

# Southend-on-Sea Green Belt Study Update

Final Report

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## Project Title: Southend-on-Sea Green Belt Study Update

### Client: Southend-on-Sea City Council

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# **Executive Summary**

#### **Study Scope**

LUC was commissioned to undertake an assessment of the Green Belt land within the District of Rochford and the Borough of Southend-on-Sea in 2019 and 2020. The Study was undertaken in two stages:

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

Southend-on-Sea City Council have now commissioned LUC to update this Study as follows:

- Review the Study methodology in light of changes in national Green Belt policy and guidance since February 2020.
- Update the Study findings to:
  - reflect appropriate changes to the methodology;
  - consider the effects of any significant new areas of inappropriate development permitted within Southend's Green Belt since February 2020 following the definition of the necessary very special circumstances;
  - reflect changes in promoted site boundaries and include newly promoted site boundaries; and,
  - only include ratings for parcels, assessment areas and sites wholly or partially within Southend.

Parcels, sites and assessment areas have not been clipped to the Southend city boundary or subdivided within the city limits, and the parcel, site and assessment area numbering system in the original 2020 study has been retained to maintain compatibility with the original study outputs in Rochford.

This updated Study provides the necessary Green Belt evidence to enable Southend-on-Sea City Council to consider if alterations to Green Belt boundaries should be proposed. There are, however, other important environmental and sustainability factors that need to be considered in order to establish the necessary exceptional circumstances for making alterations to Green Belt boundaries.

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

#### Stage 1 Findings

The vast majority of the Green Belt in Southend-on-Sea continues to serve the Green Belt purposes well, in particular with regard to maintaining the openness of the countryside. **Table ES1** below lists the Southend parcels that contain Green Belt land considered to make a lower contribution to the NPPF Green Belt purposes.

#### Table ES1 – Lower performing Stage 1 Green Belt parcels

Number of weak ratings	Number of moderate ratings	Area (ha)	Lower Performing Parcels
4	0	17.2	P66
3	1	0	-
2	2	5.14	P72, P73, P74, P75, P76P81
1	3	0	-
0	4	0	-

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

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

There are no significant areas of open countryside currently not designated as Green Belt within the City limits.

#### Stage 2 Findings

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

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

House Doting	Area of Land <sup>1</sup>			
Harm Rating	Area (Ha)	Percentage of Site/Parcel Area		
High	280.57	92.14		
Moderate - High	6.50	2.13		
Moderate	0.00	0.00		
Low - Moderate	0.28	0.09		
Low	17.15	5.63		

#### Table ES2 – Total area of Southend-on-Sea Green Belt land assessed at each harm rating

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

<sup>&</sup>lt;sup>1</sup> Southend-on-Sea contains just over 580ha of Green Belt land in total; however the area of Green Bet assessed for Green Belt harm focussed exclusively on Green Belt land promoted for development, lower performing areas identified at Stage 1 and excluding defined absolute constraints.

# **1** Introduction

1.1 LUC was commissioned to undertake an assessment of the Green Belt land within the District of Rochford and the Borough of Southend-on-Sea in 2019 and 2020. Southend-on-Sea City Council have now commissioned LUC to update this study.

# 2020 Study Objectives

- 1.2 The overall purpose of the original Study was to undertake an independent, robust and transparent assessment of Green Belt within Rochford and Southend-on-Sea. This included comprehensive assessments of the performance of Green Belt land in line with national policy, guidance and case law.
- 1.3 The Study has been undertaken in two stages:
  - **Stage 1** identified strategic variations in the '**contribution**' of land to the five Green Belt purposes as defined in the National Planning Policy Framework (NPPF). This assessment had regard to the wider context of Green Belt land within Rochford, Southend-on-Sea and neighbouring authorities and other environmental designations.
  - **Stage 2** involved a more detailed assessment of the potential **'harm**' of releasing sites from the Green Belt, focussing on specific areas of Green Belt land including the weaker performing areas identified in Stage 1 and sites submitted to the Councils for development.
- 1.4 LUC's assessment of harm is consistent with the latest case law on the matter, notably Calverton Parish Council v Greater Nottingham Councils & others (2015) which found that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.'

# 2024 Study Update Objectives

- 1.5 Southend-on-Sea City Council require the original Study to be updated in the following ways:
  - Review the Study methodology in light of changes in national Green Belt policy and guidance since February 2020.
  - Update the study findings to:
    - reflect appropriate changes to the methodology;
    - consider the effects of any significant new areas of inappropriate development permitted within Southend's Green Belt since February 2020 following the definition of the necessary very special circumstances;
    - reflect changes in promoted site boundaries and include newly promoted site boundaries; and,
    - only include ratings for parcels, assessment areas and sites wholly or partially within Southend.
- 1.6 Parcels, sites and assessment areas have not been clipped to the Southend city boundary or subdivided within the city limits for consistency in the application and output of the original study methodology, and the parcel, site and assessment area numbering system in

the original 2020 Study has been retained to maintain compatibility with the original study outputs in Rochford.

1.7 This updated study provides the necessary Green Belt evidence to enable Southend-on-Sea City Council to consider if alterations to Green Belt boundaries should be proposed. There are, however, other important environmental and sustainability factors that need to be considered in order to establish the necessary exceptional circumstances for making alterations to Green Belt boundaries.

## Method Statement Engagement

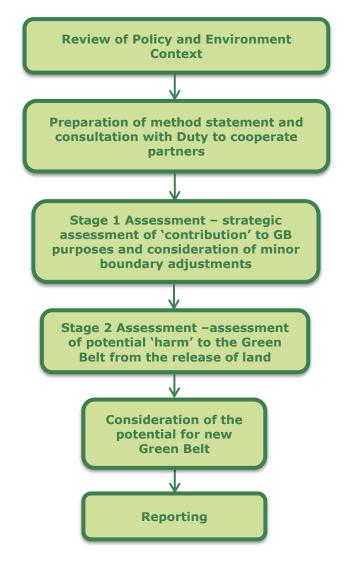
- 1.8 A method statement was circulated to the Council's key stakeholders with whom the Council has a duty to cooperate<sup>2</sup> in October 2018. This included neighbouring local authorities, Environment Agency, Historic England and Natural England.
- 1.9 This provided an opportunity for the Council's duty to cooperate partners to review and comment on the proposed approach to the Study. Stakeholder comments on the method statement were reviewed before the preparation of the final report in 2020. **Appendix 5** contains a record of the duty to cooperate consultation comments received at the time.

### Methodology Overview

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

 $<sup>^2</sup>$  Section 110 of the Localism Act (2011).

#### Figure 1.1: Methodology



### **Report Structure**

- 1.12 The remainder of this report is structured as follows:
  - **Chapter 2** outlines the assessment methodology for the Stage 1 Study of Green Belt contribution.
  - Chapter 3 sets out the findings of the Stage 1 study of Green Belt contribution.
  - **Chapter 4** outlines the assessment methodology for the Stage 2 Study of Green Belt harm.
  - Chapter 5 sets out the findings of the Stage 2 study of Green Belt harm.
  - **Chapter 6** sets out the key considerations for making alterations to Green Belt boundaries, including general opportunities for mitigating harm to the Green Belt and enhancing the beneficial uses of Green Belt.
- 1.13 The report is accompanied by the following appendices:
  - **Appendix 1** sets out the national, regional and local policy context on designating and managing Green Belts. It also summarises guidance and case law related to Green Belts and the approaches used in Green Belt studies in neighbouring local authorities.

- **Appendix 2** illustrates the details of a list of potential minor Green Belt boundary adjustments.
- **Appendix 3** sets out the detailed Stage 1 Green Belt contribution assessments by parcel.
- **Appendix 4** sets out the detailed Stage 2 Green Belt harm assessments by assessment area.
- **Appendix 5** summarises the consultation comments received in response to the consultation on the Study Method Statement.
- **Appendix 6** contains a table of the sites considered in the study and their relevant parcels and assessment areas.

# 2 Stage 1 Assessment Methodology

- 2.1 The Stage 1 assessment methodology is based on the NPPF's five purposes of Green Belt. As a precursor to the area-based assessment of Green Belt, it was necessary to gain a detailed understanding of the functionality of the Green Belt in Southend-on-Sea.
- 2.2 **Appendix 1** provides the policy context for the Study update. This information has directly informed the assessment criteria and the definitions of key terms used in the methodology. Changes to national Green Belt policy and guidance since the original Green Belt Study was undertaken in 2020 do not influence the methodology, outlined in this chapter, employed to assess the performance of Green Belt land. Therefore, no change has been made to the methodology.

## Green Belt Assessment Definitions and Criteria

- 2.3 As outlined in **Appendix 1**, there are five Green Belt purposes as defined in paragraph 143 of the NPPF:
  - To check the unrestricted sprawl of large built-up areas.
  - To prevent neighbouring towns merging into one another.
  - To assist in safeguarding the countryside from encroachment.
  - To preserve the setting and special character of historic towns.
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.4 A summary of the key criteria considered for each NPPF purpose is provided below.
- 2.5 The factors that affect the contribution made by land to each purpose are not distinct to each purpose. With the exception of assistance in urban regeneration, all the Green Belt purposes can be seen to require consideration of the relationship between the assessment area, settlements and the countryside as influenced by the following common factors:
  - **Development and land use** the extent and form of existing development, and land use characteristics, affect the degree to which Green Belt can be considered to be part of the countryside rather than an extension of the urban/settled area.
  - Location the position of Green Belt in relation to other distinctive pockets of Green Belt land and settlements can affect its role in relation to the potential expansion of settlements.
  - **Separating features** physical elements such as woodland blocks, rivers and ridges or areas of primary constraint (e.g. SACs, SSSIs) have a physical and visual impact on settlement-countryside relationships.
  - **Connecting features** physical elements such as roads or rail links can reduce the impact of separating features, and landform (e.g. valleys) can also draw areas together.
- 2.6 In addition to the five purposes of Green Belt, the NPPF refers to two 'essential characteristics': 'openness' and 'permanence'. Both characteristics are applicable to all assessment criteria. These terms are defined in more detail below.

#### Openness

2.7 Land that is fully developed cannot contribute to the purposes of the Green Belt, but land which still retains some openness may do so. Openness in Green Belt terms as both a spatial and visual quality relevant to its assessment.

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- 2.8 **Spatial openness** as a characteristic can be considered in terms of the scale and density of built development. The location, extent and form of new development in the Green Belt can, in isolation or in combination, compromise/harm the openness of the Green Belt<sup>3</sup>. Similarly, the location, extent and form of existing development affects the degree to which Green Belt land can be considered to be open rather than an extension of a built-up area in its own right. However, not all built development is considered to affect openness. The NPPF lists in paragraph 155 a number of types of buildings that are 'not inappropriate' within the Green Belt.
- 2.9 Visual openness is important in so far as it relates to the purposes of Green Belt. In certain places there is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' (Purpose 1), and preventing 'neighbouring towns merging into one another' (Purpose 2); openness of aspect is a characteristic quality of the countryside, therefore 'safeguarding the countryside from encroachment' (Purpose 3) includes preservation of openness; and preservation of 'the setting...of historic towns' (purpose 4) includes visual setting<sup>4</sup>. For example, a range of natural and man-made features topography, vegetation, buildings and linear features such as roads and railways can contribute to or compromise the visual openness of the Green Belt. A key distinction however is that while vegetation or landform can provide visual enclosure to development that lessens its visual impact this does not diminish the *spatial openness* of the Green Belt.
- 2.10 Appropriate development within the Green Belt cannot, according to case law<sup>5</sup>, be considered to have an urbanising influence and therefore harm Green Belt purposes. For the purposes of this Study update therefore, development deemed to be 'appropriate' within the Green Belt (as defined in the closed lists within paragraphs 154 and 155 of the NPPF) is not considered to constitute an urban land use, or an urban influence in the countryside. However, what is deemed to be appropriate development in the NPPF has to be carefully considered as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriate ....as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 2.11 Caution has therefore been exercised in the application of what is defined as an appropriate use. It is not possible within a Strategic Green Belt study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut e.g. for example buildings for agriculture and forestry are deemed to be appropriate development regardless of whether they preserve the openness or conflict with the Green Belt purposes. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, a considered view has been taken on the extent to which the proposed land use has affected the Green Belt purposes, for example by affecting openness, or encroaching on the perception of countryside i.e. the sense of distinction between the urban area and countryside.
- 2.12 This is of relevance to the assessment approach for all of the Green Belt purposes.

#### Permanence

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

 $<sup>^3</sup>$  This point is made in the judgement in Heath & Hampstead Society v London Borough of Camden (2008).

<sup>&</sup>lt;sup>4</sup> This point is made in the judgement in Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016).

<sup>&</sup>lt;sup>5</sup> This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404.

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

#### Containment

- 2.15 Urbanising influences, whether land inset from the Green Belt or urbanising development within it which has an urbanising character (i.e. is likely to be 'inappropriate' in Green Belt terms), can contain Green Belt land from the wider countryside and increase its relationship with urbanising development.
- 2.16 This factor relates to containment of Green Belt land by urbanising influences only, not 'natural' landscape features.
- 2.17 Paragraph 154 of the NPPF notes that 'limited infilling' is not inappropriate within the Green Belt. Furthermore, PAS guidance<sup>6</sup> states that development that would effectively be 'infill', due to the land's partial enclosure by development, would have a relatively limited impact in terms of Green Belt contribution.

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

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

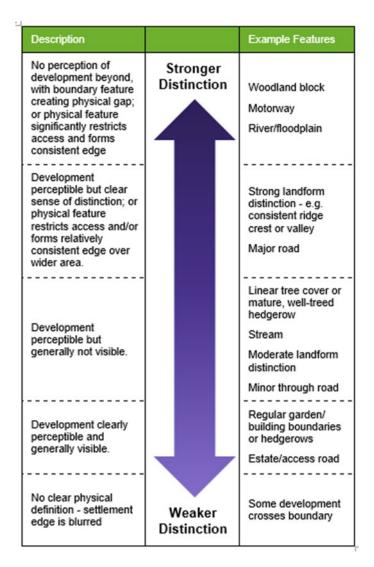
Examples of development which could potentially reduce Green Belt openness, and which could therefore be considered a containing influence, are:

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

#### Distinction

2.18 'Distinction' represents the relationship between the existing inset area and the Green Belt. Landform and/or landcover can create a physical distinction between development and Green Belt land, limiting the relationship between the two, e.g. major roads, railway lines, strong landforms.

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



#### **NPPF Purposes**

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

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

 Table 2.1: Green Belt contribution ratings

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

- 2.20 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the Study update requires the definition of variations in the extent to which land performs this purpose. This requires a detailed, area-based assessment against this strategic purpose.
- 2.21 For the purpose of this Study update, it is necessary to define what constitutes a 'large built-up area' within and in close proximity to Southend-on-Sea and what is meant by the term 'sprawl'.

#### Definition of 'large built-up area'

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

#### Definition of 'sprawl'

2.23 The PAS guidance states in relation to Purpose 1<sup>7</sup>:

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

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

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

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

Purpose 1 Assessment Criteria

- 2.26 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). All of the development forms noted in the RTPI note quoted above have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence.
- 2.27 To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development or the strength of physical separation from the wider countryside, will make a weaker contribution to this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it will make a stronger contribution.
- 2.28 Urban fringe land uses and the influence of adjacent urban areas, whilst they may reduce the extent to which land is considered to be part of the countryside, do not diminish the extent to which expansion of a large built up area would be considered sprawl i.e. this is a key difference between Purpose 1 and Purpose 3.

<sup>&</sup>lt;sup>7</sup> Planning Advisory Service, 2015, Planning on the Doorstep: The Big Issues – Green Belt. Available online at: https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf

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

#### Table 2.2: Purpose 1 assessment criteria

#### Purpose 1: Check the unrestricted sprawl of large built-up areas

**Development/land-use:** where there is less existing development, the Green Belt makes a stronger contribution.

**Location:** land closer to the large, built-up area generally makes a stronger contribution.

**Separating features:** land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.

**Connecting features:** where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.

<i>Strong</i> Contribution	Land adjacent or close to the large built-up area that contains no or very limited urban development and has a strong sense of openness. It relates strongly to the wider countryside as opposed to the urban area.
<i>Moderate</i> Contribution	Land adjacent or close to the large built-up that contains limited urban development and has a relatively strong sense of openness. It may relate to both the settlement and the wider countryside or have a degree of separation from both.
Weak/No Contribution	Land adjacent or close to the large built-up area that is already fully urbanised; or land that is sufficiently separated or distant from a large built- up area for there to be any significant potential for urban sprawl from the large built up area.

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

2.32 To ensure that the Study update takes full account of this purpose, it is necessary to define what constitutes a 'town' within and in close proximity to Southend-on-Sea.

#### Definition of 'towns'

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

Purpose 2 assessment criteria

2.39 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considers both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This accords with PAS guidance<sup>8</sup> which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another.

<sup>8</sup> Planning Advisory Service, 2015, Planning on the Doorstep: The Big Issues – Green Belt. Available online at: https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf

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

 Table 2.3: Purpose 2 assessment criteria

#### Purpose 2: Prevent neighbouring towns from merging

**Development/land-use:** less developed land will make a stronger contribution – a 'gap' which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.

Location: land juxtaposed between towns makes a stronger contribution.

**Size:** where the gap between settlements is wide, the Green Belt makes a weaker contribution.

**Separating features:** the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However, loss of such features would consequently have a greater adverse impact on settlement separation.

**Connecting features:** where physical features strengthen the relationship between

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

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

#### Purpose 3: To assist in safeguarding the countryside from encroachment

- 2.44 The third Green Belt purpose focuses on the role of the Green Belt in safeguarding the countryside from encroachment. To ensure that Southend-on-Sea takes full account of this purpose, it is necessary to define 'encroachment'. The NPPF lists in paragraph 145 a number of types of buildings that are 'not inappropriate' within the Green Belt. As a matter of law, development such as agriculture and forestry which is appropriate in the Green Belt and is not required to 'preserve the openness' of the Green Belt cannot be considered to impinge on its openness<sup>9</sup>.
- 2.45 In order to effectively assess the effects of encroachment on countryside, it is important to determine the extent to which Green Belt land:
  - Contains or is influenced by urbanising land uses and features.
  - Relates to adjacent settlements and/or to the wider countryside.
- 2.46 Urbanising land uses and features are considered to include any features that diminish openness or compromise the rural character of the countryside.
- 2.47 Paragraphs 154 and 155 of the NPPF and associated case law provides guidance on what land uses and features are considered to be 'appropriate' development in the Green Belt (see **Appendix 1**).
- 2.48 The methodology does not distinguish between different 'degrees' of countryside beyond considering urban influence, as this would stray into assessing the impact on landscape character. If land further from an urban area is for example, more 'rural' and tranquil, this is a landscape sensitivity issue.

Purpose 3 assessment criteria

- 2.49 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:
  - i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses;
  - ii) the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. whether it has a stronger relationship to urban area than with the wider countryside).

<sup>&</sup>lt;sup>9</sup> Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016), see Appendix 1.

- 2.50 Physical landscape elements (or a lack of them) may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical landscape containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence: the urban area would need to be a dominating influence either through a) the scale of development; or b) the degree of containment of the open land by development. The presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may also give land a strong relationship with a visible urban area even if buildings are not particularly dominant.
- 2.51 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape or visual character. For example, land that displays a strong landscape character in terms of sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape or visual point of view. However, the same land in Green Belt terms may well make an equal contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.
- 2.52 In summary, the key questions asked in assessing Purpose 3: safeguarding the countryside from encroachment include:
  - To what extent does the land exhibit the characteristics of the countryside i.e. an absence of built or otherwise urban development?
  - Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
  - Does land relate more strongly to the settlement(s) or to the wider countryside?
- 2.53 **Table 2.4** summarises the criteria that were used for the assessment of Purpose 3 in the study update.

 Table 2.4: Purpose 3 assessment criteria

#### Purpose 3: Assist in safeguarding the countryside from encroachment

**Development/land-use:** where there is less urbanising land use and more openness, land makes a stronger contribution.

**Separating features:** land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.

**Connecting features:** an absence of physical features to link settlement and countryside means that land makes a stronger contribution.

**Strong** Contribution Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms<sup>10</sup>) and which does not have a stronger relationship with the urban area than with the wider countryside.

 $<sup>^{10}</sup>$  This does not include development which is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

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

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

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

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

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

- 2.56 Historic England in their consultation response to the Welwyn Hatfield Stage 3 Green Belt Study (2018) also noted that Durham has since been added to this list.
- 2.57 It is therefore considered inappropriate to consider elements of the historic environment which do not relate to historic towns and their wider setting. This is supported by the PAS guidance<sup>11</sup> which states:

'This purpose is generally accepted as relating to very few settlements in practice.'

- 2.58 The connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.
- 2.59 Key questions include:
  - What is the relationship of the land with the historic town?
  - Does the land form part of the setting and/or special character of an historic town?

<sup>&</sup>lt;sup>11</sup> Planning Advisory Service, 2015, Planning on the Doorstep: The Big Issues – Green Belt. Available online at: https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf

- What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 2.60 Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic settlements.
- 2.61 To ensure that Southend-on-Sea take full account of this purpose, it is necessary to establish which settlements within and in close proximity to the Study area are historic towns, and whether they have a physical or visual relationship with the Green Belt land within the city limits. A review of the Council's latest evidence bases related to the historic environment has been undertaken, including historic landscape character assessments and conservation area appraisals.
- 2.62 The Essex Landscape Character Assessment<sup>12</sup> states that one of the principal functions of the Green Belt in Essex is to '*preserve the setting and special character of historic towns located within the Belt*'. However, the assessment does not specify which towns.
- 2.63 The Study area's largest town **Southend-on-Sea** has its origins in the Regency period of the late 18<sup>th</sup> century and expanded rapidly in the second half of the 19<sup>th</sup> century, after the arrival of the railways.<sup>1314</sup> Its central historic core is located on the cliffs above the esplanade and is characterised by a block of Regency terraced houses named the 'Royal Terrace'. This central core is now designated under several Conservation Areas organised around blocks of growth and distinct topographical and architectural features such as Clifftown and Warrior Square. Orientated to overlook the estuary and the sea beyond, and surrounded by more modern development, these central Conservation Areas have no physical or visual relationship with the Green Belt land surrounding Southend-on-Sea. Other notable historic cores, which were originally separate villages but now merged with Southend-on-Sea include Leigh to the west, Shoeburyness to the east and Prittlewell to the north.
- 2.64 Much like the central core of Southend-on-Sea, the historic cores of Leigh and Shoeburyness are both located on and orientated towards the coast and surrounded by modern development which has little relationship with the Green Belt land surrounding Southend-on-Sea. The one notable exception is the open land of the Belton Hills to the west and Leigh Marsh to the south west, although, in isolation, this suburb is not considered to be a historic town in Green Belt terms. <sup>15</sup>
- 2.65 The historic core of Prittlewell retains some of the character of its village origins owing to the topography of the area which slopes to the north down to the Prittle Brook, maintaining open views of Priory Park to the north. However the layers of more modern development further north prevent views of the wider open countryside designated as Green Belt.<sup>16</sup>
- 2.66 Largely owing to the orientation and origins of the town and its suburbs towards the sea, the Green Belt land surrounding Southend-on-Sea, although important in defining the character of the modern town, does not have a strong physical or visual relationship with the historic core of the historic town and their notable historic characteristics. Therefore the Green Belt around Southend-on-Sea is considered to make a limited contribution to Green Belt purpose 4.
- 2.67 Consideration has also been given to the historic settlements in neighbouring Rochford District. The Rochford District Historic Characterisation Project published in 2006<sup>17</sup> represents the most recent assessment of the historic character of the neighbouring District. The assessment report references several historic settlements, including the acknowledged towns of Rayleigh and Rochford merged with Ashingdon (see purpose 2 above). The town of Hockley merged with Hawkwell is acknowledged as being formed of largely dense post-World War II housing. No significant historic features are identified;

<sup>12</sup> https://www.rochford.gov.uk/sites/default/files/planning\_landscapecharacter.pdf

<sup>13</sup> https://www.rochford.gov.uk/sites/default/files/planning\_historic\_environment\_characterisation\_project.pdf

<sup>14</sup> http://www.southend.gov.uk/downloads/download/302/southend\_character\_study

<sup>15</sup> https://www.southend.gov.uk/info/200422/conservation\_areas

<sup>16</sup> https://www.southend.gov.uk/info/200422/conservation\_areas

<sup>17</sup> https://www.rochford.gov.uk/sites/default/files/planning\_historic\_environment\_characterisation\_project.pdf Rochford District and Southend-on-Sea Borough Joint 18 Green Belt Study Update

therefore the settlement is not defined as a historic town. The medieval village of Great Wakering is described as one of the small historic settlements in Rochford but is not defined as a historic town.

- 2.68 The built up area of **Rochford** and Ashingdon is largely made-up of pre- and post-World War II housing interspersed with more recent suburbs, with the historic cores of the now merged settlements being located to the south and north, respectively. The historic medieval town of Rochford built up around the intersection of North, West, East and South Street at the southern end of the settlement, adjacent to the historic market square. To the west of Rochford's historic core lies Rochford Hall comprised of the remains on an early Tudor brick built mansion and its associated farming and landscape features. It is possible that this church/hall complex was a focal point for an earlier dispersed settlement pattern prior to the foundation of the town. The church and hall and its immediate surroundings sit within the Rochford Conservation Area and the Green Belt<sup>18</sup>. However the railway line, which cuts through the town's Conservation Area, separates the historic core of the town from the wider Green Belt. Furthermore, the church/hall complex in the Green Belt now operates as a golf club. Therefore the Green Belt is not considered to make a notable contribution to the setting and special character to historic Rochford.
- 2.69 The historic core of old **Ashingdon** village is small, comprising a church and manor house on Ashingdon hill. Both assets have a limited relationship with the modern town which sprawls southwards merging with Rochford. Although the Ashingdon hill has extensive views over the Crouch estuary and the Canewdon area to the north and east, these views of the wider Green Belt contribute to the setting and special character of the church and manor house, not the setting and special character of town.<sup>19</sup>
- 2.70 **Rayleigh** is a historic town with a medieval historic core, including the motte and bailey castle Rayleigh Mount, the Holy Trinity Church, Rayleigh Windmill, the Dutch Cottage and the High Street bordering the original market place, located on a distinctive raised ridge / plateau roughly 60-70m above the surrounding countryside<sup>20</sup>. The assets and their immediate setting are designated as a Conservation Area. Despite the prominent location of the town's historic core, the Rayleigh Conservation Area Appraisal only notes one distant view of the countryside to the north-west. However, as the historic core is largely screened from the open countryside by trees and buildings and the historic core is surrounded by modern industrial estates and areas of housing that were developed in the late 19<sup>th</sup> / early 20<sup>th</sup> centuries, the Green Belt is not considered to contribute to the setting and special character of the town.
- 2.71 **Table 2.5** summarises the criteria that were used for the assessment of Purpose 4 in the study update.

Table 2.5: Purpose 4 assessment criteria

#### Purpose 4: Preserve the setting and special character of historic towns

**Development/land-use:** less developed land makes a stronger contribution.

**Location:** an area that contains key characteristics, or important in views to or from them, makes a stronger contribution.

**Separating features:** land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution.

**Connecting features:** where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger.

<sup>18</sup> https://www.rochford.gov.uk/sites/default/files/planning\_historic\_environment\_conservation\_areas\_rochford\_final.pdf 19 https://www.rochford.gov.uk/sites/default/files/planning\_historic\_environment\_characterisation\_project.pdf 20 https://www.rochford.gov.uk/sites/default/files/planning\_historic\_environment\_characterisation\_project.pdf

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

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

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

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

- 2.73 In other words, it is debatable whether development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative contribution of discrete parcels of Green Belt land to Purpose 5.
- 2.74 However, the examination reports of some planning inspectors, e.g. Cheshire East Council's Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting.
- 2.75 Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Ascent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development. In addition, the National Planning Policy Framework requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development a Housing and Economic Land Availability Assessment (HELAA). Together, these evidence bases provide an accurate and up-to-date area of available brownfield land within individual settlements, which can be used to calculate the proportion of available brownfield land relative to the size of each settlement.
- 2.76 Using these evidence bases to inform meaningful judgements on the relative contribution of discrete parcels of land to Purpose 5 is dependent on the scale and form of the settlements within and around which Green Belt is defined. For example, it is harder to draw out differences in contribution between parcels around large conurbations containing merged settlements than it is land around different isolated settlements each with their own brownfield land areas.
- 2.77 Given the fact that the vast majority of the urban area within the Study area is comprised of Southend-on-Sea and the close proximity of the Rochford's distinct settlements Rayleigh, Hockley merged with Hawkwell and Rochford merged with Ashingdon, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. In order that the Study update appropriately assesses Purpose 5 and affords it equal weighting with Purposes 1-4, an even level of contribution to Purpose 5 has been determined for all areas of Green Belt based on the average availability of brownfield land across Southend-on-Sea.

- 2.78 Without a clear range of brownfield land proportions for each settlement across the Study area, it is not possible to calculate a tailored set of percentage ranges from which to judge contribution to Purpose 5. There is also no guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or weaker, role in encouraging urban regeneration.
- 2.79 Southend-on-Sea City Council's Brownfield Register<sup>21</sup> contains a record of roughly 35.71ha of suitable and available brownfield land within the Borough none of which sits within the Green Belt. This represents 1.02% of the total urbanised area of the Borough, which is roughly 3,480ha.
- 2.80 Overall the amount of suitable and available brownfield land identified in Southend represents a relatively small proportion of the total area of urbanised land in the Study area. Therefore, all Green Belt land within the Study area is considered to make a **Strong contribution** to Green Belt Purpose 5. This recognises the historic role that the Green Belt has had in redirecting growth to within the urban area, as evidenced by the relatively low area of suitable and available brownfield land within the urbanised area, but also acknowledges the limited opportunity to recycle derelict and other urban land over the next plan period.

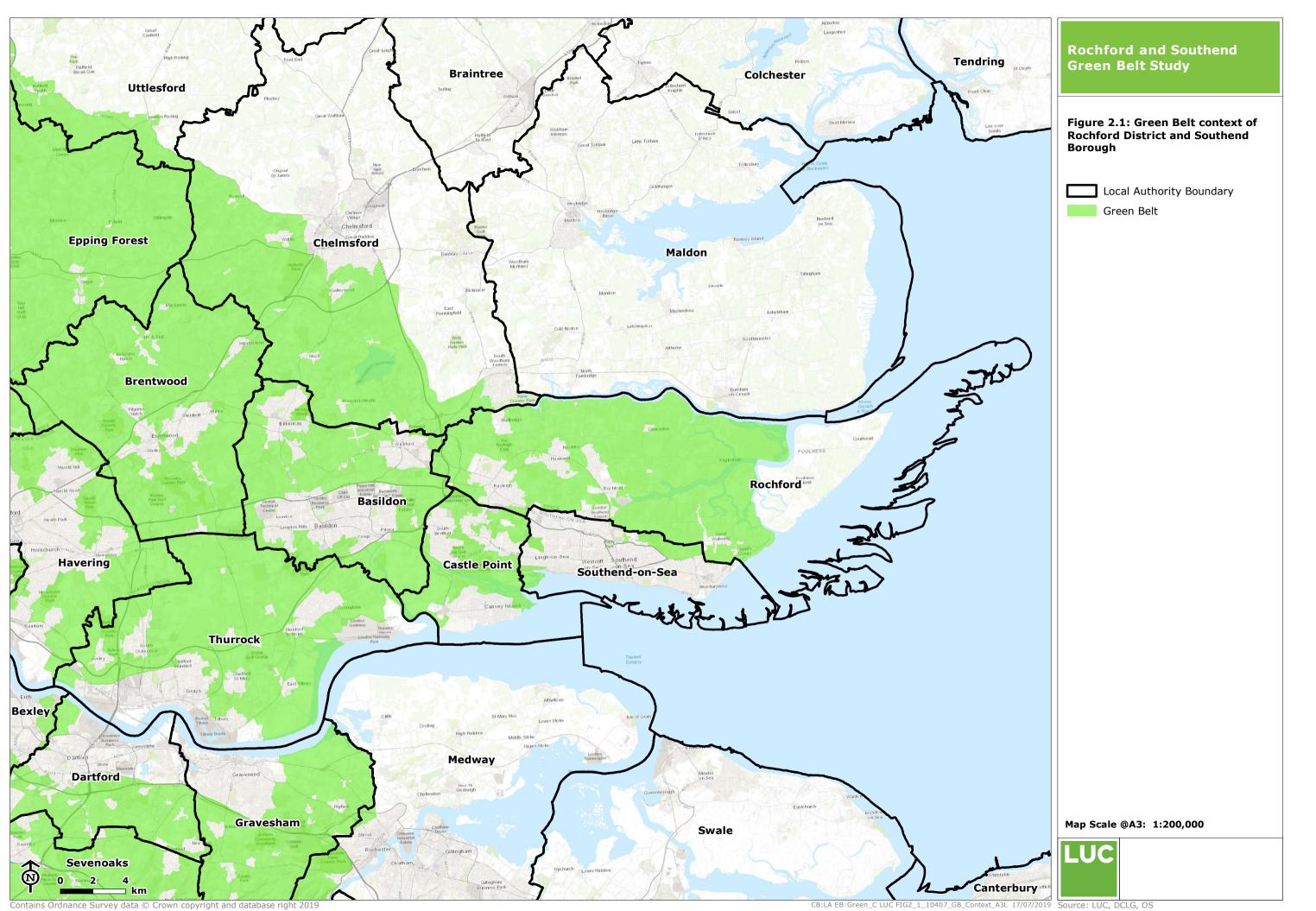
## Stage 1 Assessment Process

- 2.81 The first step of the Stage 1 assessment involved identifying any Green Belt locations where sufficient urbanising development has occurred which has had a significant impact on Green Belt openness (as defined above). Distinctions were made between development which is rural enough in character, or small enough in size, or low enough in density, to justify its designation as Green Belt, and development that calls into question its Green Belt status.
- 2.82 The second step assesses the fragility of gaps between the settlements identified as 'towns' under Green Belt Purpose 2.
- 2.83 The assessment then proceeded on a settlement by settlement basis, starting with the largest areas of inset development through to the smaller inset villages. If any significant areas of washed-over urbanising development were identified in the initial stage, these too formed a focus for analysis. Recognising the common factors that influence the role of Green Belt land in the relationship between urban settlement and countryside, the analysis:
  - Assessed the strength of the relationship between the Green Belt and the urban area, considering the extent and form of development, land use characteristics and separating and connecting features.
  - Identified changes in the strength of the relationship between settlement and countryside, again considering the extent and form of development, land use characteristics and separating and connecting features.
  - Considered how these spatial relationships affect contribution to each of the Green Belt purposes, and map lines to mark these changes.
- 2.84 The analysis progressed outwards from urban areas until it was determined that land:
  - Ceased to play a significant role in preventing sprawl of a large built-up area.
  - Made a consistent contribution to settlement separation or no contribution to this purpose.
  - Had a strong distinction from urban settlement and a strong relationship with the wider countryside.

<sup>&</sup>lt;sup>21</sup> Southend-on-Sea Borough Council's Brownfield Register, 2024. Available at:

https://planningpolicy.southend.gov.uk/monitoring Rochford District and Southend-on-Sea Borough Joint Green Belt Study Update

- Made no contribution to the setting or special character of a historic town.
- 2.85 The overall findings of the Stage 1 assessment are set out in **Chapter 3**.



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# **3 Stage 1 Assessment Findings**

- 3.1 The primary aim of the Stage 1 assessment is to establish the variation in the contribution of designated land to achieving Green Belt purposes. Based on the assessment criteria outlined in **Chapter 2**, a review of the contribution of Green Belt land to each of the five Green Belt purposes was undertaken, drawing out spatial variations in the contribution of Green Belt land to each Green Belt purpose.
- 3.2 The purpose behind this initial assessment was to draw out variations in contribution before the detailed assessments were undertaken at Stage 2, avoiding broad variations in contribution within prematurely and more arbitrarily defined parcels. Significant variations in contribution within a parcel can be an additional source of complication when providing assessment ratings – e.g. should a rating reflect the strongest level of contribution, or should it represent an average within the parcel?
- 3.3 A map is included for each Green Belt purpose illustrating the assessed variations in contribution across Southend-on-Sea (**Figure 3.1**: Purpose 1 assessment to **Figure 3.5**: Purpose 5 assessment). Each map is accompanied by supporting text (see the below sections) describing the pattern of variation for each purpose and the reasoning behind its definition.
- 3.4 Following the assessment of Green Belt against each purpose, the areas of the Green Belt which make the strongest and weakest contribution to the Green Belt purposes are identified, this is illustrated on **Figure 3.6**.
- 3.5 By combining the lines marking variations in contribution to each purpose, a list of land parcels have been generated, each of which has a reference number and rating for their contribution to each NPPF purpose. The parcels wholly or partially within Southend-on-Sea are illustrated in **Figure 3.7** and their contribution to each purpose is shown in **Table 3.1**. The parcel boundaries have not been clipped to the Southend city boundary or subdivided within the city limits for consistency in the application and output of the original study (2020), and the parcel numbering system in the original study outputs.
- 3.6 The detailed Stage 1 parcel assessments relevant to Southend-on-Sea are set out in **Appendix 3**, on a parcel by parcel basis. This Appendix includes an assessment of the contribution of the parcel against each of the purposes of the Green Belt, a map of the parcel and text justifying the ratings.
- 3.7 The assessment findings represent a point in time based on the land uses, separating and connecting features at the time of assessment. Changes in land use, the creation of new or the loss of existing features have the potential to significantly affect the contribution of Green Belt land to the Green Belt purposes. For example, to loss of woodland block has the potential increase the relationship of Green Belt land sandwiched between the woodland and settlements with the wider countryside.

## Assessment of Contribution to the Green Belt Purposes

- 3.8 The following section summarises the findings of the assessment of contribution for each Purpose as shown on **Figures 3.1-3.5**. **Appendix 3** sets out the detailed assessments for each land parcel in Southend-on-Sea.
- 3.9 One pocket of Green Belt in Southend-on-Sea is inset with urban area and therefore is not contiguous with the wider Green Belt. This area is located south and west of Fossetts Way,

containing parts of Sutton Road Cemetery and the Jones Memorial Recreation Ground in Southend-on-Sea.

3.10 This pocket of Green Belt is considered to make a low contribution to all Green Belt purposes (excluding purpose 5 for which all Green Belt is considered to make a strong contribution).

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

- 3.11 The contribution to Purpose 1 was assessed by determining the role Green Belt land plays in preventing the sprawl of the large built up area of Southend-on-Sea (See **Figure 3.1**).
- 3.12 The land which sits immediately to the north and west of Southend-on-Sea up to the first significant readily recognisable and permanent boundary is considered to contribute strongly to Purpose 1 due to the close proximity of this Green Belt to the urban edge of Southend-on-Sea. Notable boundary features marking the edge of the general area of strong contribution include the settlements of Great Wakering, Rayleigh and Rochford, Sutton Road / Barrow Hall Road / Shopland Road / Bridge Road and the River Roach.
- 3.13 The Green Belt land south and west of Leigh-on-Sea in Southend-on-Sea is considered to contribute to preventing the southwards sprawl of Southend-on-Sea. The Green Belt in between the large built up area and the waterway that separates the mainland from Two Tree Island and Leigh Marsh is considered to make a strong contribution to Purpose 1; Two Tree Island and Lee Marsh, by virtue of their close proximity to the large built-up area are considered to make a moderate contribution to Purpose 1.
- 3.14 All Green Belt within the city limits lies in close proximity to Southend-on-Sea. The majority of the city's Green Belt land is open, contains no or very limited urbanising development and relates more to the countryside than the large built up urban area and therefore makes a strong contribution to checking the unrestricted sprawl of the city. Conversely, land in close proximity to Southend-on-Sea that is urbanised by buildings and structures considered by the NPPF to be inappropriate in the Green Belt make a weaker contribution relative to the Green Belt that surrounds it. The extent to which contribution is lessened is dependent on the scale, density and location of the inappropriate development. When such land uses are located in close proximity to the edge of an inset settlement they often blur the lines between the countryside and the urban edge, lowering contribution further.
- 3.15 The types of development considered to be not inappropriate in the Green Belt as set out in the NPPF were not considered to have an urbanising influence or affect openness. For example, isolated glasshouses<sup>22</sup>, much like farm buildings, which do not form part of a commercial garden centre, are appropriate in the Green Belt.
- 3.16 Some areas of Green Belt are considered to make a moderate contribution to Purpose 1 in close proximity to Southend-on-Sea due to the presence of strong boundary features which enclose Green Belt, reducing the relationship of the Green Belt with the wider countryside and strengthening the relationship of the Green Belt with the large built-up area. For example, the Green Belt land immediately to the west of Friars Park north of Shoeburyness enclosed on two sides by dense residential development is considered to have more of a relationship with the large built-up area of Southend-on-Sea than the wider countryside.

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

3.17 The contribution to Purpose 2 was assessed by determining the role Green Belt land plays in preventing the merging of neighbouring towns. Land that is juxtaposed between towns and plays a highly significant role in inhibiting physical and visual coalescence due to the

<sup>&</sup>lt;sup>22</sup> This is based on the decision of Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016) which found that glasshouse development in the Green Belt is appropriate since it is a 'building for agriculture' under the first bullet of paragraph 145 of the NPPF and therefore not capable of generating harm to the Green Belt designation.

narrowness and / or visual openness of a gap is considered to make a strong contribution to Purpose 2. Conversely, land which is not located within a gap between towns or sits in gaps with significant separating features and / or significant distances between towns is considered to make a weak or no contribution to Purpose 2 (See **Figure 3.2**).

- 3.18 Green Belt land which is generally considered to make a strong contribution to Purpose 2 due to its location between neighbouring towns that are relatively close together includes:
  - Land between Southend-on-Sea and Rochford.
  - Land between Southend-on-Sea and Hockley.
  - Land between Southend-on-Sea and Rayleigh.
- 3.19 The Green Belt land to the east of what remains of the gap between Southend-on-Sea and Rochford is considered to make a moderate contribution to Purpose 2 by virtue of the fact that this portion of the gap between is larger and peripheral and therefore less fragile.

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

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

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

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

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

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

## Summary of Findings

3.26 As outlined above, by combining the lines marking variations in contribution to each purpose, a list of land parcels were generated, each of which has a reference number and rating for their contribution to each NPPF purpose. The parcels wholly or partially within the city limits are shown in **Figure 3.7** and their contribution to each purpose is set out in

**Table 3.1** below. The parcel boundaries have not been clipped to the Southend city boundary or subdivided within the city limits for consistency in the application and output of the original study (2020), and the parcel numbering system in the original study (2020) has also been retained to maintain compatibility with the original study outputs.

- 3.27 The detailed Stage 1 assessment of each parcel is included in **Appendix 3**, and this sets out why each parcel achieved the ratings that it did. The table below also sets out which potential development sites from the Council's 'Call for Sites' process that fall within each Stage 1 parcel in Southend-on-Sea. These sites have been considered further in the Stage 2 assessment.
- 3.28 As can be seen from **Table 3.1** there are variations in Southend in both the size of the parcels and contribution ratings to the Green Belt purposes. **Table 3.2** below provides a summary of the Southend-on-Sea parcels which make a weaker contribution to the Green Belt purpose 1-4 (i.e. they do not include a 'strong' rating). These weaker performing parcels have been considered further in the Stage 2 assessment.
- 3.29 Although a parcel may not make a strong contribution (as assessed in the Stage 1 Study) to any one Green Belt purpose, the release of the parcel of land may still have the potential to have a significant effect on the surrounding Green Belt and/or on the residual Green Belt boundary which could lead to high overall harm. This has been assessed in the Stage 2 assessment. Likewise, there are some parcels and sites which make a strong contribution to the Green Belt purposes and their release would result in a high degree of harm. However, there may be overriding sustainability or viability considerations which mean that the land is the most appropriate location for development.

Parcel no. <sup>23</sup>	Parcel size (ha) <sup>24</sup>	P1	P2	Р3	Р4	Р5	Southend Sites which fall within parcel
		Со					
25	1.2	Strong	Weak	Strong	Weak	Strong	
33	80.2	Strong	Weak	Strong	Weak	Strong	
35	77.3	Moderate	Weak	Strong	Weak	Strong	
37	67.5	Strong	Weak	Strong	Weak	Strong	
44	0.03 (1018. 9)	Strong	Strong	Strong	Weak	Strong	
65	5.4 (97.2)	Strong	Strong	Strong	Weak	Strong	
66	17.2	Weak	Weak	Weak	Weak	Strong	260
68	122.3 (388.0)	Strong	Moderate	Strong	Weak	Strong	262, 269

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

 $<sup>^{\</sup>rm 23}$  Omitted parcel numbers represent parcels wholly within Rochford District.

<sup>&</sup>lt;sup>24</sup> Figures in () are the total area of each parcel, including land in neighbouring Rochford where parcels fall within both

Southend-on-Sea and Rochford.

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

Parcel no. <sup>23</sup>	Parcel size (ha) <sup>24</sup>	P1	P2	Р3	Р4	Р5	Southend Sites which fall within parcel
		Co					
72	0.9	Moderate	Weak	Moderate	Weak	Strong	
73	1.0	Moderate	Weak	Moderate	Weak	Strong	
74	0.5 (1.9)	Moderate	Weak	Moderate	Weak	Strong	
75	1.0	Moderate	Weak	Moderate	Weak	Strong	
76	1.5	Moderate	Weak	Moderate	Weak	Strong	
81	0.3	Moderate	Weak	Moderate	Weak	Strong	
84	229.0 (775.6)	Strong	Weak	Strong	Weak	Strong	261, 263, 262, 271

Table 3.2: Weaker contributing parcels

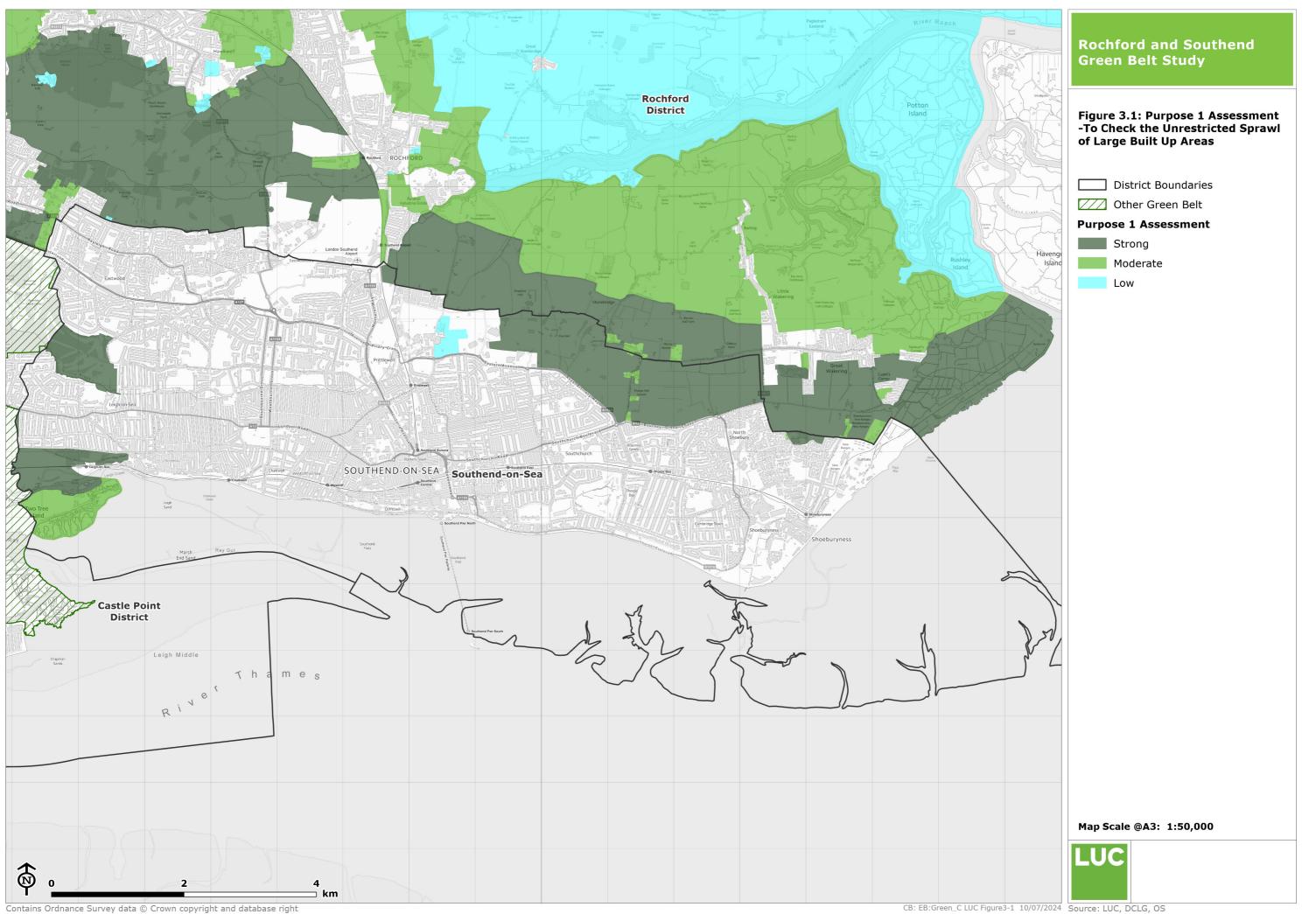
Number of weak ratings	Number of moderate ratings	Area (ha) <sup>25</sup>	Parcels
4	0	17.2	P66
3	1	0	-
2	2	5.1 (6.6)	P72, P74, P73, P75, P76, P81
1	3	0	-
0	4	0	-

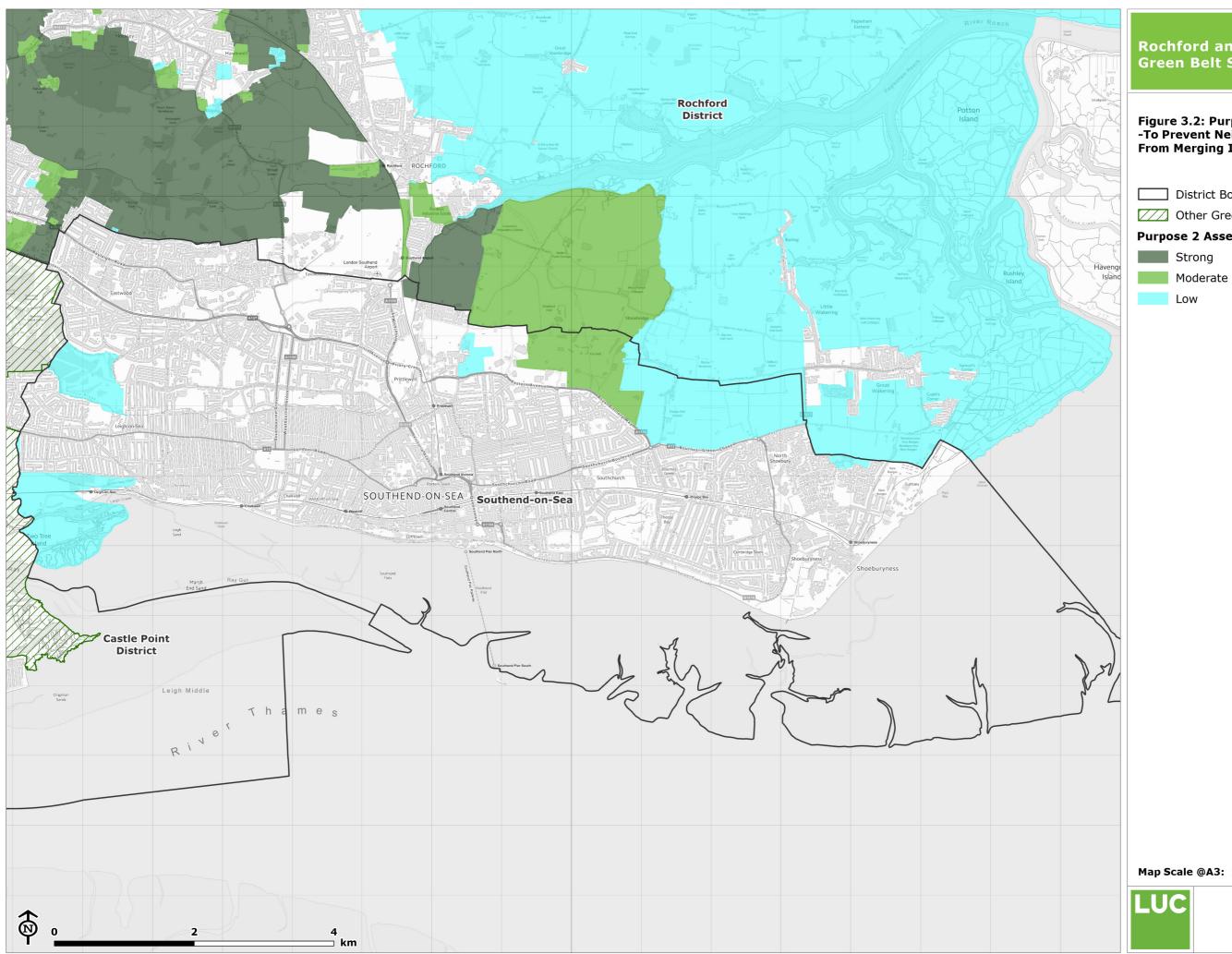
# Review of Development in Green Belt Since Original Study (2020)

- 3.30 A review of the scale and extent of development permitted in the Green Belt since the publication of the original Green Belt Study in early 2020 has been undertaken to determine whether the new development would result in different findings, if the assessment methodology applied in 2020 were applied again in 2024.
- 3.31 Permitted applications in Southend-on-Sea and neighbouring Rochford have been reviewed and none were found to be of a scale or in a location that change judgements on the contribution of Green Belt land to the Green Belt purposes.

<sup>&</sup>lt;sup>25</sup> Figures in () are the combined total area of parcels, including land in neighbouring Rochford where parcels fall within both Southend-on-Sea and Rochford.

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





## Rochford and Southend **Green Belt Study**

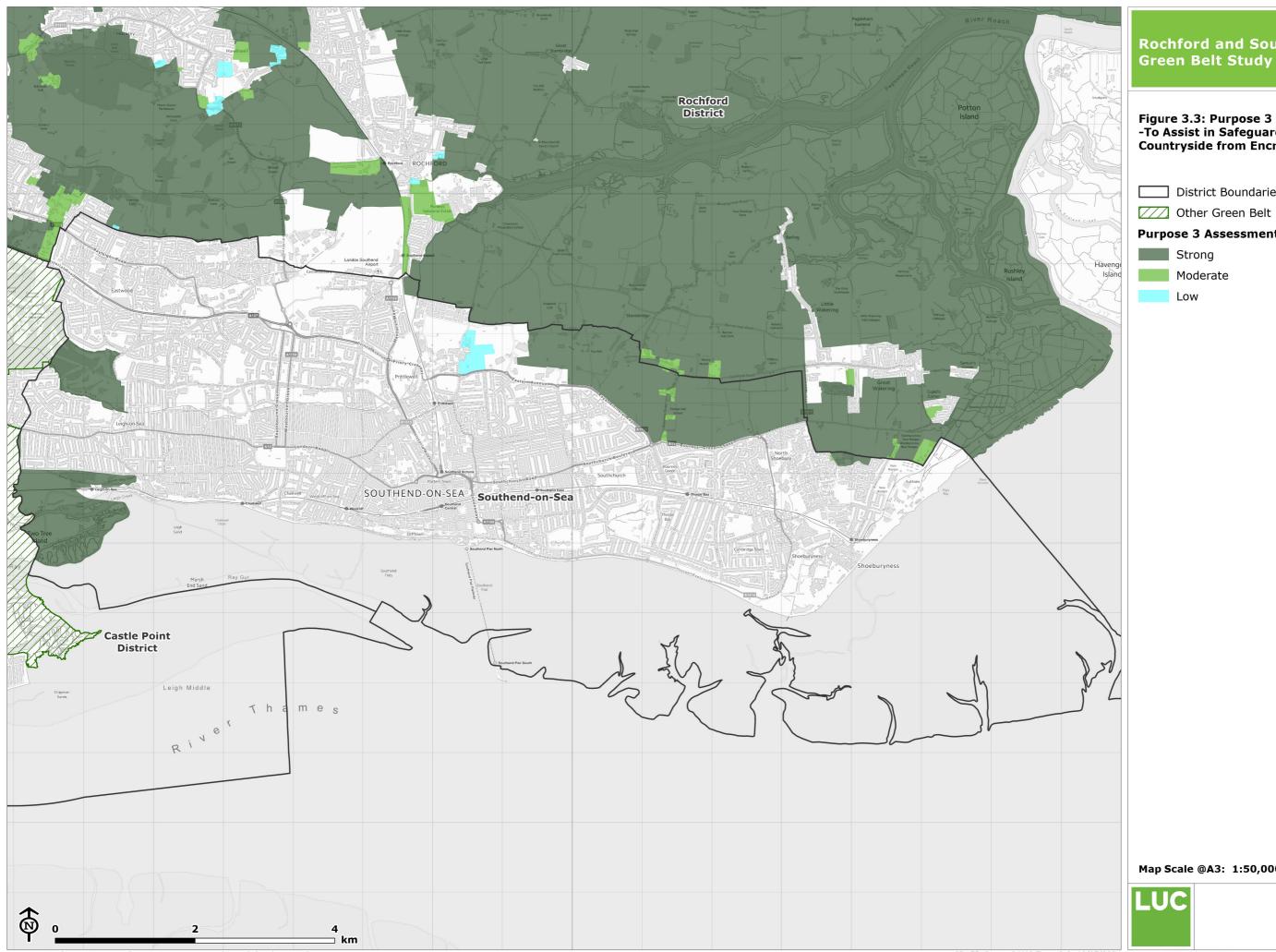
# Figure 3.2: Purpose 2 Assessment -To Prevent Neighbouring Towns From Merging Into One Another

District Boundaries

Other Green Belt

## Purpose 2 Assessment

Map Scale @A3: 1:50,000



## Rochford and Southend Green Belt Study

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



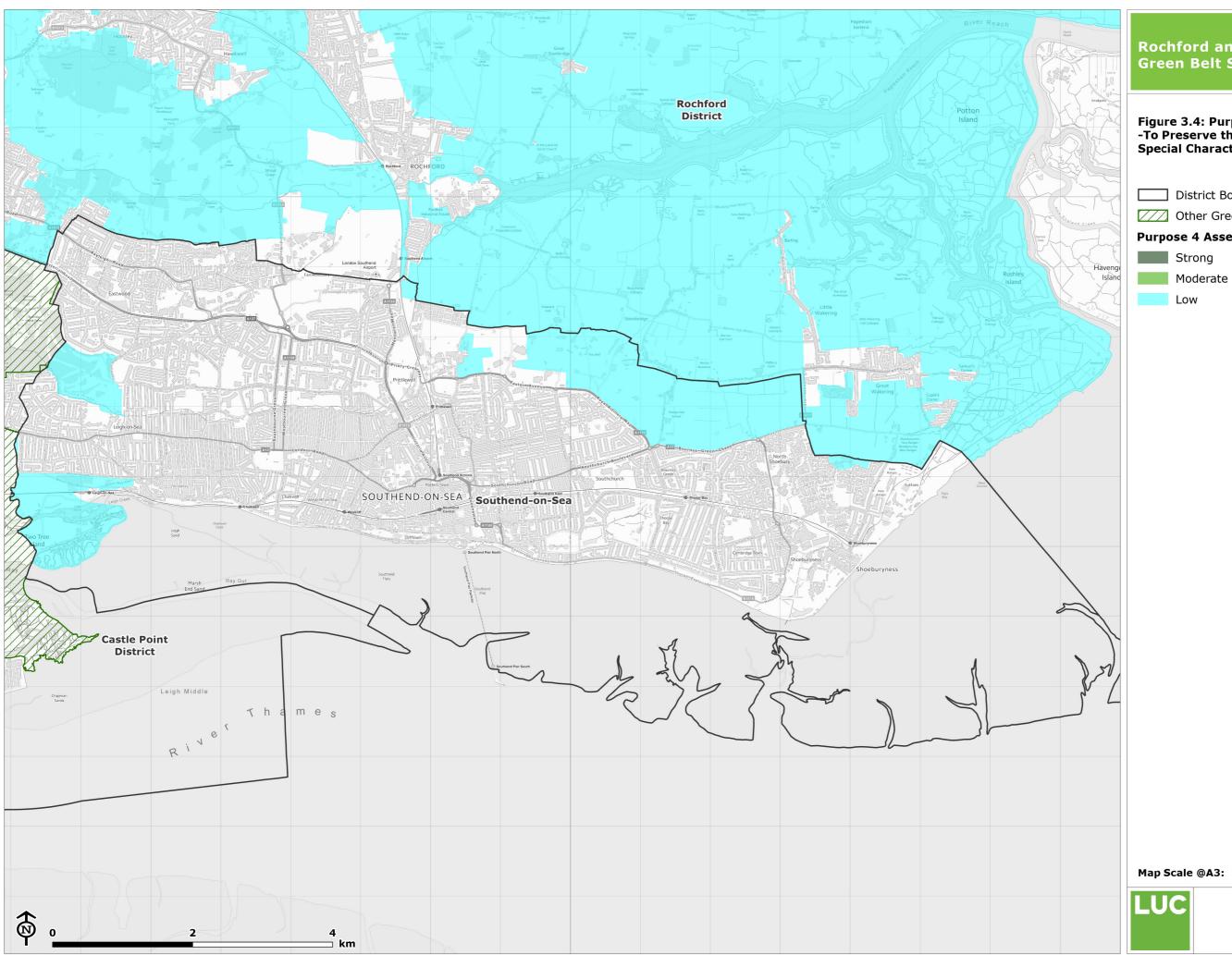
District Boundaries

## Purpose 3 Assessment



Map Scale @A3: 1:50,000

CB: EB:Green\_C LUC Figure3-3 10/07/2024 Source: LUC, DCLG, OS



## Rochford and Southend Green Belt Study

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



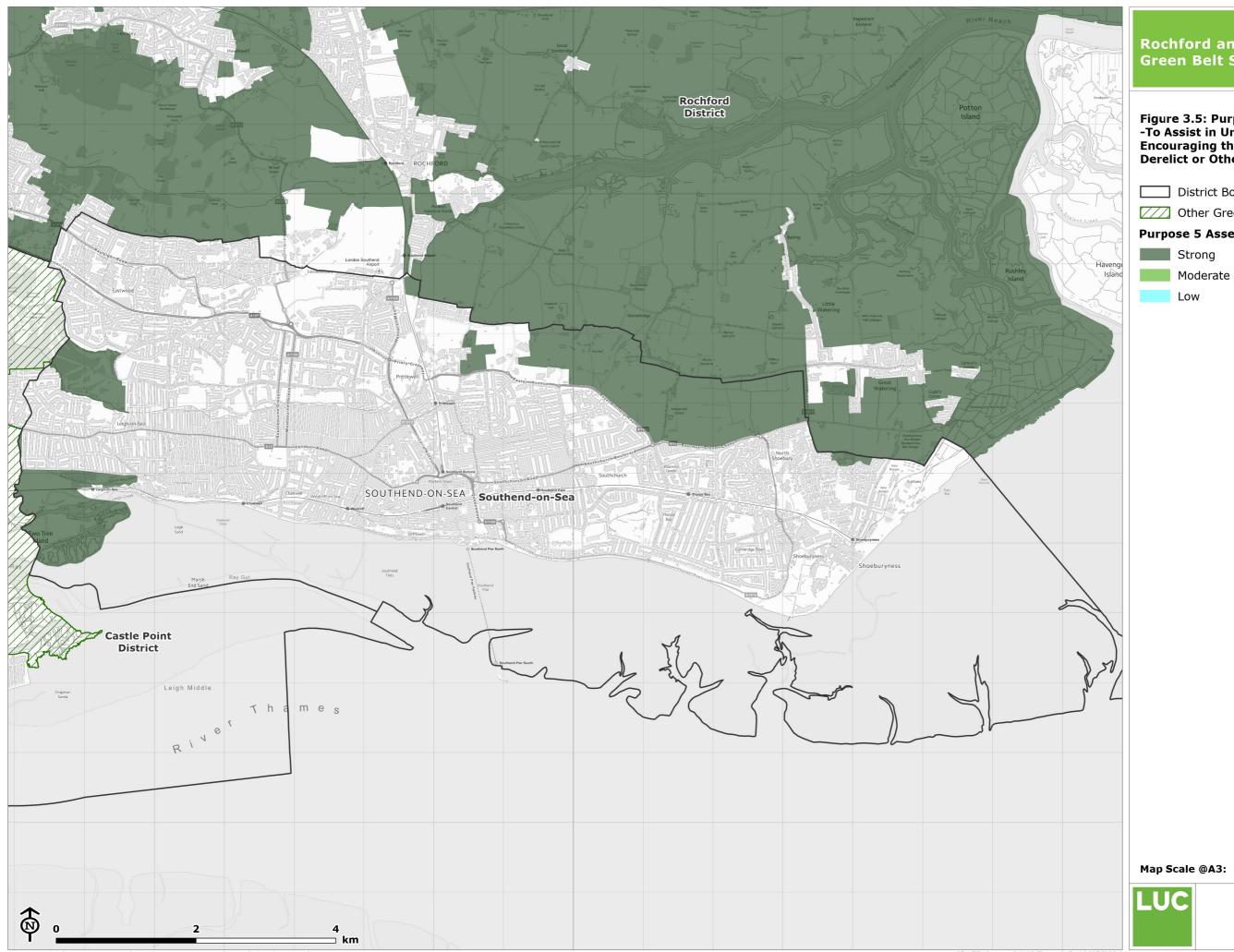
District Boundaries

Other Green Belt

### Purpose 4 Assessment



Map Scale @A3: 1:50,000



### Rochford and Southend **Green Belt Study**

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



District Boundaries

Other Green Belt

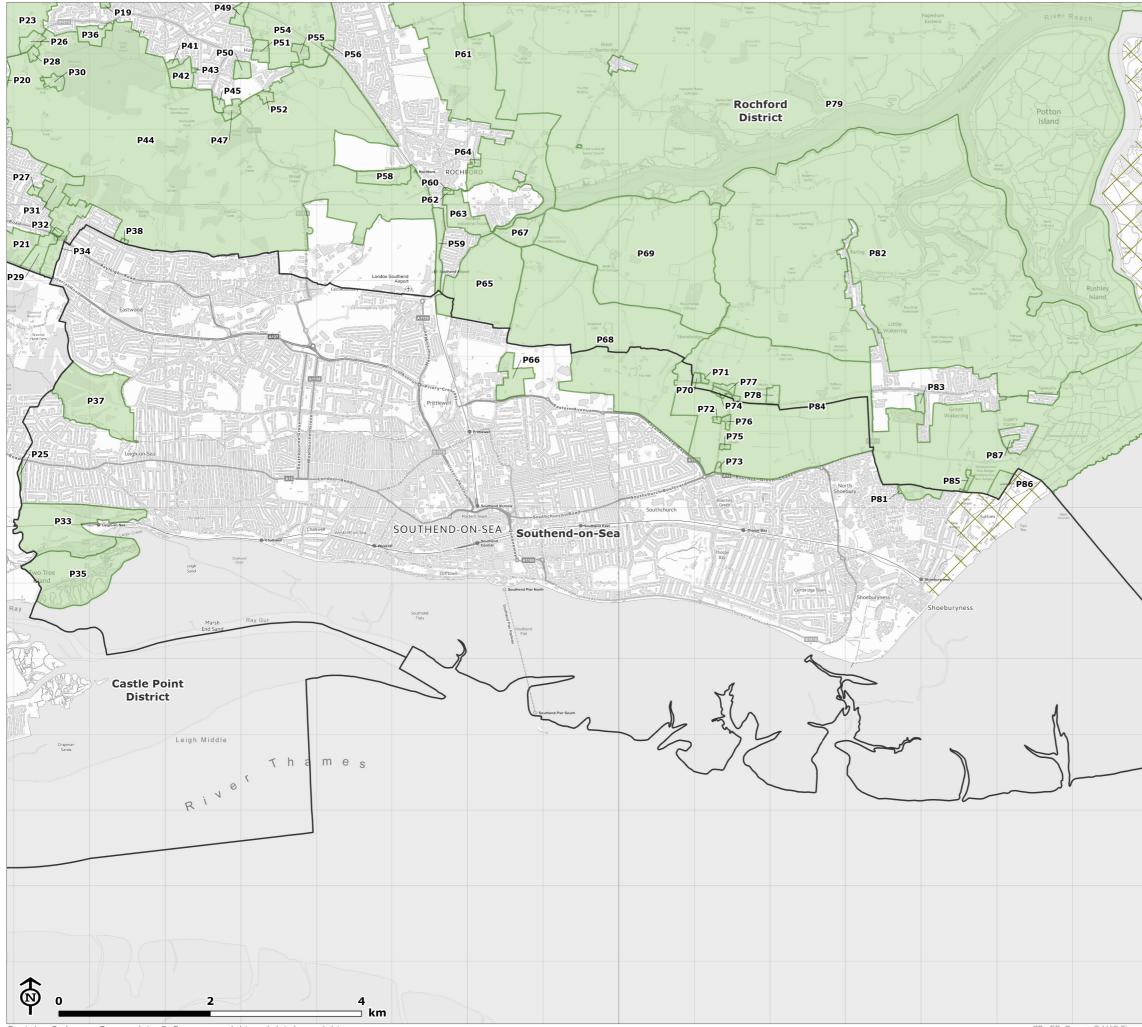
#### Purpose 5 Assessment



Low

Map Scale @A3: 1:50,000







### Rochford and Southend **Green Belt Study**

#### Figure 3.7: Stage 1 Contribution Parcels



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





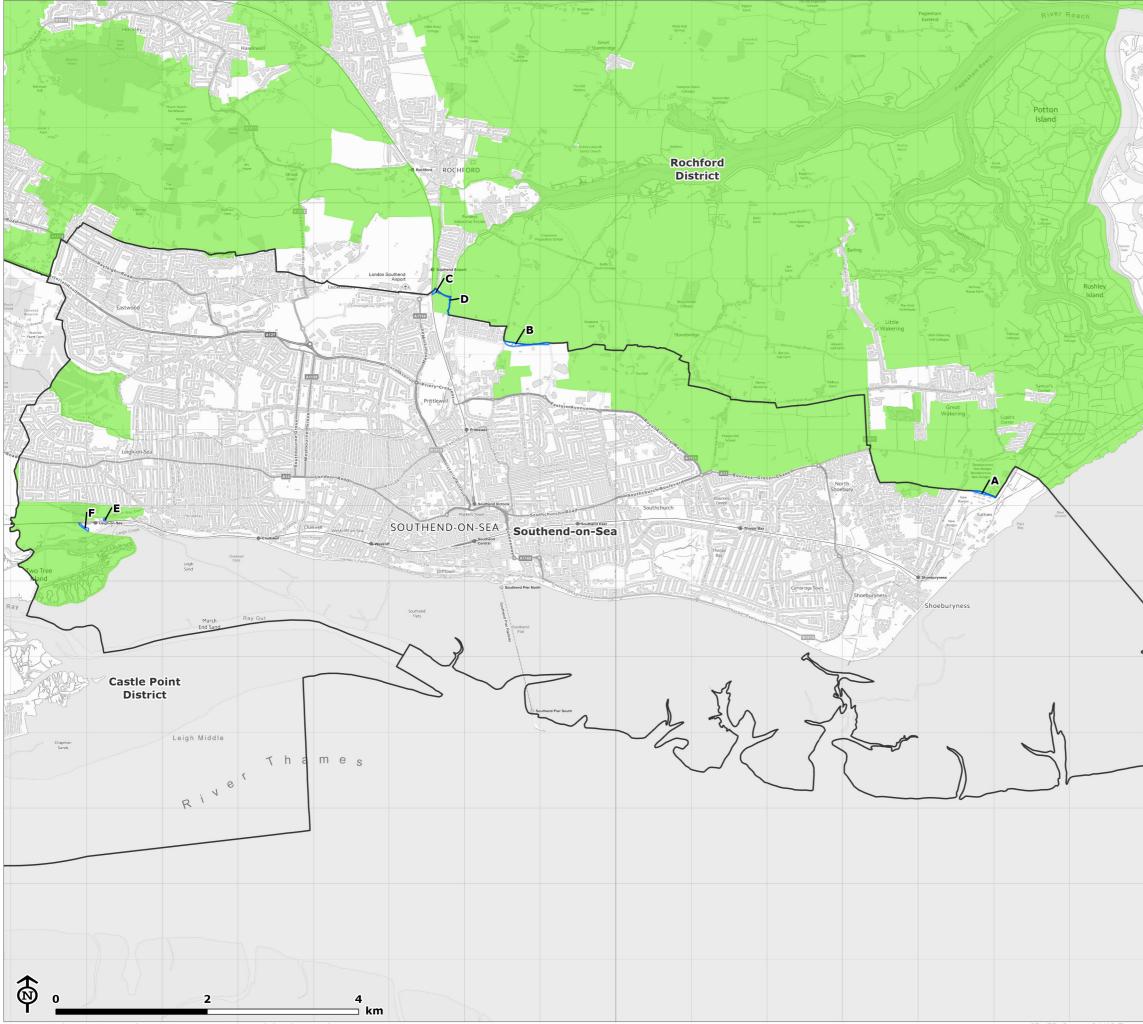
# Assessment of the Potential for Designating New Green Belt

- 3.32 Paragraph 144 of the NPPF states that the general extent of Green Belt across the country is already established and that new Green Belts should only be established in exceptional circumstances, when planning for larger scale development such as new settlements or major urban extensions. Once the spatial strategy Southend-on-Sea has been confirmed, the Councils will be in a position to consider how the designation of new Green Belt land could help promote the sustainable pattern of development proposed in the plan period and in the longer term.
- 3.33 The NPPF clearly states what is required of local planning authorities defining new Green Belt boundaries. Paragraphs 144 and 148 state that local planning authorities should:
  - "demonstrate why normal planning and development management policies would not be adequate;
  - set out whether any major changes on circumstances have made the adoption of this exceptional measure necessary;
  - show what the consequences of the proposal would be for sustainable development;
  - *demonstrate the necessity for the Green Belt and its consistency with local plan for adjoining areas;*
  - show how the Green Belt would meet the other objectives of the framework;
  - ... not include land which it is unnecessary to keep permanently open;
  - *be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
  - *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."*
- 3.34 There is only one significant pocket of open countryside contiguous with the existing Green Belt in Southend-on-Sea which is not designated as Green Belt and could therefore be considered for designation in the future. The area is located to the east of Southend-on-Sea, bordered by the North Sea to the east, the boundary of Rochford District to the north and the developed area of Southend-on-Sea / Shoeburyness to the west and south. Figure 3.8 illustrates its location. The land is predominantly open and well vegetated by woodland and scrubland. Much of the open land in the northern portion (north of Blackgate Road) is peppered with buildings and railway tracks associated with the old railway terminus. Like Foulness Island to the north, this area is currently owned and used exclusively by the MOD and designated as Flood Zone 3. It is therefore considered that existing planning and development management policies facilitate the protection of this area without the need for its designation as Green Belt. There is therefore no strategic justification to designate this area as Green Belt at the present time.

### Minor Green Belt Realignments

- 3.35 As part of the Stage 1 assessment, consideration was given to the accuracy and robustness of the Councils' existing Green Belt boundaries, with a view to highlighting areas of potential for realignments along alternative permanent and readily recognisable physical features where necessary, or just to resolve digital mapping errors. These potential minor Green Belt boundary adjustments in Southend-on-Sea are set out in detail in **Appendix 2**. An overview map of the potential adjustments in Southend-on-Sea is included as **Figure 3.8**.
- 3.36 In some locations, it is proposed that the Green Belt boundary is re-aligned so that it is consistent with the settlement edge. Where the existing boundary cuts through the large residential gardens, but follows the urban edge and is robust and regular, it is not proposed

that the boundary is re-aligned (as it assumed that the Green Belt boundary was drawn in these locations to limit the potential for further development within residential gardens). Where the Green Belt boundary would be more consistent if re-aligned along the rear of reasonably small gardens, it is recommended that the boundary should be amended.





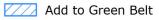
### Rochford and Southend Green Belt Study

# Figure 3.8: Potential Minor Green Belt Boundary Realignments



District Boundaries

Green Belt





## Stage 1 Conclusions

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

# 4 Stage 2 Assessment Methodology

- 4.1 The primary aim of the Stage 2 assessment is to establish the potential harm of Green Belt release on the designation. This assessment is undertaken for specific promoted sites identified by Southend-on-Sea City Council, in addition to the areas that made the weakest contribution to the Green Belt purposes as identified in the Stage 1 strategic assessment (see **Table 3.2**).
- 4.2 **Appendix 1** provides the policy context for the Study update. This information has directly informed the assessment criteria and the definitions of key terms used in the methodology. Changes to national Green Belt policy and guidance since the original Green Belt Study was undertaken in 2020 do not influence the methodology, outlined in this chapter, employed to assess the harm of releasing Green Belt land to the designation.

## Identification of Areas for Stage 2 Assessment

- 4.3 In discussion with the Council, the areas making the weakest contribution to the Green Belt purposes and the sites identified through the Council's 'Call for Sites' exercise were assessed in the Stage 2 assessment. These were overlaid with a set of 'absolute' environmental constraints i.e. areas within which the Council would not permit development.<sup>26</sup> The following environmental designations were considered absolute constraints to development in the Study update:
  - Registered Parks and Gardens.
  - Scheduled Monuments.
  - Special Areas of Conservation.
  - Special Protection Areas.
  - Ramsar Sites.
  - Sites of Special Scientific Interest.
  - National Nature Reserves.
  - Local Nature Reserves.
  - Local Wildlife Sites.
  - Ancient Woodland.
- 4.4 These are illustrated in the context of Southend-on-Sea on **Figure 4.1**.
- 4.5 It is acknowledged that there are other important environmental and planning designations that represent significant constraints to development, for example Flood Zone 3; however, generally, not all forms of development are considered to be inappropriate in the environmental and planning designations that remain. Therefore, it would be inappropriate to disregard the potential for development in such locations.

<sup>&</sup>lt;sup>26</sup> This approach is consistent with the Inspector's comments on the Welwyn Hatfield Green Belt Study (October 2017): "There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites however they are defined."

- 4.6 The weakest areas of Green Belt identified at Stage 1, or promoted sites that do not fall wholly within with the 'absolute' constraints were assessed in in Stage 2. These areas are shown on **Figure 4.2**.
- 4.7 A precautionary approach has been taken to defining the areas of Green Belt land considered to make the weakest contribution to the Green Belt purposes. Pockets of Green Belt land which make a weak or moderate contribution to Green Belt purposes (with the exception of Purpose 5, against which all Green Belt is considered to make a strong contribution) have been identified as making the weakest contribution to the Green Belt purposes (see **Table 3.2**).

#### **Development of assessment areas**

- 4.8 The weaker performing parcels and promoted sites were assessed as 'assessment areas'. Four assessment areas were identified wholly or partially within Southend-on-Sea and are shown on **Figure 4.3**.
- 4.9 The assessment areas consist of either single promoted sites, or weaker performing parcels or, where appropriate, a group of sites and / or weaker performing parcels.
- 4.10 Sites and weaker performing parcels were grouped into 'assessment areas' in order to streamline the assessment process. Sites and parcels were grouped together where they overlapped or lay directly adjacent to one another, while being reasonably similar in character, as well making a similar contribution to the Green Belt purposes. Isolated sites and weaker performing parcels, or sites and parcels separated by significant boundary features, or sites and parcels which made significantly different contributions to the Green Belt purposes were not grouped together, and were assessed individually.
- 4.11 Any differences in the harm associated with the release of specific smaller areas within an assessment area, individual sites or parcels, or portions of sites or parcels, are identified through differing 'harm scenarios'. An absence of multiple harm scenarios within an assessment area means that the harm of Green Belt release is broadly the same for the entire assessment area or its smaller constituent parts, including individual sites and parcels, within it.
- 4.12 Where a 'call for sites' submission by an individual promoter contained multiple adjoining sites the Council requested these sites to be assessed as a group as well as individually. Other 'call for sites' having a direct relationship with these grouped sites were also incorporated into this assessment. Although these additional assessment area assessments do not change the overall findings of the sites in these locations, they present the results at a more user friendly scale. For example, the original Assessment Areas 156 and 158 have been both been split in two (156a and 156b, 158a and 158b) to reflect contiguous areas of site ownership.
- 4.13 **Table 4.1** below shows which sites and / or lower performing parcels form each assessment area wholly or partially within Southend-on-Sea. These assessment areas were agreed with the Council prior to the assessment of Green Belt harm. A similar table organised by site is included in **Appendix 6**.

Assessment Area	Southend Sites	Southend Lower Performing Parcels
122	260	P66
135	261, 262, 263, 269, 271 (Rochford sites: 71, 76, 95, 103, 123, 155, 165, 192, 258, 266, 267, 268, 270)	P72, P73, P74, P75, P76 (also includes P70, P71, P74, P77 and P78 in neighbouring Rochford District)
135a	261, 262, 263, 269, 271	P72, P73, P74, P75, P76 (also includes P70, P71, P74, P77 in neighbouring Rochford District)
140		P81

41

#### Table 4.1: Sites and parcels that form assessment areas

Assessment Area	Southend Sites	Southend Lower Performing Parcels
156	262, 263, 269	P72, P74 (also includes P70, P71, P77 in neighbouring Rochford District)
156a	269	
156b	262, 263	P72, P74 (also includes P70, P71, P77 in neighbouring Rochford District)
158	261, 271	P73, P75, P76
158a	261	P73, P75, P76
158b	271	

## Stage 2 Assessment Process

- 4.14 LUC has a tried and tested methodology for assessing the harm of releasing Green Belt land on the designation. The release of an area that makes a strong contribution to any one Green Belt purpose will potentially result in a high level of harm; conversely, the release of an area that makes a weak contribution to all Green Belt purposes will potentially result in a low level of harm. However, in order to conclude what the impact of release would be on the integrity of the remaining Green Belt, consideration must be given to the relationship between the area being considered for release and the impact on the adjacent Green Belt land and the potential form of the residual Green Belt boundaries.
- 4.15 If Green Belt release significantly weakens the contribution of the adjacent Green Belt to the Green Belt purposes, then the harm is likely to be greater; conversely, if there is no or limited impact on the contribution of the adjacent Green Belt, then the harm is likely to be less.
- 4.16 If the new Green Belt boundary results in a longer, more varied edge, or creates a less distinct boundary between settlement and countryside, the Green Belt release under assessment is likely to weaken the Green Belt.
- 4.17 The Stage 2 assessment is comprised of the following steps:
  - Step 1: Considered Stage 1 contribution ratings to determine the loss of contribution to the Green Belt purposes that would result from the release of land.
  - Step 2: Assessed potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
  - Step 3: Assessed overall Green Belt harm.
  - Step 4: Considered harm resulting from alternative Green Belt release 'scenarios' i.e. any variations in harm within the assessment areas.
- 4.18 These steps are explained in further detail below.
- 4.19 Site visits were made to provide field verification of the desktop findings.

# Criteria for Assessment of Harm Resulting from Green Belt Release

#### Step 1: Considered Stage 1 contribution ratings

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

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

- 4.21 The assessment of contribution at Stage 1 already considered the relationship between a parcel and adjacent Green Belt land, but at the assessment area level it is possible to address how the loss of a specific area of land will affect Green Belt boundaries and the strength / integrity of the adjacent Green Belt.
- 4.22 If Green Belt release significantly weakens the contribution of the adjacent Green Belt to the Green Belt purposes, then the harm is likely to be greater than identified in step 1. However, if there is no, or limited impact on the contribution of the adjacent Green Belt then the harm is likely to be less.
- 4.23 If Green Belt release results in a longer, more varied Green Belt boundary, or creates a less distinct boundary between settlement and countryside, the Green Belt release under assessment is likely to weaken the wider Green Belt. Even if a strong alternative boundary can be defined, there is potential for the remaining Green Belt to be weaker, for example where a narrow strip of Green Belt remains between settlements or at the Green Belt fringe. Harm is lowest where release would have no adverse impact on the adjacent Green Belt and the boundary would be strengthened, either through creation of a shorter, simpler boundary, or through use of a feature that marks a stronger or more widely consistent distinction between an urban area and countryside.
- 4.24 With respect to purposes 1, 3 and 4, the assessment considered harm to adjacent Green Belt by assessing whether the contribution made by that land would be weakened as a result of release of the assessment area. For purpose 2 it is the robustness of the gap that would remain after release that was the key consideration, rather than impact on the contribution of the adjacent Green Belt as the latter will increase as the gap becomes more fragile.
- 4.25 The considerations that were taken into account when assessing the impact of release on the strength of adjacent Green Belt included:
  - **Purpose 1:** Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?
  - **Purpose 2:** How strong would the remaining settlement gap be if the Green Belt land were released? In order to answer this question consideration must be given to the size of the gap, the role of other development constraints in maintaining separation and the location of separating and connecting features.
  - **Purpose 3:** Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside? Unless detailed development proposals are being considered the urbanising influence of future development is difficult to judge, so it is assumed that land beyond a new boundary that currently makes a significant contribution to Purpose 3 will continue to make a significant contribution to Purpose 3.
  - **Purpose 4:** Would the role of remaining Green Belt in forming a distinctive setting to a historic town be diminished by loss of openness in the parcel/site under assessment?
  - **Purpose 5:** As outlined above, all Green Belt land within the Study area is considered to make an equal **Strong** contribution to Purpose 5, therefore harm to Green Belt Purpose 5 is the same throughout.

43

#### Step 3: Assess overall Green Belt harm

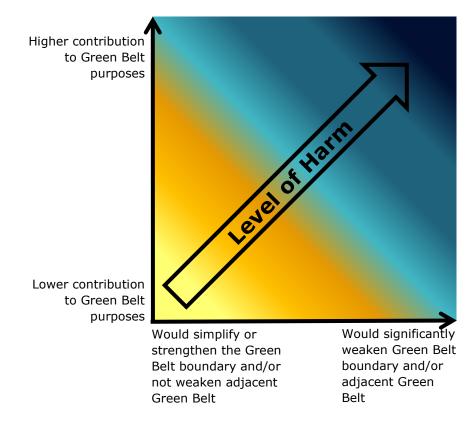
- 4.26 Step 3 represents a drawing together of the findings of Steps 1 and 2 collectively considering:
  - Openness i.e. absence of urbanising development.

- Containment by urbanising influences e.g. other development.
- Distinction between the Green Belt and the inset urban edge.<sup>27</sup>
- 4.27 The guidelines below provide an indication as to how the contribution to the Green Belt, the impact on adjacent Green Belt and the strength of the boundary influence the overall harm of Green Belt release. However, **professional judgement** is required in each individual case to consider how much weight to attach to each contributing element. For example:
  - Where land makes a relatively strong contribution to multiple Green Belt purposes and where its release would weaken the adjacent Green Belt (for example by leaving a narrow gap between towns, or increasing its containment by urban areas), harm is likely to be **high**.
  - Where land makes a moderate contribution to at least one of the Green Belt purposes but where its release would significantly weaken the adjacent Green Belt (for example by isolating an area of Green Belt that makes a stronger contribution), or where land makes a strong contribution to the Green Belt purposes but its release would not significantly weaken adjacent Green Belt due to its containment and/or the creation of a stronger or more consistent alternative Green Belt boundary, harm is likely to be **moderate-high.**
  - Where land makes a moderate contribution to at least one of the Green Belt purposes, but where its release would only partially weaken the adjacent Green Belt (for example by increasing containment of adjacent open land, or by creating a less consistent boundary line), harm is likely to be **moderate**.
  - Where land makes a moderate contribution to one of the Green Belt purposes, but where its release would create a simplified, more consistent boundary and/or would not weaken the adjacent Green Belt due to its containment and lack of distinction from the existing settlement edge, harm is likely to be **low-moderate**.
  - Where land makes a weak contribution to the Green Belt purposes and release would create a simplified, more consistent boundary and/or would not weaken the adjacent Green Belt, harm is likely to be **low**.
- 4.28 These example judgements represent broad generalisations of the types of scenarios that would result in each rating to aid understanding of the rating system, but there will always be exceptions to these general rules. Detailed justification is provided for all ratings (see **Appendix 4**) in relation to how the overall judgement of Green Belt harm was reached.
- 4.29 Green Belt harm has been rated using a five point scale ranging from high to low harm.
  - High harm Moderate-high harm Moderate harm Low-moderate harm Low harm

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 $<sup>^{\</sup>rm 27}$  Further detail with regards to these concepts can be found in **Chapter 2**.

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



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

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

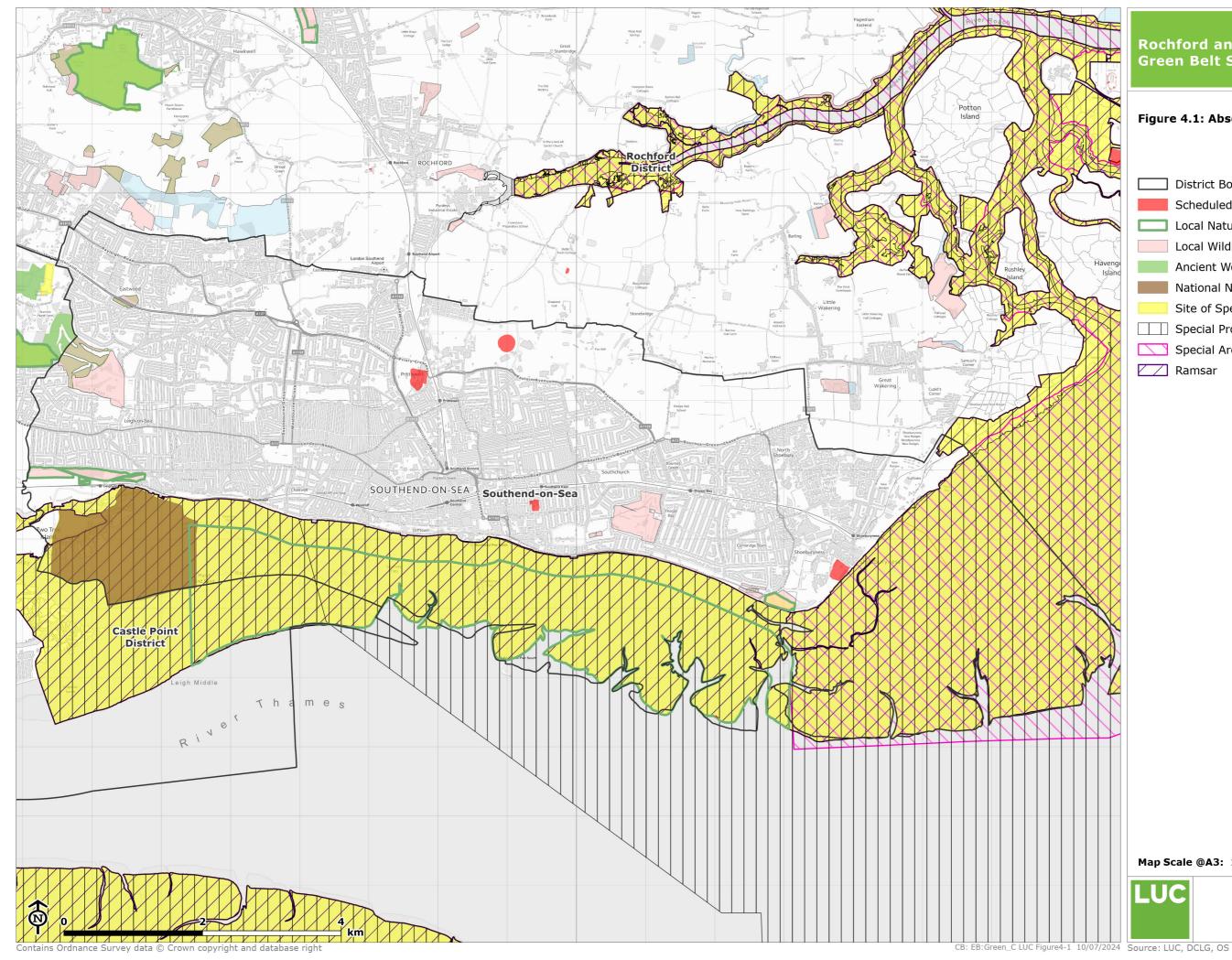
### Stage 2 Assessment Outputs

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

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• Assessment area reference and brief description.

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





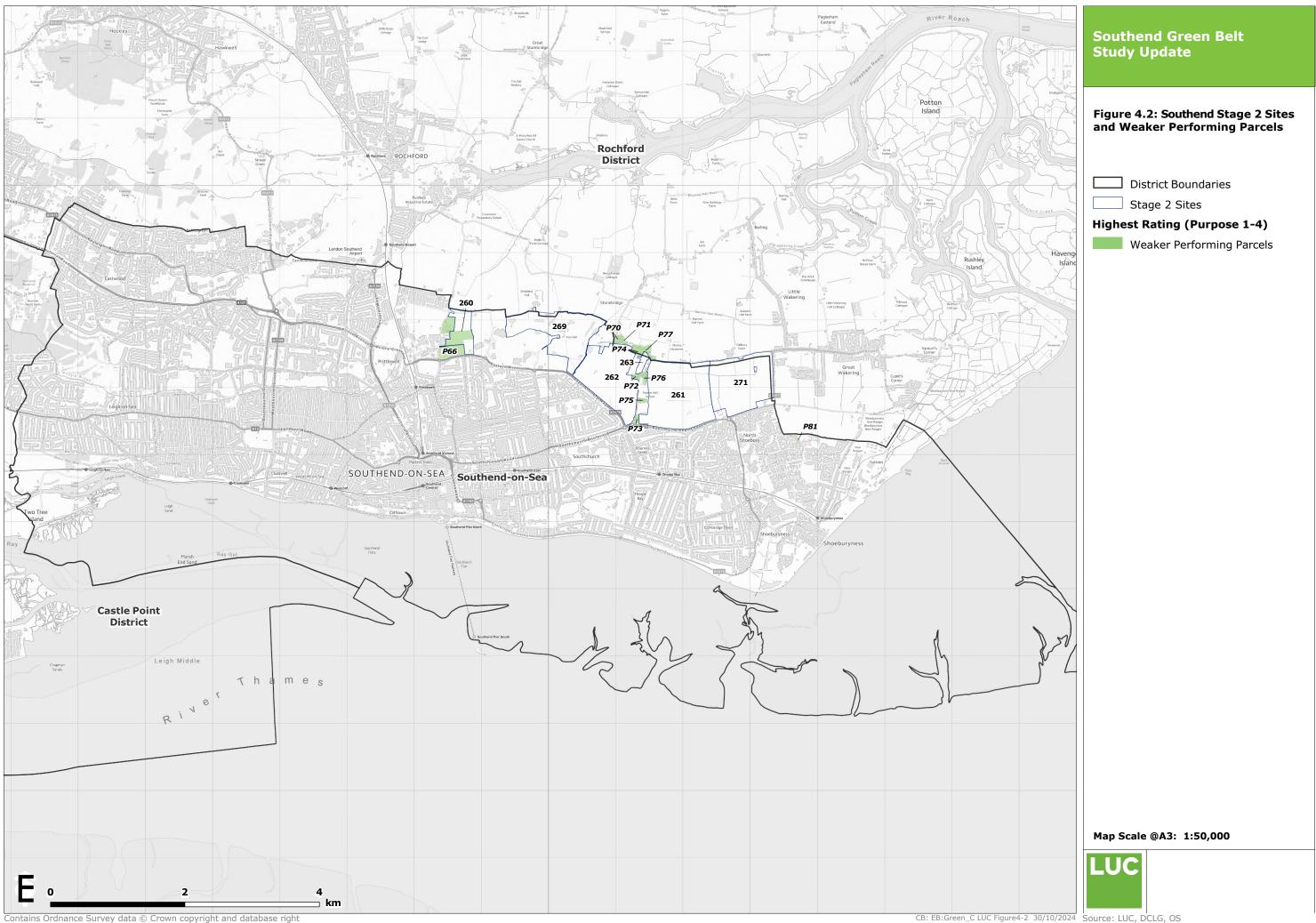
### Rochford and Southend **Green Belt Study**

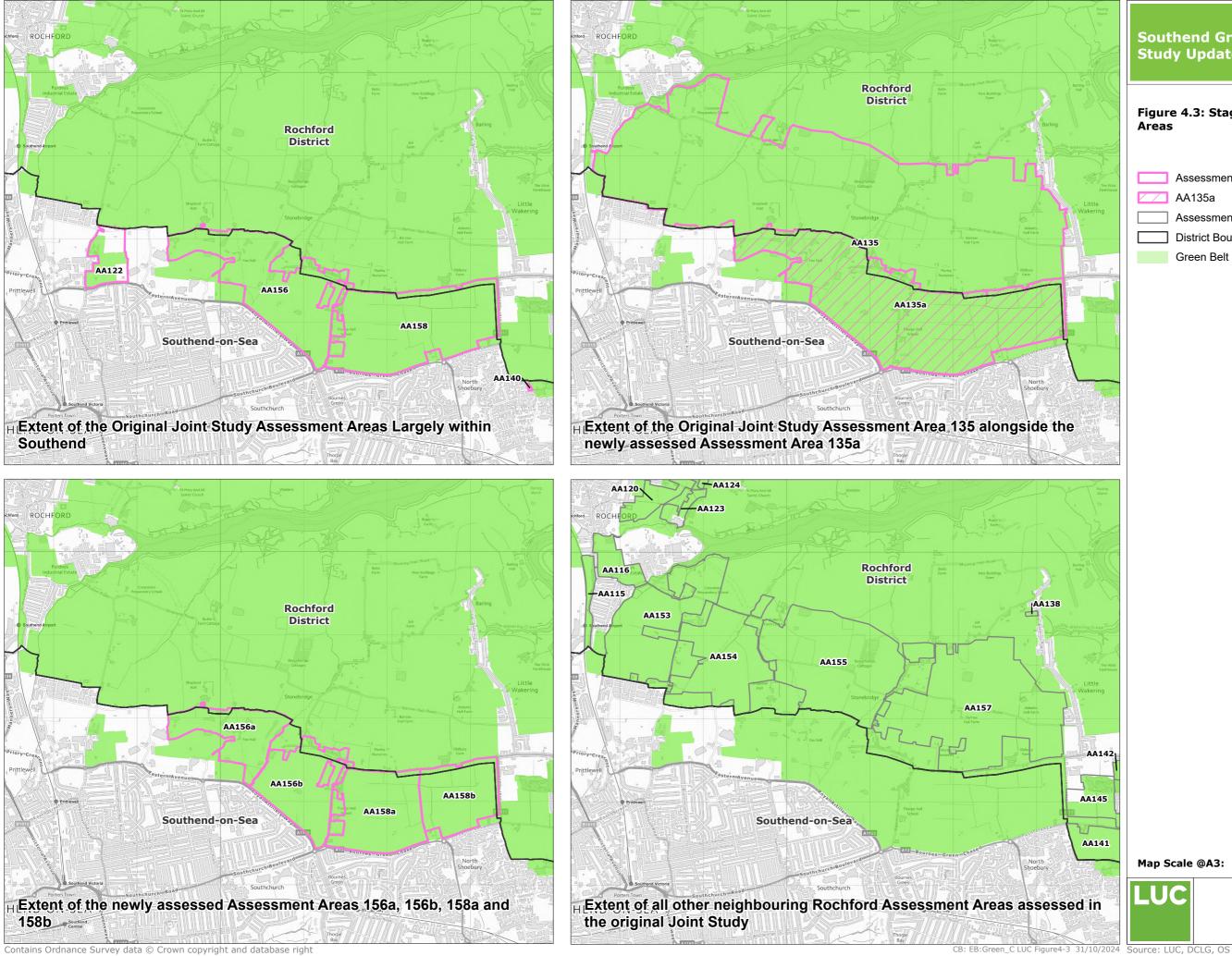
#### Figure 4.1: Absolute Constraints

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

Map Scale @A3: 1:50,000







# Southend Green Belt Study Update

#### Figure 4.3: Stage 2 Assessment Areas



Assessment Areas

AA135a

Assessment Areas outside Southend

District Boundaries

Green Belt

Map Scale @A3: 1:42,000



# **5 Stage 2 Assessment Findings**

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

Table 5.1: Assessment areas wit	thin which no variation in ha	rm was identified

Stage 2 Assessment Area	Southend Sites / Parcels	Harm
AA122	260	Low
AAIZZ	P66	Low
AA140	P81	Low-Moderate
AA156a	269	High
AA158b	271	High

Stage 2 Assessment Area

Southend Sites / Parcels

Harm

Stage 2 AA	Southend Sites / Parcels	Harm Scenario	Harm Rating
AA135	Parcels: P70, P71, P72, P73, P74, P75, P76, P77; Sites: 261, 262, 263, 269, 271 (Some parcels/sites overlap into Rochford District. Also includes several other sites and parcels in neighbouring Rochford District: Parcels: P78; Sites: 71, 76, 95, 103, 123, 155, 165, 192, 258, 266, 267, 268 and 270).	Release of whole assessment area or isolated promoted sites.	High
	P70, P71, P72, P73, P74, P75, P76, P77	Release of weaker performing parcels in isolation (not in combination)	Moderate- High
AA135A	Parcels: P70, P71, P72, P73, P74, P75, P76, P77; Sites: 261, 262, 263, 269, 271 (Some parcels/sites overlap into Rochford District.)	Release of whole assessment area or isolated promoted sites.	High
AA135A	Parcels: P70, P71, P72, P73, P74, P75, P76, P77	Release of weaker performing parcels in isolation (not in combination)	Moderate- High
AA156	Parcels: P70, P71, P72, P74, P77; Sites: 262, 263, 269 (Some parcels/sites overlap into Rochford District.)	Release of whole assessment area or isolated promoted sites.	High
AAISO	Parcels: P70, P71, P72, P74, P77	Release of weaker performing parcels in isolation (not in combination)	Moderate- High
AAAECH	Parcels: P70, P71, P72, P74, P77; Sites: 262, 263. (Some parcels/sites overlap into Rochford District.)	Release of whole assessment area or isolated promoted sites.	High
AA156b	Parcels: P70, P71, P72, P74, P77	Release of weaker performing parcels in isolation (not in combination)	Moderate- High
	Parcels: P73, P75, P76; Sites: 261, 271	Release of whole assessment area or isolated promoted sites.	High
AA158	Parcels: P73, P75, P76	Release of weaker performing parcels in isolation (not in combination)	Moderate- High
AA158a	Parcels: P73, P75, P76; Site: 261	Release of whole assessment area or isolated promoted sites.	High

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

Stage 2 AA	Southend Sites / Parcels	Harm Scenario	Harm Rating
	Parcels: P73, P75, P76	Release of weaker performing parcels in isolation (not in combination)	Moderate- High

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

Table 5.3: Total area of Southend-on-Sea	<b>Green Belt land</b>	assessed at each harm
rating		

	Total Area of Land (excluding constraints)		
Harm Rating	Area (Ha) <sup>28</sup>	Percentage of Site/Parcel Area	
High	280.57	92.14	
Moderate - High	6.50	2.13	
Moderate	0.00	0.00	
Low - Moderate	0.28	0.09	
Low	17.15	5.63	

5.10 It is important to note that the Green Belt harm illustrated in the figures below and **Appendix 4** are more than a product of the loss of the existing contribution of Green Belt land to the purposes (see Step 1 in in **Chapter 4**). These judgements also consider the impact of release and development on adjacent, remaining Green Belt land (See Step 2 in Chapter 4). For example, although Stage 1 parcel P65 and Stage 2 Assessment Area AA153 are recognised as making a strong contribution to Purposes 1, 2 and 3, vs the wider area to the east which generally makes a strong contribution to purposes 1 and 3, release in P65/AA153 is considered to be less harmful (in Green Belt terms) than the area to the west because release of the land to the west of Sutton Road is contained on three sides by the inset urban areas of Southend-on-Sea to the south, Rochford to the west and Purdey's Industrial Estate to the north. Consequently...limiting release to the land to the west of the road would minimise harm to adjacent Green Belt. Sutton Road is equally strong when compared to the existing Green Belt boundaries and would represent a more regular Green Belt boundary. However, release of the land to the west of Sutton road would significantly increase the sense of coalescence of Rochford and Southend-on-Sea. By comparison, for example, release and development in the wider area would 'would significantly increase containment of land west of Sutton Road, the land to the north of Shopland Road in between the Area and Purdeys Industrial Estate (part of Rochford) and, finally, land to the east beyond Shopland Road and south east beyond Shopland Hall Equestrian Centre. The release of the entirety of this site would likely result in the creation of less consistent Green Belt boundary to Southend-on-Sea undermining the integrity of the surrounding Green Belt.

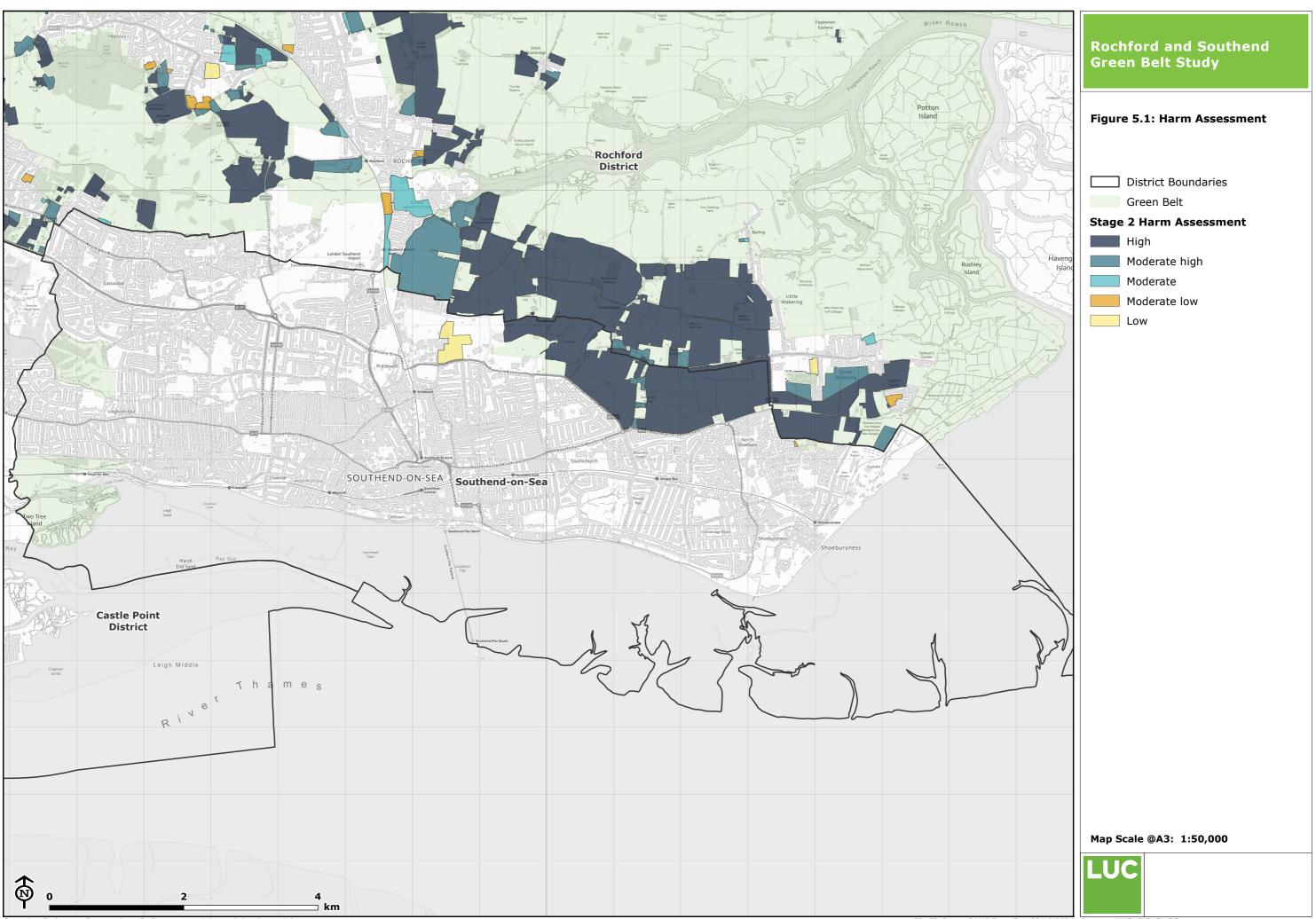
## Role of Green Belt Harm Assessment

5.11 Consideration of the harm to Green Belt that could result from the release of land for development is an essential aspect of establishing the exceptional circumstances for

 $<sup>^{28}</sup>$  A number of the sites extend into neighbouring Rochford District. This table only includes the land area of such sites within Southend.

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

- 5.12 In light of the above, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies relative variations in the harm to the designation.
- 5.13 The Study update does not assess the cumulative impact of the release of multiple sites and/or parcel scenarios on the Green Belt as a whole. That lies outside the scope of this Study update as there are numerous permutations of the scenarios and sites that could be considered for release.



# 6 Making Changes to the Green Belt

6.1 This chapter sets out the key steps that need to be considered if the Council consider there is a need to release land from the Green Belt. The chapter also sets out some potential mitigation measures that could be applied to reduce the potential harm to the Green Belt, if land is released. This is followed by a discussion of the potential opportunities for enhancing the beneficial use of the Green Belt (in line with paragraph 150 of the NPPF). However, it should be noted that this chapter does not contain an exhaustive list of potential mitigation measures or enhancement opportunities. It is therefore recommended that mitigation and enhancement are carefully considered in the context of what development is finally proposed when more detailed information is available.

## Making Changes to the Green Belt

- 6.2 Paragraph 145 of the NPPF states that 'once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period.'
- 6.3 The NPPF requires changes to the Green Belt to be made through the Local Plan process. If such changes are made, the process should include demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience.
- 6.4 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless the benefits of the most sustainable locations are outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes<sup>29</sup>. In other words the relatively poor performance of the land against the Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. In fact the release of Green Belt land likely to result in low harm may not be appropriate or sustainable.
- 6.5 In developing an 'exceptional circumstances' case it will be necessary to look at the objectively assessed needs for development, the needs to promote sustainable patterns of development and whether these needs can be accommodated without releases from the Green Belt. The NPPF sets out clear steps that local authorities need to consider, specifically:
  - 1. making effective use of suitable brownfield sites and underutilised land;
  - 2. optimising the density of development in town and city centres and other locations well served by public transport; and
  - 3. exploring whether other authorities can help meet some of the identified development requirement.  $^{\rm 30}$

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 $<sup>^{29}</sup>$  Planning on the Doorstep: The big Issues – Green Belt Planning Advisory Service (PAS), 2015.  $^{30}$  Paragraph 146 of the NPPF.

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

6.6 Should the Councils conclude *`that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport.'*<sup>31</sup> Furthermore, careful consideration will also need to be given to the form of the amended Green Belt boundaries. As set out in paragraph 148 of the NPPF:

'When defining Green Belt boundaries, plans should:

- a. ensure consistency with the development plans strategy for meeting identified requirements for sustainable development;
- b. not include land which it is unnecessary to keep permanently open;
- c. where necessary, identify areas of safeguarded land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period;
- *d.* make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- e. be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f. define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'
- 6.7 Further guidance on establishing the necessary 'exceptional circumstances' for making alterations to Green Belt boundaries is set out in the recent High Court judgement: Compton Parish Council and others v Guildford Borough Council and others (2019). This involved an appeal opposed to the principle and extent of land proposed for release from the Green Belt in the Council's submitted Local Plan. The judge concluded there is no definition of the policy concept of 'exceptional circumstances' for altering Green Belt boundaries. "*This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case.*":

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

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

<sup>&</sup>lt;sup>31</sup> Paragraph 147 of the NPPF.

# Mitigation to Reduce Harm to the Green Belt

#### The concept of mitigation

- 6.9 One of the factors weighed up in the judgement of harm resulting from release of a Green Belt area is the impact that the loss of openness would have on other Green Belt land. This is assessed by considering how neighbouring land would rate in terms of its contribution to Green Belt purposes were the area in question to be urbanised i.e. would its contribution be lessened? In many cases this is a key factor in the judgement: a site might in itself be small, but its development could represent a more significant change than its physical area might suggest if, for example, this resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land.
- 6.10 There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect the relationship between the remaining Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the case for release of a particular area. Although release of Green Belt land will still require 'exceptional circumstances' to be demonstrated.
- 6.11 Mitigation relates to land under the control of the site developer, and could therefore apply either to land being released or land being retained as Green Belt. There is an overlap between the latter and the concept of beneficial use of Green Belt land as set out in the NPPF, in that mitigation can also present an opportunity to enhance beneficial use.

#### **Mitigation themes**

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

Mitigation measure	Benefits	Considerations
Use landscaping to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance.	Maintaining separation between urban and open land.	A boundary that is relatively homogeneous over a relatively long distance is likely to be stronger than one which has more variation. Landscaping works can help to minimise the impact of 'breaches' in such boundaries.
Strengthen boundary at weak points – e.g. where 'breached' by roads.	Reducing opportunities for sprawl.	The use of buildings and landscaping can create strong 'gateways' to strengthen settlement-edge function.

#### Table 6.1: Potential measures to mitigate harm to Green Belt

Mitigation measure	Benefits	Considerations
Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt.	Reducing perception of urbanisation, and may also screen residents from intrusive landscape elements within the Green Belt (e.g. major roads).	Boundaries that create visual and movement barriers can potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents.
Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge.	Reducing perception of urbanisation.	This may however have implications in terms of reducing housing yield.
Consider ownership and management of landscape elements which contribute to Green Belt purposes.	Ensuring permanence of Green Belt.	Trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (e.g. within back gardens).
Enhance visual openness within the Green Belt.	Increasing perception of Countryside.	Although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
Preserve / enhance landscape elements which contribute to the setting of historic settlements and views which provide an appreciation of historic setting and special character.	Preserving setting and special character of historic towns.	Landscape character and historic settings assessment can help to identify valued characteristics that should be retained and if possible strengthened, and intrusive elements that should be diminished and where possible removed.
Enhance access within the Green Belt.	Increasing perception of countryside.	Uses of the countryside that permit an appreciation of it as a connected area with value characteristics can counter urbanising influences – e.g. enhancement of connectivity

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

# Beneficial Use of Green Belt

6.14 The purposes of Green Belt do not make any reference to the quality or use of land falling within the designation, but the NPPF, at paragraph 150, states that:

"Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."

- 6.15 Furthermore, paragraph 147 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should "*set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land".* This could be achieved through legal agreements in conjunction with the release of land and planning consent for development, or through strategic enhancement initiatives e.g. creation of community woodland.
- 6.16 The NPPF also suggests types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary / buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes.
- 6.17 Planning practice guidance elaborates on paragraph 147 by endorsing the preparation of supporting landscape, biodiversity, or recreational need evidence to identify appropriate compensatory improvements, including:
  - "new or enhanced green infrastructure;
  - woodland planting;
  - *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
  - improvements to biodiversity, habitat connectivity and natural capital;
  - new or enhanced walking and cycle routes; and
  - improved access to new, enhanced, or existing recreational and playing field provision."
- 6.18 Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.
- 6.19 Some of the mitigation measures listed in the previous section which relate to Green Belt land can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land that (by adding to its value) will strengthen the case for that land's future protection, regardless of whether it is classified as Green Belt. Some examples are provided in **Table 6.2** below.
- 6.20 Beneficial uses could be achieved through planning conditions, section 106 obligations and/or the Community Infrastructure Levy. The Planning Practice Guidance stresses the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance.

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open space provision.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.

#### Table 6.2: Potential beneficial uses of Green Belt

Beneficial use	Considerations
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
Increasing biodiversity	Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins and provision of habitat connectivity. Linkages could be provided to identified environmental networks.
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect of avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics / qualities which help it contribute to Green Belt purposes.

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

# Conclusion

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

# **Appendix 1**

Green Belt Policy and Guidance

## Origins of the Metropolitan Green Belt

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

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

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

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

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

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

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

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

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

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

PPG2 was replaced through the publication of the National Planning Policy Framework (NPPF) in March 2012, revised and re-published in July 2018, February 2019, July 2021 and December 2023, and this document currently provides national Green Belt policy.

As of April 2024 the entirety of the Metropolitan Green Belt covers around 514,000 hectares, across London, the East and South East of England. Roughly 40% of the Metropolitan Green Belt

falls in London. Land within the Metropolitan Green Belt accounts for approximately 31% of the total 1,638,420 hectares of Green Belt land in England<sup>32</sup>.

# National Planning Policy

Government policy on Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF)<sup>33</sup> and associated National Planning Practice Guidance<sup>34</sup>. Paragraph 142 of the NPPF states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

This is elaborated in NPPF paragraph 143, which states that Green Belts should serve five purposes, as set out below.

The purposes of Green Belt

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

The NPPF emphasises in paragraphs 144 and 145 that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans. Paragraph 145 goes on to say that 'once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period'.

Paragraph 146 of the NPPF requires that the 'strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development' before concluding that the exceptional circumstances exist (paragraph 146), specifically whether the strategy:

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

Paragraph 147 of the NPPF indicates that 'when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green

<sup>&</sup>lt;sup>32</sup> Local authority green belt: England 2022-2023 – statistical release, Department for Levelling Up, Housing & Communities, 2024, [online] available at: https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2022-to-2023/local-authority-green-belt-england-2022-23-statistical-release

<sup>&</sup>lt;sup>33</sup> Department for Levelling Up, Housing and Communities, 2023, National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/733637/National\_Planning\_Policy\_ Framework\_web\_accessible\_version.pdf

<sup>&</sup>lt;sup>34</sup> Department for Levelling Up, Housing and Communities, 2023, National Planning Practice Guidance [online] available at: https://www.gov.uk/guidance/green-belt

Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.<sup>35</sup>

Paragraph 148 of the NPPF suggests that Local Planning Authorities may wish to identify areas of 'safeguarded land' between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period.

Paragraph 144 of the NPPF indicates that, if proposing new Green Belt, local planning authorities should:

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

Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states "local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land" (Paragraph 150).

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

Paragraph 152 and 153 state that "*inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances...* 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of *inappropriateness, and any other harm, is clearly outweighed by other considerations.*"

Paragraphs 154 sets out the types of development that are appropriate in the Green Belt:

- 'buildings for agriculture and forestry;
- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- *limited infilling in villages;*
- *limited affordable housing for local community needs under policies set out in the development plan; and*

<sup>&</sup>lt;sup>35</sup> This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

- *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:* 
  - not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development, or
  - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.'

Paragraph 155 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:

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

#### **Planning Practice Guidance**

The NPPF's Green Belt policies are supplemented by additional planning practice guidance. The guidance sets out some of the factors that can be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations born out through specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects<sup>36</sup>. Other circumstances which have the potential to affect judgements on the impact of development on openness include the duration of development and its remediability to the equivalent, or an improved state of, openness, and the degree of activity likely to be generated by development, such as traffic.

The guidance also elaborates on paragraph 147 of the NPPF which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, including:

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

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

<sup>&</sup>lt;sup>36</sup> Two important planning appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016) define openness as having both a spatial aspect and a visual aspect. Further details are set out in Chapter 2 and in the case law section in Appendix 1 below.

# Planning Inspectorate Local Plan Examination Reports

Since the adoption of the National Planning Policy Framework in March 2012, there have been several important Planning Inspectorate Local Plan Examination Reports which have informed Green Belt planning<sup>37</sup>. These include:

- The Inspector's preliminary conclusions (S Emerson) to Bath and North East Somerset Council (June 2012) highlighted the importance of having an "up-to-date and comprehensive review of the Green Belt in the district is necessary to see whether all the land so designated fulfils the Green Belt purposes".
- The Inspector's report (A Thickett) to Leeds City Council (September 2014) emphasised that Green Belt studies should be "fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations", i.e. Green Belt reviews should be 'comprehensive' rather than 'selective'.
- The Inspector's interim views (S J Pratt) to Cheshire East Council (October 2014) and further interim views (December 2015) highlighted several flaws in the approach to the Council's Green Belt assessment:
  - Contribution to the Green Belt purpose were not the only factors used to inform the assessment, land ownership, availability and deliverability were also considered, weighting overall Green Belt judgements against the purposes of the designation.
  - The Green Belt was divided-up in to assessment parcels inconsistently: large areas were assessed in the same way as small sites and some areas of Green Belt were not assessed.
  - $_{\odot}~$  Green Belt Purposes 4 and 5 were not assessed.
  - The Council's two stage Green Belt assessment update involving an initial assessment of large general areas followed by smaller parcels for a five Green Belt purposes, was subsequently approved by the Inspector. However, the Inspector emphasised the needs for consistency and transparency: "This is a complex process, which needs to be undertaken in a consistent and transparent manner using available and proportionate evidence, involving professional judgements; it was not simply a desk-based study, but one which involved many site visits by CEC's officers or consultants to confirm the assessments and judgements."
  - With regard to the assessment of Purpose 4 the Inspector commented that "the assessment utilises a variety of historical evidence, which enables a full assessment of the smaller settlements; this could be criticised as being too detailed for a Green Belt assessment which focuses on the larger historic towns, but is not necessarily inappropriate or irrelevant".
  - With regard to the assessment of Purpose 5 which focussed on the area of brownfield land within the settlement nearest to the Green Belt land under assessment, the Inspector found the approach to be "consistent, transparent and proportionate."
- The Inspector's interim findings (H Stephens) to Durham City Council (November 2014) clarified that assessments against the Green Belt purposes should form the basis of any justification for releasing land from the Green Belt, and in reviewing land against the purposes Green Belt studies should consider the reasons for a Green Belt's designation.
- The Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015) emphasised that Green Belt studies should make clear "*how the assessment of* '*importance to Green Belt' has been derived*" from assessments against the individual purposes of Green Belt and highlighted the importance of revisions to Green Belt boundaries to "*take account of the need to promote sustainable patterns of development, as required by paragraph 85 of the NPPF* (paragraph 147 of the latest NPPF, 2023)[*even if*] *such an exercise would be carried out through the SEA/SA process.*"
- The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) highlighted that the Council has supplied insufficient justification to not allocate sufficient

<sup>&</sup>lt;sup>37</sup> Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

housing development proposals in the Local Plan. The Council's primary source of justification was the Council's Green Belt review. Then inspector found the Phase 1 of the review was too strategic to draw out finer grained variations in Green Belt performance and Phase 2 of the review, although more detailed, failed to assess all potential development sites and did not examine all potentially suitable areas and did not assess the extent to which the Green Belt would be harmed by the loss of a parcel in part, in its entirety or in combination with other parcels. The inspector noted the Green Belt review had incorrectly incorporated an examination of landscape character into the consideration of openness, which "should only be concerned about the absence of built development and other dominant urban influences". In addition, the inspector noted that if the quantum of development required can't be met adjacent to urban areas, the Council should assess other locations that are large enough to accommodate a new settlement.

- The Inspector's report (D Smith) to the London Borough of Redbridge (January 2018) supported the Council's decision not assess the Borough's Green Belt against Purpose 4 on the grounds that there are no historic towns in the Borough. The inspector also noted that contribution to Purpose 5 had not been assessed because all brownfield sites with reasonable prospects of development had been identified. The inspector concluded that this reasoning was "flawed as a matter of principle because the aims of the Green Belt are long-term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites".
- The Inspectors' report (W Fieldhouse; L Gibbons; S Lee) to the Greater Manchester Combined Authority supported the GMCA's assessment that there was a strategic justification for removing 2,400 hectares of land from the Green Belt, even though there was sufficient land within the existing urban areas to meet identified housing requirements. The primary reason for this decision was that the distribution of that existing supply would not allow local housing needs to be met in all of the areas participating in this GMCA plan. Furthermore, the inspectors considered the justification for 49 Green Belt additions proposed in the Plan, but only agreed with the exceptional circumstances justification for adding 17 of the sites listed, noting that the exceptional circumstances for the others had not been adequately evidenced and justified.

#### Planning Appeal Decisions

Since the adoption of the National Planning Policy Framework in March 2012, there have been several important planning appeal decisions that have informed general interpretation of national Green Belt policy<sup>38</sup>. These include:

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

"the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at

 $<sup>^{38}</sup>$  Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

least ideally, identify and then grapple with the following matters: (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."

- Timmins and Lymn Family Funeral Service v Gedling Borough Council and Westerleigh Group Limited (2015) clarifies that any material change of use of land in the Green Belt generally (and the use of land as a cemetery in particular) should be regarded as inappropriate unless listed in paragraphs 89 and 90 of the NPPF (paragraph 155 of the latest NPPF, 2023).
- Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016) was an appeal heard in the High Court relating to a previous appeal judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The High Court appeal was dismissed, but the judgement concluded that:
  - "openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt presents"
  - "The question of visual impact is implicitly part of the concept of 'openness of the Green Belt' as a matter of the natural meaning of the language used in para. 89 of the NPPF (paragraph 154 of the latest NPPF, 2023)... There is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' and the merging of neighbouring towns...openness of aspect is a characteristic quality of the countryside, and 'safeguarding the countryside from encroachment' includes preservation of that quality of openness. The preservation of 'the setting ... of historic towns' obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields."
  - "The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result of the location of a new or materially larger building there."
- Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016) found that glasshouse development in the Green Belt is appropriate since it is a 'building for agriculture' under the first bullet of paragraph 89 (paragraph 154 of the latest NPPF, 2023) of the NPPF and therefore not capable of generating harm to the Green Belt designation.
- Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) involved a challenge to a planning permission for a 6 hectare quarry extension in the Green Belt. Although paragraph 90 of the NPPF (paragraph 155 of the latest NPPF, 2023) states that "mineral extraction" is not "inappropriate development" in the Green Belt, it was found that the Council failed to take into account visual impacts when considering whether the proposal would "preserve the openness of the Green Belt" as required in paragraph 90 of the NPPF (paragraph 154 of the latest NPPF, 2023). Lord Justice Lindblom found that the council had limited its consideration of the effects of the proposed development on the openness of the Green Belt to spatial impact and nothing more, despite the fact that, on the council's own assessment of the likely effects of the development on the landscape, visual impact on openness was "quite obviously" relevant to its effect on the openness of the Green Belt. This judgement was subsequently overturned in the Supreme Court (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3. Contrary to Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018), visual impact was found not to be an obligatory consideration when assessing Green Belt. It was found that "a proper reading of the NPPF in its proper historic context, visual quality of landscape is not in itself an essential part of openness for which the Green Belt is protected." "The concept of "openness" in paragraph 90 of the NPPF (paragraph 154 of the latest NPPF, 2023) is a broad policy concept which is the counterpart of urban sprawl and is linked to the purposes to be served by the Green Belt. Openness is not necessarily a

statement about the visual qualities of the land, nor does it imply freedom from all forms of development."

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

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

- Mr C Luke v Tonbridge & Malling Borough Council (2020) was a High Court judgement involving an appeal against a refusal to grant outline planning permission for the erection of a detached dwelling for an agricultural worker relating to a nursery business to replace a mobile home. The appeal was allowed and outline planning permission granted on the grounds that the appellant had presented an appropriate 'very special circumstances' case. The existing mobile home was found not to be a building or 'previously developed land' as defined in the NPPF, so the scheme was not considered to be an 'exception' under paragraph 145 of the NPPF and therefore 'inappropriate' and harmful the Green Belt by definition. However, the inspector concluded that there would be "*limited to negligible effect on the visual aspect of the Green Belt's openness."* And, while "the spatial reduction in the Green Belt's openness...would remain", the benefits of the scheme visual improvement, energy efficiency, quality of life were "persuasive and thus worthy of sufficient weight to tip the balance in favour of the appeal scheme."
- Mayor of London v the Secretary of State for Housing, Communities And Local Government & Ors (2020) was a High Court challenge by the Mayor of London to the Secretary of State's decision to allow the appeal of Harrow School against a refusal of planning permission. The High Court ruled to dismiss the challenge. The proposed development took place in the MOL and would have significant heritage assets, according to the Mayor. It was deemed that there was no need for the Secretary of State to address the harm to MOL purposes just because it agreed with the view that there would be less than substantial harm to heritage assets and the Secretary of State was not bound to have found that there would be harm to the school's historic site. The Court held that the Secretary of State had not disregarded heritage harm in the VSC balance and had looked at the case as a whole.
- Wedgewood v City of York (2020) EWHC 780 (Admin) was a Planning Court judgement that City of York Council was entitled to treat a site as not in its Green Belt even though it was located in an "indicative doughnut ring" in its policies. Local resident Christopher Wedgewood had challenged the council's decision to grant planning permission for two extensions to a neurological rehabilitation centre. As well as applying a presumption against development, Wedgwood asserted that York failed to give sufficient reasons for departing from its Green Belt designation and the local plan. York's Green Belt has not been fixed with detailed boundaries because the city for historical reasons has no formally adopted local plan. The judge stated that it was "plain beyond reasonable argument that the detailed boundaries of the Green Belt around York have not been defined" and that "much of this [land] had none of the characteristics associated with Green Belt". The judge said the case raised "a question that is novel and difficult for the court" of whether a high-level strategic plan was sufficient to define Green Belt land.

- Compton Parish Council & Ors v Guildford Borough Council & Anor (2019) was a High Court judgement, dismissing the claims of two parish councils and an individual against Guildford Borough Council and the Secretary of State for Housing Communities and Local Government that challenged the adoption of its local plan on the grounds that the plan's release of sites from the Green Belt was unlawful as the Inspector had erred in law in his approach to what constituted the "exceptional circumstances". This had a number of aspects, the Judge held, including "whether [the Inspector] had treated the normal as exceptional, and had failed to consider rationally, or with adequate reasons, why Green Belt boundaries should be redrawn. The Judge rejected all the grounds of challenge. The Judge found that the Inspector had considered and provided amply reasoned, legally adequate reasons for concluding that objectively assessed need for dwellings be met in full, notwithstanding the consequent need for the release of land from the Green Belt. The Judge also found that the Inspector's reasoning was adequate in making out the necessary "exceptional circumstances" to justify allocation of housing sites released from the Green Belt.
- Link Park Heathrow LLP v Secretary of State for Levelling Up, Housing and Communities & Ors (2023) was a High Court judicial review against the Inspectorate's decision to prevent a data centre on Green Belt land covering Buckinghamshire Council and Hillingdon Council areas. The appellant advanced three grounds at the High Court, the first contending that the inspector's conclusions as to the lack of employment opportunities offered by Link Park Heathrow were inconsistent and/or irrational. The second ground alleged that the inspector erred in law as to the effect of a planning condition, and/or he did not take it into account, although it was a material consideration. Ground three argued that the inspector wrongly interpreted the five purpose of the Green Belt in the NPPF. On the grounds of most interest one and three the judge found in favour of Link Park Heathrow, concluding that it was irrational for the inspector to give specific weight to the supposed harm caused by the removal of the financial contribution and found that the inspector made an error of law in his interpretation of "encroachment" in the context of the NPPF's purposes.

## Southend-on-Sea Borough Development Plan

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

- The Core Strategy, adopted 2007<sup>39</sup>.
- The Development Management Policies, adopted 2015<sup>40</sup>

These are supported by the Essex and Southend Replacement Waste Local Plan and Area Action Plans (Joint Area Action Plan for London Southend Airport and Southend Central Area Action Plan).

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

#### **Core Strategy**

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

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

40 http://www.southend.gov.uk/downloads/file/3737/southend\_development\_management\_document\_adopted\_version

<sup>39</sup> https://www.southend.gov.uk/downloads/file/7023/core-strategy-dpd1-document-2007-

maintained. Policy CP4 requires the maintenance of the function and open character of a sustainable Green Belt.

#### **Development Management Document**

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

#### **Area Action Plans**

The Southend Central Area Action Plan<sup>41</sup>, prepared in 2018, acts as a driver for inward investment and for the delivery of the remaining proportion of planned regeneration and growth in the Southend Central area.

The London Southend Airport and Environs AAP<sup>42</sup>, prepared in 2014, was jointly prepared by Rochford District Council and Southend-on-Sea Borough Council in response to the challenges and opportunities raised by the airport. The plan integrates land use, transport, environmental and regeneration proposals with mechanisms for delivery.

### Safeguarded Land

There is one area of open land in Southend-on-Sea that is not designated as Green Belt but has not been considered further for potential extensions to the Green Belt as it is designated as Safeguarded Land in the Council's current Local Plan: Land north of Southend at Fossetts Farm (pre 2021). The area is earmarked for future residential development as part of strategic settlement extensions.

Other designations include the London Southend Airport and Environs Joint Area Action Plan Area and employment land allocations.

## Neighbouring Authority Green Belt Reviews

#### **Chelmsford City Council**

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

Current protection for Green Belt is set out in Policy S1 which identifies the protection of the Green Belt as a strategic priority. Policy S1 is supplemented by Policy S11 which also protects the openness and permanence of the designation and looks for opportunities to support the beneficial uses of the Green Belt.

#### **Basildon Borough**

Basildon Council undertook a review of Green Belt land within the Borough in 2016 and 2017<sup>43</sup>, to inform the preparation of a new Local Plan, determining permanent Green Belt boundaries that can endure for the long term and setting the framework for Green Belt and settlement policy.

The purpose of the review was to enable the Council to understand how the Borough's Green Belt land contributes to the fundamental aim, characteristics and purposes of the Green Belt. The assessment was undertaken in four stages: Stage 1 – identifying the assessment areas; Stage 2 – carrying out the assessments; Stage 3 – identifying the contribution to Green Belt purposes; Stage 4 – drawing out the conclusions. The main stage of the review was the assessment of the contribution of each of the parcels defined in Stage 1 against the first four purposes of the Green

<sup>41</sup> http://www.southend.gov.uk/downloads/file/5409/southend\_central\_area\_action\_plan\_-\_2018

<sup>42</sup> London Southend Airport and Environs Joint Area Action Plan Adopted Version (rochford.gov.uk)

<sup>43</sup> Microsoft Word - Green Belt Topic Paper 2017 - October 2018 Update FINAL (basildon.gov.uk)

Belt. Purpose 5 was not included as it was considered that Green Belt by nature contributes to the recycling of derelict and urban land.

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

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

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

Basildon Borough Council commissioned LUC to undertake a updated Green Belt assessment in 2023. The study has yet to be published.

#### **Castle Point Borough**

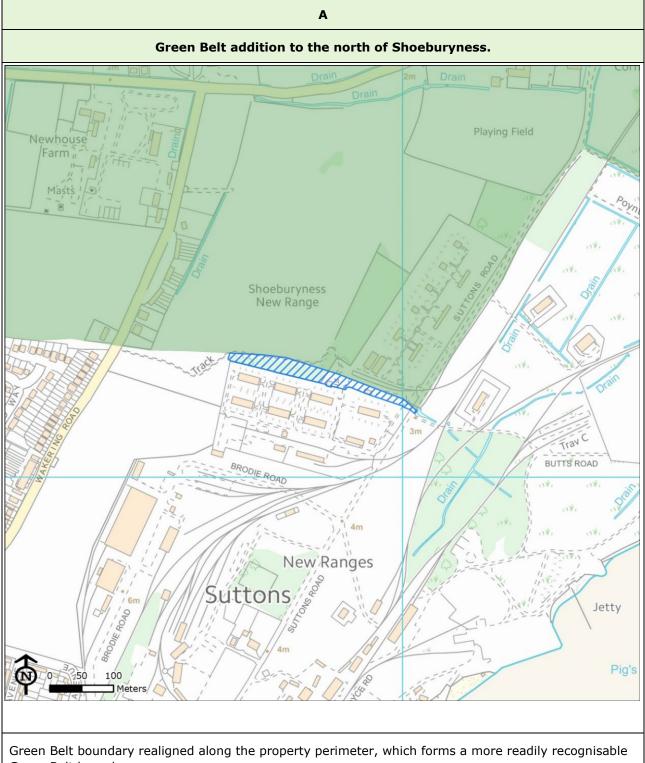
Castle Point Borough Council has undertaken several Green Belt assessments which informed the preparation of their now withdrawn new Local Plan. This initially included a Green Belt Functions Assessment(2010), Green Belt Landscape Assessment (2010) and a Green Belt Boundaries Review all of which were subsequently replaced by a Green Belt Review Part 1 and Part 2 (2018) and an update to Part 2 in 2019.

The Green Belt Review Part 1 assessed the contribution of parcels of Green Belt land to the Green Belt purposes. With regards to Purpose 1, the settlements of Canvey Island, Daws Heath, Hadleigh, South Benfleet and Thundersley were defined as large built-up areas. Similarly, the same settlements were defined as neighbouring towns in the assessment of Purpose 2. No historic towns relevant to the assessment of Purpose 4 were identified in the Borough. All Green Belt land was considered to perform equally against Purpose 5 and therefore no detailed assessment was undertaken for Purpose 5.

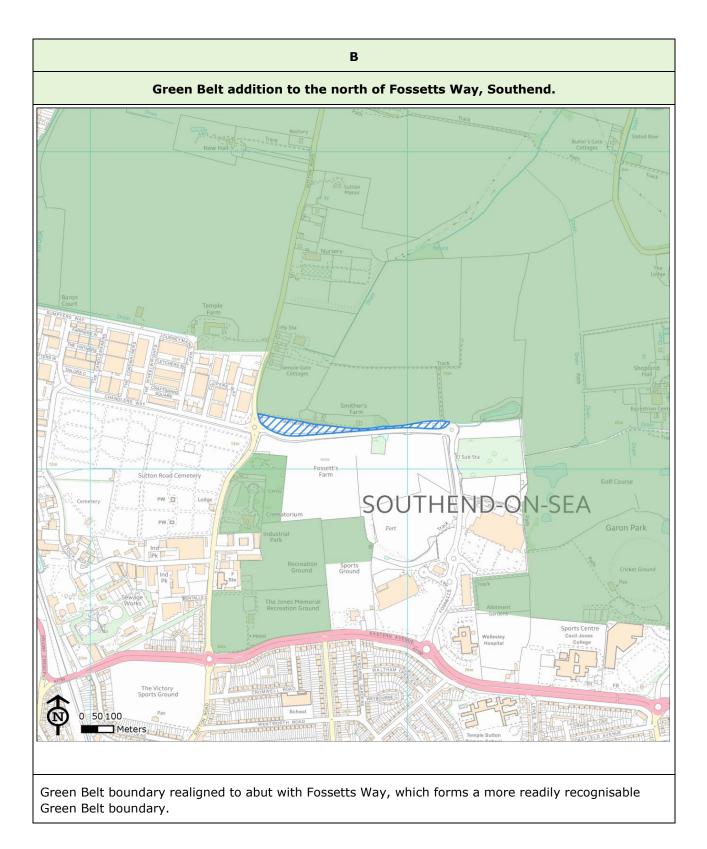
The Green Belt Review Part 2 and updated Part 2 assessed the Green Belt harm of releasing site options from the Green Belt. Each site assessment considered the harm of releasing the site, its impact on the remaining Green Belt, potential alternative Green Belt boundaries and opportunities to mitigate Green Belt harm.

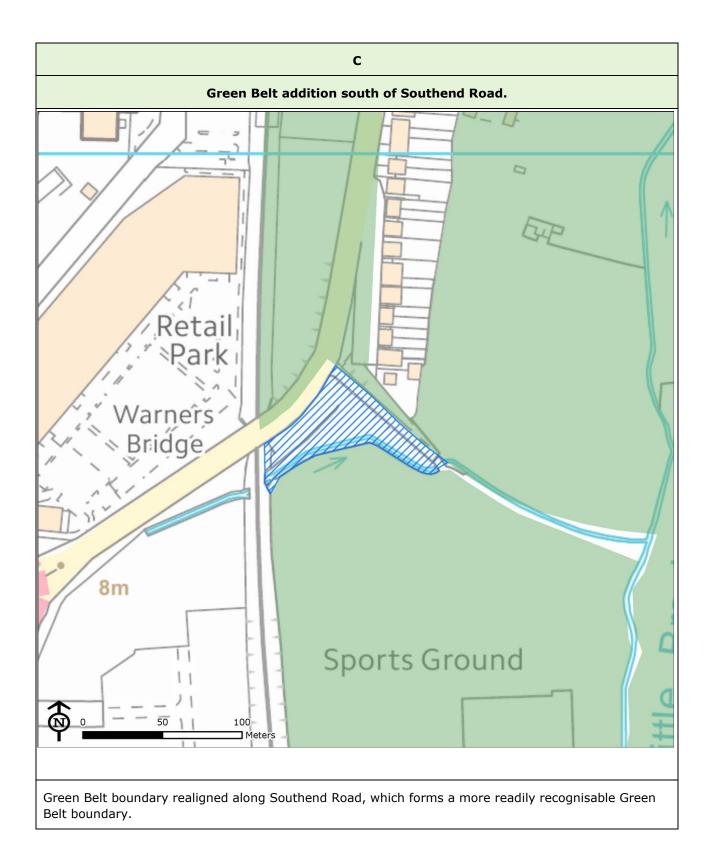
# Appendix 2

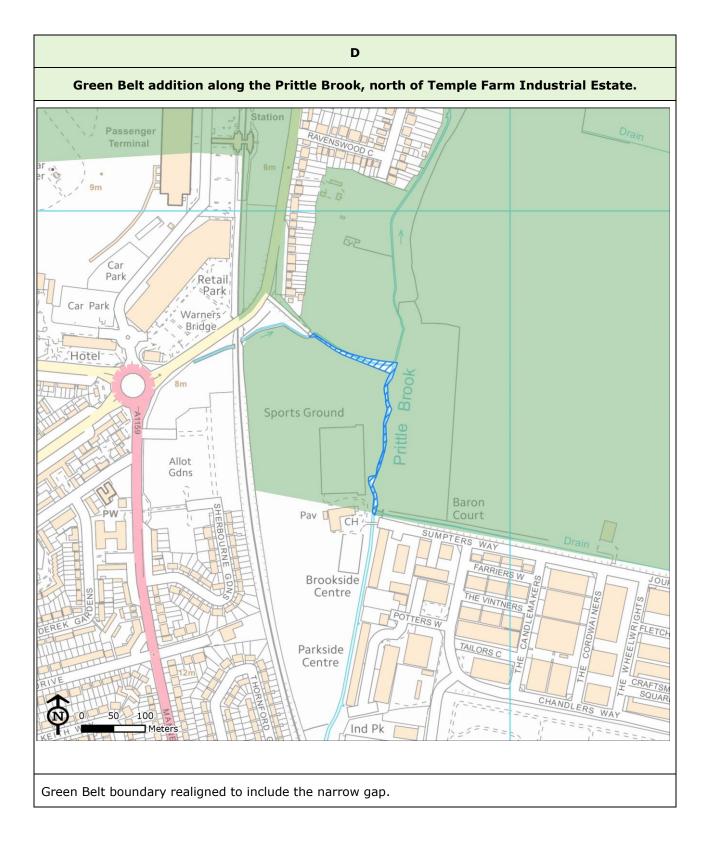
Potential Minor Green Belt Adjustments

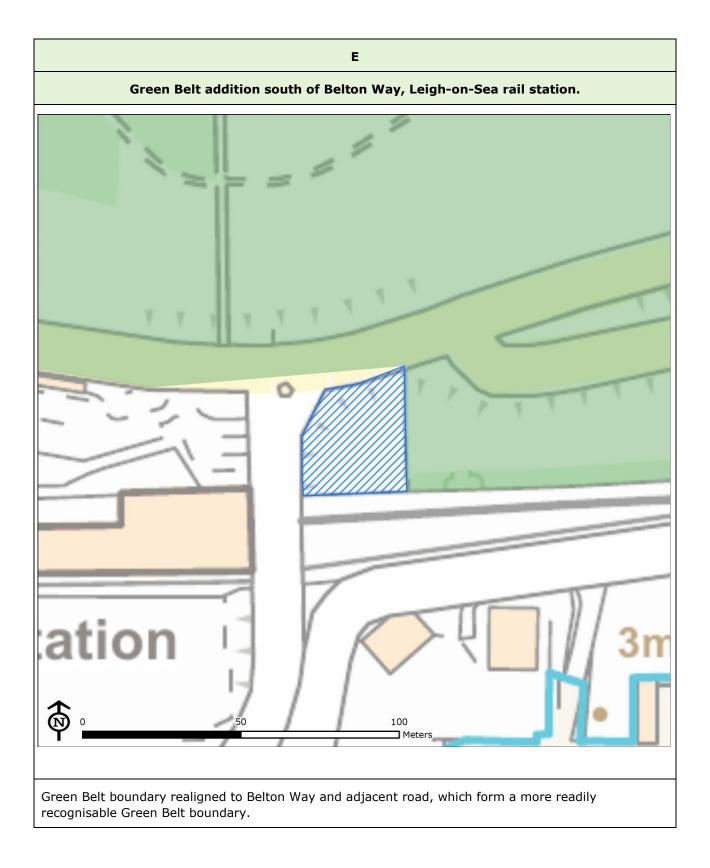


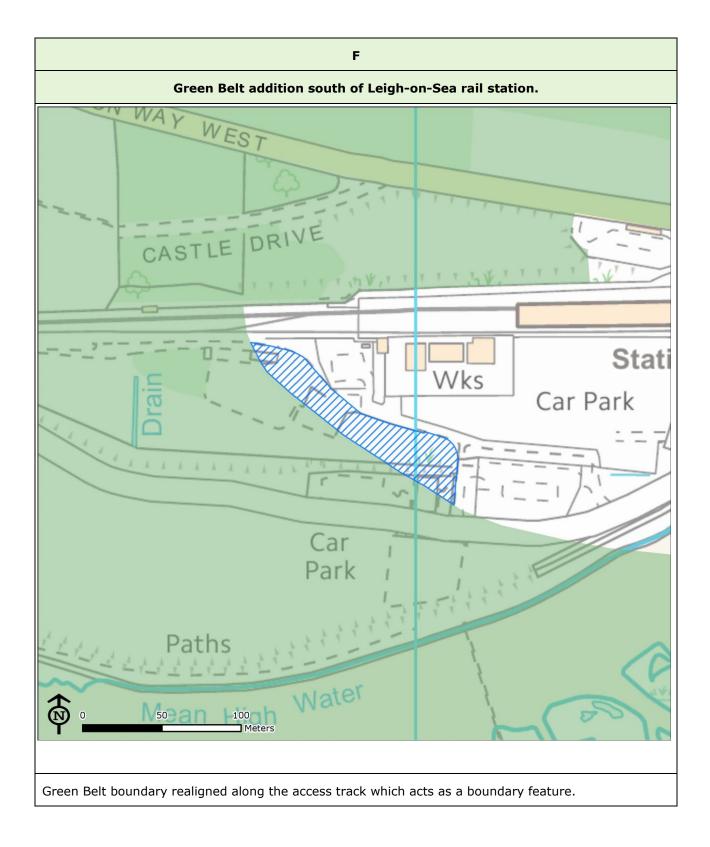
Green Belt boundary.





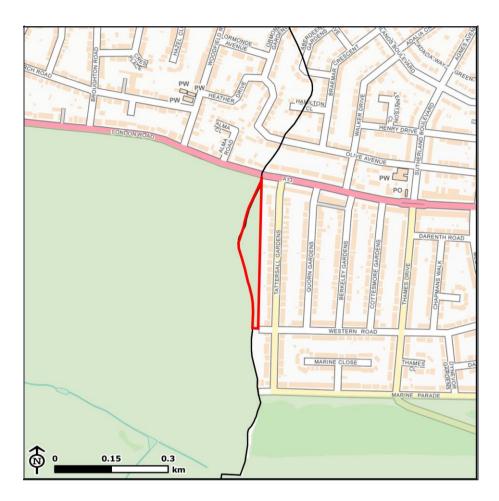






# **Appendix 3** Detailed Stage 1 Parcel Assessments

# **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Strong

#### Comments

Land is adjacent or close to the large built up area of Southend-on-Sea, it contains no significant urban development, and has strong openness. It relates strongly to the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Thin strip of land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Strong

#### Comments

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

Weak

#### Comments

Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Strong

#### Comments

Land is adjacent or close to the large built up area of Southend-on-Sea, it contains no significant urban development, and has strong openness. It relates strongly to the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Strong

#### Comments

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

Weak

#### Comments

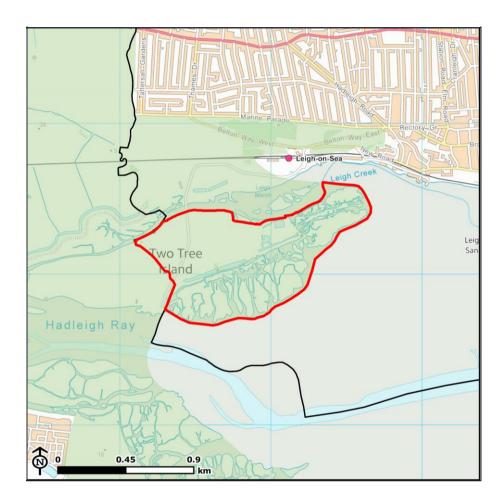
Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



### Purpose 1 - Check the unrestricted sprawl of large built up areas

Moderate

#### Comments

Land is close to the large built-up area of Southend-on-Sea however it is separated from it by Leigh Creek, limiting the potential for sprawl.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Strong

#### Comments

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

Weak

#### Comments

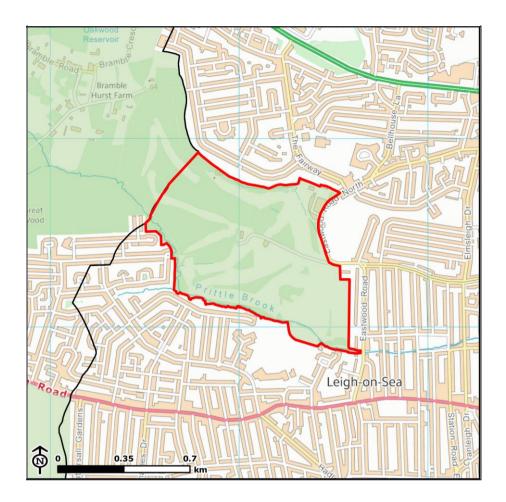
Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Strong

#### Comments

Land is adjacent to the large built up area of Southend-on-Sea, it contains no significant urban development and has strong openness.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Strong

#### Comments

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

Weak

#### Comments

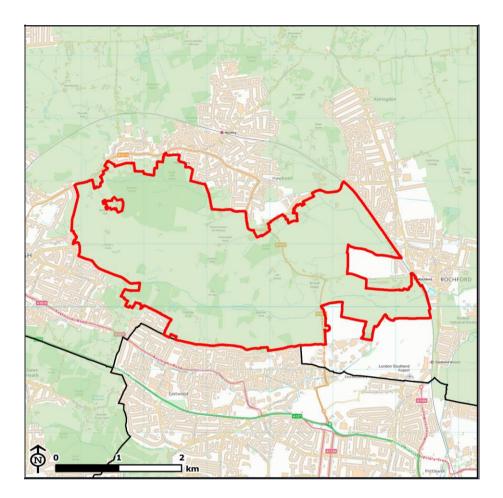
Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Strong

#### Comments

Land is adjacent to the large built up area of Southend-on-Sea, it contains no significant urban development and has strong openness. It relates strongly to the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Strong

#### Comments

Land forms a gap between Southend-on-Sea, Rayleigh, Hockley and Rochford and is essential to maintaining a sense of separation between them. The land is visually open.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Strong

#### Comments

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

Weak

#### Comments

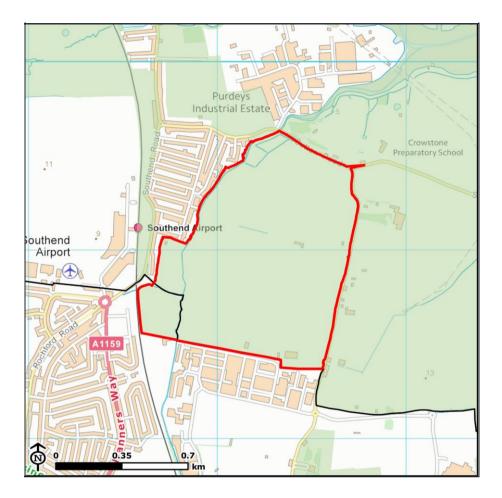
Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Strong

#### Comments

Land is adjacent or close to the large built up area of Southend-on-Sea, it contains no significant urban development, and has strong openness. It relates strongly to the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Strong

#### Comments

Land forms part of the gap between Southend-on-Sea and Rochford, and is essential to maintaining a sense of separation between them. The land is visually open with few separating features.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Strong

#### Comments

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

Weak

#### Comments

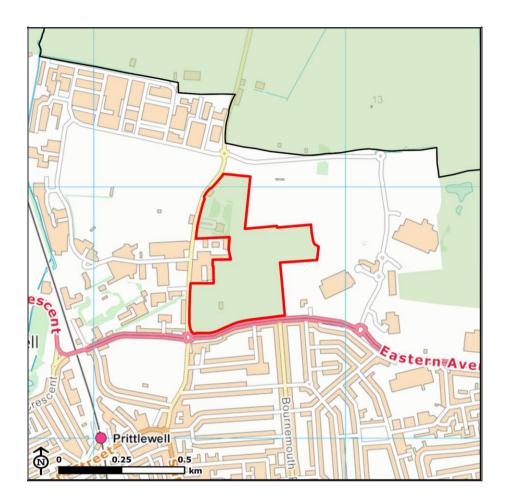
Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Weak

#### Comments

Land is completely enclosed by the large built up area of Southend-on-Sea and allocated land and therefore does not contribute to restricting sprawl.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Weak

#### Comments

While the land retains some openness it is enclosed by development and land allocated for development which restricts any relationship with the wider countryside and instead gives the land a stronger relationship with the urban area.

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

Weak

#### Comments

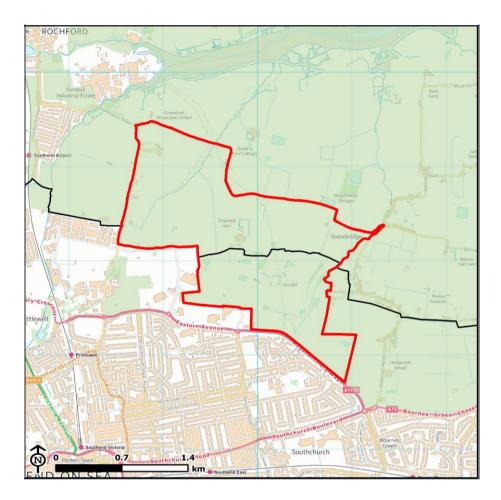
Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Strong

#### Comments

Land is adjacent to the large built up area of Southend-on-Sea, it contains no significant urban development, and has strong openness. It relates strongly to the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Moderate

#### Comments

Land lies to an extent between Southend-on-Sea and Rochford which are near each other, but lies where there is sufficient physical separation to prevent the coalescence of the towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Strong

#### Comments

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

Weak

#### Comments

Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Moderate

#### Comments

Land is close to the large built-up area of Southend-on-Sea, it contains some urban development in the form of a gym and some dwellings but retains a relatively strong sense of openness and some relationship with the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

# **Rochford and Southend Green Belt Study**

### Stage 1 - Parcel P72

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Moderate

#### Comments

Land retains some degree of openness but is compromised by urbanising development in the form of a gym and dwellings.

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

Weak

#### Comments

Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Moderate

#### Comments

Land is adjacent to the large built-up area of Southend-on-Sea, it contains some urban development in the form of a fitness club but retains a sense of openness and some relationship with the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Moderate

#### Comments

Land retains some degree of openness but is compromised by urbanising development in the form of a fitness club.

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

Weak

#### Comments

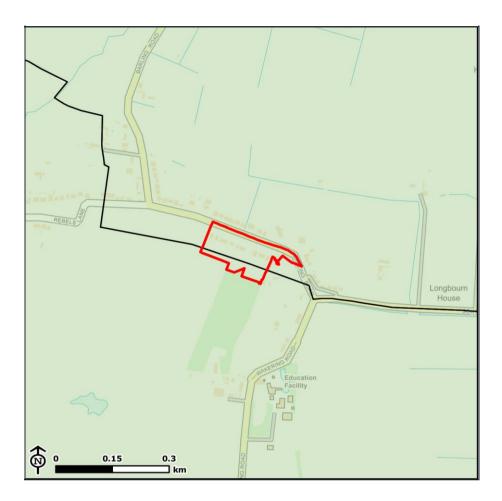
Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

## **Contribution to Green Belt purposes**



#### Purpose 1 - Check the unrestricted sprawl of large built up areas

Moderate

#### Comments

Land is close to the large built-up area of Southend-on-Sea, it contains some urban development in the form of dwellings, but retains a relatively strong sense of openness and some relationship with the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Moderate

#### Comments

Land retains some degree of openness but is compromised by urbanising development in the form of dwellings.

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

Weak

#### Comments

Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

# **Contribution to Green Belt purposes**



### Purpose 1 - Check the unrestricted sprawl of large built up areas

Moderate

#### Comments

Land is close to the large built-up area of Southend-on-Sea, it contains some urban development in the form of Thorpe Hall School but retains some relationship with the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Moderate

#### Comments

Land retains some degree of openness but is compromised by urbanising development (Thorpe Hall School) within it.

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

Weak

#### Comments

Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

All Green Belt land can be considered to support urban regeneration and it is not possible to distinguish which parcels perform this to a greater or lesser degree.

## **Contribution to Green Belt purposes**



## Purpose 1 - Check the unrestricted sprawl of large built up areas

Moderate

#### Comments

Land is close to the large built-up area of Southend-on-Sea, it contains some urban development in the form of Alleyn Court Preparatory School but retains some openness and some relationship with the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

## Purpose 3 - Assist in safeguarding the countryside from encroachment

Moderate

#### Comments

Land retains some degree of openness but is compromised by urbanising development (Alleyn Court Preparatory School) within it.

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

Weak

#### Comments

Land does not preserve the setting and special character of a historic town.

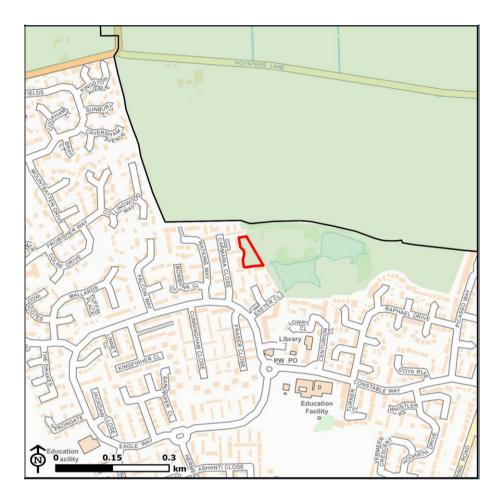
# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

All Green Belt land can be considered to support urban regeneration and it is not possible to distinguish which parcels perform this to a greater or lesser degree.

## **Contribution to Green Belt purposes**



## Purpose 1 - Check the unrestricted sprawl of large built up areas

Moderate

#### Comments

Land is adjacent to the large built-up area of Southend-on-Sea, it is to an extent contained by urban development to the north and south but retains a relatively strong sense of openness and some relationship with the wider countryside.

## Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Moderate

#### Comments

Land retains its openness and a relationship with the wider countryside however, it is contained by development on three sides which also gives the land a relationship with the urban edge.

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

Weak

#### Comments

Land does not preserve the setting and special character of a historic town.

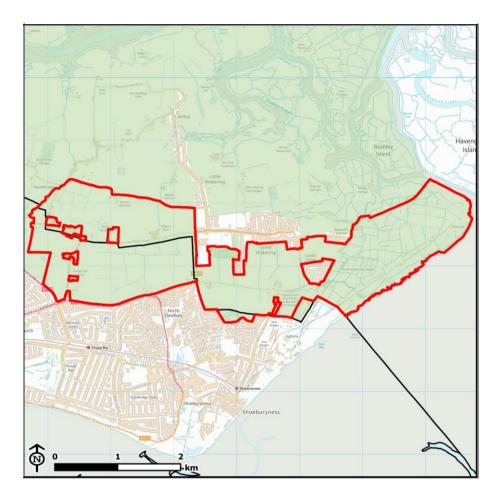
# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

All Green Belt land can be considered to support urban regeneration and it is not possible to distinguish which parcels perform this to a greater or lesser degree.

## **Contribution to Green Belt purposes**



## Purpose 1 - Check the unrestricted sprawl of large built up areas

Strong

#### Comments

Land is adjacent or close to the large built up area of Southend-on-Sea, it contains no significant urban development, and has strong openness. It relates strongly to the wider countryside.

#### Purpose 2 - Prevent neighbouring towns merging into one another

Weak

#### Comments

Land is not located within a gap between towns.

#### Purpose 3 - Assist in safeguarding the countryside from encroachment

Strong

#### Comments

Land contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.

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

Weak

#### Comments

Land does not preserve the setting and special character of a historic town.

# Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Strong

#### Comments

All Green Belt land can be considered to support urban regeneration and it is not possible to distinguish which parcels perform this to a greater or lesser degree.

# **Appendix 4** Detailed Stage 2 Assessments

## Stage 2 - Assessment Area AA122



## Description

The assessment area is located to the east of Temple Farm Industrial Site in the gap between Rochford and Southend-on-Sea. The assessment area consists of a crematorium, Sutton Park and Jones Memorial Recreation Ground in the west, and an open space with associated car parking and The Blues Training Ground in the east. The assessment area is bounded to the north by Fossets Way, Sutton Road to the west, the A1159 to the south and a hedgerow to the east. It should be noted that The Blues Training Ground and some open space in the north of the assessment area does not fall within the Green Belt, severing the Green Belt to the south from thw wider Green Belt.

## **Assessment Type**

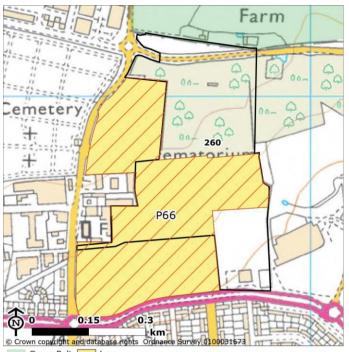
Urban Extension

## Sites falling within Stage 2 Site Assessment Area

260

## Stage 1 parcels that fall within Stage 2 Assessment Area

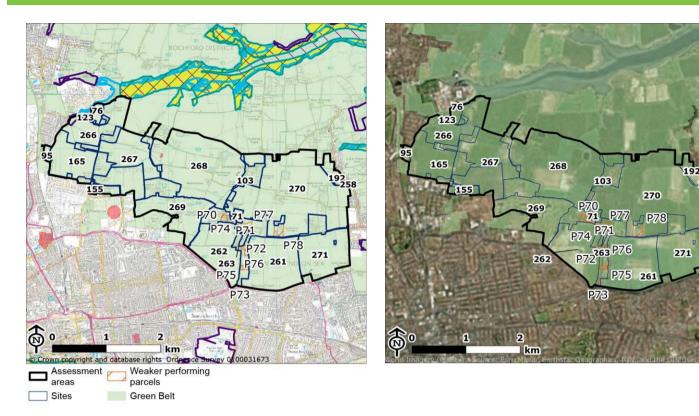
## Stage 2 - Assessment Area AA122



Green Belt \_\_\_\_ Low

Scenario	Justification	Score
Release of any land within the assessment area	The Green Belt land within the assessment area makes a weak contribution to all Green Belt purposes due to the fact that it is isolated within the urban area of Southend-on-Sea and has a limited relationship with the wider Green Belt. The assessment area is contained on three sides by urbanising development. Therefore, the release of this assessment area is not considered to weaken the integrity of any of the neighbouring Green Belt and would not increase containment of Green Belt elsewhere. The release of this Green Belt land would simplify the Green Belt boundary at the northern edge of Southend-on-Sea.	Low

## Stage 2 - Assessment Area AA135



## Description

The assessment area covers the large area of open Green Belt land north of Southend-on-Sea in between Rochford to the north west and Great and Little Wakering to the east. The centre of the area contains the washed over hamlet of Stonebridge and the associated washed over ribbon development along Wakering Road/Barling Road and Rebels Lane. These pockets of development are made up of a number of detached and semi-detached dwellings and their back gardens, plant nurseries and their associated glasshouses and polytunnels, Thorpe Hall School and Alleyn Court Preparatory School and a fitness centre off Wakering Road. The area also contains the Essex Golf Complex. The sites that fall within this large area generally consist of open agricultural fields with a strong relationship with the open countryside.

## **Assessment Type**

Urban Extension

#### Southend Sites falling within Stage 2 Site Assessment Area

261	
262	
263	
269	
271	
Rochford Sites falling with	nin Stage 2 Site Assessment Area
71	
76	
95	
103	
123	
155	
165	
192	
258	115

## Stage 2 - Assessment Area AA135

266

267

268

270

## Southend Stage 1 parcels that fall within Stage 2 Assessment Area

P70

- P71
- P72

P73

P74

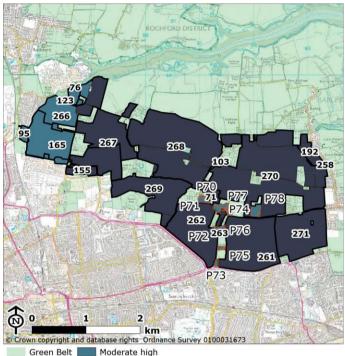
P75

P76

P77

## Rochford Stage 1 parcels that fall within Stage 2 Assessment Area

#### Stage 2 - Assessment Area AA135



High

#### Harm Assessment

#### Scenario

#### Justification

Release of whole assessment area or individual promoted Southend or Rochford sites

The assessment area makes a strong contribution to at least one of the first three Green Belt purposes, and the great majority to two, with the western most extent making a strong contribution to all three. The southern half makes a strong contribution to checking the unrestricted sprawl of the large built up area of Southend-on-Sea, the land to west of Sutton Road makes a strong contribution to preventing neighbouring towns (Southend-on-Sea and Rochford) from merging into one another, and almost the entirety of the area makes a strong contribution to safeguarding the countryside from encroachment. Overall, the release of the vast majority of the area will result in high harm. A cluster of areas along Wakering Road in the centre of the southern half of the area were rated as making a lower contribution to some of the Green Belt purposes and would result in slightly lower harm if released (due to the existing presence of washed over development). However, it is considered that if these areas were released in combination the harm of release would be significantly higher. These areas contain a couple of glasshouses and a number of polytunnels; however, these are not considered to be urbanising and the land on which they sit is otherwise open and undeveloped. The release of AA135 would represent significant urban sprawl into open land that has a strong relationship with the wider countryside; merging Southend with the inset villages of Great and Little Wakering to the east, further merging Southend with Rochford to the west and breaching the strong and regular existing Green Belt boundary formed of Royal Artillery Way and the A13. This would create a more irregular Green Belt boundary that would weaken the Green Belt to the north and east of the City within Rochford. The harm generally increases the greater the area of release, i.e. the

High

Score

## Stage 2 - Assessment Area AA135

Release of land to the

west of Sutton Road

performing Southend and Rochford parcels

P75, P76, P77 or P78 in

and/or the weaker

P71, P72, P73, P74,

isolation (not in

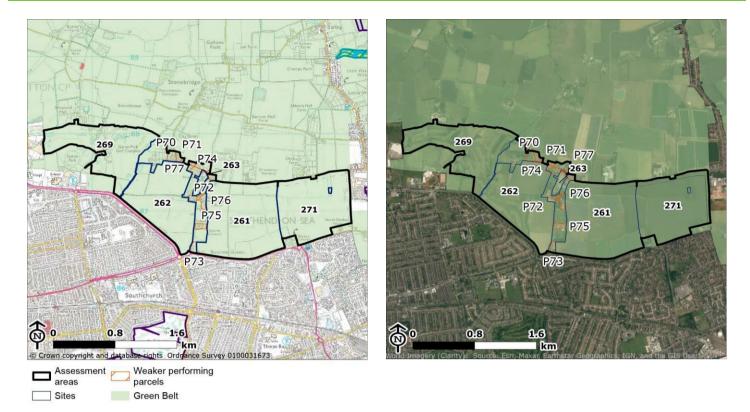
combination)

further away from the existing urban edge the new Green Belt boundary is located. The area likely to generate the least harm to the Green Belt is located to the west of Sutton Road where the Green Belt is contained on three sides by the inset urban edges of Southend-on-Sea, Rochford and the Purdey's Industrial Estate. Moving the outer boundary of the area east and north of Sutton Road is likely to result in higher harm where further release would have a more significant containing influence on adjacent Green Belt land. However, release of the land to the west of Sutton road would significantly increase the sense of coalescence of Rochford and Southend-on-Sea.

Release of the land to the west of Sutton Road is contained on three sides by the inset urban areas of Southend-on-Sea to the south, Rochford to the west and Purdey's Industrial Estate to the north. Consequently, with the exception of the Green Belt to the north west and south west, which would most likely be released alongside the area, limiting release to the land to the west of the road would minimise harm to adjacent Green Belt. Sutton Road is equally strong when compared to the existing Green Belt boundaries and would represent a more regular Green Belt boundary. However, release of the land to the west of Sutton road would significantly increase the sense of coalescence of Rochford and Southend-on-Sea. The weaker performing parcels represent pockets of washed over development that have an urbanising influence on the Green Belt but still maintain a strong relationship with the wider open countryside. The types of development include detached and semi-detached dwellings, a fitness centre, Thorpe Hall School and a large nursery / garden centre and aquatics centre. With the exception of P73 which is contiguous with the existing development east of Wakering Road, their release would result in an isolated inset area of development that would compromise adjacent Green Belt. In particular the justification for leaving the surrounding washed over development in the Green Belt would be reduced. Although the release of P73 would not result in a small inset area within the main body of the Green Belt, release of the parcel would breach the A13 which currently provides a regular and robust boundary along the northern edge of the inset settlement of Southend-on- Sea. This would compromise the strength of this boundary, create a more irregular Green Belt edge and weaken adjacent Green Belt, particularly to the east.

**Moderate-High** 

## Stage 2 - Assessment Area AA135a



## Description

The assessment area covers all promoted and Stage 1 lower performing land north of Southend-on-Sea but largely within the City administrative boundary, from the Garons Park Colf Complex in the west to Star Lane. Small portions of the northern-most promoted sites and lower performing areas cross the city boundary into Rochford up to Southend Road, in and around the development along Wakering Road/Barling Road/Rebels Lane and south east of Shopland Hall. The pockets of development are largely made up of detached and semi-detached dwellings and their back gardens, plant nurseries and their associated glasshouses and polytunnels, Thorpe Hall School and Alleyn Court Preparatory School and a fitness centre off Wakering Road. Outside of the developed areas and excluding the Golf Course the sites that fall within this large area generally consist of open agricultural fields with a strong relationship with the open countryside.

#### **Assessment Type**

Urban Extension

#### Sites falling within Stage 2 Site Assessment Area

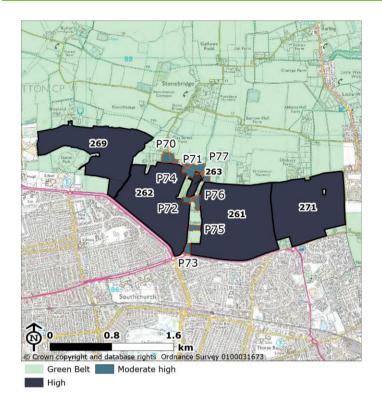
- 261 262 263
- 269
- 271

## Stage 1 parcels that fall within Stage 2 Assessment Area

P70 P71 P72 P73 P74 P75 P76

Stage 2 - Assessment Area AA135a

## Stage 2 - Assessment Area AA135a



Scenario	Justification	Score
Release of whole assessment area or individual promoted sites	The assessment area makes a strong contribution to at least one of the first three Green Belt purposes, and the great majority to two. The open areas make a strong contribution to checking the unrestricted sprawl of the large built up area of Southend-on-Sea and safeguarding the countryside from encroachment. Overall, the release of the vast majority of the area will result in high harm. A cluster of areas along Wakering Road in the centre of the area were rated as making a lower contribution to some of the Green Belt purposes and would result in slightly lower harm if released (due to the existing presence of washed over development). However, it is considered that if these areas were released in combination the harm of release would be higher. Part of the area contains a couple of glasshouses and a number of polytunnels; however, these are not considered to be urbanising and the land on which they sit is otherwise open and undeveloped. The release of AA135a would represent significant urban sprawl into open land that has a strong relationship with the wider countryside; merging Southend with the inset villages of Great and Little Wakering to the east and breaching the strong and regular existing Green Belt boundary formed of Royal Artillery Way and the A13. This would create a more irregular Green Belt boundary that would weaken the Green Belt to the north and east of the City within Rochford. The harm generally increases the greater the area of release, i.e. the further away from the existing urban edge the new Green Belt boundary is located.	High

## Stage 2 - Assessment Area AA135a

Release of the weaker performing parcels P70, P71,P72, P73, P74, P75, P76 or P77 in isolation (not in combination)

The weaker performing parcels represent pockets of washed over development that have an urbanising influence on the Green Belt but still maintain a strong relationship with the wider open countryside. The types of development include detached and semi-detached dwellings, a fitness centre and Thorpe Hall School . With the exception of P73 which is contiguous with the existing development east of Wakering Road, their release would result in an isolated inset area of development that would compromise adjacent Green Belt. In particular the justification for leaving the surrounding washed over development in the Green Belt would be reduced. Although the release of P73 would not result in a small inset area within the main body of the Green Belt, release of the parcel would breach the A13 which currently provides a regular and robust boundary along the northern edge of the inset settlement of Southend-on- Sea. This would compromise the strength of this boundary, create a more irregular Green Belt edge and weaken adjacent Green Belt, particularly to the east.

#### **Moderate-High**

## Stage 2 - Assessment Area AA140



#### Description

The assessment area lies to the north east of North Shoebury and consists of an open space with scattered trees. The assessment area is bounded to the east, west and south by a pavement, and by a patchy hedgerow to the north. The assessment area is accessible through Exeter Close and has a strong relationship with the settlement of North Shoebury.

## **Assessment Type**

Urban Extension

## Stage 1 parcels that fall within Stage 2 Assessment Area

## Stage 2 - Assessment Area AA140



Green Belt 📃 Moderate low

Scenario	Justification	Score
Release of any land within the assessment area	n The assessment area makes a moderate contribution to preventing the sprawl of the large built-up area and to preventing encroachment on the countryside. The assessment area is open with a strong relationship with Green Belt to the east. However, it also maintains a strong relationship with the adjacent settlement as it is contained on three sides with little distinction between settlement and countryside. The assessment area is predominantly contained by the existing edge of Southend-on-Sea to the north, west and south. Release of this assessment area would create a more consistent Green Belt boundary, yet would slightly increase containment of Friars Park to the east.	Low-Moderate

## Stage 2 - Assessment Area AA156



#### Description

The assessment area lies adjacent to the urban edge of Southend-on-Sea to the south. The assessment area is largely comprised of the Essex Golf Complex, although the area also extends further eastwards to include an open reservoir surrounded by woodland and a couple of large open fields. These large open fields to the east sit adjacent to pockets of residential development that form part of the washed over village of Stonebridge. With the exception of Wakering/Barling Road to the east, the area has relatively weak boundaries formed of the broken hedgerows of agricultural fields and the golf course. Consequently, the area has numerous uninterrupted views of the open views of the countryside to the north, east and west. Shopland Hall Equestrian Centre sits immediately to the north of the area. The Green Belt land to the south of the area comprised of an agricultural field, Garon Park, a portion of a large allotment and the open land to the north of Southend Leisure Centre lie in between the inset edge of Southend-on-Sea and the assessment area; however, the release of the surrounding promoted land to the north and east of the park would isolate the park and its surrounds from the Green Belt such that the park and its surrounds for the pocket of land in the northeastern quadrant of the area that falls in between but surrounded by sites 263, 269 and lower performing areas P70, P71, P72, P74 and P77. Site 263 is not a commercial garden centre enterprise and is predominantly glasshouses – an appropriate use in the Green Belt, and therefore does not affect openness.

## Assessment Type

Urban Extension

#### Sites falling within Stage 2 Site Assessment Area

262

263

269

#### Stage 1 parcels that fall within Stage 2 Assessment Area

P70 P71

P72

P74

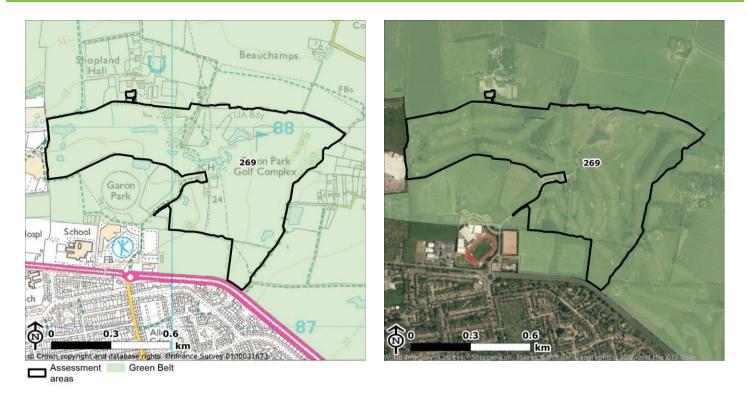
P74

## Stage 2 - Assessment Area AA156



Scenario	Justification	Score
Release of whole assessment area or individual promoted sites	The area makes a strong contribution to preventing the sprawl of the large built-up area of Southend (Purpose 1). The western half of the area, specifically the land west of the brook that flows to the west of Barling Road area is considered to make a moderate contribution to inhibiting the continued merging of the neighbouring towns of Rochford and Southend. The vast majority of the area makes a strong contribution to preventing encroachment on the countryside (Purpose 3); however, the developed pockets of Green Belt land south and west of Barling Road/Wakering Road are considered to make moderate contributions to this purpose. The assessment area is open, has a strong relationship with the wider countryside and has far reaching views of undeveloped land to the north. The release of Green Belt land within the area would represent a significant breach of the strong existing Green Belt boundary formed by Royal Artillery Way / Bournes Green Chase, significantly weakening the Green Belt to the north and east, but particularly to the east around the washed over village of Stonebridge and beyond.	High
Release of weaker performing parcels P70, P71, P72, P74 or P77 in isolation (not in combination)	These areas represent pockets of washed over development that have an urbanising influence on the Green Belt but still maintain a strong relationship with the wider open countryside. The parcels generally contain detached and semi-detached dwellings. Their release would result in an isolated inset area of development that would compromise adjacent Green Belt. In particular the justification for leaving the surrounding washed over development in the Green Belt would be reduced.	Moderate-High

## Stage 2 - Assessment Area AA156a



## Description

The assessment area lies adjacent to the urban edge of Southend-on-Sea to the south. The assessment area is largely comprised of the Garons Park Golf Complex. The woodland blocks at the outer edges of the golf course are punctuated by relatively weak boundaries formed of the broken hedgerows of agricultural fields. Consequently, the area has some uninterrupted views of the open views of the countryside to the north and east. Shopland Hall Equestrian Centre sits immediately to the north of the area. The Green Belt land to the south of the area comprised of an agricultural field, Garon Park, a portion of a large allotment and the open land to the north of Southend Leisure Centre lie in between the inset edge of Southend-on-Sea and the assessment area; however, the release of the surrounding promoted land to the north and east of the park would isolate the park and its surrounds from the Green Belt such that the park and its surrounds would also need to be released.

## **Assessment Type**

Urban Extension

## Sites falling within Stage 2 Site Assessment Area

269

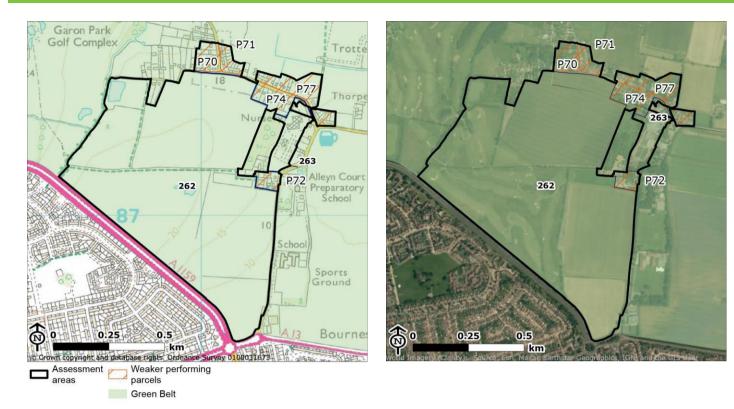
## Stage 2 - Assessment Area AA156a



Green Belt High

Scenario	Justification	Score
Release of whole assessment area or individual promoted sites	The area makes a strong contribution to preventing the sprawl of the large built-up area of Southend (Purpose 1) and to preventing encroachment on the countryside (Purpose 3). The assessment area is open, has a strong relationship with the wider countryside and has views of undeveloped land to the north. The release of Green Belt land within the area would represent a significant breach of the strong existing Green Belt boundary formed by Royal Artillery Way, significantly weakening the Green Belt to the north and east, but particularly to the East towards the washed over village of Stonebridge.	High

## Stage 2 - Assessment Area AA156b



## Description

The assessment area lies adjacent to the urban edge of Southend-on-Sea to the south. The assessment area is largely comprised of the Garon Park Golf Complex to the south west, open agricultural fields in its centre and pockets of residential development that form part of the washed over village of Stonebridge and its northern and eastern-most portions. Site 263 comprised is located to the south of the village and is comprised of non-commercial glasshouses and polytunnels that are appropriate uses in the Green Belt and therefore do not affect openness. Wakering/Barling Road to the east represents a consistent boundary but is breached by washed over development to the east and north beyond which are relatively weak boundaries. Mature trees screen views of the wider golf course to the west. The area has open views of the countryside to the north and east. Shopland Hall Equestrian Centre sits immediately to the north of the area. The pocket of land in the northeastern quadrant of the area that falls in between but surrounded by promoted sites and lower performing areas would need to be release in combination with the wider area to avoid it being isolated from the wider Green Belt.

## **Assessment Type**

Urban Extension

#### Sites falling within Stage 2 Site Assessment Area

262

263

#### Stage 1 parcels that fall within Stage 2 Assessment Area

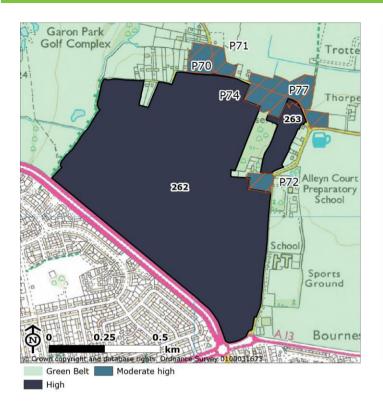
P70 P71

-20

P72

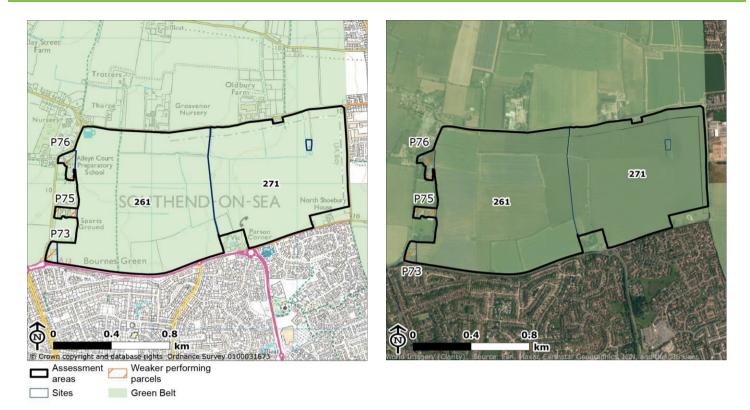
P74

## Stage 2 - Assessment Area AA156b



Scenario	Justification	Score
Release of whole assessment area or individual promoted sites	The area makes a strong contribution to preventing the sprawl of the large built-up area of Southend (Purpose 1) and to preventing encroachment on the countryside (Purpose 3); however, the developed pockets of Green Belt land south and west of Barling Road/Wakering Road are considered to make moderate contributions to these purposes. The assessment area is largely open, has open views of the wider countryside to the north and east. The release of Green Belt land within the area would represent a significant breach of the strong existing Green Belt boundary formed by Royal Artillery Way, merging Southend-on-Sea with the washed over village of Stonebridge and significantly weakening the Green Belt to the north and east, and increasing the urban containment of the wider golf course to the west.	High
Release of weaker performing parcels P70, P71, P72, P74 or P77 in isolation (not in combination)	These areas represent pockets of washed over development that have an urbanising influence on the Green Belt but still maintain a strong relationship with the wider open countryside. The parcels generally contain detached and semi-detached dwellings. Their release would result in an isolated inset area of development that would compromise adjacent Green Belt. In particular the justification for leaving the surrounding washed over development in the Green Belt would be reduced.	Moderate-High

## Stage 2 - Assessment Area AA158



## Description

The assessment area is comprised of large open agricultural fields. Washed over development within the area is limited to the western edge east of Wakering Road; however, the inset urban edges of Southend-on-Sea to the south and the inset village of Great Wakering to the east lie immediately adjacent to the area. The boundaries to the north and west of the area are formed by Southend Road and the wooded boundaries of Alleyn Court School and Thorpe Hall School along Wakering Road, respectively. The schools form part of the washed over village of Stonebridge, which continues along Barling Road to the north west. Although the village and schools limit views of the open countryside to the west, there are good open views of the open countryside to the north of Southend Road and east to what remains of the open land in between Great Wakering and Southend-on-Sea. Some of the land immediately north of Poynters Lane which follows the inset urban edge of Southend-on-Sea does not sit within the area. Consequently, the release of the assessment area would result in the isolation of two pockets of open Green Belt land in between the area and the urban edge of Southend-on-Sea. To avoid the isolation of these areas, it is envisaged that this land would also be released alongside any release to the north.

#### **Assessment Type**

Urban Extension

#### Sites falling within Stage 2 Site Assessment Area

261

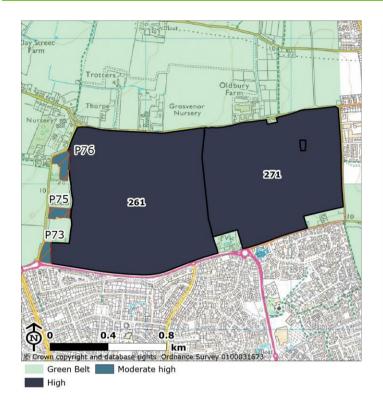
271

#### Stage 1 parcels that fall within Stage 2 Assessment Area

P73

P75

## Stage 2 - Assessment Area AA158



Scenario	Justification	Score
Release of whole assessment area or individual promoted sites	The vast majority of the area makes a strong contribution to preventing the sprawl of the large built- up area of Southend (Purpose 1) and preventing encroachment on the countryside (Purpose 3); however, the developed pockets of Green Belt land east of Wakering Road are considered to make moderate contributions to these purposes. The release of this assessment area would allow urban sprawl to breach northwards of the Bournes Green Chase Road onto Green Belt which is typically open and has a strong relationship with the wider countryside. The release of this assessment area would merge Southend-on-Sea to the south with the inset villages of Great and Little Wakering to the east and create a more irregular Green Belt boundary when compared to the existing strong Bournes Green Chase Road boundary. Furthermore, the release of the assessment area would weaken the integrity of the neighbouring Green Belt to the north in between the area, Little Wakering and Barling Road, to the east further containing the remaining open countryside in between Great Wakering and Southend- on-Sea and to the west around the washed over village of Stonebridge and beyond including the Essex Golf Complex.	

## Stage 2 - Assessment Area AA158

Release of weaker performing parcels P73, P75 or P76 in isolation (not in combination)

These areas represent pockets of washed over development that have an urbanising influence on the Green Belt but still maintain a strong relationship with the wider open countryside. The types of development include detached and semi-detached dwellings, a fitness centre, and two schools. With the exception of P73 which is contiguous with the northern edge of Southend-on-Sea, their release would result in an isolated inset area of development that would compromise adjacent Green Belt. In particular the justification for leaving the surrounding washed over development in the Green Belt would be reduced. Although the release of P73 would not result in a small inset area within the main body of the Green Belt, release of the parcel would breach the Bournes Green Chase Road which currently provides a regular and robust boundary along the northern edge of the inset settlement of Southend-on- Sea. This would compromise the strength of this boundary, create a more irregular Green Belt edge and weaken adjacent Green Belt, particularly to the east.

#### **Moderate-High**

## Stage 2 - Assessment Area AA158a



## Description

The assessment area is comprised of large open agricultural fields directly adjacent to the urban edge of Southend to the south. Small pockets of washed over development are located east of Wakering Road at the western edge of the area. The boundaries to the north and west of the area are formed by Southend Road and the wooded boundaries of Alleyn Court School and Thorpe Hall School along Wakering Road, respectively. The schools form part of the washed over village of Stonebridge, which continues along Barling Road to the north west. Although the village and schools limit views of the open countryside to the west, there are good open views of the open countryside to the north of Southend Road and east towards Great Wakering and Southend-on-Sea.

## **Assessment Type**

Urban Extension

## Sites falling within Stage 2 Site Assessment Area

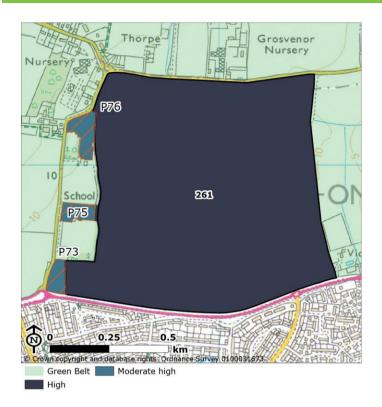
261

## Stage 1 parcels that fall within Stage 2 Assessment Area

P73

P75

## Stage 2 - Assessment Area AA158a



Scenario	Justification	Score
Release of whole assessment area or individual promoted sites	The vast majority of the area makes a strong contribution to preventing the sprawl of the large built- up area of Southend (Purpose 1) and preventing encroachment on the countryside (Purpose 3); however, the developed pockets of Green Belt land east of Wakering Road are considered to make moderate contributions to these purposes. The release of this assessment area would allow urban sprawl to breach northwards of Bournes Green Chase Road onto Green Belt which is typically open and has a strong relationship with the wider countryside. The release of this assessment area would merge Southend-on-Sea with the washed over village of Stonebridge to the north west. It would also create a more irregular Green Belt boundary when compared to the existing strong boundary formed by Bournes Green Chase Road. Furthermore, the release of the assessment area would weaken the integrity of the neighbouring Green Belt to the north in between the area, Little Wakering and Barling Road, to the east further containing the remaining open countryside in between Great Wakering and Southend-on-Sea and to the west around the washed over village of Stonebridge and beyond including the Essex Golf Complex.	

## Stage 2 - Assessment Area AA158a

Release of weaker performing parcels P73, P75 or P76 in isolation (not in combination)

These areas represent pockets of washed over development that have an urbanising influence on the Green Belt but still maintain a strong relationship with the wider open countryside. The types of development include detached and semi-detached dwellings, a fitness centre, and two schools. With the exception of P73 which is contiguous with the existing development east of Wakering Road, their release would result in an isolated inset area of development that would compromise adjacent Green Belt. In particular the justification for leaving the surrounding washed over development in the Green Belt would be reduced. Although the release of P73 would not result in a small inset area within the main body of the Green Belt, release of the parcel would breach the Bournes Green Chase Road which currently provides a regular and robust boundary along the northern edge of the inset settlement of Southend-on- Sea. This would compromise the strength of this boundary, create a more irregular Green Belt edge and weaken adjacent Green Belt, particularly to the east.

#### **Moderate-High**

## Stage 2 - Assessment Area AA158b



## Description

The assessment area is comprised of large open agricultural fields. There is not development within the area; however, the inset urban edges of Southend-on-Sea to the south and the inset village of Great Wakering to the east lie immediately adjacent to the area. The boundaries to the north and east of the area are formed by Southend Road and Star Lane, respectively. The area is relatively flat but there are some open views of the wider open countryside to the north, east and west. Some of the land immediately north of Poynters Lane which follows the inset urban edge of Southend-on-Sea does not sit within the area. Consequently, the release of the assessment area would result in the isolation of two pockets of open Green Belt land in between the area and the urban edge of Southend-on-Sea. To avoid the isolation of these areas, it is envisaged that this land would also be released alongside any release to the north. The same can be said for a small rectangular pocket of land in the northeastern quadrant of the area that falls outside its boundaries.

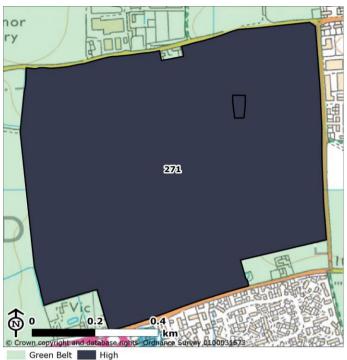
#### **Assessment Type**

Urban Extension

#### Sites falling within Stage 2 Site Assessment Area

271

## Stage 2 - Assessment Area AA158b



Green Belt 🗾 High

Scenario	Justification	Score
Release of whole assessment area	The area makes a strong contribution to preventing the sprawl of the large built-up area of Southend (Purpose 1) and preventing encroachment on the countryside (Purpose 3). The release of this assessment area would allow urban sprawl to breach northwards of the Bournes Green Chase Road onto Green Belt which is open and has a strong relationship with the wider countryside. The release of this assessment area would merge Southend-on-Sea to the south with the inset villages of Great and Little Wakering to the east and create a more irregular Green Belt boundary when compared to the existing strong Bournes Green Chase Road boundary. Furthermore, the release of the assessment area would weaken the integrity of the neighbouring Green Belt to the north in between the area, Little Wakering and Barling Road, to the east further containing the remaining open countryside in between Great Wakering and Southend-on-Sea and to the west towards the washed over village of Stonebridge.	High

# Appendix 5

Method Statement Consultation Record

A method statement setting out the context behind and how the assessment of Green Belt was to be undertaken was circulated for consultation in October 2018 under the duty to cooperate.

Consultees including neighbouring local planning authorities, the Environment Agency, Historic England and Natural England were invited to submit written comments before the methodology for the study was finalised.

The written submissions received are summarised below.

Consultee	Comments
Basildon Borough Council	Thank you for the opportunity to comment on the Method Statement for Rochford and Southend's the emerging Green Belt Study. Following a review of the document Basildon Council does not wish to make any comments.
Chelmsford City Council	Thank you for opportunity for Chelmsford City Council (CCC) to review the Joint Green Belt Study Method Statement dated October 2018. Please note this is an officers response to the consultation. The Council has reviewed the methodology and has limited comments to make at this stage. It is noted that the methodology for reviewing the Green Belt will take place in a two-stage process. Stage 1 – Strategic Green Belt Assessment and Stage 2 – focussed green belt parcel/site assessment. It is considered that the methodology for the Green Belt study is reasonable and follows a best practice approach. It is noted that there will also be an assessment of the potential for designating new Green Belt. The Council welcomes the recognition of South Woodham Ferrers as a significant settlement within close proximity of the study area as noted under paragraph 2.28, as meeting the definition of 'towns' for the study. This will help to ensure that the purpose of the Green Belt to prevent neighbouring towns from merging into one another is maintained. The Council understands that the study will help inform the Green Belt and allocations within the Local Plan. The Council welcomes the opportunity to comment on further stages of the study and as the Local Plan as they progress.
Historic England	Thank you for your e-mail inviting Historic England to respond to the Rochford District and Southend-on-Sea Borough Joint Green Belt Study Method Statement. We regret that we do not have the capacity to comment specifically at this time. We do however recommend that the advice of your local authority conservation and archaeological staff is sought as they are best placed to advise on local historic environment issues and priorities, including access to data, indicate how historic assets may be impacted upon by the Plan, the design of any required mitigation measures and opportunities for securing wider benefits for the future conservation and management of the historic environment. If you have specific questions relating to the historic environment that cannot be answered by your local conservation and archaeological specialists, please contact Historic England's regional Historic Places Team, who can be reached on 01223 582749. Although we have not been able to provide a substantive response at this stage, this does not mean that we are not interested in further iterations of the document. Please note that we may still advise on, and potentially object to, any specific development proposal(s) which may subsequently arise from this or later versions of the documents subject to the consultation. Please do not hesitate to contact us if you have any questions.

Consultee	Comments
Maldon District Council	No comments
Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England has no comments to make on the Rochford and Southend Green Belt Study. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document. If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.



Southend Sites	Stage 1 Parcel	Stage 2 Assessment Area
260	P66	AA122
261	P84	AA135, AA135a, AA158, AA158a
262	P68, P84	AA135, AA135a, AA156, AA156a, AA156b
263	P74, P84	AA135, AA135a, AA156, AA156b
269	P68	AA135, AA135a, AA156, AA156a
271	P84	AA135, AA135a, AA158, AA158b