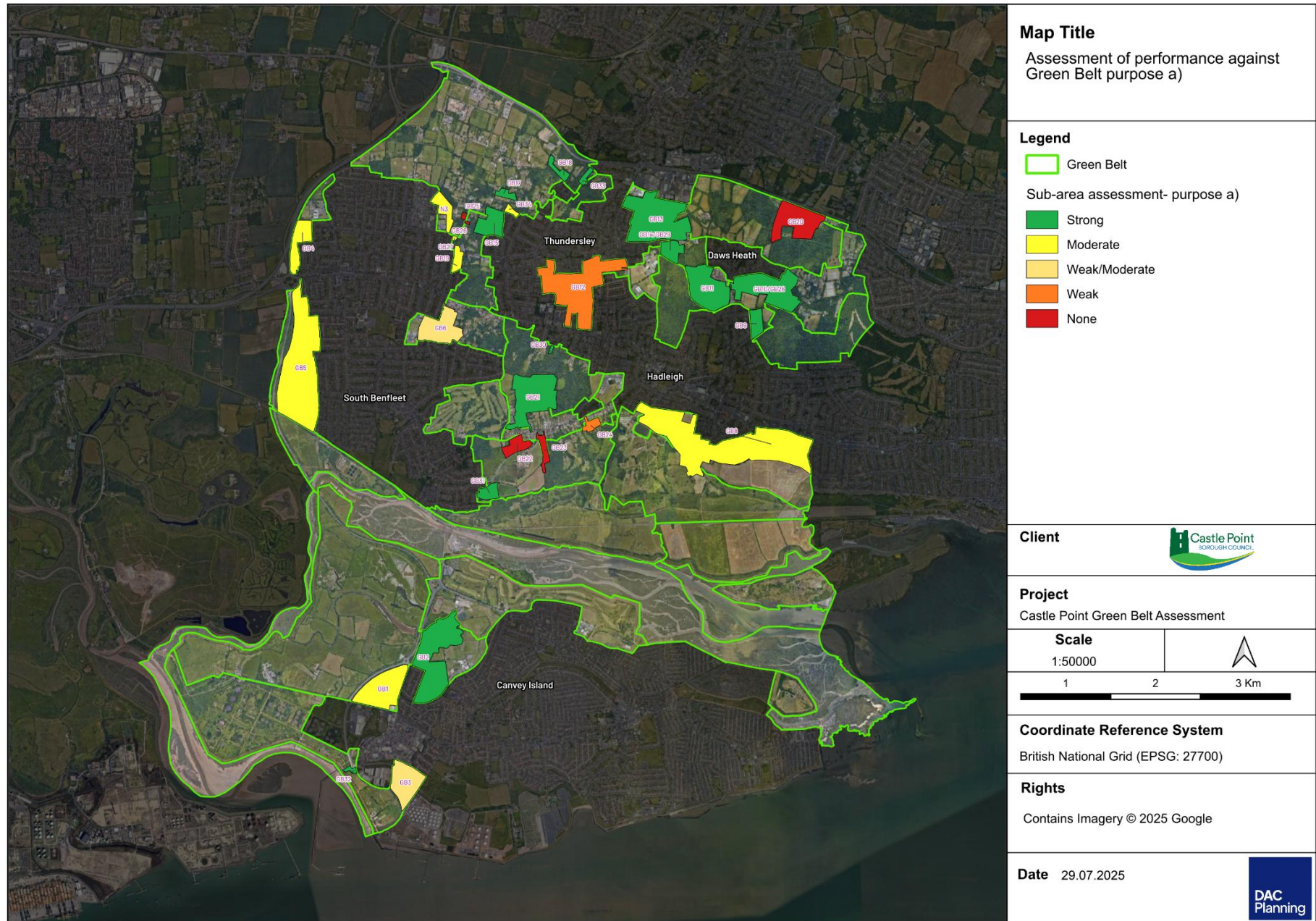
Assessment of performance against purpose a): To check the unrestricted sprawl of large built-up areas

5.3.2 Table 7 summarises the assessment scores of the sub-areas against purpose a) of the Green Belt and Figure 11 shows this output spatially. The sub-area proformas in Appendix C outline observations in respect of each sub-area in more detail. A dominance of sub-areas assessed as performing strongly against purpose a) is noted around both Hadleigh and Thundersley (with GB 12 forming the most notable exception) and to a lesser degree to the east of South Benfleet. Sub-areas further west in the Borough are assessed as generally performing less strongly.

Table 7: Assessment of performance against Green Belt purpose a)

Assessment of performance against purpose a)	Sub-area
Strong	GB2 East of Canvey Road GB9 Oak Tree Farm, Site 40107 GB10/GB28 South East of Daws Heath/ 170 Bramble Road GB11 South West of Daws Heath GB13 East of Rayleigh Road GB14/GB29 South of Daws Heath Road/ Ragwood Riding Centre GB15 North of Grasmere Road GB17 Land off Grange GB18 Land off Goldfinch Lane GB21 Land off Hilltop Avenue GB30 Land off Netherfield GB31 Land off Gliders' GB32 Land south of Fleet Roundabout, Roscommon Way GB33 Land west of Kingsley Lane
Moderate	GB1 West of Canvey Road GB4 Land off Glebelands, Site 40168 GB5 West of Benfleet GB8 South of Hadleigh GB19 Land North of Thundersley Church Road and East of Downer Road North GB34 Grandview Stables, Grandview Road N3 East of Manor Trading Estate
Weak/ Moderate	GB3 Land south of Charfleets, Site 39926 GB6 Lb Felstead Road and Catherine Road
Weak	GB12 The Chase GB24 Land off Shipwrights Close
None	GB22 Land Between Essex Way and Vicarage Hill GB20 Land to the East of St Michaels Road GB23 Land to the rear of 329 Benfleet Road GB25 Land to rear of Beaucroft and Sunray, Bassenthwaite Road GB26 Land between Glen Haven and Ye Oaks, Bassenthwaite Road GB27 Land Adjacent 298 Church Road

Figure 11: Assessment of performance against Green Belt purpose a



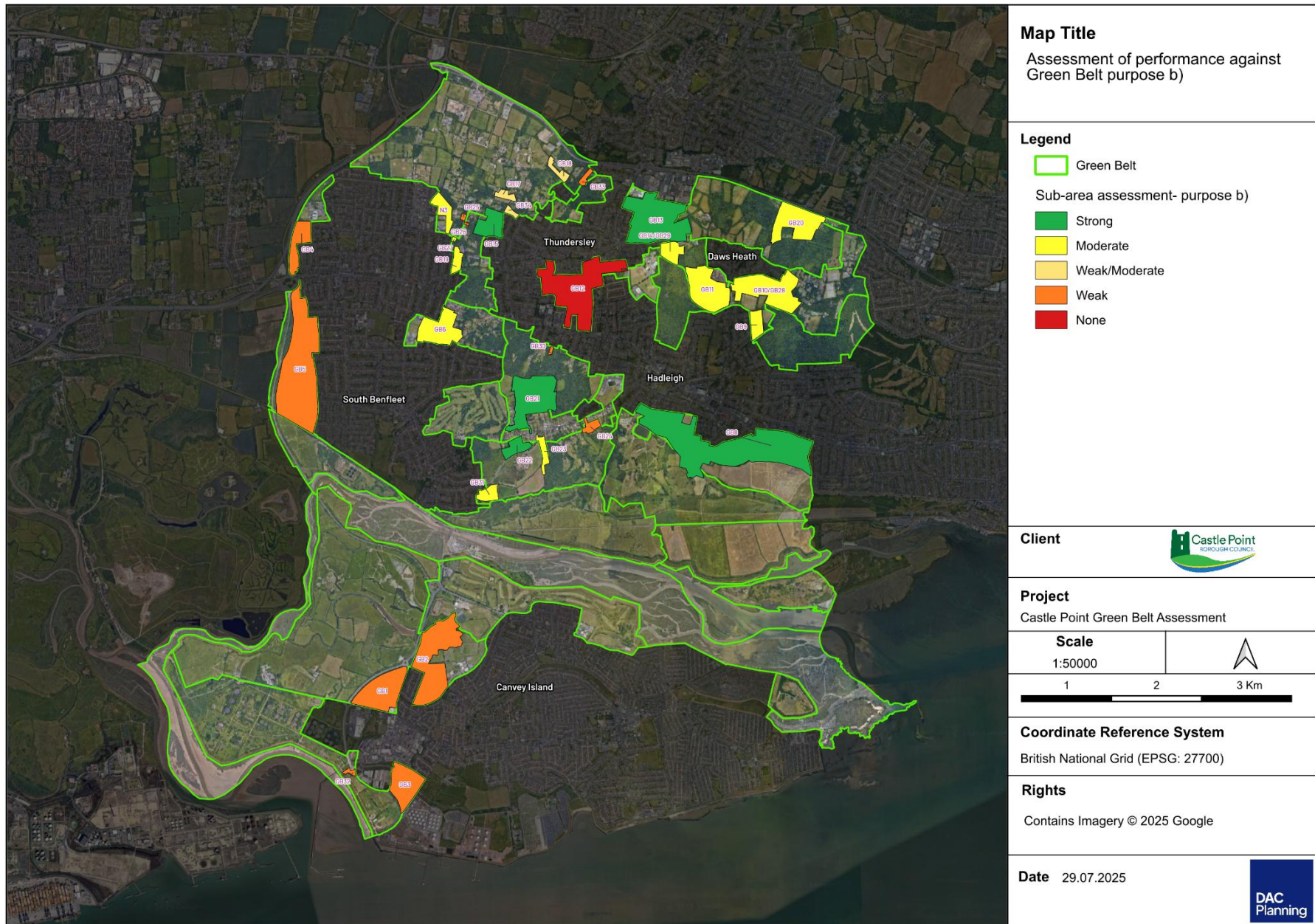
Assessment of performance against purpose b): To prevent neighbouring towns merging into one another

5.3.1 Table 8 summarises the assessment scores of the sub-areas against purpose b) of the Green Belt and Figure 12 shows this output spatially. The sub-area proformas in Appendix C outline observations in respect of each sub-area in more detail. There is a notable pattern of sub-areas between South Benfleet and Thundersley/ Hadleigh and between Thundersley/ Hadleigh and Leigh-on-Sea scoring strongly against this purpose. Sub-areas assessed as performing weakly are primarily to the west of Canvey Island and the west of South Hadleigh. Sub-area GB 12 is assessed as making no contribution in respect of Green Belt purpose b).

Table 8: Assessment of performance against Green Belt purpose b)

Assessment of performance against purpose b)	Sub-area
Strong	GB8 South of Hadleigh GB13 East of Rayleigh Road GB15 North of Grasmere Road GB21 Land off Hilltop Avenue GB22 Land Between Essex Way and Vicarage Hill
Moderate	GB6 Lb Felstead Road and Catherine Road GB9 Oak Tree Farm, Site 40107 GB10/GB28 South East of Daws Heath/ 170 Bramble Road GB11 South West of Daws Heath GB14/GB29 South of Daws Heath Road/ Ragwood Riding Centre GB19 Land North of Thundersley Church Road and East of Downer Road North GB20 Land to the East of St Michaels Road GB23 Land to the rear of 329 Benfleet Road GB27 Land Adjacent 298 Church Road GB31 Land off Glyders N3 East of Manor Trading Estate
Weak/ Moderate	GB17 Land off Grange GB18 Land off Goldfinch Lane GB34 Grandview Stables, Grandview Road
Weak	GB1 West of Canvey Road GB2 East of Canvey Road GB3 Land south of Charfleets, Site 39926 GB4 Land off Glebelands, Site 40168 GB5 West of Benfleet GB25 Land to rear of Beaucroft and Sunray, Bassenthwaite Road GB26 Land between Glen Haven and Ye Oaks, Bassenthwaite Road GB30 Land off Netherfield GB32 Land south of Fleet Roundabout, Roscommon Way GB33 Land west of Kingsley Lane GB24 Land off Shipwrights Close
None	GB12 The Chase

Figure 12: Assessment of performance against Green Belt purpose b)



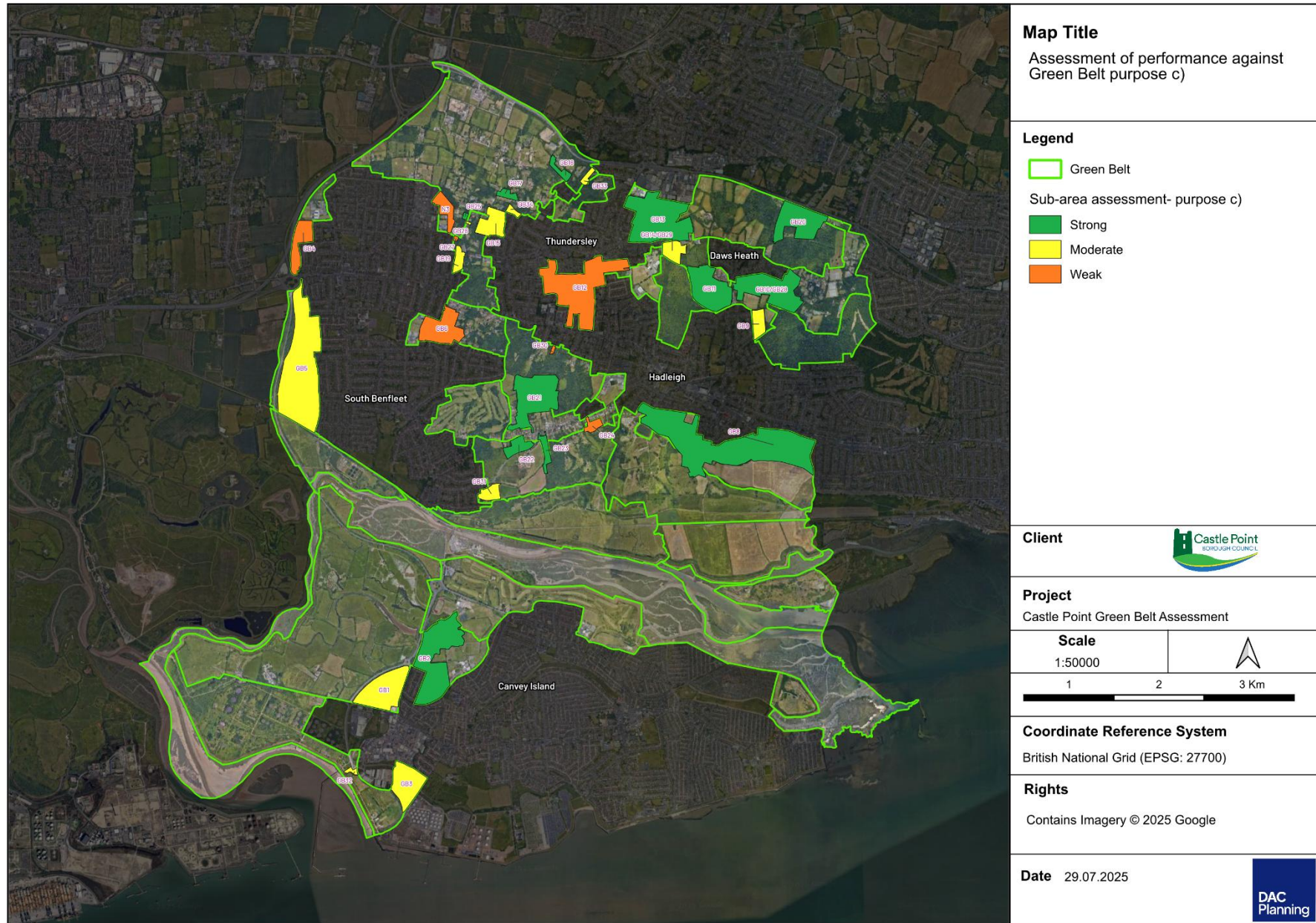
Assessment of performance against purpose c): To assist in safeguarding the countryside from encroachment

5.3.2 Table 9 summarises the assessment scores of the sub-areas against purpose c) of the Green Belt and Figure 13 shows this output spatially. The sub-area proformas in Appendix C outline observations in respect of each sub-area in more detail. Sub-areas assessed as performing strongly against purpose c) are distributed across the Borough to the south and west of Hadleigh, the vicinity of Daws Heath and Canvey Island, and several small sub-areas to the north-west of Thundersley. Sub-areas located around South Benfleet and GB 12 are amongst the weakest performing.

Table 9: Assessment of performance against Green Belt purpose c)

Assessment of performance against purpose c)	Sub-area
Strong	GB2 East of Canvey Road GB8 South of Hadleigh GB10/GB28 South East of Daws Heath/ 170 Bramble Road GB11 South West of Daws Heath GB13 East of Rayleigh Road GB17 Land off Grange GB18 Land off Goldfinch Lane GB20 Land to the East of St Michaels Road GB21 Land off Hilltop Avenue GB22 Land Between Essex Way and Vicarage Hill GB23 Land to the rear of 329 Benfleet Road GB25 Land to rear of Beaucroft and Sunray, Bassenthwaite Road
Moderate	GB1 West of Canvey Road GB3 Land south of Charfleets, Site 39926 GB5 West of Benfleet GB9 Oak Tree Farm, Site 40107 GB14/GB29 South of Daws Heath Road/ Ragwood Riding Centre GB15 North of Grasmere Road GB19 Land North of Thundersley Church Road and East of Downer Road North GB26 Land between Glen Haven and Ye Oaks, Bassenthwaite Road GB31 Land off Glyders GB32 Land south of Fleet Roundabout, Roscommon Way GB33 Land west of Kingsley Lane GB34 Grandview Stables, Grandview Road
Weak	GB4 Land off Glebelands, Site 40168 GB6 Lb Felstead Road and Catherine Road GB12 The Chase GB24 Land off Shipwrights Close GB27 Land Adjacent 298 Church Road GB30 Land off Netherfield N3 East of Manor Trading Estate

Figure 13 Assessment of performance against Green Belt purpose c)



5.4 Drawing conclusions from the assessment of sub-areas (Step D)

Performance against purposes of the Green Belt overall

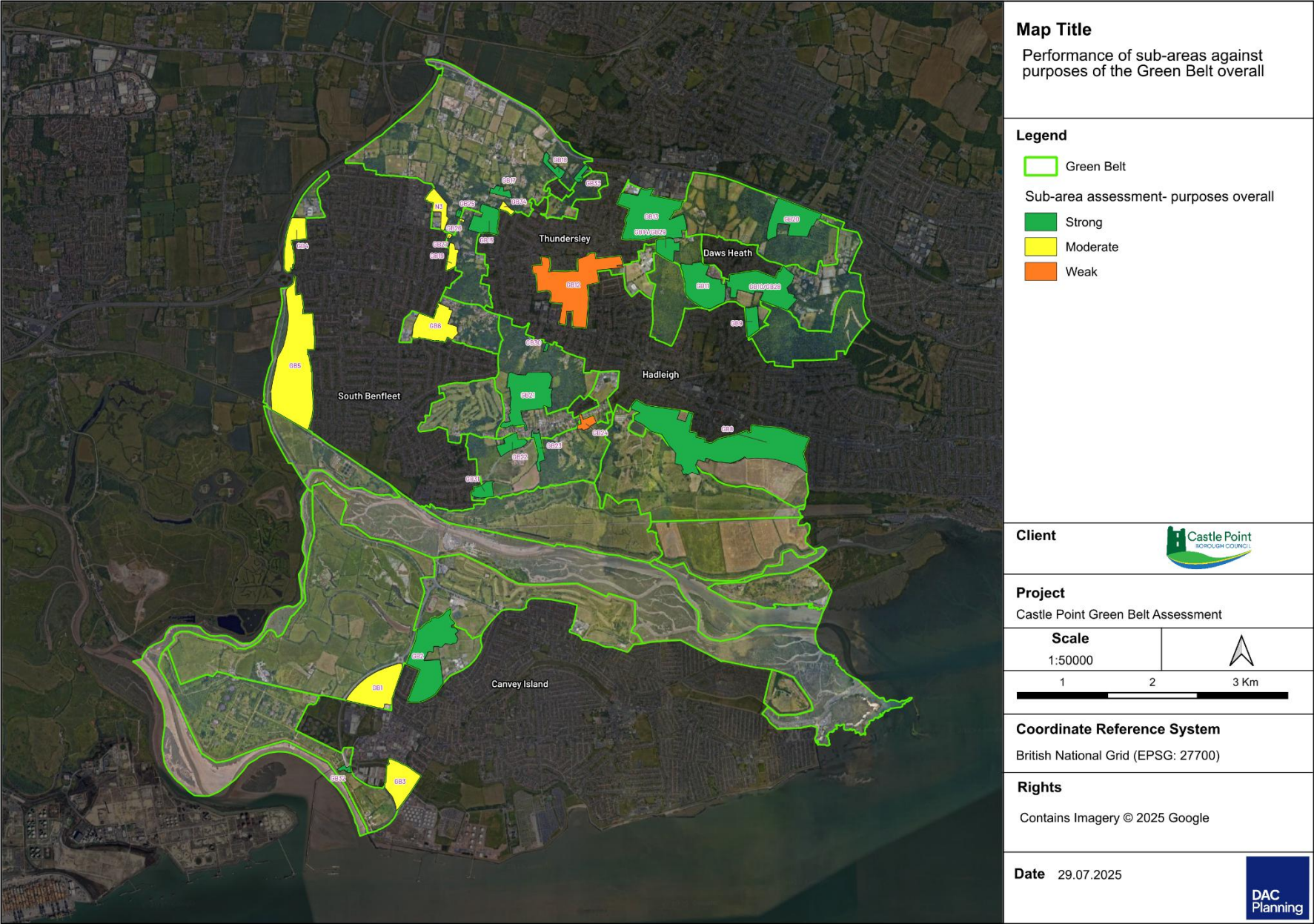
5.4.1 Table 10 summarises the assessment scores of the sub-areas in respect of the NPPF's Green Belt purposes overall and Figure 14 shows this output spatially. As per the methodology, this is either Strong, Moderate or Weak. The strongest score for each sub-area determines its overall performance. 18 of the sub-areas are deemed to perform strongly against the NPPF Green Belt purposes overall, 11 moderately and two to a weak degree.

Table 10: Performance of sub-areas against purposes of the Green Belt overall

Sub-area reference and name	Performance against purposes of the Green Belt overall
GB1 West of Canvey Road	Moderate
GB2 East of Canvey Road	Strong
GB3 Land south of Charfleets, Site 39926	Moderate
GB4 Land off Glebelands, Site 40168	Moderate
GB5 West of Benfleet	Moderate
GB6 Lb Felstead Road and Catherine Road	Moderate
GB8 South of Hadleigh	Strong
GB9 Oak Tree Farm, Site 40107	Strong
GB10/GB28 South East of Daws Heath/ 170 Bramble Road	Strong
GB11 South West of Daws Heath	Strong
GB12 The Chase	Weak
GB13 East of Rayleigh Road	Strong
GB14/GB29 South of Daws Heath Road/ Ragwood Riding Centre	Strong
GB15 North of Grasmere Road	Strong
GB17 Land off Grange	Strong
GB18 Land off Goldfinch Lane	Strong

Sub-area reference and name	Performance against purposes of the Green Belt overall
GB19 Land North of Thundersley Church Road and East of Downer Road North	Moderate
GB20 Land to the East of St Michaels Road	Strong
GB21 Land off Hilltop Avenue	Strong
GB22 Land Between Essex Way and Vicarage Hill	Strong
GB23 Land to the rear of 329 Benfleet Road	Strong
GB24 Land off Shipwrights Close	Weak
GB25 Land to rear of Beaucroft and Sunray, Bassenthwaite Road	Strong
GB26 Land between Glen Haven and Ye Oaks, Bassenthwaite Road	Moderate
GB27 Land Adjacent 298 Church Road	Moderate
GB30 Land off Netherfield	Strong
GB31 Land off Glyders	Strong
GB32 Land south of Fleet Roundabout, Roscommon Way	Strong
GB33 Land west of Kingsley Lane	Strong
GB34 Grandview Stables, Grandview Road	Moderate
N3 East of Manor Trading Estate	Moderate

Figure 14: Performance of sub-areas against purposes of the Green Belt overall



Green Belt boundaries and potential options for mitigation of harm

- 5.4.2 Green Belt boundaries and potential options for mitigation of harm are outlined within the proforma for each of the sub-areas in Appendix C.
- 5.4.3 In respect of sub-areas GB 2, GB 13, GB 15, GB 23 and GB 31 the assessment has concluded that the full extent of the sub-area is not recommended for further consideration. However, it is concluded that part of the sub-area can be recommended for further consideration given that this reduced part of the sub-area would result in reduced potential harm to the Green Belt. This is further detailed within the proforma and indicated in Figure 15 within the assessment conclusions.

Assessment Conclusions

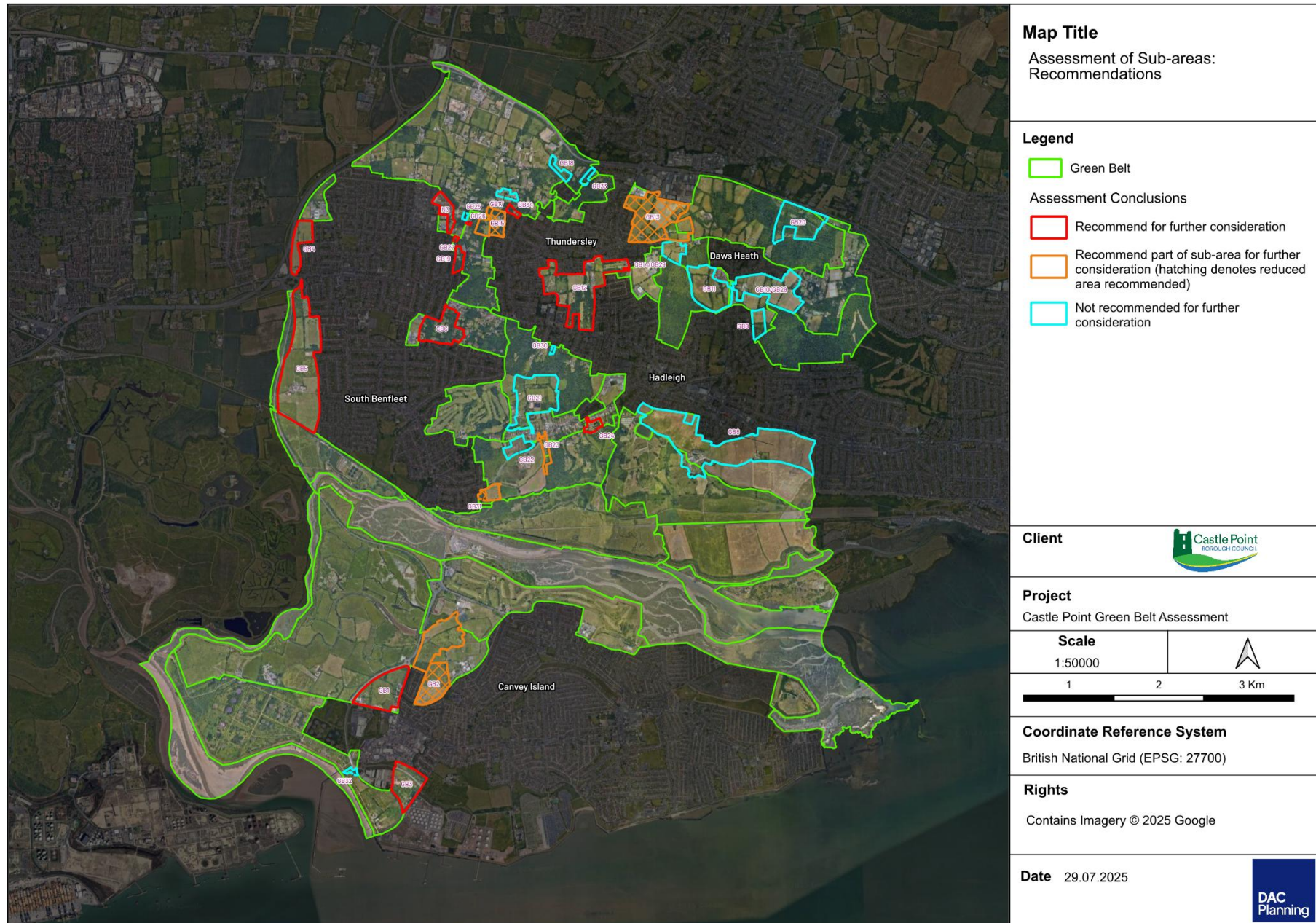
- 5.4.4 The assessment of each sub-area concludes with a recommendation to the Council which is intended to inform the plan-making process and specifically consideration of where potential changes may be required to Green Belt boundaries, subject to other evidence and justification in accordance with the NPPF. These conclusions are collated in Table 11 and Figure 15. Overall, 12 sub-areas are recommended for further consideration by the Council and 19 sub-areas are not recommended for further consideration by the Council. In the case of five of the 19 sub-areas not recommended for further consideration (GB 2, GB 13, GB 15, GB 23 and GB 31) our conclusion is that a reduced area is recommended to the Council for further consideration in order to reduce the level of potential harm to the Green Belt.
- 5.4.5 The below represents a summary picture and the Council will be required to interrogate beyond these high level recommendations (drawing on the assessment per purpose of the Green Belt as presented), adopting an approach that, should Green Belt release be required and justified, prioritises the further consideration of those sub-areas that would cause least harm to the Green Belt if proposed for release.
- 5.4.6 It is important to emphasise that Green Belt Assessments form part of the evidence base for Local Plans and can help inform a Council's consideration of the extent of harm to the Green Belt if land were to be released and development were to come forward. Findings from Green Belt Assessments are used alongside other evidence to inform the spatial strategy and site allocations of emerging local plans. Green Belt Assessments are not a policy or decision-making document, they provide a starting point to inform potential changes to the Green Belt (alongside other evidence and considerations) and cannot be used to release land, which is a matter for the Council to determine through the emerging Local Plan.

Table 11: Assessment conclusion per sub-area

Sub-area reference and name	Assessment conclusion
GB 1 West of Canvey Road	Recommend sub-area for further consideration
GB 2 East of Canvey Road	Entire sub-area not recommended for further consideration. Reduced area recommended
GB 3 Land south of Charfleets	Recommend sub-area for further consideration
GB 4 Land off Glebelands	Recommend sub-area for further consideration
GB 5 West of Benfleet	Recommend sub-area for further consideration
GB 6 Lb Felstead Road and Catherine Road	Recommend sub-area for further consideration
GB 8 South of Hadleigh	Sub-area not recommended for further consideration
GB 9 Oak Tree Farm	Sub-area not recommended for further consideration
GB 10/ GB 28 South East of Daws Heath/ 170 Bramble Road	Sub-area not recommended for further consideration
GB 11 South West of Daws Heath	Sub-area not recommended for further consideration
GB 12 The Chase	Recommend sub-area for further consideration
GB 13 East of Rayleigh Road	Entire sub-area not recommended for further consideration. Reduced area recommended
GB 14/ GB 29 South of Daws Heath Road/ Ragwood Riding Centre	Sub-area not recommended for further consideration
GB15 North of Grasmere Road	Entire sub-area not recommended for further consideration. Reduced area recommended
GB17 Land off Grange	Sub-area not recommended for further consideration
GB18 Land off Goldfinch Lane	Sub-area not recommended for further consideration
GB19 Land North of Thundersley Church Road and East of Downer Road North	Recommend sub-area for further consideration
GB20 Land to the East of St Michaels Road	Sub-area not recommended for further consideration
GB21 Land off Hilltop Avenue	Sub-area not recommended for further consideration
GB22 Land Between Essex Way and Vicarage Hill	Sub-area not recommended for further consideration
GB23 Land to the rear of 329 Benfleet Road	Entire sub-area not recommended for further consideration. Reduced area recommended
GB24 Land off Shipwrights Close	Recommend sub-area for further consideration

Sub-area reference and name	Assessment conclusion
GB25 Land to rear of Beaucroft and Sunray, Bassenthwaite Road	Sub-area not recommended for further consideration
GB26 Land between Glen Haven and Ye Oaks, Bassenthwaite Road	Recommend sub-area for further consideration
GB27 Land Adjacent 298 Church Road	Recommend sub-area for further consideration
GB30 Land off Netherfield	Sub-area not recommended for further consideration
GB31 Land off Glyders	Entire sub-area not recommended for further consideration. Reduced area recommended
GB32 Land south of Fleet Roundabout, Roscommon Way	Sub-area not recommended for further consideration
GB33 Land west of Kingsley Lane	Sub-area not recommended for further consideration
GB34 Grandview Stables, Grandview Road	Recommend sub-area for further consideration
N3 East of Manor Trading Estate	Recommend sub-area for further consideration

Figure 15: Assessment conclusion per sub-area



5.5 Compensatory Improvements/ Golden Rules

5.5.1 As noted earlier in the report, we have recently seen significant change in respect of national Green Belt policy. The NPPF prior to December 2024 included reference in paragraph 147 to compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of the removal of the land from the Green Belt. This was supported by the 2023 Green Belt PPG which outlined that such compensatory improvements could include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity, new or enhanced walking or cycling routes and improved access to new, enhanced or existing recreational and playing field provision.

5.5.2 The December 2024 NPPF and Green Belt PPG February 2025 make no explicit reference to compensatory improvements but instead refer (Paragraph 156 of the NPPF and Paragraph: 012 Reference ID: 64-012-20250225 of the PPG) to 'Golden Rules' that major development involving the provision of housing proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application should meet. The third 'Golden Rule' (c.) relates to the provision of new, or improvements to existing, green spaces that are accessible to the public and that new residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces. Paragraph 159 adds:

The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.

5.5.3 The Council is continuing to propose a compensatory improvement to the Green Belt within Canvey Wick Nature Reserve which is a designated Site of Special

Scientific Interest (SSSI) as per its previous and withdrawn Local Plan. This 11 hectare area of public open space is currently owned by the Land Restoration Trust and managed by the RSPB and Buglife. It is made up of a unique ex-industrial habitat, rich in rare plant and insect species, and comprising of scrub and small wooded areas. The site is referenced within section 3 of the report and in the proforma in Appendix B under reference MAGB17.

- 5.5.4 In the context of compensatory improvements and the 'Golden Rules' it will be essential for the Council to carefully consider its supporting evidence on landscape, biodiversity and recreational needs. Amongst other evidence this will likely include the South Essex Green and Blue Infrastructure Strategy Update (2025), the Borough's Open Space Assessment (2023), the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) SPD (2020), the Greater Essex Local Nature Recovery Strategy (2025) and any active travel strategies.

5.6 Identification of potential Grey Belt

- 5.6.1 The Green Belt PPG 2025 outlines that any assessment area that is not judged to strongly contribute to any one of purposes a), b), or d) can be identified as Grey Belt land, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.
- 5.6.2 As already outlined, Green Belt purpose d) is not deemed applicable to Castle Point and therefore we are concerned only with purposes a) and b). On this basis, Table 12 below indicates which sub-areas may be considered as potential Grey Belt land in respect of their performance against the relevant Green Belt purposes. For the sub-areas where only part of the sub-area was recommended for further consideration, appraisal as to whether it is potential Grey Belt or not is based upon the lesser area recommended for further consideration as opposed to the original extent of the sub-area.

Table 12: Whether sub-areas constitute potential Grey Belt based upon the consideration of Green Belt purposes a) and b)

Sub-area	Potential Grey Belt upon consideration of Green Belt purposes a) and b)?
GB 1 West of Canvey Road	Yes

Sub-area	Potential Grey Belt upon consideration of Green Belt purposes a) and b)?
GB 2 East of Canvey Road	Revised smaller area yes
GB 3 Land south of Charfleets	Yes
GB 4 Land off Glebelands	Yes
GB 5 West of Benfleet	Yes
GB 6 Land between Felstead Road and Catherine Road	Yes
GB 8 South of Hadleigh	No
GB 9 Oak Tree Farm	No
GB 10/ GB 28 South East of Daws Heath/ 170 Bramble Road	No
GB 11 South West of Daws Heath	No
GB 12 The Chase	Yes
GB 13 East of Rayleigh Road	Revised smaller area yes
GB 14/ GB 29 South of Daws Heath Road/ Ragwood Riding Centre	No
GB 15 North of Grasmere Road	Revised smaller area yes
GB 17 Land off Grange	No
GB 18 Land off Goldfinch Lane	No
GB 19 Land North of Thundersley Church Road and East of Downer Road North	Yes
GB 20 Land to the East of St Michaels Road	Yes
GB 21 Land off Hilltop Avenue	No
GB 22 Land Between Essex Way and Vicarage Hill	No
GB 23 Land to the rear of 329 Benfleet Road	Yes
GB 24 Land off Shipwrights Close	Yes
GB 25 Land to rear of Beaucroft and Sunray, Bassenthwaite Road	Yes

Sub-area	Potential Grey Belt upon consideration of Green Belt purposes a) and b)?
GB 26 Land between Glen Haven and Ye Oaks, Bassenthwaite Road	Yes
GB 27 Land Adjacent 298 Church Road	Yes
GB 30 Land off Netherfield	No
GB 31 Land off Glyders	Revised smaller area yes
GB 32 Land south of Fleet Roundabout, Roscommon Way	No
GB 33 Land west of Kingsley Lane	No
GB 34 Grandview Stables, Grandview Road	Yes
N3 East of Manor Trading Estate	Yes

5.6.3 Based upon the consideration of Green Belt purposes a) and b) 19 of the sub-areas assessed constitute potential Grey Belt land.

5.6.4 As referenced, national policy outlines that land subject to footnote 7 constraints should be excluded when considering potential Grey Belt. None of the sub-areas identified as potential Grey Belt in Table 12 (based on assessment against Green Belt purposes a) and b)) are subject to any footnote 7 constraints. Therefore, all sub-areas identified as 'yes' within Table 12 are potential Grey Belt land. Figure 16 shows this output spatially.

5.6.5 The above consideration of potential Grey Belt land only factors what may constitute Grey Belt in respect of the assessment of sub-areas against Green Belt purposes a) and b). As per the NPPF definition, Green Belt comprising previously developed land (PDL) also constitutes Grey Belt land. Determining PDL is not always straight forward and the NPPF definition includes a number of terms and elements which are potentially subjective in nature.

5.6.6 The NPPF's Grey Belt definition outlines that Grey Belt includes PDL in the Green Belt. PDL is defined in the NPPF 2024 as:

Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be

assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed.

Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

5.6.7 Clearly such a review can be undertaken to different degrees, including detailed on-site assessments. We have referred to a range of relevant appeal decisions, case law and where relevant, locally determined interpretations of what does and does not constitute PDL. This is summarised in Table 13.

Table 13: Summary of research on appeal decisions and case law to assist in defining approach to identify PDL

Specific theme in relation to PDL	Relevant Appeal Decisions/ Case Law/ Policy approach
Consideration of curtilage	<ul style="list-style-type: none"> • R (on the application of Marshall) v East Dorset DC [2003] • The case of Adrian Burford v Secretary of State for Communities and Local Government & Test Valley Borough Council [2017] • Sumption v Greenwich LBC [2007]: • Burford v Secretary of State for Communities and Local Government [2017] EWCA Civ 121
Definition of 'built-up area' in the context of the NPPF Glossary's definition of PDL	<ul style="list-style-type: none"> • Dartford Borough Council v Secretary of State for Communities and Local Government & Anor [2017] EWCA Civ 141 • Green Belt SPD November 2023, Guildford Borough Council • New homes in the countryside on PDL January 2019, Basingstoke and Deane Borough Council
Consideration of fixed surface infrastructure	<ul style="list-style-type: none"> • Lee Valley Regional Park Authority v Epping Forest DC [2016]

Equestrian Uses	<ul style="list-style-type: none"> • Appeal Decision October 2017 against Milton Keynes Council APP/Y0435/W/17/3178790 • R v. Secretary of State for the Environment, Transport and the Regions ex parte Brighton and Hove City Council [2000] (High Court) • London Borough of Barnet v. Secretary of State for the Environment [1996] (Court of Appeal)
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5.6.8 It was determined that a desk-based study applying a series of assumptions on what is and isn't considered to be PDL consistently across all areas of the Green Belt would constitute an appropriate and proportionate approach. This was to provide an understanding of the general overall extent of PDL within the Borough's Green Belt, rather than focusing on detailed assessments of individual boundaries and precise hectarage. It is considered that this approach fits with the Council's main impetus in requiring the review primarily from a policy and plan-making standpoint.

5.6.9 The illustrative output of our review of PDL within the Borough's Green Belt excluding any NPPF 'footnote 7 constraints' is shown in Figure 17. It should be noted that this exercise was conducted prior to the publication of the December 2024 NPPF which saw the inclusion of 'lawfully developed' within the definition of PDL. In referencing planning histories during the exercise this is factored into the plotting of some areas but as an exercise at this scale it is clearly not feasible to check the lawfulness of all development. This comes back to the need for a proportionate approach and that the desired output is an illustration of the extent of PDL to support policy and plan-making as opposed to a detailed site by site analysis.

5.6.10 Figure 18 combines both the sub-areas determined as Grey Belt with the indicative PDL mapping (Figures 16 and 17) in order to suggest broader areas of potential Grey Belt land within the Borough.

Figure 16: Consideration of potential Grey Belt based upon the consideration of Green Belt purposes a) and b) for the sub-areas assessed

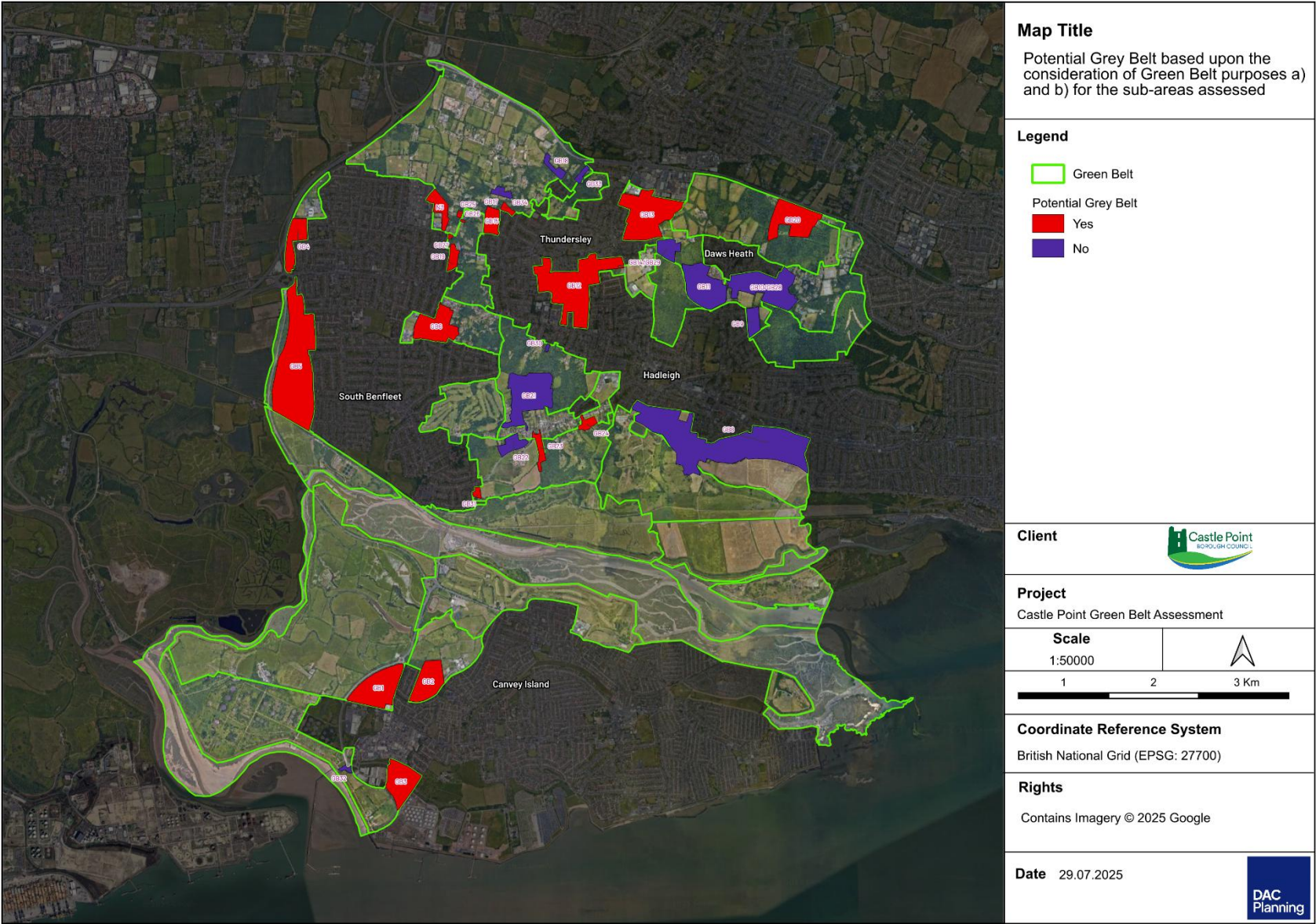


Figure 17: Indicative understanding of the general overall extent of PDL within Castle Point's Green Belt, excluding any footnote 7 constraints

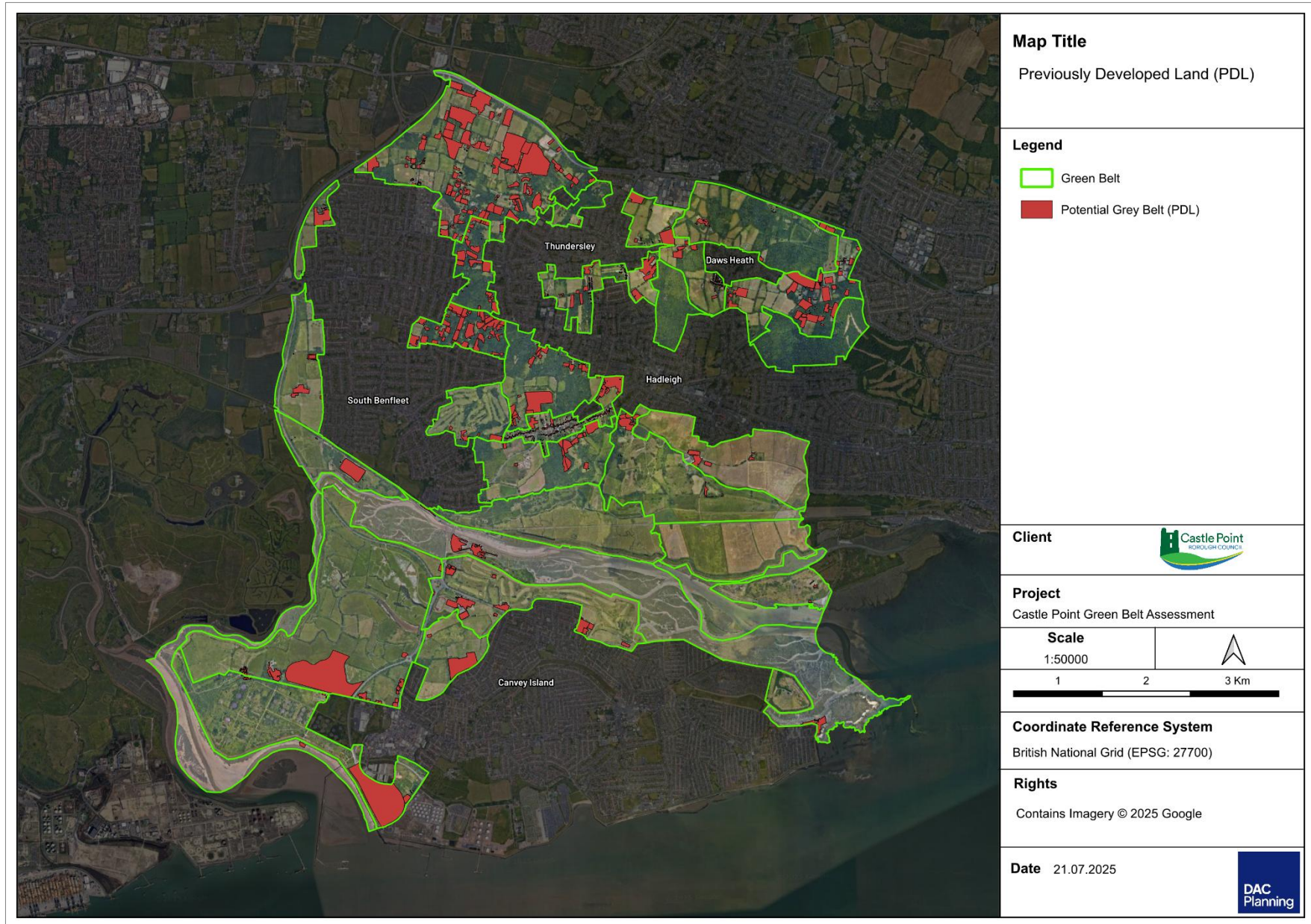
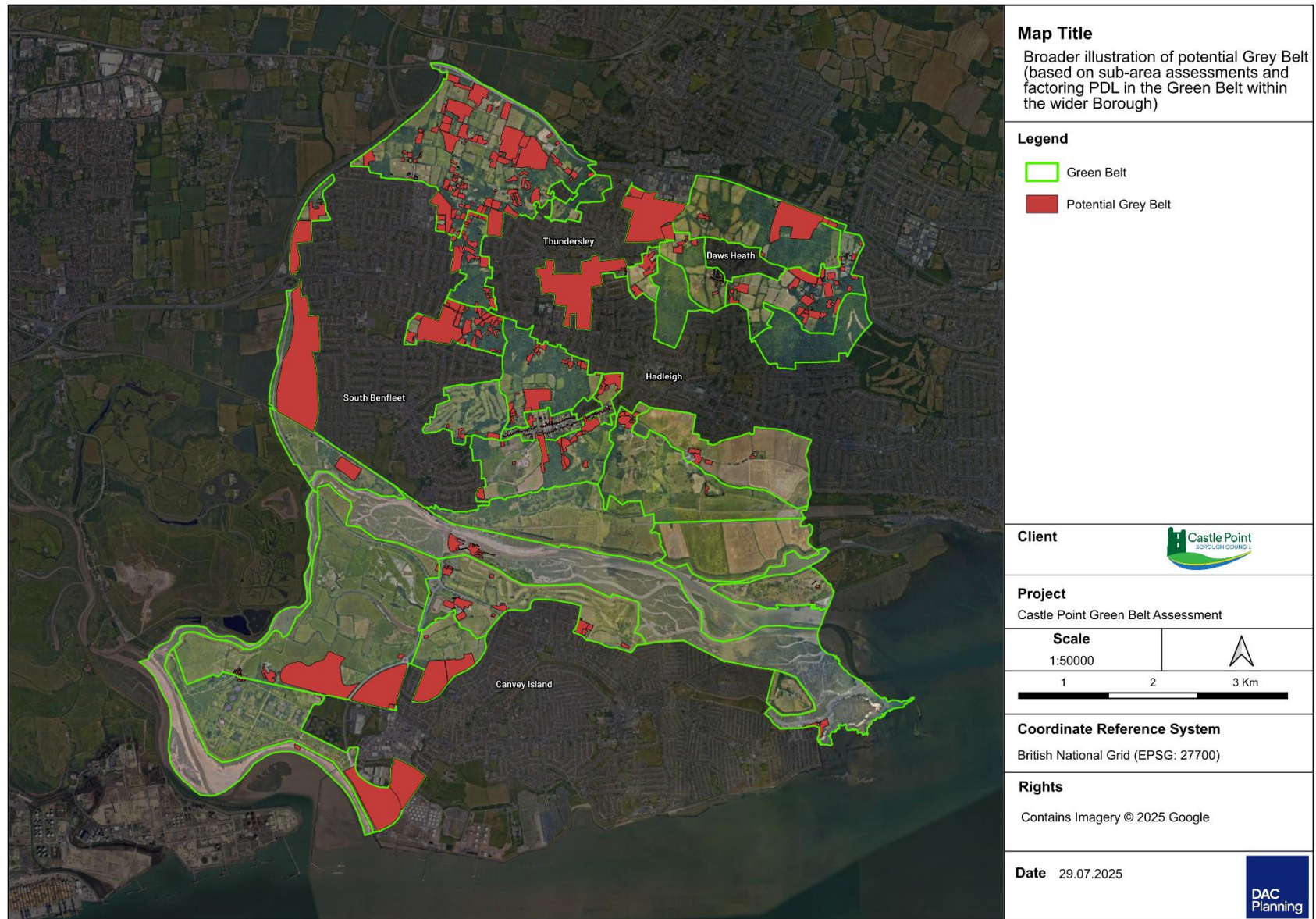


Figure 18: Broader illustration of potential Grey Belt (based on sub-area assessments and factoring PDL in the Green Belt within the wider Borough)



5.7 Observations in respect of the Wider Green Belt

- 5.7.1 This section within the assessment proforma has not informed our recommendations in respect of individual sub-areas but rather provides important observations in terms of considering the broader Green Belt context. Comment is provided, where relevant, on the potential cumulative impacts arising in respect of other sub-areas which are in close proximity. For the purposes of plan-making it is not appropriate to consider sub-areas in isolation but rather a strategic approach is required. This is particularly noteworthy in Parcel 1 of the Green Belt and straddling into Parcel 3A where we have assessed a number of fairly small sub-areas. The release of these sub-areas in isolation would be unlikely to significantly harm the Green Belt, although when considering cumulatively a different conclusion may be reached.
- 5.7.2 In considering sub-areas and future potential alterations to Green Belt boundaries within Parcel 1 it will be necessary to consider the wider context including, the geographic extent and nature of the Parcel, its fragmented land ownership and varied planning history and contexts relating to individual sites, which results in a complicated overall fabric. It is recommended that in due course further work is undertaken to assess Parcel 1 in its entirety at a more granular level to determine its future planning status in the context of national Green Belt policy. Regardless, the Parcel does contain a relatively extensive coverage of PDL which in itself will constitute Grey Belt. In a similar vein, reflecting upon our understanding from both the Green Belt boundary review exercise (in section 3) and sub-area assessments in the vicinity, it is suggested that in due course further work is undertaken to assess Parcels 6 and 13 in their entirety at a more granular level to determine their future planning status in the context of national Green Belt policy.
- 5.7.3 In its clarification that villages such as Daws Heath should not be considered 'large built-up areas' or 'towns', the Green Belt PPG (2025) impacts upon how Green Belt purposes a) and b) to Green Belt apply around Daws Heath. Whilst the sub-area assessments accord with the 2025 PPG, the Green Belt Review Part 1 (2018) clearly pre-dates this. Further work may therefore need to be undertaken in due course to review the Green Belt at a parcel level around Daws Heath in line with the revised PPG. Regardless, the sub-area assessments highlight the important role and function that the Green Belt 'ring' around Daws Heath has in checking the unrestricted sprawl of Hadleigh to the south, Thundersley to the west and Leigh-on-Sea to the east, as well as safeguarding the countryside from encroachment.

5.7.4 As referenced, observations are also provided within this section of the proforma to assist the Council with the application of paragraph 146 of the NPPF and the review of Green Belt boundaries which outlines that ‘authorities should review Green Belt boundaries in accordance with policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan’. It is considered that this assessment of the potential to ‘fundamentally undermine’ is a test that should be applied most appropriately at a plan level rather than within the assessment of individual sub-areas as it requires consideration of the cumulative implications of decisions taken ‘across the area of the plan’ such as those relating to the preferred spatial strategy and proposed site allocations. Our observations on a sub-area level are intended to be helpful for the Council to factor into this higher-level exercise when it is conducted. The context of this commentary is important, and it is emphasised that the proforma should be read as a whole with particular reference to the performance of the sub-area against the Green Belt purposes and our assessment conclusion.

6.0 Conclusions and Recommendations

6.1 Scope and purpose

6.1.1 The Green Belt Assessment has been produced to supplement Castle Point Borough Council's existing Green Belt evidence base and to inform the emerging Castle Point Plan.

6.1.2 DAC Planning's work has comprised the following workstreams:

- An appraisal of national planning policy alongside the Borough's existing Green Belt evidence and a review of best practice in undertaking Green Belt Assessments;
- A review of the current Green Belt boundary in Castle Point (which was last amended in 1998) identifying potential 'major' anomalies and providing guidance to the Council on where the boundary may warrant alteration through the Local Plan process and whether it can be strengthened to ensure a robust and defensible boundary;
- A Green Belt Assessment of sub-areas identified by the Council during the plan-making process, including recommendations for the Council; and
- Consideration of Grey Belt land in respect of the sub-areas subject to the Green Belt Assessment and a high level desk-based study of PDL in the Borough's Green Belt to identify broader areas of potential Grey Belt land within Castle Point.

6.1.3 It is important to reflect that this report (and work that underpins it) has been undertaken during a period of change in respect of national policy, including the newly introduced concept of Grey Belt and revision of the Green Belt PPG in 2025. Whilst the PPG has introduced some guidance to help standardise the process of Green Belt Assessment, the guidance is high level and only partial, which leaves considerable subjectivity in interpretation. Our work is therefore caveated in respect of being to the best of our knowledge and planning judgment based on the information available at the time of undertaking the exercise.

6.2 Outcomes from Green Belt boundary review

- 6.2.1 The Green Belt in the Borough was last amended in 1998. Producing a new Local Plan presents the Council with the opportunity to consider whether the Borough's Green Belt boundaries require alteration subject to the demonstration of exceptional circumstances.
- 6.2.2 We completed a mapping exercise reviewing the Green Belt boundary at a granular level to identify where there are potential anomalies (e.g. where development has taken place or it does not seem to follow a logical boundary). This led to the identification of 17 'potential major anomalies' which were then assessed in greater detail. Our assessment recommends that the Council should consider potentially altering the Green Belt boundary at 16 locations. The net change in Green Belt if all these potential alterations were implemented would be a 25.5 ha reduction in Green Belt area. We also recommend that prior to determining where alterations may be proposed through the emerging Local Plan the Council should also give further careful consideration to the potential individual or cumulative strategic implications arising from any alterations for the wider role and function of the Green Belt of the Borough. These should be considered in tandem with the recommendations arising from the sub-area assessments.
- 6.2.3 It is for the Council to consider the outputs of the boundary review exercise as part of its plan-making process and in conjunction with the evidence base as a whole, and to set out the exceptional circumstances case for alterations that it wishes to take forward as part of the Local Plan examination.

6.3 Green Belt Assessment of sub-areas

- 6.3.1 This workstream included the finer grained assessment of a number of sub-areas identified by the Council during the plan-making process in order to inform work on the emerging Castle Point Plan. We have considered the sub-areas according to their performance against the purposes of the Green Belt overall. The Green Belt Assessment concludes that 12 sub-areas are recommended for further consideration by the Council in the plan-making process and 19 sub-areas are not recommended for further consideration by the Council. In the case of five of the 19 sub-areas not recommended for further consideration we identify that a reduced area may be considered in order to reduce the level of potential harm to the Green Belt. This information is set out in Table 11 and Figure 15 of the report.

We have considered whether the sub-areas constitute Grey Belt land, and this is shown within Table 12 and Figure 16.

- 6.3.2 Separate to each sub-area assessment, we have provided the Council with observations in respect of the relationship between the sub-area and the wider Green Belt in order to inform the Councils consideration of the potential impact of sub-area release (individually and cumulatively) at a strategic level.

6.4 Identification of potential Grey Belt

- 6.4.1 Based upon the consideration of Green Belt purposes a) and b) 19 of the 31 sub-areas assessed constitute potential Grey Belt land. Green Belt comprising previously developed land (PDL) also constitutes Grey Belt and Figure 17 in the report outlines the general overall extent of PDL not subject to footnote 7 constraints in the Borough's Green Belt generated through a high level desk-based study. Figure 18 in the report combines these two sources thus identifying broader areas of potential Grey Belt land in the Borough.

Refer to accompanying document for Appendices

DAC Planning Limited

Hop House,
Colchester Road, West Bergholt,
Colchester, CO6 3TJ
United Kingdom
dacplanning.com
01206 688103

DAC
Planning

