

# **Green Belt Topic Paper**

## **DRAFT**

November 2018

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## 1 Introduction

- 1.1 The purpose of this topic paper is to consider whether the approach to Green Belt in the Castle Point Borough Draft Local Plan is appropriate, and in particular if 'exceptional circumstances' exist to justify the release of land within the extent of the Green Belt for development purposes, and if so to what extent.
- 1.2 The Topic Paper aims to inform the decisions taken in the Publication Local Plan, to be approved by the Council in November 2018. For completeness, the rationale in relation to 'exceptional circumstances' and 'harm' are therefore set out to assist in the interpretation of how the Council could make its final judgements.

### Background

- 1.3 Green Belt is one of the best known and oldest national planning policies. Following the initial identification of a Green Belt around London, the Town and Country Planning Act 1947 allowed local authorities across the county to incorporate Green Belts into their Development Plans with the aim of preventing urban sprawl and keeping land around towns and cities permanently open.
- 1.4 Nationally there are 14 different Green Belts that cover a total area of over 1.6 million hectares of land. The Green Belt in Castle Point Borough is part of the Metropolitan Green Belt that forms a ring around London.

Figure 1: The Metropolitan Green Belt



### The Green Belt in Castle Point Borough

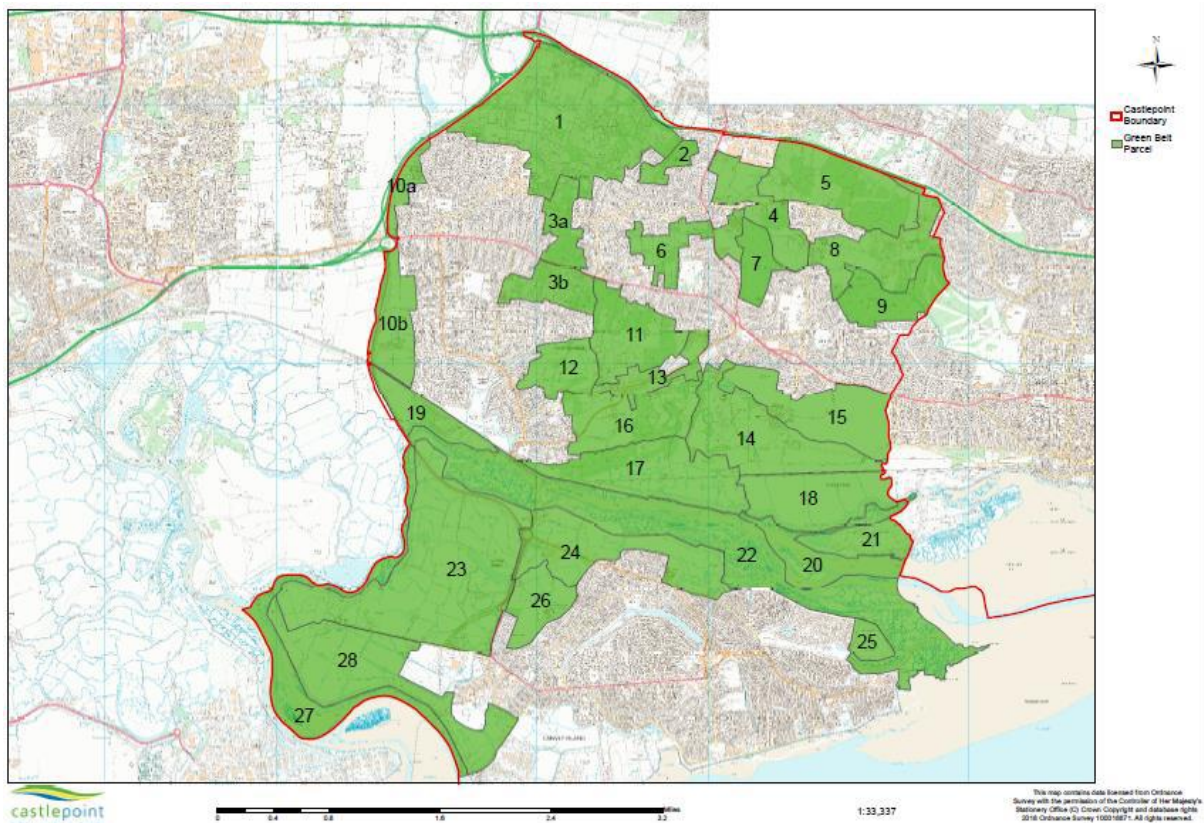
- 1.5 The Green Belt was first identified in Castle Point in the Approved Review Development Plan, (ARDP), which was submitted to the Secretary of State in 1964, and finally approved in 1976. Identification of the Green Belt in Castle Point was part of a significant extension of the Green Belt in Essex. Within South Essex the ARDP also extended the previous Green Belt designation through Basildon District and most of Rochford District. The Green Belt designations in Castle Point therefore perform a local and sub-regional function, as well as forming part of the Metropolitan Green Belt for London.
- 1.6 The Green Belt boundaries in Castle Point were identified on an OS map base in the Town Maps of the ARDP. Green Belt policy has been continuously applied to development proposals in the Green Belt of Castle Point since approval of the ARDP for submission to the Secretary of State in 1964.
- 1.7 The ARDP was replaced by the Essex Structure Plan, which itself was amended by the First and Second Alterations to the Structure Plan, and later replaced by the Essex and Southend on Sea Replacement Structure Plan 1996-2011. Each edition of the Structure Plan described the general extent of the outer boundary of the

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Green Belt in Essex. The inner boundary of the green belt fell to be determined by the Borough Council as part of the Local Plan process. No edition of the Structure Plan amended or altered the extent of the Green Belt within Castle Point.

- 1.8 The Borough Council used the boundaries of the Green Belt identified by the ARDP for development control purposes from the period when the authority was created in 1974 until the adoption of the Local Plan in 1998. In preparing the Local Plan it was intended that the Green Belt boundaries would become 'permanent' and would substantially exceed the lifetime of the Local Plan. The Borough Council undertook a comprehensive review of the boundaries of the Green Belt as part of the preparation of the Local Plan, having regard to the development needs of the borough to 2001 only (as set out by the Structure Plan). Further development needs and allocation of land to meet such needs were to be considered through a review of the Local Plan. They have not been the subject of amendment since that time despite substantial growth in the borough's population, which has instead had to be accommodated by brownfield and greenfield development in urban areas.
- 1.9 The borough 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 2: Current Green Belt extent in Castle Point Borough



## National Planning Policy for Green Belts

### *National Planning Policy Framework 2018*

1.10 The National Planning Policy Framework (NPPF) states the following in relation to Green Belts:

1.11 The Government attaches great importance to the Green Belt. The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. As such the essential characteristics of Green Belts are their openness and their permanence.

1.12 Green Belt serves the following five purposes:

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

1.13 Green Belt is therefore a policy designation intended to keep land free from development. There is a common public misconception that Green Belt land is



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‘sacrosanct’ and that once designated it should never be developed. This has never, however, been the case in legislative or policy terms.

- 1.14 National policy is very clear that when a planning application is submitted on Green Belt land, the applicant must demonstrate ‘very special circumstances’ exist in order to justify harm to the Green Belt. National Planning Practice Guidance (PPG) states that housing need alone is unlikely to represent these ‘very special circumstances’.
- 1.15 However, a different test applies when determining whether to adjust Green Belt boundaries through a Local Plan – in particular the process of plan-making requires a more strategic and longer term assessment and then judgement to be made. Paragraph 136 of the NPPF states that: *‘Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans’*. However, at this time, it does not define what ‘exceptional circumstances’ may be.
- 1.16 The focus of the NPPF is on promoting sustainable patterns of development: paragraph 137 requires demonstration that all other reasonable options for meeting development needs have been considered prior to considering Green Belt locations. Paragraph 138 requires that where it is concluded that it is necessary to release land from the Green Belt, that previously developed land and/or that which is well served by public transport should be considered first. Thus, NPPF confirms that exceptional circumstances relate to the provision of sustainable patterns of development, and meeting the requirements for sustainable development.
- 1.17 NPPF also sets out the considerations which must be taken into account when defining green belt boundaries. These include consideration of safeguarding land for future development beyond the plan period, with the aim of demonstrating that green belt boundaries will not need to be altered at the end of the plan period.

#### *Planning Practice Guidance*

- 1.18 The national Planning Practice Guidance (PPG) does not include a specific section on Green Belt, nor the interpretation of what is meant by ‘exceptional circumstances’. However, the relationship between Green Belt and development needs is considered in the sections on *Housing and economic development needs assessments* and *Housing and economic land availability assessments*.
- 1.19 In relation to the assessment of need paragraph 2a-004-20140306 states that plan-makers should not apply constraints to the overall assessment of need. However, it goes on to state that these [constraint] considerations will need to be addressed when bringing evidence bases together to identify specific policies within Development Plans. Therefore, constraints such as Green Belt cannot be considered

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in *determining* what the overall need for development, whether it be residential or commercial, should be.

- 1.20 In relation to the assessment of supply meanwhile, paragraph 3-045-20141006 states that local planning authorities should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which may indicate that development should be restricted and which may *restrain the ability* of an authority to meet its need.
- 1.21 The PPG as a whole therefore indicates that whilst constraints such as Green Belt should not be used to assess development needs, they can be considered in determining whether it is possible for an authority to meet its full, objectively assessed need for development. However, the PPG does not provide any guidance on the balance that should be struck between development need and the different types of constraints that exist. In relation to Green Belt, it merely refers the reader back to paragraph 83 of the NPPF, which states that Green Belt boundaries may only be amended in exceptional circumstances through the review of the Local Plan. No further guidance on what these 'exceptional circumstances' may be is offered.

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## 2 Green Belt Policy in Practice

- 2.1 In the absence of legislation, as well as current clear planning policy or guidance on the matter of what constitutes the 'exceptional circumstances' required to allow for the revision of Green Belt boundaries through the plan-making process, consideration should be given to how this policy has been interpreted in practice.
- 2.2 Numerous Local Plans for Green Belt authorities have been subject to Examination in Public over the period since the NPPF came into effect in 2012, providing a steer as to how Planning Inspectors are interpreting Green Belt policy in relation to development needs and in turn, how they are interpreted further through Judicial Review.
- 2.3 There are some examples where local planning authorities have submitted plans which have sought to avoid revising Green Belt boundaries, indicating that exceptional circumstances have not existed to justify such release.

### Reigate and Banstead

- 2.4 Reigate and Banstead Borough Council in Surrey has 8,890ha of London Metropolitan Green Belt; amounting to 69% of its total area. It submitted a Local Plan in 2012, which did not plan for Green Belt release, and this was subject to an Examination in Public against the requirements of the NPPF.
- 2.5 However, following initial consideration of the submitted plan, the Inspector issued an Interim Report highlighting legal deficits and concerns about the soundness of the Submission Local Plan. In his final report he noted:
- The Submission version of the Plan was somewhat ambivalent about the need for land outside the urban area to be developed, particularly Green Belt land. Because information about potential capacity within the urban area to meet the housing and employment needs identified by the Council was not wholly convincing, it became evident that development of some land outside the urban area would be unavoidable.*
- 2.6 The Examination was subsequently suspended for a period of seven months and the Council acknowledge the need for Green Belt release and devised an approach to identify suitable land to remove from the Green Belt in accordance with the NPPF. In his analysis of the amendments to the Green Belt subsequently proposed by the Council he reported that the debate at the Examination concluded that exceptional circumstances for releasing land from the Green Belt would exist if:

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*...there is an overriding need for the development to achieve the strategic objectives and policies of the Core Strategy, and either (i) all possible options for development outside the Green Belt have been exhausted, or (ii) the development would represent a significantly more sustainable option than development on non-Green Belt land. In addition, there should be either no conflict with the purposes and integrity of the Green Belt or, at worst, limited conflict. Because sustainable development lies at the heart of the Core Strategy, its promotion is implicit in the need to achieve the Plan's strategic objectives.*

- 2.7 In this case, the Inspector acknowledged that there was significant local objection to the release of Green Belt for development purposes, including petitions and an adjournment debate in Parliament, as a consequence of intervention by the local MP. However he concluded the following in relation to this matter:

*These concerns are legitimate and understandable, for the inevitable harm caused by the loss of sizeable tracts of protected countryside and the effects on neighbouring communities are significant adverse impacts of the proposed SUEs [sustainable urban extensions] and should not be dismissed lightly. But as Government advice in The Planning System: General Principles makes clear, local opposition is not in itself sufficient reason to reject a proposal; decisions should be taken in the light of all material considerations, including local priorities and needs, guided by relevant national policy. In this case the planning merits of the selected SUEs have been thoroughly explored at this examination and found, in principle, to outweigh the loss of Green Belt and the impacts on the local area and its communities.*

- 2.8 Ultimately, Reigate and Banstead was not successful in the submission of a Local Plan that put Green Belt protection ahead of meeting its needs for housing and employment. Through the suspension of the Local Plan Examination in Public, it concluded that the exception circumstances necessary to revise Green Belt boundaries existed, and sought to remove land from the Green Belt. This was despite substantial local objection and intervention by the MP at a Parliamentary level.

#### Lichfield

- 2.9 Lichfield District Council in Staffordshire has 15,190ha of the West Midlands Green Belt, amounting to 46% of its total area. It submitted a Local Plan in 2014 which was not considered to identify sufficient sites to meet its full objectively assessed need for housing. In this case the Local Plan Examination was also suspended in order for the Council to carry out additional work. However, in the case of Lichfield, there were sites both within the Green Belt and in open countryside outside the Green Belt

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available for consideration; which differs from Castle Point Borough's situation, but is similar for comparison to that of Chelmsford City's.

2.10 Of all the Inspectors reports' issued in the recent past, the report for the Lichfield Local Plan is of particular significance, as it sets out a clear interpretation of the relationship between sustainable development and Green Belt. Furthermore, an aggrieved landowner (IM Properties) sought a Judicial Review of the Inspector's conclusions on this matter, and therefore this aspect of the report is also the subject of a high level legal judgement.

2.11 In his report, the Inspector considered the matter of whether Green Belt land should be used only as a last resort, as there is open countryside within Lichfield District which falls outside the extent of the Green Belt. Paragraphs 199 to 200 of his report reach the following conclusion on this matter:

*The fact that land is in Green Belt should not be taken lightly, it should be released only in exceptional circumstances. So, for example, it would be legitimate for the Council, as it has done elsewhere, to select a site although it was somewhat less sustainable in other respects than alternative sites but which avoided developing in Green Belt.*

*However, I can find no justification in the Framework, in Planning Guidance or indeed in the case of IM Properties for the proposition that Green Belt land should be released only as a last resort. This would be to accept that sustainability is the servant of Green Belt designation - which it is not. On the contrary, as has already been established, the duty in determining Green Belt boundaries is to take account of the need to promote sustainable patterns of development.*

2.12 The Inspector in this case consequently went on to conclude the following with regards to the proposed allocations within the Green Belt:

*...the additional sites selected by the Council are in Green Belt and land should be released from Green Belt only in exceptional circumstances. In my judgement the lack of more sustainable sites outside the Green Belt to meet the identified need for housing in a way that is consistent with the Plan's urban and key centre strategy amounts, in this instance, to the exceptional circumstances that justify the release of Green Belt land...*

2.13 In the case of **IM Properties Development Limited v Lichfield District Council [2015]** the Hon. Mr Justice Cranston considered the above interpretation of Green Belt policy as part of the complaint (ground no. 3). He held that the approach taken by the Inspector was logical, as he had applied the appropriate legal and planning policy tests in reaching his conclusion on the matter.

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2.14 Given its clarity, and given the legal judgement, this Litchfield Inspector's report should therefore be given greater credence in understanding how Green Belt policy should be interpreted in relation to sustainable development, with sustainable development being considered as the primary driver for identifying the location of development within an area, and Green Belt matters being a consideration in that exercise. It is clear that there is a duty for local planning authorities to consider the appropriateness of their Green Belt boundaries to promote sustainable development. This ultimately means that in some circumstances it may be necessary to exceptionally amend Green Belt boundaries to deliver sustainable development patterns.

### Solihull

2.15 Solihull Metropolitan Borough lies within the Birmingham Green Belt which amounts to 11,870ha amounting to 68% of its total area. Through its Local Plan it sought to allocate land currently siting outside the extent of the Green Belt as Green Belt. The Inspector supported this approach, and consequently the landowners/developers for that land sought a judicial review of the Solihull Local Plan. The resulting Judicial Review, **Gallegher Homes v Solihull MBC [2014]**, undertaken by the Hon. Mr Justice Hickinbottom gathered in his determination some useful principles relevant to the revision of Green Belt boundaries.

2.16 Firstly, the test for redefining a Green Belt boundary has not been changed by the NPPF. It is still necessary to demonstrate exceptional circumstances resulting in a necessary change to the Green Belt boundary. Secondly, the mere process of preparing a new local plan is not in itself regarded to be an exceptional circumstance justifying the amendment of a Green Belt boundary. Thirdly, whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgement, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if it fails to adopt a lawful approach to exceptional circumstances. Finally, once a Green Belt has been established and approved, it requires more than just general planning concepts to justify an alteration.

2.17 In this particular case, the review found that the Inspector had erred in law by simply permitting the designation of land as Green Belt because it was not suitable for development, as opposed to considering whether exceptional circumstances existed to necessitate the amendment of the Green Belt boundary. This therefore highlights the need to demonstrate exceptional circumstances when considering any amendments to the Green Belt boundary.

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## Greater Nottingham

2.18 The City of Nottingham is surrounded by Green Belt. This Green Belt covers substantial portions of the surrounding districts and boroughs, and also acts to separate Nottingham from the City of Derby to the west. The local planning authorities in the Greater Nottingham area have worked together to identify the need for, and a strategy for growth in this area, with Examinations taking place during 2014. Concerned about the approach taken and the allocation of a strategic development sites within its area, Calverton Parish Council sought a Judicial Review of the approved Local Plan. The resulting Judicial Review, **Calverton Parish Council v Greater Nottingham Councils [2015]**, undertaken by the Hon. Mr Justice Jay set out a number of matters that should be identified and dealt with in order to ascertain whether 'exceptional circumstances' exist to justify the releasing of land from the Green Belt. These were identified as:

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

2.19 In the absence of a definition of exceptional circumstances in national policy, these tests have been used by a number of the authorities to determine whether the release of Green Belt in each instance was appropriate.

2.20 Another interesting component of the Greater Nottingham Examination addressed the variation of supply over time, with early parts of the plan period not providing as high a supply of housing due to the lead-in time for development. A developer had argued that additional land should be released from the Green Belt to improve the five year housing land supply, rather than deferring delivery to later in the plan period. In relation to this matter, the Inspector concluded the following:

*In this case, I am satisfied that the prospective build rates for each 5 year tranche do not represent an attempt to suppress house building in the early years or rely on past poor economic conditions to justify low housing targets. The proposed build rates are supported by convincing evidence on the operation of local housing markets in the GL Hearn report [CD/KEY/02], which found the proposed levels of housing delivery*

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*in the ACS for each of the three Authorities to be ambitious but feasible. In the first five years, housing delivery would be less than the annual averages for the 17 year period. As the Councils argued, however, significantly increasing the supply of sites in the early years would not necessarily speed delivery, would require the release of additional Green Belt land contrary to national policy, and could delay progress on some of the more challenging regeneration sites.*

- 2.21 This indicates that where other evidenced factors are suppressing housing building rates, and the Council cannot demonstrate a five year supply as a consequence, it is not necessarily the case that they should seek to identify additional sites to remove from the Green Belt to overcome this by over-supplying sites, if the plan will ultimately meet the need for development over a longer timescale. A degree of moderation is therefore expected around the release of Green Belt land to meet housing needs, it is not simply the case that short term market demands should drive higher levels of Green Belt release than is actually required to meet the need for housing in an area.

#### Conclusion

- 2.22 It is clear from practice and legal precedent that there is an imperative for ensuring that any amendments made to Green Belt boundaries can be fully justified and can be judged as amounting to exceptional circumstances which necessitate their amendment. Anything less would put the Local Plan at risk of either being found unsound by the Planning Inspector, or being found wanting at a judicial review thereafter. It is therefore recommended that the tests established by Hon Justice Jay in **Calverton Parish Council v Greater Nottingham Councils [2015]** are considered in determining the appropriateness of Green Belt boundary revisions in Castle Point Borough. In addition to this, in anticipation of the changes to the NPPF, it is recommended that those tests for Green Belt identified in the Housing White Paper are also incorporated, particularly given the degree of overlap with test 2 of **Calverton Parish Council v Greater Nottingham Councils [2015]**.



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### 3 Green Belt Evidence

- 3.1 In considering the appropriateness of the approach in the Draft Local Plan, and whether exceptional circumstances exist to justify the release of land within the current extent of the Green Belt for development, it is important to note that there is a broad body of evidence already in existence to assist in examining this point. Those related to development need and land supply are discussed in relation to the relevant tests in the following section. However, it is important to highlight as part of this paper that a thorough review of the Borough's current Green Belt extent has been undertaken as part of the process of preparing the Local Plan.

#### History of Green Belt Review in Castle Point Borough

- 3.2 A Green Belt Functions Assessment was prepared in 2010 to aid in the plan-making process. This assesses the contribution different parts of the Green Belt in Castle Point make to the five purposes set out above. The Assessment identified four strategic areas of Green Belt in Castle Point. It also identified the role the Green Belt in Castle Point played in maintaining separation between the settlements in Castle Point and the settlements in neighbouring districts.
- 3.3 At the same time, a Green Belt Landscape Assessment was also prepared by landscape specialists at Essex County Council. This assessed the contribution different parts of the Green Belt in Castle Point make to the quality and aesthetic appeal of the borough. This Assessment sets out the landscape and visual sensitivity of the Green Belt across the borough, and adds in understanding the impact of development on the openness of the Green Belt, and also on the landscape as a positive element.
- 3.4 In September 2011, these assessments were used as a basis to brief elected Members on sites promoted to the Council as potential housing sites. The September 2011 briefing considered the impact of development on the strategic function of the Green Belt – i.e. would the four areas of strategic Green Belt, and the separation of settlements in Castle Point with settlements in neighbouring boroughs be maintained if each of the proposed sites was developed.
- 3.5 These three pieces of work were drawn together in a Green Belt Topic Paper 2013 and used to review the likely impact of the development of each potential site on the Green Belt, and confirm whether it could reasonably be brought forward for development through the Local Plan without harming the strategic function of the Green Belt. The various impacts identified were colour coded and set out within the Housing Site Options Paper, November 2013.

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- 3.6 The Council chose not to include site within the Green Belt in the Local Plan which was published in 2016, and subsequently that Plan was withdrawn in response to the Inspector's position relating to the duty to cooperate.
- 3.7 In response to Local Plan Intervention by the Ministry for Housing, Communities and Local Government, Castle Point Borough Council agreed to prepare a new Local Plan in June 2018 along with necessary updates to the evidence base. Discussions with MHCLG together with earlier statements made by the Council (planning appeal statements) confirmed that due to the tightly drawn Green Belt boundaries, if the level of housing need indicated by national requirements is to be met, Green Belt locations would need to be considered, leading to a release of Green Belt land. In advance of the commissioning of new Green Belt Review work to inform the Local Plan, Castle Point Officers sought to understand any relevant local evidence which may assist. Basildon Council shared the conclusions from an Independent Review completed by the Planning Advisory Service which had been used to inform the consideration of their draft Local Plan in March 2018.
- 3.8 Basildon Council completed an assessment of their Green Belt in December 2015 report, using a methodology similar to that used within the Castle Point Green Belt Functions Assessment in 2010. Basildon Council commissioned an Independent Review of their 2015 work, to assess the approach taken and suggest any amendments to the methodology and considerations to ensure consistency with national policy and best practice. The conclusions of the Independent Review are considered applicable to Castle Point, given the similarity of the methodologies being assessed.
- 3.9 The Basildon PAS Independent Review set out that the methodology of the Green Belt Assessment 2015 appeared sound in itself and appears consistent with what has now evolved as 'good practice' (though there is no 'official' guidance on how Green Belt assessments should be undertaken). Noting that for reasons beyond the Council's control, the work relates only to the Green Belt in Basildon rather than being more strategic, the basic principles of good practice demonstrated by the report include:
- *The assessment is solely concerned with Green Belt policy and hence avoids other issues getting mixed up in the assessment*
  - *It is comprehensive in addressing all of the area in Basildon designated as Green Belt*
  - *The area has been divided into 'parcels' of land to make the assessment more manageable and the results more understandable*
  - *Each parcel has been assessed in terms of the contribution keeping the land open makes to the fulfilment of the five purposes of including land in the Green Belt from the Framework*
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- *The interpretation placed on 'large built up areas' and 'towns' for the purposes of applying the 'tests' inherent in the purposes has been set out for the avoidance of doubt and to avoid subsequent variation in interpretation*
  - *The way the 'fourth purpose' concerned with the setting of historic towns should be applied is properly discussed and a sensible interpretation set out and used*
  - *The 'fifth purpose' concerned with regeneration has not been used in the assessment as it provides no means of distinguishing the role of one part of the Green Belt from another*
  - *The way land performs in fulfilling the purposes that are used in the assessment is set out as far as is reasonably possible given the very poor drafting of the purposes and the inevitable element of subjectivity involved in their application, and this should have helped achieve consistency in the assessment as well as providing clarity and reassurance to those interested in the findings of the assessment.*
  - *Whilst all that the Council has now done in undertaking an assessment of the Green Belt in its area appears consistent with good practice, there are a couple of comments made in relation to the use of the land parcels and in the presentation of the findings of the assessment:*
    - *First, dividing the study area into parcels to make the assessment manageable is common practice and there is nothing wrong with this approach in principle. How the division is done varies from study to study, with some approaches seeking to base the change from one parcel to another on landscape character thinking, noting the use of landscape character (not quality) assessment techniques in informing the performance of land against some of the purposes. Other approaches rely more on the use of 'lines' recognisable on the ground such as roads, rivers and railway lines. There can be no 'right' approach - many studies combine different approaches in any case. What is important is to recognise that the division into parcels is to enable the assessment to be undertaken and so care must be taken to recognise that possible boundaries for the Green Belt are to be an output and cannot therefore be a fixed input. Green Belt assessments have to allow for iteration. It may well be that in carrying out the assessment of the parcels against the purposes of Green Belt, some parts of parcels may appear to perform differently to other parts and therefore the parcel should be split if a recognisable and potentially defensible boundary can be identified. Basildon Council needs to review its assessment to reassure itself that no further iteration is required. It can be assured that the promoters of development sites will seek to show that within an assessment parcel a smaller site could be identified that would a non-strategic housing scheme could found.*
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- *The second point is about presentation. The 'bottom line' of the assessment, Figure 12, 'Overall Green Belt Contribution' shows the assessment findings to be that the contribution to the Green Belt purposes is overwhelmingly 'partial' or 'limited', conveyed visually by paler colours. This may come as a surprise to some given that the starting assumption is that the Green Belt was designated on sound grounds. It may provide encouragement to developers with local interests and it may be a shock to those who believe that Green Belt land can never be touched. As noted in the discussion, the presentation of the study in this form is a consequence of the way that the individual assessments against the purposes have been combined. There is nothing intrinsically wrong with what has been done.*

3.10 Overall, the review concluded that the methodology applied was robust, thereby rebuffing those representations that challenged the change in methodology between 2013 and 2015 for the reason set out in the first bullet point above.

3.11 However, the review highlighted the potential for improvements to be made in relation to the sub-division of the Green Belt and the presentation of results. It was not considered that these resulted in the Basildon Green Belt Study 2015 being *fundamentally flawed*, however, given the opportunity to review, these were potential areas where the study could be made *more robust*.

3.12 In presenting the PAS Independent Review to Basildon Council, the reviewer responded to two questions posed by elected members:

**Should equal weight be applied to each of the Green Belt Purposes?**

*Our view is that this is what is normally done when assessments are carried out, noting that one or more of the purposes may not be used at all, and there is no basis in the Framework or anywhere else for doing other than applying equal weight. Anything else would be severely challenged and very hard to justify.*

**Should the assessment have used more quantifiable assessment questions, with examples given including the proportion of Green Belt developed in relation to urban sprawl and the width of gap between settlements where coalescence may be an issue. If so should some form of weighting be developed according to these types of issues?**

*Our thoughts are that the purposes are poorly written and so are already difficult to interpret, but adding quasi-objectivity is not the way to overcome apparent subjectivity. What is needed and has been used is as clear as possible an explanation of the application of the assessment of the fulfillment*

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*of the purpose when assessing parts of the Green Belt so that the assessment is as robust and as consistent as it can be. There is in any case no clear basis for doing the kind of thing suggested that would carry widespread confidence. For instance, there is far more to the interpretation of the role of open space to the maintenance of the separate identify of towns than the width of the gap. Seeking to set down a specific distance below which the towns are determined to be tending to merge would be very spurious and gain nothing in the robust practical application of the purposes. The way to deal with the (many) discretionary aspects of the planning process includes professionalism and dialogue, and such matters cannot be replaced by a system of 'planning by numbers'.*

3.13 It is noted that there are examples of quantifiable measures being employed in such assessments, including the case of *Buckinghamshire Green Belt Assessment* which relies strongly on a quantifiable scheme of assessment and the application of scores to areas of Green Belt. However, the *Buckinghamshire Green Belt Assessment* has not been subject to examination in public to date, and as set out above, the PAS Independent Review did not consider that such an approach would result in a more robust assessment than the 2017 assessment for Basildon Borough.

#### Castle Point Borough Green Belt Review 2018

3.14 In order to address the issues raised though the Basildon PAS Independent Review in relation to the Castle Point Green Belt, a review of the Green Belt boundaries was commissioned. In response to the findings of the Basildon PAS Independent Review the approach to the Castle Point Borough commission and the outcomes are detailed below.

3.15 Consistency:

- A review of the Green Belt Functions Assessment 2010 was undertaken by Place Services, the consultancy service within Essex County Council, resulting in the Green Belt Review 2018.
- Outputs were mapped early in the review process to check for inconsistent results.

3.16 Methodology:

- Consideration was given to the sub-division of land parcels. Green Belt Parcels within Castle Point are very large, and in some cases greater clarity and improved defensibility could be achieved by diving parcels to better reflect clear permanent boundaries.

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- Consideration of sprawl. The consistency checks revealed the need to distinguish between those areas that do not contribute towards preventing sprawl due to their location, and those which do not contribute towards preventing sprawl due to the extent of existing sprawl e.g. the Plotlands.

### 3.17 Presentation:

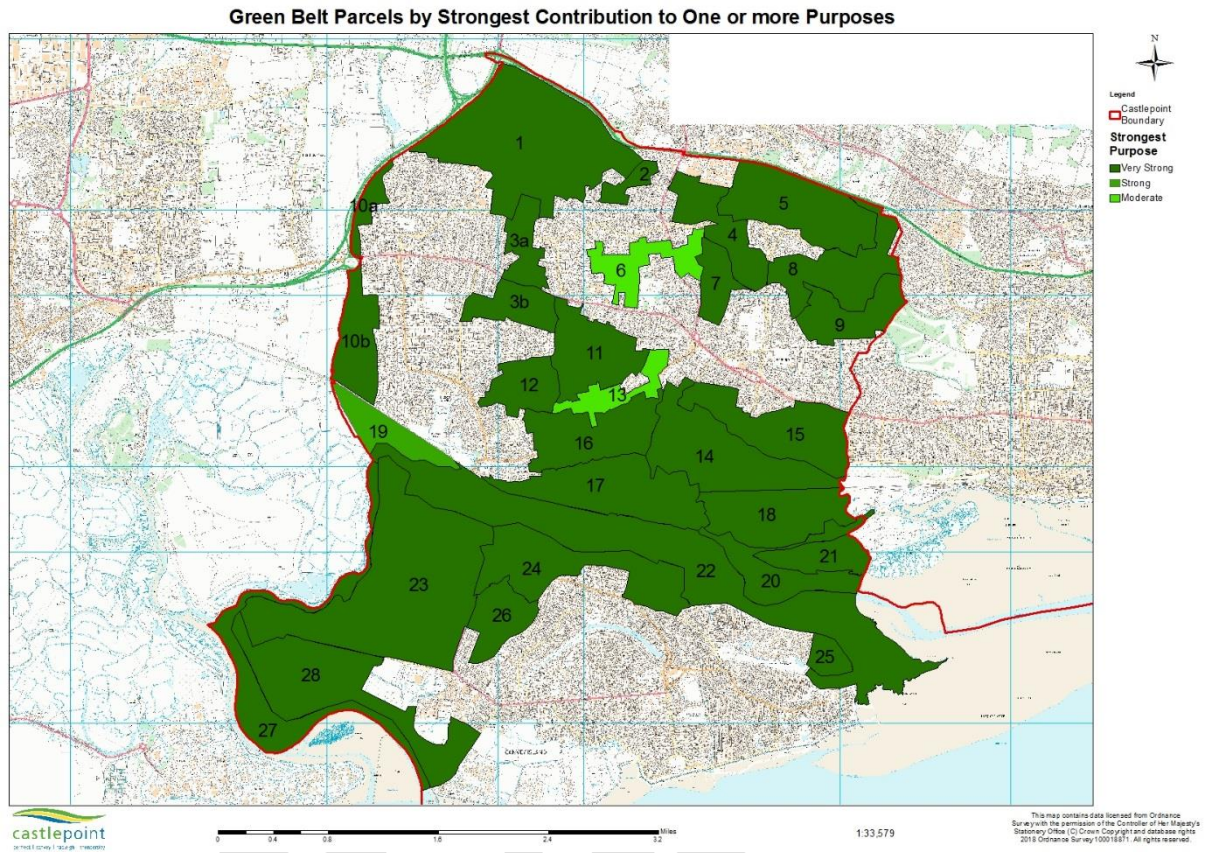
- In recognition that the assessment is of the Green Belt, a green colour gradation was used to present the results as opposed to red, amber, green (RAG) scoring.
- The approach to artificially combining the four purpose results was changed to instead present the highest scoring for each parcel.
- A section considering the wider Green Belt context has been included.

3.18 In order to understand the results of the Green Belt Review 2018 in the context of the wider Green Belt, the Assessment also contains the map shown at figure 4 of this report. This shows the role the Green Belt in Castle Point Borough plays in separating the towns across South Essex at both a local and at a strategic level. This map has both a role to play in determining the appropriateness of development locations at a local level, highlighting key areas where development may cause neighbouring towns to merge, and also at highlighting those areas where cross-boundary cooperation is needed to prevent neighbouring towns in different authority areas from merging.

*Table 1: Combined results of the Green Belt Review 2018 – based on highest scoring purpose.*

<b>Key</b>	<b>Green Belt Parcels</b>	<b>Number of Parcels</b>
Very Strongly contributes to at least one Green Belt Purpose	1, 2, 3a, 3b, 4, 5, 7, 8, 9, 10a, 10b, 11, 12, 14, 15, 16, 17, 18, 20, 21, 22, 23, 24, 25, 26, 27, 28	27
Strongly contributes to at least one Green Belt Purpose but does not Very Strongly to a purpose	19	1
Moderate contribution to at least one Green Belt Purpose but does not Strongly or Very Strongly contribute to a purpose	6, 13	2
Minor contribution to at least one Green Belt Purpose but does not Moderately, Strongly or Very Strongly contribute to a purpose		0
Does not contribute or is not relevant to a Green Belt purpose		0

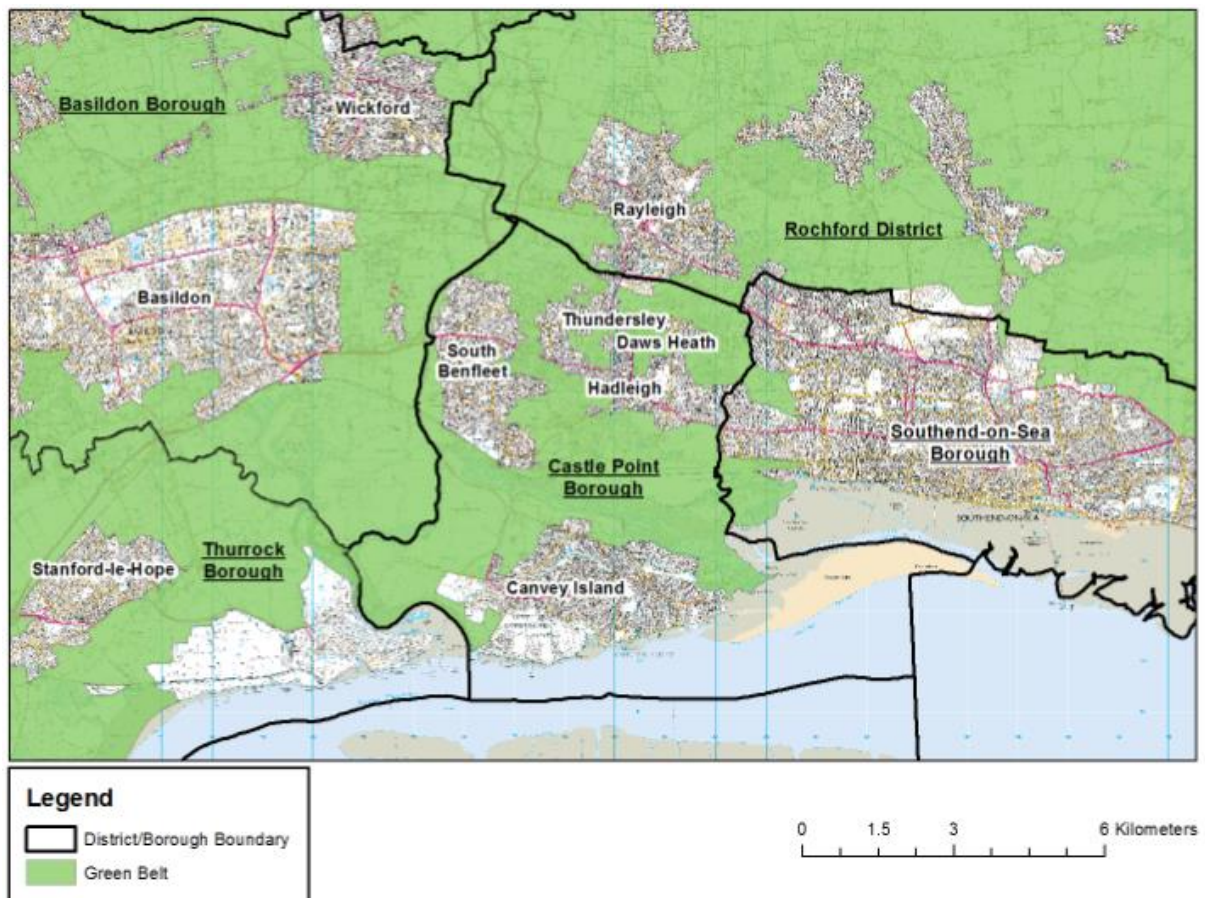
Figure 3: Combined results of the Green Belt Review 2018 - based on the highest scoring purpose



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Figure 4: Relationship of the Green Belt in Castle Point Borough with that in surrounding areas



## Conclusions

- 3.19 Castle Point Borough has a robust Green Belt that has been subject to refinement and review since 2010 and has been found to be an appropriate evidence base for informing planning policy development and decisions in Castle Point Borough.
- 3.20 The Green Belt Review 2018 shows that the vast majority of the Borough's Green Belt continues to contribute towards the openness of the Green Belt and the purposes of including land within it. Consequently, it is likely that development within its current extent **will cause harm** to the Green Belt.
- 3.21 However, as set out in *Calverton Parish Council v Greater Nottingham Councils* [2015] there are five components to the consideration of whether exceptional circumstances exist to which may permit a degree of harm to the Green Belt to arise through the plan-making process. The extent and nature of harm to the Green Belt is only one of these tests. Furthermore, as was clear from the *Lichfield Local Plan Inspector's Report*, sustainable development is not the servant of Green Belt policy, and there may be instances where harm to the Green Belt is necessitated by the

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need to secure sustainable development patterns. The Green Belt Review 2018 therefore needs to be considered alongside other components of the evidence base before it can be determined whether exceptional circumstances exist, or not to amend the Green Belt boundaries through a review of the Local Plan.

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## 4 Testing whether there are 'Exceptional Circumstances' in Castle Point Borough

- 4.1 Having regard to the National Planning Policy Framework, the Planning Practice Guidance and the application of Green Belt policy in practice, this section of the report will examine whether there are exceptional circumstances for reviewing the Green Belt in Castle Point Borough.
- 4.2 The tests identified in **Calverton Parish Council v Greater Nottingham Councils [2015]** will be applied, with the second test which considers the constraints on supply/availability of land extended to capture those tests proposed in the NPPF 2018.
- 4.3 In undertaking this testing, the report will draw upon a wide source of evidence related to development needs, land supply and the Green Belt Review 2018, the latter as discussed in the previous section of this report.

### Test 1: the acuteness/intensity of objectively assessed need

- 4.4 The proposals in the Draft Local Plan 2014 sought to amend the Green Belt boundaries in relation to the need for housing and also for the purpose of providing additional land for economic and social development purposes. This issue was again raised as part of the Regulation 18 consultation in July 2018. The question has been raised as to whether this is appropriate, and whether the Publication Local Plan 2018 should do this. Therefore, the acuteness/intensity of the need for each of these land uses is discussed separately below in order to inform how the Publication Local Plan 2018 should be taken forward.

### *Housing*

- 4.5 The Draft Local Plan 2014 proposed the provision of 200 homes per annum, this plan was not taken forward and instead the Council submitted the Draft Local Plan 2016 for examination proposing just over 100 homes per annum. The South Essex Strategic Housing Market Assessment (SHMA) 2016 together with its Addendum published in 2017, identifies a need for 353 homes per annum in the period 2014 to 2037.
- 4.6 In 2017, the Government consulted on a standard method for calculating housing needs, and this identified a need for 342 dwellings per annum in Castle Point. The standard method became part of national planning policy/guidance through the new NPPF in summer 2018. Therefore the objectively assessed housing need (OAN) for Castle Point is 342 dwellings per annum. Given the requirement to ensure a 5 year housing land supply at the end of the Plan period, the supply must be considered

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over a 20 year period, to cover the 5 years beyond the end of the Plan period. Over the period 2018 – 2038 the total number of dwellings in Castle Point is 6,840.

- 4.7 The Castle Point Borough Strategic Housing Land Availability Assessment 2018 has been reviewed in light of this increased need, to determine whether additional capacity could be identified from sites within the urban area, or whether higher densities could be achieved on sites to limit the loss of Green Belt land. It remains the case however, that a significant proportion of housing needs would remain unmet, unless Green Belt was considered to determine whether the full extent of this housing need could be accommodated sustainably.
- 4.8 Of particular note, the SHMA Addendum 2017 shows a considerable worsening of market conditions within Castle Point Borough over time, justifying this uplift in need. In particular, average house prices have increased by almost 50% in the period from 2001 to 2014. This means it has become much harder for first time buyers to access the housing market. This has resulted in an increase in the number of people still living with their parents into adulthood, including those with their own children. These are known as concealed households, and there is a risk that the number of these will continue to grow unless affordability and supply issues are not addressed.
- 4.9 The scale of need, especially which cannot be met within the urban area, combined with the worsening of market conditions indicate that there is an acuteness of need for housing in Castle Point Borough. Therefore, it is considered that this first test in respects of demonstrating the acuteness of needs in relation to housing is passed.
- 4.10 It should be noted that Castle Point Borough sits within the South Essex Housing Market Area, and also the Wider South East. Consequently, it may receive requests from others to accommodate an element of their unmet need also. At this time, the South Essex Strategic Planning Framework and the review of the London Plan are not sufficiently advanced, and the extent of any such request is not therefore known at a strategic scale. In September 2018, a request for support to meet unmet needs was received from Basildon Council which identified a gap of 1,700 homes to 2034. This request was made to all authorities in the South Essex Housing Market Area, and the responses confirmed that support for this level of unmet need was not possible due to needs in the individual authorities. Castle Point Borough Council is clear that this request acts to increase the acuteness of need further in Castle Point Borough.

#### *Economic Development*

- 4.11 The South Essex Economic Development Needs Assessment (EDNA) 2017 identifies a need for 9ha of land to accommodate economic development needs

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purposes within Castle Point Borough in the period to 2036. This figure accounts for churn, windfall losses and displaced used from London as set out within the EDNA.

4.12 The Draft Local Plan 2016 supported allocation of employment land totalling 19ha (Manor Trading Estate, an extension to Charfleets Industrial Estate and Land for Employment South of Northwick Road). Since that time, a planning permission has been implemented at Charfleets Industrial Estate, bringing forward employment uses envisaged through the 2016 Plan. Some development at South of Northwick Road has been permitted, and could be supported through the Local Plan 2018 without recourse to Green Belt release. Discussions with the owner of Manor Trading Estate have revealed a proposal to reconfigure the site to improve accessibility and capacity of the employment uses and to reduce the impact on the existing residential uses which abut the Estate. This proposal includes development of neighbouring land within the same ownership for residential uses to deliver 109 additional units, as a means to provide funding for the Estate improvements. In light of the high level of housing need, the reconfiguration of Manor Trading Estate offers the opportunity to provide additional units, economic benefits and reduce the impact of existing Estate operations.

4.13 Therefore, the first test in relation to acuteness of need in respect of economic development is not passed because sufficient capacity exists in the Borough. However, the opportunity for Manor Trading Estate to offer both economic and housing development weighs in favour of redevelopment due to the acute housing needs.

#### *Gypsy, Traveller and Travelling Showpeople Needs*

4.14 In terms of the need for Gypsy, Traveller and Travelling Showpeople accommodation, this is identified in the Castle Point Borough Gypsy and Traveller Local Needs Accommodation Assessment (CPLNAA). This has been prepared in accordance with the Planning Policy for Traveller Sites and the Housing and Planning Act 2016, and forecasts the needs for Gypsies, Travellers and Travelling Showpeople in the Borough to 2034.

4.15 Due to the different requirements of the PPTS and the Housing and Planning Act 2016, the CPLNAA identifies two groups of Gypsies, Travellers and Travelling Showpeople, depending on whether they meet the 'planning definition':

- Do not meet the planning definition: Those who should be planned for in accordance with their specific cultural needs for living accommodation in accordance with the Equality Act 2010, the Children's and Families Act 2014 and the Human Rights Act 1998, but no longer exercise a nomadic lifestyle

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and where the PPTS does not apply (ethnic Gypsies, Travellers and Travelling Showpeople).

- Do meet the planning definition: Those Gypsies, Travellers and Travelling Showpeople who continue to travel and for whom the policy requirements of the PPTS apply (nomadic Gypsies, Travellers and Travelling Showpeople).

- 4.16 No households were identified as meeting the planning definition, therefore no additional pitches are required throughout the plan period. There is need for up to 1 additional pitch for Gypsy and Traveller households that may meet the planning definition; and a need for 5 additional pitches for Gypsy and Traveller households who do not meet the planning definition but nevertheless, have an ethnic right to live in culturally appropriate accommodation. There were no Travelling Showpeople identified living in Castle Point so there is no current or future need for additional plots. These needs should be met as part of the overall housing provision and have therefore been added to the full objectively assessed need for housing.
- 4.17 Whilst there is historic evidence to suggest that there may be a need for some form of transit provision in Greater Essex, the robustness of the data which could indicate this is not considered to be sufficient, therefore no transit provision will be made at this time. Essex County Council is commissioning a specific review of transit needs across Essex but this will not be available until after the Local Plan is published.
- 4.18 The first test is therefore not passed in relation to Gypsy, Traveller and Travelling Showpeople Accommodation Needs as the needs are not sufficiently acute. However, these needs will be addressed in the Local Plan, as required by NPPF.

Test 2: The inherent constraints on supply/availability of land prima facie suitable for sustainable development

*Housing*

- 4.19 There is some suggestion in both the original judgement of **Calverton Parish Council v Greater Nottingham Councils [2015]**, and also in the later judgement of **IM Properties Development Limited v Lichfield District Council [2015]** that this test duplicates Test 1, as there would not be an acute need if there were not an inherent constraint, and vice versa. However, it could also reasonably be interpreted that this test is intended to ensure that other sustainable and available sources of supply have not been overlooked in preference of Green Belt locations. It is therefore appropriate to consider as part of this test, the tests first proposed by the Housing White Paper 2017 and now incorporated into the NPPF 2018, namely that the strategy:

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- makes as much use as possible of suitable brownfield sites and underutilised land;
  - optimises the density of development in line with the policies in chapter 11 of the NPPF, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
  - has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

4.20 In undertaking these tests it is important to note that, the Green Belt boundary is very tightly drawn around the existing urban areas of Castle Point Borough. The Green Belt boundaries have not been reviewed in Castle Point Borough since the early 1990s, as reflected in the 1998 Local Plan. The Green Belt boundaries put in place at that time were based on a consideration of needs up to 2001. Needs beyond 2001 did not form part of the consideration of the Green Belt reviews at that time.

4.21 The Castle Point Borough Strategic Housing Land Availability Assessment (SHLAA) has been developed based on an extensive survey of available land, a 'call for sites' process, and also regular updating to capture newly emerging proposals. The Council's own Corporate Property Service has been encouraged to put forward surplus public land and opportunity sites through this process. Similarly, in discussions with the Homes England, Essex County Council and Essex Police, further public sector sites have been identified for inclusion.

4.22 In relation to each site, an assessment has been undertaken in line with the Council's approved SHLAA Methodology 2018 to ensure that development locations are suitable, available and achievable as potential housing sites. This ensures that the most sustainable development locations are identified informed by the Local Plan evidence base.

4.23 The Council has sought to establish a Brownfield Land Register 2018, drawing upon the SHLAA, in order to prioritise development on brownfield sites. The Council has also sought to prioritise development within town centres with the aim of delivering the principles which were established through masterplanning work in the past.

4.24 Meanwhile, in order to ensure that any development which does occur is sustainable in itself, opportunities to optimise land use have been explored. As part of this process, careful consideration has been given to the potential density of development for each site, having regard to the urban character of local areas and also the opportunities to bring forward regeneration and renewal which makes more efficient use of land.

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- 4.25 The opportunity to maximise the potential from these non-Green Belt strategic sites has therefore been considered to minimise the need to remove land from the Green Belt elsewhere in the Borough.
- 4.26 Through the SHLAA process, it has been possible to identify a supply of suitable land outside the Green Belt for 1,467 homes. This is the *optimal urban potential* and not the maximum potential urban supply, as it uses a strategy which protects existing public open spaces from development in accordance policy in the NPPF. It also protects those employment areas that have been identified as worthy of protection from other forms of development in accordance with the Economic Development Needs Assessment and policy in the NPPF.
- 4.27 It is however recognised that not all sources of urban supply are known at this time. As the economy and technologies change some sites in other uses may become available for housing. For example, the Government's intention to ban petrol and diesel fuelled cars from 2040 will see the demise of the petrol station format in the long-term. However, the speed of this demise is not known at this time as the current take up of electric vehicles is low. Furthermore, as the way public sector bodies work changes, it is reasonable to assume that some more surplus public sector land may become available in time. In addition to this, the housing stock itself is renewed in an adhoc way, often at a greater density than that which preceded it. An allowance can therefore be made for this 'windfall' development, although it is expected by the NPPF that such an allowance has some form of robust basis. To that end, consideration of all sources of windfall land supply to contribute to future housing has been undertaken. This identified the potential for 10 additional homes to be provided each year in Castle Point Borough from windfall sources.
- 4.28 This brings the total supply potential from non-Green Belt sites within Castle Point to 1,667 homes. This is substantially less than the need for housing as identified in Test 1, at a shortfall of just over 5000 homes, indicating the presence of an inherent constraint within the Borough.
- 4.29 NPPF requires that local planning authorities explore whether neighbouring authorities could accommodate need before the release of Green Belt land can be considered. Castle Point Borough is located within the South Essex Housing Market Area (HMA), and therefore consideration has been given to the capacity of the other authorities in this area to accommodate the remainder of Castle Point Borough's OAHN for housing, once the Borough's urban land supply has been exhausted.
- 4.30 All other authorities within the South Essex HMA are within the Metropolitan Green Belt, with their boundaries similarly tightly drawn around their urban areas. There is an area of land, Foulness Island, within Rochford District which sits beyond the Green Belt boundary, however, it is owned by the Ministry of Defence and a
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considerable part of this land remains in use for munition testing. It is also significantly affected by tidal flood risk and is subject to International and European nature conservation designations. These conditions make it unsuitable for anything other than the most minor forms of development.

- 4.31 In the cases of the other four authorities within the HMA, although Local Plans are at different stages of preparation, it is clear that they all have insufficient capacity in their urban areas to accommodate their housing need, and will all have to consider land within the current extent of their area's Metropolitan Green Belt for housing and other development purposes. There is no plausible scope within other parts of the HMA for the remainder of Castle Point Borough's housing need to be met without encroaching into the Green Belt of those authorities, which would be contrary to the test set out for the receiving authority.
- 4.32 Local Authorities in neighbouring HMAs, Brentwood Borough, Chelmsford City, Maldon District have also been considered. As with the South Essex authorities, Brentwood Borough's urban areas are entirely surrounded by Metropolitan Green Belt and it is therefore having to consider applying these tests itself. At this time there, it cannot therefore assist Castle Point Borough with regard to securing some of Castle Point's unmet need on land outside the Green Belt.
- 4.33 Meanwhile, those parts of the Chelmsford City most closely related to South Essex (Runwell, Ramsden Health and Battlesbridge) also sit within the Metropolitan Green Belt. The north-western part of the Chelmsford City (around Broomfield) and the eastern part (South Woodham Ferrers and Danbury) sit beyond the Green Belt, however these are already subject to substantial development proposals to meet the OAHN for Chelmsford City's Local Plan update until 2036. Furthermore, the northern parts, in particular, are more closely aligned to the North Essex HMA, of which Chelmsford City is a part. Meeting some/all of Castle Point Borough's unmet housing needs in these parts of Chelmsford City, even if it were possible, may not therefore result in the most sustainable development patterns, and may increase traffic flows on the strategic road network, namely the A12, A130 and A127.
- 4.34 The capacity of Chelmsford City, as with all other areas is finite, and due to its central location in Essex, the City will be subject to the same considerations by other surrounding Essex authorities, which will make the consideration of whether it can assist any specific authority/s more complex and certainly not resolvable by the time the Council intends to submit its Local Plan to the Government as set out in its approved Local Development Scheme 2017-2020.
- 4.35 The Maldon District Local Development Plan was approved by the Secretary of State in July 2017 and sets out the housing requirements, spatial strategy and other policies for the period to 2029. The Plan includes a housing target of 310 dwellings

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per annum, which is greater than the objectively assessed need (260 dpa) to take account of market issues and demographic/household formation. The OAN was informed by a Strategic Housing Market Assessment. The SHMA identifies that the District is relatively self-contained in terms of household movements and travel to work patterns, therefore Maldon is considered to be a single market area. This has been tested through not only the Maldon LDP, but also the North Essex Strategic Plan.

- 4.36 The SHMA concludes that in-migration was principally from mid and north Essex given the close proximity and economic activity. There is no recent trend in migration from Castle Point to Maldon. This is not surprising given the size and choice of the South Essex Market Area, the distance and marked difference in access to employment.
- 4.37 There are existing capacity issues which constrain further growth within Maldon District beyond that proposed in the LDP. Much of the District is rural with small settlements with limited services and facilities. The two main urban areas (Maldon / Heybridge and Burnham-on-Crouch) are both constrained by transport and education capacity issues, as set out in adopted Plan.
- 4.38 What can be concluded therefore, is that there is an inherent constraint on land supply outside the Green Belt within the wider South Essex HMA, and also within other neighbouring authorities to Castle Point Borough, which means that it is not possible to meet the OAHN for housing on suitable and sustainable sites across a number of local authority areas without giving consideration to the current extent of the Green Belt.
- 4.39 Overall, housing Test 2 is therefore passed, as it can be demonstrated that there is an inherent constraint on land suitable for sustainable housing development.

Test 3: the consequent difficulties in achieving sustainable development without impinging on the Green Belt

- 4.40 So far, in the consideration of Tests 1 and 2 it is considered that the OAHN and the employment figures identified in the EDNA represent sustainable development, and that failing to meet the OAHN or the employment requirement will result in unsustainable development. However, this may not be the case in all circumstances. It is therefore necessary to consider, as part of Test 3, if the OAHN and the employment requirement represents the most sustainable level of development given that it requires the need to impinge on the Green Belt.
- 4.41 The Draft Local Plan 2018 has been subject to Sustainability Appraisal which considers in relation to policy SD2, the scale of growth proposed in the Draft Local
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Plan (4,300 homes and 23ha of employment land), along with reasonable alternatives including policy SD2a – “No development in the Green Belt”; and policy SD2b “Higher levels of housing growth in the Green Belt”.

- 4.42 The Sustainability Appraisal Report 2018 summarises the outcomes of this assessment. It identified that the main, adverse effect of the preferred option was the use of Greenfield land to accommodate development, and its implications for the landscape, biodiversity, heritage assets, flood risk and air quality. It however concluded, that other than the loss of Greenfield land itself, that other adverse effects *could be potentially be mitigated* depending on the sites selected, and that the draft development management policies in the Draft Local Plan would support this being achieved. It also identified that there would be significant positive benefits in terms of economic growth, regeneration, meeting housing needs, the creation of vibrant communities and the regeneration and renewal of disadvantaged areas.
- 4.43 With regards to reasonable alternative SD2a *No development in the Green Belt*, the Sustainability Appraisal identified negative consequences for economic growth, regeneration and meeting housing needs. This is because there would be insufficient housing to support the labour demands of local businesses, and a supply and demand ratio for housing which would prevent access to the housing market for lower income households and first time buyers. Overall, the Sustainability Appraisal concluded the following:

*Policy SD2 seeks to ensure that OAN is met ‘as far is as is possible’ through directing as much development as possible to sites within the existing urban areas in the borough, and in particular under-utilised sites or spaces at upper levels above commercial uses in town centres. To this extent, Policy SD2 has a number of positive implications in line with the merits of spatial distribution and directing development to the Borough’s most sustainable settlements; however acknowledgement must be had to the negative implications of the development of Greenbelt land and the extent to which plan-period OAN is met through Greenbelt allocations. The Plan’s Policy SD2 allows for both Greenbelt protection in the first instance, with a secondary focus of new development to be located on previously developed land outside and within the Greenbelt.*

*The release of Greenbelt land exists in this sense as a last resort; however Greenbelt land has been released within the Plan in order to address objectively assessed housing needs. In consideration of this approach, broadly speaking the permutations of the alternative approach SD2a are comparably more favourable for environmental themes, but with the negative implications of housing delivery within the Plan area. The negative effects highlighted for Policy SD2 are exacerbated by Policy SD2b. Significant negative effects are realised therefore for landscape under Policy SD2 and SD2b, and in contrast*

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*significant negative effects are highlighted at this stage notionally for housing under Policy alternative SD2a.*

- 4.44 Therefore, the Sustainability Appraisal concludes that a strategy which involves encroachment into the Green Belt represents a more sustainable option, than the option which would see no encroachment into the Green Belt. However, there are negative consequences arising from the strategy put forward in the Draft Local Plan.
- 4.45 Therefore, sustainability must also be considered at the site level to ensure that where it is necessary to impinge on the Green Belt defined through the 1998 Local Plan, that the resulting development will still be capable of being considered as sustainable, compared to reasonable alternatives.
- 4.46 The Sustainability Appraisal for the Draft Local Plan also indicates that those sites identified for housing purposes are generally sustainable development options, although there are some sites where the potential impact on accessibility and health was assessed as being negative. In such cases, however the overall conclusions of the Sustainability Appraisal was that with mitigation measures included in the allocation policies these harmful impacts *could still be overcome*.
- 4.47 A separate paper entitled the Housing Options Topic Paper has been prepared drawing together all the different streams of evidence in relation to each site, including alternative options in terms of locations. This has enabled the Council to take an evidence based approach to identifying the most sustainable sites for development purposes. This has also concluded that this is likely to require the use of some land within the current extent of the Green Belt.
- 4.48 Overall, development which includes land within the current extent of the Green Belt has been assessed in terms of sustainability through the Sustainability Appraisal process, and has been determined to represent a more sustainable level of development. This test can therefore be considered to be met.

Test 4: The nature and extent of harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed)

- 4.49 The Green Belt Review 2018 concludes that the vast majority of the Green Belt in Castle Point Borough contributes towards the openness and at least one of the purposes of including land within the Green Belt, at least partially. There will therefore be inevitable harm arising from development of land within the current extent of the Green Belt. However, the nature and extent of the harm will vary from site to site depending on:
- a) the size of the site;
  - b) the location of the site;

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- c) the topography, landscape and visual prominence of the site; and
  - d) the extent of Green Belt that will remain in a given location after development has occurred, and the ongoing purpose that Green Belt will serve.

4.50 These matters will vary from site to site, and therefore an additional element of the Green Belt Review 2018 has been prepared which assesses the harm to the Green Belt from development at particular sites proposed to the Council through the SHLAA, and is included as an addendum to this report in order to inform the decision-making process. Having considered these matters, it has been possible to conclude as to the extent of harm on a site by site basis, enabling Green Belt harm to be balanced against the delivery of sustainable development patterns as required by the NPPF.

4.51 The outcomes of the assessment of harm from the Review have been incorporated into the Housing Options Topic Paper 2018, enabling Green Belt harm to be balanced against the sustainability considerations in order to identify a suite of sites which most effectively contributes towards achieving sustainable development patterns as required by the NPPF.

4.52 As an overarching position however, the Draft Local Plan proposes the release of 187.8ha of Green Belt for new housing development purposes, which represents 6.8% of the borough's current Green Belt extent. It also proposes that existing and any new schools together with the associated playing fields which are currently within the Green Belt would also be removed from this designation. Development such as schools are not appropriate development in the Green Belt and whilst playing fields do not conflict with the designation they are protected from development by other robust policy initiatives. It is not expected that the demand on the Green Belt from new housing development will exceed 10% of its current extent. Consequently, it is considered that harm to the nature and extent of the Green Belt can be limited through the careful selection of appropriate housing sites and necessary mitigation measures.

Test 5: 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

4.53 As with Test 4 and the detailed element of Test 3, the extent to which harm to the Green Belt can be ameliorated or reduced will need to be considered on a site by site basis.

4.54 However, there are some overarching measures that can be taken to ensure that harm to Green Belt is minimised through the overarching plan-making process.

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- 4.55 These include those measures identified in respect of Test 2, where detailed investigations of urban capacity have been undertaken, including the capacity of town centres, consideration of estate renewal and optimising development on public sector land holdings. These measures should be ongoing to ensure that the windfall allowance is achieved, and where possible exceeded, along with ensuring urban capacity is optimised into the future.
- 4.56 Consideration can also be given to the densities achieved on any land that the Council does consider releasing from the Green Belt, as higher densities will require the release of less land from the Green Belt to deliver the same number of homes. Densities will however need to be considered on a site by site basis, as there will be some locations where higher densities will increase harm to the Green Belt by emphasising more of the visual prominence of development on its edge, rather than reducing harm by blending in. Initial work to support the Local Plan has reviewed the potential capacity and density of a number of possible new housing sites. The conclusions have been used to inform the Local Plan.
- 4.57 Consideration can also be given to the creation of new public open spaces at the edge of developments, or between developments, to maintain a sense of containment/ separation and bring land which may be at risk of future encroachment into a practical use that benefits existing and new local residents. This not only mitigates the effects of harm of the Green Belt, but also responds positively to the NPPF which promotes the positive use of land in the Green Belt for recreation and nature conservation purposes.
- 4.58 It is also likely that on a site by site basis, the design and layout of development and the use of landscaping will play an important role in mitigating harm to the Green Belt. Design and layout can ensure that development integrates into both the nearby urban area, and also the rural environment it would form the new boundary to, and particularly ensure that visually prominent parts of the site are either avoided, or else developed in a more sensitive way. Landscaping meanwhile can screen development in both nearby and long-distance views. It is also important that this landscaping is integral to the development, as when established settlements are viewed from a distance the rooftops are normally interspersed with treetops which helps to soften the relationship between the urban and rural environments. High quality design which is based on a context appraisal, and includes consideration of landscaping requirements is therefore essential to minimising harm arising from development on sites within the current extent of the Green Belt, and should therefore form a consideration in relation to Test 5 also.

### Conclusions

- 4.59 It is clear that in relation to development needs for housing and economic development the circumstances certainly exist for determining that there are
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exceptional circumstances justifying the release of the land from the current extent of the Green Belt for development purposes. There is clearly an acute need for development, which is affected by inherent constraints on land supply. This in turn is affecting the ability of the Council to achieve more sustainable patterns of development that support economic growth and social outcomes. There will however be harm to the Green Belt arising from achieving this development, however the loss of Green Belt is limited to less than 10% of the current Green Belt extent, and there are opportunities to minimise this harm through careful site selection and mitigation including the use of appropriate development densities, the provision of open space at the edge of development, and through high quality design and landscaping. It is considered that it is possible to pass the tests set out in **Calverton Parish Council v Greater Nottingham Councils [2015]** within Castle Point Borough and provide land to deliver the levels of development that meet assessed development needs.

- 4.60 However, it is necessary to consider the detailed elements of Tests 3 to 5 as part of the Housing Options Topic Paper in order to ensure that a) the most sustainable development locations are identified; b) the extent and nature of harm to the Green Belt is considered; and c) harm to the Green Belt is ameliorated or reduced on development sites.
- 4.61 To support this, the assessment of harm prepared as part of the Green Belt Review 2018 is included as an addendum to this report.

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## 5 Recommendations

- 5.1 The NPPF expects Local Plans to be positively prepared, actively seeking to meet their identified needs for development, and indeed the unmet needs of others. However, it also expects local planning authorities to apply the most careful consideration to the protection of Green Belts in their plan-making processes, and only amend Green Belt boundaries in exceptional circumstances. There is practice and legal precedent to guide local planning authorities in making the necessary judgements in this regard, and it is first and foremost recommended that this practice and legal precedent is given serious contemplation, as failure to do so could result in the Castle Point Borough Local Plan being found unsound, or else subject to legal challenge itself.
- 5.2 Having given consideration to this practice and legal precedent, it is secondly recommended that the Council weighs Green Belt considerations alongside those other considerations that help to determine what constitutes sustainable development, in order to ensure that the Local Plan the Council submits promotes sustainable development, consistent with the NPPF.
- 5.3 Thirdly, it is recommended that in order to ensure that the correct balance is achieved between meeting development needs and protecting the Green Belt from harm, the five tests set out in the case of **Calverton Parish Council v Greater Nottingham Councils [2015]** are considered in order to determine whether exceptional circumstances exist to amend Green Belt boundaries, as if they don't the balance would fall in the favour of retaining the Green Belt.
- 5.4 These tests have been considered at a plan-wide level within this report, and it is concluded that at a plan level, a significant proportion of the identified development needs could be met within Castle Point Borough through amendments to the Green Belt boundaries. However, there is a need for site by site consideration to take place to identify the sites where this can best occur whilst achieving a balance between sustainable development and harm to the Green Belt. It is therefore fourthly recommended that Tests 3, 4 and 5 are specifically considered on a site by site basis as part of the Housing Options Topic Paper which considers all elements of evidence related to each potential development location to determine if it is sustainably and practically feasible to do so. To support this, the assessment of harm prepared as part of the Green Belt Review 2018 is included as an addendum to this report.



6 Addendum - Site Appraisals

Site Option	Green Belt Parcel	Green Belt Assessment 2018			Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
		Purpose 1	Purpose 2	Purpose 3			
Land west of Benfleet	10b	Minor	Minor	Minor	<p>The site is currently almost entirely free from built development. Future development would act as a westerly extension of South Benfleet and would be in keeping with the general settlement pattern, and allow for the Green Belt to be realigned with the A130 which would create a strong permanent boundary.</p> <p>The proposed development site represents a small proportion of the total strategic gap between South Benfleet and North Benfleet. It is considered that there is no inter-visibility between South Benfleet and North Benfleet, with multiple lanes and slip roads of the A130 providing a robust barrier between the two urban areas.</p> <p>The site is currently almost entirely free from built development that is considered to be inappropriate development in the Green Belt. However, the area is cut off from the wider countryside by the A130 and its development would amount to the infilling of a relatively narrow strip of land in between South Benfleet and the A130.</p>	<p>The proposed development site primarily comprises of open field and foliage. The proposed development site is crossed by Jotmans Lane which could potentially act as a boundary but it is considered that the currently proposed boundaries of the A130 and railway line make for more appropriate robust boundaries that could act to define the Green Belt in the long term.</p> <p>The introduction of landscaping and mature trees would help create the perception that this part of the A130 is cutting across a rural area but the full visual impact would be hard to mitigate due to the landform. Development would require a substantial belt of vegetation to be created or retained along the A130 to create a rural character on the approach to Canvey Island.</p>	<p>The land comprising Parcel 10a to the north is a similar lateral strip that exists between the A130 and South Benfleet. Development of this site would constitute a similar westerly extension of South Benfleet that would be contained by the A130.</p> <p>Development of the proposed site would act to reduce the amount of Green Belt land between North Benfleet and South Benfleet but the A130 acts as a robust boundary feature which runs through the Green Belt in this area, and much of the development would be 'away' from North Benfleet. It is considered that the removal of this site from the Green Belt would not have a significant impact on the wider Green Belt system. The Green Belt boundary at this locality would be realigned away from residential curtilage to the more robust boundary feature of the A130.</p>
Land between Felstead Road and Catherine Road	3b	Minor	Minor	Minor	<p>The proposed development site lacks a strongly defined edge with the existing built-up area such that further development would not be of a significant detriment to the character of this area. Although releasing this site from the Green Belt could result in residential development of</p>	<p>The parcel contains a number of internal roads which could be used to define an alternative boundary. This could include continuing a revised boundary along the remainder of Bowers Road which already acts to demark the extent of part of the Green Belt. Another option could be to</p>	<p>Parcel 3b lies within the Locally Important Strategic Green Belt area of the Central Corridor as defined by Part 1 of the Castle Point Green Belt Review 2018. However, development of this site would not significantly impact on the strategic function of the wider Central Corridor as the width of</p>

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					<p>higher densities, the footprint would be in keeping with the general settlement pattern and a new Green Belt boundary formed primarily along a local road.</p> <p>Removing this site from the Green Belt could potentially result in a continuation of the densities of development in the north east and south, whilst also threatening the wooded areas which act to screen the development which already exists. However, other land forming part of the strategic gap between South Benfleet and Thundersley contains significant amounts of woodland which prevent inter-visibility between these towns. Whilst the strategic gap would nonetheless be reduced, it wouldn't be any narrower to that which exists along the frontage of Kiln Road.</p> <p>The proposed development site and the immediate surrounds are urban to semi-urban in appearance such that this has a significant impact on the perception of the site being in the countryside. The proposed development site is not located in an area which would significantly impact on the countryside corridor between South Benfleet and Thundersley.</p>	<p>reduce the east to west extent by re-aligning the boundary with Rhonda Road until it meets a footpath and eventually residential curtilages. However, these approaches are no more defensible than the one proposed by the allocation.</p> <p>The proposed housing site contains a significant number of mature trees, some of which could be retained and incorporated into sympathetic landscaping to ensure that development is well screened.</p>	<p>the strategic gap which renders the parcels identified within the Central Corridor as performing a specific strategic function is already narrower across the majority of its extent. Development of the site would partly represent an infilling of land surrounded by development rather than placing more pressure on the corridor running between South Benfleet and Thundersley. Development of this site would also act to separate the Green Belt currently designated as school playing fields to the west from the wider Green Belt system. In terms of the re-alignment of the Green Belt boundary, a greater proportion of the boundary of Parcel 3b would be demarked by roads with a reduction demarked by residential curtilages.</p> <p>Much of the Green Belt in this locality is currently defined by residential curtilages. Development at this site would provide the opportunity to realign the Green Belt with the A13 and Catherine Road which would be a more defensible boundary and ensure the incorporation of the new housing development which no longer acts as Green Belt. Consideration could also be given as to whether it would be appropriate to retain the schools to the west of the proposed site in the Green Belt as these would then be separated from the wider Green Belt. Jarvis Road to the east of Catherine Road presents another realignment opportunity for the eastern boundary but this would act to further narrow the strategic gap between South Benfleet and Thundersley to the extent that the gap at this location would</p>

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							represent amongst the narrowest of gaps across the whole strategic area. As such, this proposed site does not offer a significant opportunity to consider a wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period of the emerging Local Plan.
Land off Glyders	16	Strong	Minor	Moderate	<p>The development site is currently free from existing urban development and the release of this site would constitute an easterly extension of South Benfleet. The release of this site from the Green Belt would result in the reforming of the Green Belt boundary away from the current residential curtilage to a new curtilage defined by the proposed new development. Whilst much of the development would constitute an infilling of the current settlement pattern, development of the whole site would amount to the beginnings of ribbon development along Essex Way and not result in a robust Green Belt boundary.</p> <p>Although Parcel 16 as a whole is making a very strong contribution to this Green Belt Purpose, development of this site would not cause significant harm in this regard. Development would primarily be an infilling of the existing settlement pattern. The easterly protrusion that would mark the beginning of a ribbon development would however be visible from the existing ribbon development along Vicarage Hall which</p>	<p>The proposed development site comprises of field and therefore there are no alternative boundaries that would act as a more robustly define the boundary between the Green Belt and the development site. Reconfiguring the development site up to the point where the eastern boundary runs directly north to south, thereby omitting the easterly protrusion, would however create a pattern of development more akin to residential infill whilst removing the element considered to constitute ribbon development and encroachment into the countryside.</p> <p>Part of the northern boundary and the entirety of the eastern boundary of the proposed development site would be adjacent to Green Belt land so a landscaped boundary would be required to minimise the visual impact on the rural area beyond. Due to the topography, any new properties that may be built along Essex Way, like those which exist, would be visible from Vicarage Hall which is also in the Green Belt and are unlikely to be able to be screened.</p>	<p>Development of this site would give rise to the need to consider the realignment of the Green Belt boundary further to the east such that it fully incorporates the field which the current boundary cuts through. There are no other boundaries in this area which offer the potential to form an alternative, robust Green Belt boundary should this site be released from the Green Belt. As such, this proposed site does not offer a significant opportunity to consider a wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period of the emerging Local Plan.</p> <p>Development of the proposed site would primarily act to realign the majority of a boundary that is currently formed of residential curtilages with a different set of residential curtilages. Development would also not act to sever any Green Belt from the wider system nor impact significantly on the locally strategically important function of the wider Parcel. However, the eastern protrusion would result in a finger of land being deallocated from the Green Belt which would not be well aligned to the existing settlement pattern or an existing robust</p>

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		Purpose 1	Purpose 2	Purpose 3			
					<p>would create a limited perception of the growth of South Benfleet towards Hadleigh.</p> <p>The proposed development site is currently free of built development considered inappropriate in the Green Belt. Whilst much of the development site is surrounded by urban development, the eastern protrusion juts out into open countryside, with the majority of its extent not surrounded by a robust boundary.</p>		<p>boundary. This is considered to weaken the integrity of the Green Belt in this locality and potentially open up the opportunity for further ribbon development along Essex Way, or further extensions to South Benfleet.</p>
Land off The Dale	11	Minor	None	None	<p>The proposed development site is adjacent to an existing built up area and would act as a very small scale southerly extension of the settlement boundary of South Benfleet. There is already a high degree of permeability between the existing built-up urban area and the Green Belt in this immediate location such that development would act to infill land surrounded by existing residential development and curtilage. However, as stated, not all of this developed land is outside of the Green Belt. As such the proposed site is still assessed as being a southerly extension to a non-robust boundary but due to the size of the proposed site, any impact on this purpose would be relatively minor.</p> <p>The proposed development site is between two neighbouring towns but forms a small part of the total gap between them. Development of this site in isolation would not have an impact on this function as there is already built development enclosing the proposed site.</p>	<p>The proposed site is a small unmanaged patch of land that contains no obvious internal boundary features through which the site could be reconfigured.</p> <p>The proposed development site is well-screened by existing built development and tree lines and therefore its development would not be particularly detrimental to the wider character of the area.</p>	<p>There are no obvious robust boundary features to which the Green Belt could be realigned as part of a wider strategic release of land from the Green Belt. It is considered that any significant release would directly impact on the locally important strategic function that the Green Belt performs in this area.</p> <p>Should this site be considered appropriate to release from the Green Belt, consideration will need to be given to remove the sliver of land to the north from the Green Belt as this would become isolated.</p> <p>Development of this site in isolation would not have a significant impact on the Green Belt. The proposed development site falls within Parcel 11 which is part of the Locally Important Strategic Green Belt area of the Central Corridor. This local Green Belt system serves to restrict the settlements of South Benfleet and Thundersley from merging and also creates a connection between the northern Green Belt parcels within the borough to those in the south. The</p>

Site Option	Green Belt Parcel	Green Belt Assessment 2018			Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
		Purpose 1	Purpose 2	Purpose 3			
					<p>Although the proposed development site itself is undeveloped, its character is of a small undeveloped space within an urban area rather than that of countryside, with any views of the wider countryside to the east largely obscured by existing trees at the boundary.</p>		<p>size of the site means that there would not be a markedly negative impact on this strategic function.</p> <p>Its release would not constitute the realignment of the Green Belt boundary to a robust defensible boundary that could be defended in the long term, with the current boundary with residential curtilage being realigned to the new curtilage.</p> <p>Development here would however effectively round off the Green Belt that currently exists at the edge of the settlement of South Benfleet, rather than a strategic release and would create a more logical boundary. Development would also add to the residential sprawl which has already encroached into the Green Belt.</p>
Land east of Rayleigh Road	4	Moderate	Very strong	Strong	<p>The proposed development site is free from existing urban development. Future urban development would display a relationship with the general settlement pattern as the site is directly adjacent to built development to the north, south and west. It would act to propagate the ribbon development along Daws Heath Road further eastwards but also infill all land inbetween this lateral extension and the industrial estate to the north. Development would not however result in the</p>	<p>The proposed development site largely comprises of open fields and therefore there are no alternative boundaries that would act to more robustly define the boundary between the Green Belt and the development site. Nonetheless, should this site be considered for release from the Green Belt, opportunities should be explored in terms of the configuration of the site in order to limit the propagation of ribbon development along Daws Heath Road.</p> <p>The development site is currently open countryside and has particular significance to</p>	<p>Development of the proposed site would give rise to the need to consider the merit of keeping the land developed as a fire station and car show room in the Green Belt as this would be cut off from the wider Green Belt system and in any event no longer functions as Green Belt land.</p> <p>Any further Green Belt realignment would have to consider extending into woodland further south into Parcel 4 but this would further weaken the integrity of the Daws Heath Ring and act to exacerbate the perception of urban coalescence in this</p>

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					<p>realignment of Green Belt with an existing boundary feature.</p> <p>The proposed site currently forms a significant part of the existing gap between Thundersley and Daws Heath. Development would act to reduce the gap between the two settlements, bringing a greater extent of Thundersley in closer proximity to Daws Heath whilst also narrowing the gap which exists between the two settlements along Daws Heath Road which is currently its narrowest point. In this area, the strategic gap would be reduced by approximately two thirds. The perception of merge would therefore be significantly increased.</p> <p>The proposed development site is currently free of built development considered inappropriate in the Green Belt. Although there is build development around much of the periphery of the site, this is not assessed as being sufficient to compromise the rural integrity of the site as a whole due to its size.</p>	<p>the Green Belt purpose of preventing urban coalescence and so therefore any development would need to be well screened.</p>	<p>wider area. As such, this proposed site does not offer a significant opportunity to consider a wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period of the emerging Local Plan.</p> <p>Development of the proposed site would not have a significant negative impact on the robustness of Green Belt boundaries as it would act to realign a boundary that is already currently formed of residential curtilages with what would be a different set of residential curtilage.</p> <p>Its development would act to cut off the small parcel of Green Belt land which is currently developed as a fire station and car show room from the wider Green Belt. This is not considered to have a significant impact on the purposes of the Green Belt as the land is already developed with inappropriate uses and of limited strategic importance.</p> <p>There is however a significantly negative impact in relation to the merging of urban settlements as the strategic gap between Thundersley and Daws Heath will be significantly reduced in general, as well as narrow by approximately two thirds at the point where it is currently the narrowest. Development would act to exacerbate the perception of coalescence of the urban settlements in this area and reduce the contribution the Green Belt makes to the identified locally strategic priority of</p>

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							preventing the urban coalescence of Thundersley, Daws Heath and Hadleigh.
Land at Brook Farm	8	Very Strong	Very Strong	Minor	<p>Releasing this site would realign a Green Belt boundary that currently takes the form of residential curtilages with an unsurfaced road in the most part, but which also brings the boundary across the unsurfaced road meaning much of the south western boundary would be aligned against residential curtilage. The proposed site is free of development considered inappropriate in the Green Belt and would act as a southerly extension of Daws Heath. However, this extension as a whole would not be well related to the existing settlement pattern, with the land associated with Brook Farm jutting out from what otherwise would be a general rounding out of the south of Daws Heath, and forming a ribbon development along Daws Heath Road.</p> <p>Given the existing development within the Green Belt along Daws Heath Road, development of the proposed site would likely constitute a loss of the current strategic gap between Hadleigh and Daws Heath along Daws Heath Road to the point where the general perception would be that these urban settlements had merged.</p> <p>In the wider context of the proposed development site, development would act to reduce the existing strategic gap between Hadleigh and Daws Heath, with</p>	<p>The proposed development site could be realigned along the unsurfaced road such that the land incorporating Brooks Farm is not included. This wouldn't represent a significantly more robust boundary than what is currently proposed but would importantly omit most of the land in proximity to Daws Heath Road from potential development which would cause the merging of Hadleigh and Daws Heath.</p> <p>Development within this site will be required to be well screened along the southern edge such that it doesn't significantly contribute to the perception of Daws Heath merging with Hadleigh.</p>	<p>Development of this site would give rise to the need to consider the realignment of the Green Belt boundary further to the east such that it fully incorporates the field which the current boundary cuts through. There are no other boundaries in this area which offer the potential to form an alternative, robust Green Belt boundary to that which would result through development of this site. As such, this proposed site does not offer a significant opportunity to consider a wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period.</p> <p>Development of the proposed site would not have a significant negative impact on the robustness of Green Belt boundaries as it would primarily act to realign the majority of a boundary that is currently formed of residential curtilages with new residential curtilage and an unsurfaced road.</p> <p>There would however be a very strong degree of harm in relation to the merging of urban settlements as the area of Green Belt land between Daws Heath and Hadleigh will be reduced in extent, particularly in the south west where the strategic gap will be effectively lost. Development would therefore act to exacerbate the perception and reality of coalescence of the urban settlements in this area and reduce the contribution this</p>

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					<p>boundaries or features which prevent inter-visibility between the two urban settlements being weak or non-existent in the land which would form the remainder of the strategic gap.</p> <p>The proposed development site is currently free of built development considered inappropriate in the Green Belt and its development would therefore constitute a loss of countryside. However the immediate surrounds are predominantly urban to semi-urban in appearance and this has a significant impact on the perception of the site being in countryside.</p>		<p>part of the Green Belt makes to the identified locally strategic priority of preventing the urban coalescence of Thundersley, Daws Heath and Hadleigh. The southern part of the Daws Heath Ring would be all but severed along Daws Heath Road.</p>
Land at Oak Tree Farm	8	Strong	Minor	Strong	<p>The proposed development site is adjacent to Hadleigh and currently contains no development considered inappropriate in the Green Belt. Its release for development would constitute an easterly extension of the urban area out into the countryside, rather than a more general rounding off of the urban edge, and will not result in the Green Belt boundary being aligned to an existing robust feature. Any realignment would be from existing curtilage to new curtilage.</p> <p>The direction of the extension would not be towards Daws Heath which is the closest settlement to Hadleigh at the point where this proposed development site lies.</p> <p>Development would reduce the gap between Hadleigh and the ribbon development in between Daws Heath and Leigh-on-Sea but this ribbon development</p>	<p>The only boundary feature within the proposed development site is a field boundary which isn't considered a permanent feature for the purposes of realigning the Green Belt. The orientation of the proposed development site in the context of the general settlement pattern means that no alternative configuration would be more defensible.</p> <p>The well-developed screening along the northern, eastern and southern edge should be retained but otherwise development would act as an extension of the existing urban area.</p>	<p>The wider available land in this area is comprised of open field with hedged or tree lined boundaries. As such there are no robust boundaries that could be used to realign the Green Belt as part of a larger strategic release. Further development in this wider area would also directly impact on the strategic function of the Daws Heath Ring and act to propagate the perception and reality of the merge between the three settlements of Hadleigh, Daws Heath and the ribbon development between Daws Heath and Leigh-on-Sea.</p> <p>Development of the proposed site would not have a significant negative impact on the robustness of Green Belt boundaries as it would act to realign a Green Belt boundary that currently takes the form of residential curtilage with new curtilage that would be developed as part of the release of this site. Other boundaries will continue to follow the</p>



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					<p>is not considered to be a 'town' with regard to this purpose. Nonetheless, the proposed site forms a small part of the existing gap between Hadleigh and Leigh-on-Sea although there is no inter-visibility which would lead to the perception of merge.</p> <p>The proposed development site is currently free of built development considered inappropriate in the Green Belt, and development would be extended out into rural countryside where no boundary feature exists to contain such development.</p>		<p>field boundary and lane which they currently follow before taking the form of the new residential curtilage.</p> <p>Parcel 8, within which this proposed development site lies, is part of the Locally Important Strategic Green Belt area of the Daws Heath Ring. Release of sites in this part of the Green Belt will reduce the extent of the rural break that currently exists between the settlements of Hadleigh, Daws Heath and Leigh-on-Sea, contributing to the general perception of urban coalescence. The width of Green Belt between Hadleigh and Daws Heath would not however be specifically reduced through the release of the proposed site, and there would still be a significant rural break between Hadleigh and Leigh-on-Sea. The intervening Green Belt between Hadleigh and the ribbon development along Bramble Road would however be materially reduced, although this intervening land contains features which ensure there is no inter-visibility between settlements</p>
Land east of Downer Road North	3a	Minor	Moderate	Minor	<p>The proposed development site lacks a strongly defined edge with the existing built-up area due to the presence of a small number of properties along Church Road in the north east and those further properties that exist more centrally. Land to the immediate west is fully developed into residential use whilst land to the east of the site also contains built development in the form of a church and school. Development of this site would primarily act as an eastern extension to South Benfleet</p>	<p>The only potential boundary feature that exists within the site is Chesterfield Avenue which runs through the site in an east to west direction. Its orientation is such that it wouldn't make for a particularly logical alternative boundary in the context of the wider settlement pattern, but should development be restricted to the southern portion of the site only, it would avoid further development up to the boundary of Church Road. This is the main access between South Benfleet and Thundersley and is tree</p>	<p>Any further Green Belt release as part of the release of this site would need to be across Church Road to the north east into further woodland, or to the east across the unsurfaced road and further woodland. Both of these additional releases would mean bringing development across a boundary feature into an area which is not confined. Any development to the north east and east would also further impact on the strategic function of the Green Belt in this locality and reduce the perception that the remaining</p>

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					<p>although it would also act to infill land between what is clearly the settlement of South Benfleet and ribbon development along Church Road leading to Thundersley, and would be in keeping with the extent of the settlement pattern to the immediate south. If this site was to be released from the Green Belt, in the northern portion of the site the Green Belt boundary would be realigned away from residential curtilage to Church Road and an unsurfaced road. In the south, the release of this site would realign the boundary away from an existing local road to the same unsurfaced road.</p> <p>The proposed development site is between South Benfleet and Thundersley, and forms an important part of the current gap in terms of distance. The release and subsequent development of this site would narrow the Green Belt between the two towns to what is already its narrowest extent, whilst development along the edge of Church Road in the northern portion would create an almost unbroken frontage of development between South Benfleet and Thundersley. The impact on this Green Belt Purpose is however tempered by the fact that there is already ribbon development along Church Road between the two settlements such that there is no strong rural break along the main access route between them in this locality, with residential dwellings already present on the eastern border which would represent the new building line. Additionally there is also</p>	<p>lined, albeit one interrupted by built development along the extent of the road.</p> <p>Should this site be released for development, consideration should be given to maintaining the tree line along Church Road and thus avoiding an almost unbroken frontage of built development between South Benfleet and Thundersley. Further trees could be retained along the eastern boundary to screen what would become the new easterly extent of South Benfleet.</p>	<p>Green Belt is safeguarding the countryside from encroachment. As such the site is not considered to offer a strong opportunity for further release.</p> <p>Parcel 3a, within which the proposed development site lies, is part of the Locally Important Strategic Area of the Central Corridor, which acts to prevent urban coalescence between South Benfleet and Thundersley whilst maintaining an unbroken chain of Green Belt through the centre of the borough. Deallocation would act to narrow the width of the strategic gap between Thundersley and South Benfleet, though this narrowing would broadly be to a similar extent to where the gap is already narrowest, and would equate to a 'filling out' of the land which lies between the properties along Downer Road North and those on Church Road, and match the extent of development that has already occurred to the south of Thundersley Church Road. Unless appropriately screened, development would also likely impact on the perception of the remaining land being in countryside, as development of this site would necessitate the loss of woodland in this locality.</p> <p>Consideration would therefore need to be given to the balance of whether this land could be released for further development as much of the site and surrounding land is already developed to varying degrees, or whether the localised impact on the strategic function that this part of the Green Belt is playing would be significantly</p>

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					<p>well established woodland in the remaining strategic gap between the two settlements. As such it is assessed that in terms of the perception of urban coalescence, the impact would not be as strong.</p> <p>Although much of the proposed site is wooded, the proposed development site is adjacent to significant residential development to the west and south, whilst there is also low density non-residential development to the immediate east. The site itself contains a number of dwellings and an access track.</p>		<p>detrimentally impacted by the release of this site, such that its Green Belt designation should be maintained for that reason.</p>
Land at Glebelands	10a	Minor	Minor	Minor	<p>The site is currently free from existing urban development but future development would act as a westerly extension of South Benfleet and would be in keeping with the general settlement pattern and allow for the Green Belt to be realigned with the A130 which would create a strong permanent boundary.</p> <p>The parcel represents a small part of the strategic gap between South Benfleet and North Benfleet. It is however considered that there is no inter-visibility between South Benfleet and North Benfleet, and the A130 would form a strong barrier to any further expansion and resultant reduction of that gap.</p> <p>The proposed development site is currently free of built development considered inappropriate in the Green Belt. However, the area is cut off from the wider countryside by the A130 and its</p>	<p>The proposed development site comprises of open field and scrubland and therefore does not contain any robust boundary that would represent a logical realignment of the development site.</p> <p>The introduction of landscaping and mature trees would reduce the perception that this part of the A130 is cutting across a rural area.</p>	<p>Development of the proposed site would act to reduce the amount of Green Belt land between North Benfleet and South Benfleet but the A130 acts as a natural boundary feature which runs through the Green Belt in this area. It is considered that the removal of this site from the Green Belt would not have a significant impact on the wider Green Belt system. The Green Belt boundary at this locality would be realigned away from residential curtilage to the more robust boundary feature of the A130.</p> <p>The land comprising Parcel 10b to the south is a similar lateral strip that exists between the A130 and Benfleet. Any future development of this site would constitute a similar westerly extension of South Benfleet that would be contained by the A130.</p> <p>Should it be considered appropriate to remove this site from the Green Belt, consideration should be given to the</p>

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		Purpose 1	Purpose 2	Purpose 3			
					development would amount to the infilling of a relatively narrow strip of land in between South Benfleet and the A130.		potential of removing the rest of the land to the north of this site bound by the A130 from the Green Belt such that the A130 forms the new boundary. Part of this land is already developed as a school and is therefore not performing a Green Belt function.
East of Manor Trading Estate & rear of Robert Drake School	1	Moderate	Minor	Minor	<p>Although the release of this land from the Green Belt would not result in the formation of more defensible Green Belt boundaries, it would not weaken them relative to the boundaries that currently exist. The site itself is free of built development but is encircled by a trading estate, local roads, dwellings and a school. Development would therefore broadly constitute urban infilling although it is noted that the densities associated with true urban development are only prevalent in the residential area to the south and the industrial estate to the west.</p> <p>The proposed development site forms a relatively important part of the strategic gap between Thundersley and South Benfleet. However, development of this site would not act to reduce any existing strategic gap due to the prevalence of plot land development to the immediate east of the site.</p> <p>The site is currently free from built development and densely wooded. However, the immediate surroundings of the site is predominantly developed, in part by industrial uses, such that the rural integrity of the site is compromised.</p>	<p>There are no alternative boundaries within the proposed development site that could provide an alternative configuration.</p> <p>Any development within this parcel should be well screened from the proximal road network to preserve the rural feel of what largely functions as a small rural break inbetween the industrial estate and surrounding residential dwellings.</p>	<p>The release of this proposed development site from the Green Belt would present the opportunity to consider whether a further release to the extent of Windermere Road and Keswick Road may represent more robust and defensible Green Belt boundaries in the long term.</p> <p>Consideration should also be given as to whether the land accommodating the school situated to the south west of the parcel should also be removed from the Green Belt. Being developed, this land does not contribute to the purposes of the Green Belt and would also become cut off should the proposed site be released.</p> <p>As noted above, much of the Green Belt in this locality is already developed with plot land style housing and an industrial estate. It is noted that Parcel 1, within which the proposed development site lies, is part of the Locally Important Strategic Area of the Central Corridor, which acts to prevent urban coalescence between South Benfleet and Thundersley whilst maintaining an unbroken chain of Green Belt through the centre of the borough. Whilst deallocation would act to narrow the width of the strategic gap</p>

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		Purpose 1	Purpose 2	Purpose 3			
							<p>between Thundersley and South Benfleet, there has already been a significant amount of encroachment in the immediately locality such that the immediate Green Belt area is already not significantly contributing to the purposes of the Green Belt. This is despite the parcel as a whole having a clear role in preventing sprawl and urban coalescence. Consideration would need to be given to the balance of whether this land could be released for further development as much of the surrounding land is already developed to varying degrees, or whether the localised impact on the strategic function that this part of the Green Belt is playing would be significantly detrimentally impacted by the release of this site, such that its Green Belt designation should be maintained for that reason.</p> <p>The land developed as a school and associated playing field to the south west of the site is currently allocated as Green Belt and this would become cut off from the wider Green Belt.</p>
The Chase	6	Moderate	None	Moderate	<p>Although much of the proposed development site is rural in nature, in places the proposed development site lacks a strongly defined edge with the existing built-up area as it contains ribbon development running through the centre. Any development would constitute an infill of land within Thundersley and therefore be</p>	<p>Land to the north of The Chase is of a more rural character than that to the south where much of the ribbon development exists. As such it may be considered appropriate to realign the proposed housing site to just incorporate the land to the south of The Chase. This would however leave a strip of Green Belt which is even more isolated than that which exists now.</p>	<p>Should this site be developed, it would amount to the infilling of land surrounded by residential development in the settlement of Thundersley. Release of this site from the Green Belt would require a consideration of whether it would be more apt to slightly extend the release eastwards such that the new boundary is aligned with Rayleigh Road which would present a more logical boundary than what would otherwise be</p>

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		Degree of Harm					
		Purpose 1	Purpose 2	Purpose 3			
					<p>in keeping with the existing settlement pattern.</p> <p>The proposed development site is not considered to fall within a strategic gap between two neighbouring towns.</p> <p>Whilst a greater proportion of land at this relatively large site is undeveloped, the site does not display a strong rural character due to parts of the proposed development site having already been encroached and due to the fact that development has already taken place around the vast majority of its borders. In terms of the impact on the wider countryside system in the Borough, the impact is considered minimal as the site is largely cut off from this wider rural system. However, in the local context the site represents a rural break, albeit one which has been relatively significantly encroached.</p>	<p>The release of land from the Green Belt in this location would amount to residential infilling and would leave just part of the eastern and north western boundary adjacent to Green Belt. The harm arising from this development proposal could be managed through the appropriate design and layout of development on the site, accompanied by the use of strong landscaped boundaries. Much of the site boundary and land within the site already benefits from mature trees which could be retained.</p>	<p>residential curtilage. The release of this site would result in a significant opportunity for accommodating housing need. Further, it would be appropriate to consider the removal of the Green Belt designation from the land occupied by the primary school and nursery as these would become small, isolated pockets of Green Belt entirely detached from the wider system.</p> <p>Any wider Green Belt release would need to be to the east of the site, crossing the robust boundary of Rayleigh Road. Such a release would see the boundary aligned away from Rayleigh Road to either a hedged field boundary or the edge of woodland. These boundaries are less robust and would therefore be against the grain of national policy, but such development would equate to a rounding off of the general settlement pattern.</p> <p>The proposed development site does not lie within a Locally Important Strategic Green Belt area as defined by Part 1 of the Castle Point Green Belt Review 2018. The release of land comprising SH18 from the Green Belt would amount to the residential infilling of Thundersley and it is assessed that this would not impact on the integrity of the wider Green Belt system as this area of land is already relatively isolated from the wider Green Belt. Any new boundary would be formed of residential curtilage which mirrors the nature of the current boundary such that there would be no change in their robustness, but the extent of such boundaries would be significantly reduced.</p>

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		Purpose 1	Purpose 2	Purpose 3			
							Development of the site would however sever the land currently developed as playing fields associated with educational facilities from the Green Belt.
Land east of Canvey Road	26	Very Strong	Moderate	Strong	<p>There is no built development currently in the proposed development site. Development in the southern portion of the proposed site would primarily amount to an infilling of open land within Canvey Island due to the built footprint of the Dutch Village. However, the northern portion of the site is not considered to reflect the existing settlement pattern. Its development would act to begin the encirclement of a parcel of Green Belt comprising of a school and further fields.</p> <p>Other than to the west where the boundary would be with Canvey Road, development of this site would not result in the Green Belt being realigned to a robust boundary.</p> <p>The proposed development site is between Canvey Island and South Benfleet. Due to the extent of the northern portion of the proposed development site, the strategic gap would be noticeably reduced between the two settlements. This reduction would leave the remaining gap broadly similar to the narrowest extent that currently exists at proximal locations. However, Benfleet Creek lies between South Benfleet and Canvey Island and this acts as a strong boundary between the two settlements.</p> <p>The proposed development site is currently free of built development considered</p>	<p>The proposed development site is predominantly open field with a general absence of boundary features beyond hedged fields such that there are no alternative boundaries that could act to more robustly define the extent of the Green Belt. Nonetheless, re-aligning the development site to the hedgerow which extends from the wooded area to the school would result in a development site which more closely reflects the existing settlement pattern.</p> <p>The northern and eastern boundaries of the site would need to be effectively landscaped as this will be immediately adjacent to rural Green Belt. Development at the western boundary will continue the urban form up to Canvey Road where existing vegetation acts to screen the properties in the Dutch Village that are already in close proximity to the road. Such screening should be retained and further developed as necessary.</p>	<p>Should it be considered appropriate to release all or part of this site from the Green Belt, consideration should be given to also releasing the land already developed as a school as this land does not accord with the purposes of the Green Belt. This will assist in creating a more logical settlement boundary.</p> <p>Any further Green Belt release would need to be north and north east of the proposed site otherwise urban development would sprawl across Canvey Road, although to the south west any development that did cross Canvey Road would be subsequently bound by Roscommon Way which could act as an alternative robust boundary.</p> <p>Somnes Avenue is some distance north from the proposed site and this represents the only feature that could act as a robust boundary feature in this area. It is however noted that Canvey Island has already crossed over Somnes Avenue in some areas. Such a Green Belt release would amount to a sizeable release in this locality. As such, this proposed site does not offer a significant opportunity to consider a wider Green Belt release to provide land that could be safeguarded for future housing development beyond the proposed plan period of the emerging Local Plan, unless</p>

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		Purpose 1	Purpose 2	Purpose 3			
					<p>inappropriate in the Green Belt, with the northern portion extending through what is an open expanse of countryside. However, the southern portion of the site is bounded by residential development and a school which impacts on the perception of the area being a rural locality.</p>		<p>such a sizeable release is considered appropriate.</p> <p>The proposed development site falls within the Locally Important Strategic Green Belt Area of Canvey Island. This strategic area acts to prevent the urban settlement of Canvey Island from expanding to the extent of the coastal wall or urban encroachment disrupting the ecological value and landscape character of the west of the island. Whilst the southern portion of the proposed site would largely amount to residential infilling, the northern portion is not well located with regard to the existing settlement pattern, would cause an impact on wider the countryside in this location and its development would also act to begin the encirclement of a parcel of Green Belt comprising of a school and further fields, and also bring development significantly closer to Benfleet Creek.</p>
Land west of Canvey Road (The Triangle)	23	Moderate	None	Minor	<p>Developing this site would have little impact on the robustness of the Green Belt boundaries in this locality as it would re-align those boundaries which are currently aligned with Northwick Road and Canvey Road to Roscommon Way which is considered to be similarly robust. The development site would be entirely contained by main roads but would amount to continuing the westerly extension of Canvey Island rather displaying a particularly strong fit with the existing settlement pattern. It is however noted that</p>	<p>The proposed development site is surrounded by robust boundaries in the form of main roads. Within the site itself, any boundaries are formed of hedged field boundaries and as such there are no robust alternative boundaries through which to reconfigure the site.</p> <p>Screening will need to be considered along the boundary with Roscommon Way such that a sympathetic edge is created between</p>	<p>The parcel is well constrained by existing infrastructure in all directions. The proposed development site does not offer significant potential for a wider strategic release. Any release across Roscommon Way would be into open countryside with no other robust boundary by which to constrain such a release. Whilst there is open land to the south of Northwick Road which is also contained by Roscommon Way, existing industrial commercial development impacts</p>



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		Purpose 1	Purpose 2	Purpose 3			
					<p>the development to the immediate south does provide the proposed development site with a measure of coherency with the general settlement pattern.</p> <p>Developing the proposed site would act as a lateral extension which is not considered to be located in a strategic gap.</p> <p>The proposed development site is predominantly undeveloped but contains a small amount of development considered inappropriate in the Green Belt. The site is cut off from the wider countryside by Roscommon Way, and is also bound by two other main roads. This creates more of a semi-urban environment.</p>	the proposed development and wider countryside.	<p>on the ability to accommodate future housing need.</p> <p>The proposed development site falls within the Locally Important Strategic Green Belt Area of Canvey Island. This strategic area acts to prevent the urban settlement of Canvey Island from expanding to the extent of the coastal wall or urban encroachment disrupting the ecological value and landscape character of the west of the island. Although the proposed development site would act to extend development westward, this would be into a parcel that is well contained from the wider open countryside to the west of Canvey Island. As such there would be some impact on the strategic role this part of the Green Belt plays. In terms of the general integrity of the Green Belt in this immediate locality, what are currently robust boundaries between Green Belt and non-Green Belt land would be realigned to equally robust strong boundaries.</p>
Land adjacent to Solby Wood Farm, Daws Heath	4	Strong	Strong	Moderate	<p>The proposed site is currently undeveloped. If it were to be removed from the Green Belt, a current boundary with residential curtilage would be re-aligned to the lane in the south, with new residential curtilage forming the remainder of the new boundary. The resultant Green Belt release would be a southerly protrusion into the Green Belt which although localised, would</p>	<p>The proposed development site takes the form of open field which does not contain any internal boundaries that could be used to re-align the site.</p> <p>Any development should incorporate screening to the south and west. Effective boundary treatment would be particularly important to the south to preserve the</p>	<p>Should this site be considered suitable for development, a more natural settlement pattern would be afforded by taking the land currently occupied by Solby Wood Farm out of the Green Belt given that the land has been permitted for housing development. It would however not result in the opportunity for further housing delivery, nor would such a deallocation ensure that the Green Belt boundary becomes more robust. It is not considered that there is a strong opportunity</p>

Site Option	Green Belt Parcel	Green Belt Assessment 2018			Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
		Purpose 1	Purpose 2	Purpose 3			
					<p>not be particularly reflective of the settlement pattern.</p> <p>Development would act to reduce the strategic gap between Hadleigh and Daws Heath, with boundaries or features which prevent inter-visibility between the two urban settlements being relatively weak in the land which would form the remainder of the strategic gap. Nonetheless, it would not extend the built frontage of Daws Heath out further than what exists at Solby Wood Farm. However, it is noted that the development site falls within Green Belt considered strategically important in preventing urban coalescence.</p> <p>The proposed development site is currently free of built development considered inappropriate in the Green Belt. The site is adjacent to countryside or rural uses on three sides such that the general perception would be an extension of housing into functional countryside, but one which is limited in harm due to the size of the proposed development.</p>	<p>perception of a rural gap between Hadleigh and Daws Heath.</p>	<p>for any other wider Green Belt release in this locality such that the Green Belt would be more robustly aligned.</p> <p>The release of this site would not constitute the realignment of the Green Belt boundary to a robust boundary that could be defended in the long term. Although the site is relatively small, there would be a strong degree of harm in relation to the merging of urban settlements as the area of Green Belt land between Daws Heath and Hadleigh will be reduced in extent, although development would bring settlement boundaries in line with where they are already the narrowest rather than further decrease any gap at its narrowest extent. Nonetheless, development would act to exacerbate the perception of coalescence of the urban settlements in this area and reduce the contribution this part of the Green Belt makes to the identified locally strategic priority of preventing the urban coalescence of Thundersley, Daws Heath and Hadleigh.</p> <p>It is noted that the granting of permission for the redevelopment of Solby Wood Farm presents a difficult context for the assessment of this site, as in effect development considered inappropriate in the Green Belt has been permitted in close proximity. Completion of this permitted development will reduce the perception of this site being in the countryside. Additionally, whilst a realignment of the Green Belt to exclude this site would act to form a protrusion of undesignated land into the Green Belt which would not be reflective</p>

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		Purpose 1	Purpose 2	Purpose 3			
							of the general settlement pattern, in effect development of the site would result in a rounding off of the pattern of development that will be present once the development of Solby Wood Farm has taken place.
Kings Park, Canvey	25	Minor	None	Minor	<p>Development of this site would not result in the realignment of the Green Belt to a more robust development boundary but the site is largely constrained by inter-tidal habitat and a reclaimed landfill which would act to limit any further significant development beyond the site. Development would result in an easterly extension of build development on Canvey Island which would be in keeping with the settlement pattern in the surrounding area adjacent to the inter-tidal habitat.</p> <p>The proposed development site is not considered to fall within a strategic gap between two neighbouring towns.</p> <p>Although the proposed development site is formed of undeveloped countryside, the entirety of its eastern edge is adjacent to existing dwellings which are part of a sizeable residential area. There is also considerable development to the south. This gives the area a broad urban feel. Development would not act to significantly extend development beyond existing peripheries or cause a marked change in visual impact.</p>	<p>There are no alternative boundaries within the site which could act as a more robust Green Belt boundary.</p> <p>The proposed development would act as a relatively minor lateral extension to the existing settlement boundary of Canvey Island, which is already relatively developed albeit with large views of open countryside to the north and east. Boundary treatments should aim to provide a sympathetic edge with the inter-tidal habitat to the north and the nature reserve which would remain in the Green Belt to the east. The topography to the immediate east would however make any screening difficult to fully achieve if the proposed development was of any significant height.</p>	<p>The wider Green Belt in this area forms inter-tidal habitat or takes the form of a reclaimed landfill. Further development opportunities that could be put into effect through a larger Green Belt release are therefore not considered to be present.</p> <p>Development of this site is not considered to have a significant impact on the Green Belt. Development would not result in a reduction in the robustness of Green Belt boundaries and would act as a small lateral urban extension to an existing settlement, with any further expansion problematic as the site is bound by inter-tidal habitat and a reclaimed landfill.</p>