



# Southend-on-Sea Green Belt Assessment

## Southend-on-Sea Council

### **Final report**

Prepared by LUC

September 2026

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# Chapter 1

## Introduction

**1.1** LUC was commissioned by Southend-on-Sea City Council (SCC) to undertake an assessment of Green Belt land across the local authority area. This will form part of the evidence base for the Council's emerging local plan in order to inform the process of identifying and proposing sites for allocation. This will replace previous Green Belt studies that were prepared for SCC.

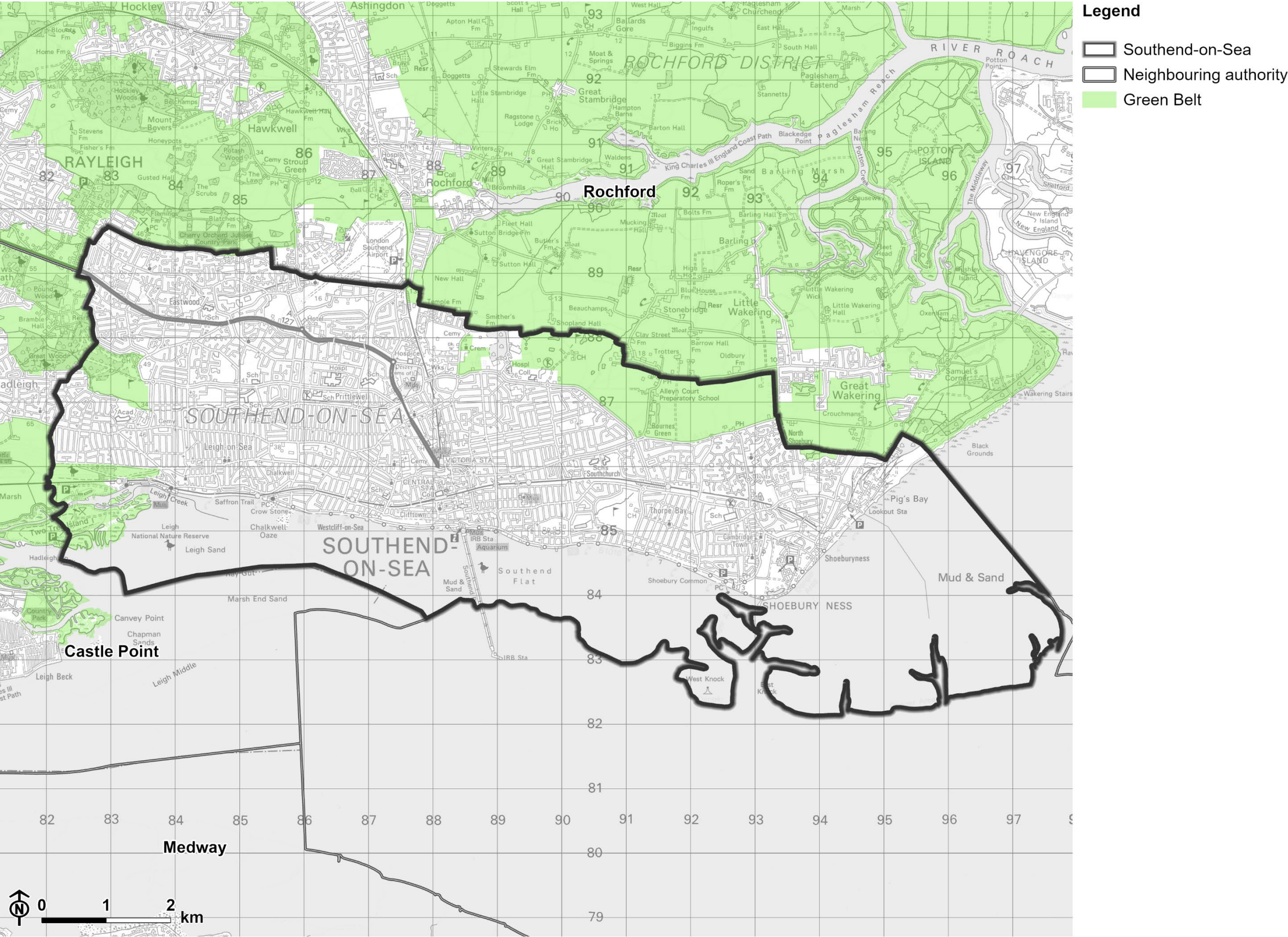
**1.2** The Southend Green Belt is located on the eastern edge of the London Metropolitan Green Belt, and its Green Belt land is historically linked to the wider Essex Green Belt. Green Belt policies were set out by SCC in 1994 following the Southend Borough Local Plan (1994). Amendments to the Green Belt policy have since been made through the adopted Southend Core Strategy (2007) and the Green Belt boundaries reflect on the Policies Map for the Development Management DPD (2015).

**1.3** There are a number of policy requirements and changes that necessitate undertaking a new Green Belt Assessment:

- In 2024, updated affordability and housing stock data led to revised Local Housing Need figures. This increased local housing need in Southend and therefore the number of new dwellings the Council is expected to plan for.
- In December 2024 the Government introduced significant changes to national policy on Green Belt within the National Planning Policy Framework (NPPF) and in February 2025 changes were made to the relevant sections of Planning Practice Guidance (PPG) with guidance provided on the definition of 'Grey belt' and the methodology for undertaking Green Belt Assessments.
- Following these significant changes, the NPPF was revised in August 2026. The updated national policy continues to require development plan-making and decision-making policies to be supported by relevant and up-to-date evidence. The council's previous Green Belt evidence predates the changes to national Green Belt policy introduced in the December 2024 NPPF, the February 2025 PPG, and the August 2026 NPPF, and therefore requires review and updating.

**1.4** The purpose of the Green Belt assessment is to determine how land within the Southend Green Belt performs against the purposes of the Green Belt consistent with the requirements of the NPPF and PPG. SCC has also provided locations of potential development sites to be considered as part of the assessment process.

Figure 1.1: Green Belt context



Created by LUC - 15695\_002\_SouthEnd\_Green\_Belt\_Overview/15695\_r1\_Fig2\_1\_Context 20/08/2026  
Contains Ordnance Survey data © Crown copyright and database rights, Ordnance Survey license number AC0000807432. © MHCLG 2026.

**1.5** The assessment will form part of a wider evidence base that, taken together, will help inform the development of the Southend-on Sea Local Plan. The purpose of the assessment is not to identify land that is suitable for development or set out the necessary exceptional circumstances for releasing land from the Green Belt. This will be considered by the Council in due course considering a wide range of evidence relating to wider sustainability and viability considerations.

**1.6** The remainder of this report is structured as follows:

- **Chapter 2** sets out planning policy in relation to Green Belt, with particular reference to the recent changes to the NPPF and PPG. It also outlines the origins of the Green Belt in Southend-on-Sea and provides a summary of previous Green Belt studies.
- **Chapter 3** outlines the proposed assessment methodology.
- **Chapter 4** summarises the findings of the assessment of contribution to the Green Belt purposes.
- **Chapter 5** suggests next steps that should be considered, if it is necessary to identify potential development allocations in the Green Belt.
- **Appendix A** sets out a glossary of key terms
- **Appendix B** provides background information to the Historic Towns assessment methodology (relevant to the assessment of Purpose D).
- **Appendix C** provides a summary of the consultation undertaken with neighbouring authorities to understand any cross boundary methodological issues.
- **Appendix D** sets out the list of minor Green Belt boundary adjustments recommended following the previous Green Belt Assessment.
- **Appendix E** provides the detailed contribution assessments, with supporting text, map and aerial view, for each identified parcel of Green Belt land.
- **References**

It should be noted that this report is in an 'Accessible format', which means it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018), as set out in the Web Content Accessibility Guidelines (WCAG 2.2). This means it must have larger font and larger spacing between lines and headings.

## Chapter 2

# Planning Policy Context

**2.1** This chapter sets out the planning policy context relating to the definition and assessment of Green Belt and grey belt in relation to Green Belt assessments. It also provides a summary of the origins of the Southend Green Belt and previous Green Belt studies that were prepared.

## National Green Belt policy

**2.2** Government policy on the Green Belt and grey belt is set out in chapter 13 of the NPPF 'Protecting Green Belt land' [See reference 1]. The Government attaches great importance to Green Belt, and for this reason there is a detailed policy framework for both the review of Green Belt for plan-making policies and for determining planning applications for development within the Green Belt.

### Aims and purposes

**2.3** The NPPF states that “the objective of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential features of which are their openness and permanence”.

**2.4** This is elaborated on in NPPF policy GB2: Assessing existing Green Belt land, which states that Green Belts may serve five purposes, as set out below:

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

**2.5** The NPPF explains that development in the Green Belt is inappropriate unless covered by one of the exceptions set out in policy GB7: Development which is not inappropriate in the Green Belt (see Glossary in Appendix A). Policy GB6 sets out that inappropriate development is by definition harmful to the Green Belt and that, when considering planning applications, ‘substantial weight’ should be given to any harm to the Green Belt, including harm to its openness.

## Altering and Defining Green Belt Boundaries

**2.6** Policy GB3: Altering existing Green Belt boundaries states that Green Belt boundaries should only be altered through the preparation or updating of plans where exceptional circumstances are fully evidenced and justified. Exceptional circumstances in this context include a local planning authority being unable to meet its identified need for development in full, having examined all other reasonable options for doing so. Notable reasonable options include:

- a) “making as much use as possible of suitable previously developed and underutilised land;
- b) optimising the density of development in accordance with the policy L1; and
- c) assessing whether sufficient suitable sites can be identified outside the Green Belt.”

**2.7** Policy GB3 goes on to state that “where a development plan’s spatial strategy has identified suitable land around well connected stations for development, exceptional circumstances do not need to be demonstrated to justify altering Green Belt boundaries.”

**2.8** Policy GB4: Defining Green Belt boundaries states that “when defining Green Belt boundaries, whether as a result of altering or establishing Green Belts, local plans should:

- a) Only include land which it is necessary to keep permanently open as Green Belt;
- b) Include villages within the Green Belt where it is necessary to restrict development because of the important contribution the open character of the village makes to the openness of the Green Belt. Such villages should not be identified as ‘settlements’ for the purpose of the spatial strategy in the development plan;
- c) Use other, more relevant, policy approaches, such as conservation area designation where the character of a village needs to be protected for other reasons;
- d) Demonstrate that new Green Belt boundaries are broadly consistent with the spatial strategy for accommodating growth and meeting development needs across the plan area and adjoining areas, including those of any relevant spatial development strategies. This includes ensuring that any alterations to Green Belt boundaries promote sustainable patterns of development, including by:

- i. Giving priority to the release of previously developed land within the Green Belt, then to grey belt land which is not previously developed, and then other Green Belt locations, so long as this promotes a sustainable pattern of development overall; and
  - ii. Not proposing alterations where there is clear evidence these alterations would fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan.
- e) Ensure that allocations for major development involving the provision of housing on land released from the Green Belt can meet the Golden Rules, as set out in policy GB8, and that these requirements are set out within the local plan;
- f) Ensure Green Belt boundaries are defined clearly, using physical features that are readily recognisable and likely to be defensible; and
- g) Identify areas of safeguarded land, where necessary to meet longer-term development needs well beyond the plan period. It should be made clear that safeguarded land is not allocated for development at the present time (and does not form part of settlements), and that its status will change only when the plan is updated and proposes that the land is released for development.

## Grey belt

**2.9** As noted above, the NPPF indicates that, after considering previously developed land, grey belt land should be prioritised for release in order to meet development need. The NPPF's policies regarding development proposals in the Green Belt also indicate, at policy GB7, that development will not be inappropriate if it would utilise grey belt land, as long as:

- It would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- There is an evidenced unmet need for the type of development proposed;
- The development would be in a sustainable location, with particular reference to policy TR3 of this Framework ; and
- In the case of major development involving the provision of housing, the development proposed complies with policy GB8.

**2.10** The concept of 'grey belt' was introduced into the NPPF in December 2024. It is defined in Annex B of the NPPF as "land in the Green Belt comprising previously developed land and/or any other land that, in either case, **does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2.**

**2.11** The definition of grey belt is important because one of the main purposes of the Green Belt Assessment will be to determine the extent to which land within the Green Belt contributes to the purposes (a-e) set out at policy GB2 of NPPF. In turn, this will then identify grey belt land that does not make a strong contribution to purposes a, b or d.

**2.12** The NPPF states that inappropriate development is, by definition, harmful to the Green Belt, including to its openness and should not be approved except in very special circumstances. Development in the Green Belt is inappropriate unless it falls within one of the categories in policy GB7.

## Consultation on revised NPPF

**2.13** In December 2025, the Ministry of Housing, Communities and Local Government (MHCLG) published a wide range of proposed reforms to the NPPF and other changes to the planning system. A consultation on these reforms was undertaken until March 2026 and MHCLG subsequently published a new version of the NPPF in August 2026.

**2.14** This Green Belt assessment was undertaken prior to the publication of the August 2026 NPPF. The revised NPPF does not however introduce any changes that affect the Green Belt contribution assessment methodology set out in this report. However, an amendment to the definition of 'grey belt' means that the requirement to consider the 2024 NPPF's footnote 7 constraints (other than Green Belt) has been removed. As this change has been implemented, there is no longer need to classify certain areas in the Green Belt Study as 'provisional' grey belt pending further assessment of whether development would have a significant impact on footnote 7 areas or assets.

**2.15** Importantly, this change does not negate the need to consider the impact of specific development proposals on footnote 7 areas and assets alongside wider sustainability considerations, it simply removes its inclusion as part of the definition of grey belt. As the guidance note describing the proposed NPPF changes set out, the revised definition "seeks to enable grey belt to be identified with greater certainty, whilst continuing to ensure that these areas receive the same level of protection as elsewhere in the Framework." The study contains maps showing footnote 7 designation. Although these designations are no longer used to determine whether grey belt is 'provisional', the Local Authority has requested their inclusion to help inform future sustainability considerations.

## Annex E: Green Belt assessments

**2.16** The NPPF's Green Belt policies are supplemented by Annex E: Green Belt assessments on Green Belt planning and how to assess Green Belt land. This section of the NPPF was previously set out in the National Planning Practice Guidance (PPG) which was substantially re-written in February 2025. It states that Green Belt assessments should:

“a. Identify the location and appropriate scale of the area or areas to be assessed, and in doing so:

- i. Consider all Green Belt within the plan area in the first instance;
- ii. Be broadly consistent with any Strategic Green Belt assessment in an adopted Spatial Development Strategy;
- iii. Ensure assessment areas are small enough to enable variations in their contribution to the Green Belt purposes to be assessed;
- iv. Facilitate identifying areas of grey belt by subdividing areas into smaller assessment units where this is necessary; and
- v. Consider where it may be appropriate to vary the size of assessment areas based on local circumstances. For example, the assessment of smaller areas may be appropriate in certain places, such as around existing settlements or public transport hubs or corridors.

b. Identify areas of grey belt land, as defined in the glossary at Annex B, by evaluating the contribution each assessment area makes to Green Belt purposes (a), (b) and (d) set out in policy GB2, using the [illustrative criteria set out in Annex E].

c. Identify whether the release or development of the assessment area(s) would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan.”

### Grey belt assessment criteria

**2.17** Annex E sets out illustrative criteria for assessing the contribution of land to Green Belt Purposes A, B and D. These criteria are intended to assist in evaluating the performance of assessment areas against the relevant Green Belt purposes and provide illustrative features that may indicate a strong, moderate or weak contribution. These criteria are discussed further in Chapter 3, where they have informed the assessment methodology for this Green Belt assessment.

## Assessing the impact of Green Belt release or development on the remaining Green Belt across the Plan area

**2.18** Annex E requires that Green Belt assessment should not be limited to the impact of release or development of grey belt land but any Green Belt land, and requires consideration of whether the release or development of assessment areas would fundamentally undermine the five Green Belt purposes, taken together, of the remaining Green Belt when considered across the area of the plan.

**2.19** The Planning Practice Guidance provides further clarification on this requirement. It states that Green Belt locations should only be discounted for release or development where they would “affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way” (PPG Paragraph: 008 Reference ID: 64-008-20250225).

## The appropriate scale of Green Belt assessments

**2.20** Authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances. Local circumstances may dictate, for example, the need for smaller assessment areas in locations where there is greater variation in contribution to the Green Belt purposes, or greater potential for sustainable development, such as around existing settlements or public transport hubs or corridors.

**2.21** Villages should not be defined as large built-up areas, towns or historic towns. Where there are no historic towns in or adjacent to a plan area, it may not be necessary to provide detailed assessments against Purpose D.

## Planning Practice Guidance

**2.22** The Planning Practice Guidance (PPG), updated in February 2025, provides supporting guidance on the application of Green Belt policy and Green Belt assessments. Whilst key assessment requirements are now set out in Annex E of the NPPF, the PPG continues to provide additional guidance that is relevant to the preparation of Green Belt assessments

**2.23** The PPG states that strategic planning authorities, local planning authorities, and groups of local planning authorities should produce a Green Belt assessment during the preparation or updating of Local Plans and Spatial Development Strategies that set the strategic context for the release of land where this would be required to meet development needs.

## Assessing Green Belt land to identify grey belt land

**2.24** Authorities must identify grey belt land as part of the necessary review and alteration of Green Belt boundaries in order to:

- prioritise it over other Green Belt locations through the plan-making process, and
- help determine planning applications on Green Belt land in line with policy GB7.

**2.25** Importantly, the guidance is clear that “where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt, or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the area’s adopted Plan and the NPPF” (PPG Paragraph: 001 Reference ID: 64-001-20250225), including consideration of whether:

- development is sustainably located;
- whether it would meet the ‘Golden Rules’ contribution (where applicable); and
- whether there is a demonstrable unmet need for the type of development proposed.

**2.26** The identification of grey belt land is only one consideration in decisions relating to Green Belt land. Decisions on whether land should be allocated, released from the Green Belt or developed should also be informed by the wider development plan, national policy and sustainability considerations.

## Identifying sustainable locations in a Green Belt

**2.27** Irrespective of the outcomes of reviewing Green Belt boundaries, when determining applications in the Green Belt or identifying appropriate locations for development in a Local Plan, the need to promote sustainable patterns of development remains an important consideration. These principles should help determine whether a site's location is appropriate for the type of development proposed. Accordingly, the identification of land as grey belt does not in itself indicate that it is suitable for development.

**2.28** The sustainability of specific locations should be determined in light of local context and site or development-specific considerations. Thus, in plan making, the fit of locations with the principles of sustainability will take into consideration factors

such as: local geography; infrastructure and connectivity; the specific settlements characteristics and function; climate change; effective use of land; and other relevant constraints and opportunities, including the natural and built environment, physical characteristics, legal covenants, and opportunities for environmental improvement. Furthermore, authorities are required to seek to prioritise sustainable transport solutions in line with NPPF policy TR1.

## Impact of development on the openness of the Green Belt

**2.29** PPG pre-dating the introduction of grey belt states that, where necessary, assessments of the impact of proposals on the openness of the Green Belt must be tailored to the circumstances of the case and may include consideration of a proposal's:

- spatial volume, i.e. impact on spatial openness;
- visual impact, i.e. impact on visual openness;
- the duration of development, and its remediability; and
- the degree of activity, such as traffic generation.

**2.30** Although relating to development proposals, this guidance can help inform judgements relating to the impact that existing development has on Green Belt openness, which is one of the factors that needs to be considered when assessing contribution to the Green Belt purposes.

## Southend Local Plan policies

**2.31** Current local plan policies predate the recent revisions to the NPPF.

**2.32** The Southend-on-Sea development plan is currently formed of the Core Strategy (2007), the Development Management Document (2015), the Central Area Action Plan (2018), Airport Joint Area Action Plan (2014), Waste Local Plan and a number of saved policies from the former Borough Local Plan. Together these documents set the development planning framework for the city until the adoption of the emerging Southend New Development Plan.

**2.33** The Council is actively preparing a replacement Local Plan, and its "*Preferred Approach with Options (2025)*" consultation explicitly considers the release or re-allocation of Green Belt land, especially to the north of Southend.

## Previous Green Belt Studies

**2.34** The Southend Green Belt was last reviewed in 2020 as part of a joint assessment with the District of Rochford [See reference 2]. In 2024, a version including only Southend Green Belt sites and providing updates in national guidance and case law was published, which pre-dates the introduction of the concept of “grey belt” and therefore a further assessment was required.

## Chapter 3

### Assessment Methodology

**3.1** This chapter sets out the methodology undertaken for the Southend Green Belt Assessment, with reference to key planning policy, practice guidance and case law. Annex E (outlined above in Chapter 2) is particularly relevant to this chapter.

#### General approach

**3.2** The assessment analysed the contribution that identified parcels of land make to each of the five purposes of the Green Belt (A to E). Contribution to Purposes C and E are not relevant to the identification of grey belt, but Purpose C in particular is still an important consideration in planning decisions related to the Green Belt, particularly in scenarios involving the potential release or development of Green Belt land that is not defined as grey belt land.

**3.3** Assessment outputs also:

- Reference and map potential development sites that are located within the Green Belt; and
- Comment, in general terms, on whether there is scope for mitigation measures (other than reduction in the proposed development area) to reduce the harm to the Green Belt purposes that would result from site development.
- Map the designations identified in footnote 7 of the December 2024 NPPF. Although these designations are no longer used to determine whether grey belt is 'provisional', the Local Authority has requested their inclusion to help inform future sustainability considerations.

**3.4** Parcels have been defined to reflect variations in contribution to the Green Belt purposes, rather than predefined, and so do not necessarily reflect the boundaries of potential development sites. A set of assessment output maps are included in Chapter 4 which overlay the potential development site boundaries onto the mapping of the parcel outlines, the grey belt and highest contribution to the Green Belt purposes.

**3.5** Having assessed contribution to the Green Belt purposes, and commented on specific sites, conclusions were drawn on any potential for development of the identified sites to fundamentally undermine those purposes across the plan area as a whole.

## The location and scale of assessment areas

**3.6** Annex E states that Green Belt assessments should identify an appropriate scale of areas to be assessed that ensures clear variations in contribution to the Green Belt purposes, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances.

**3.7** Local circumstances may dictate, for example, the need for smaller parcels in areas where there is greater variation in contribution to the Green Belt purposes, or greater potential for sustainable development, such as around existing settlements or public transport hubs or corridors. In this study, LUC identified ‘parcels’ of land which have not been predefined but instead used an analysis process to identify variations in contribution to the purposes, with parcel areas defined to reflect those variations. The defined parcels are the final product of the assessment, reflecting the range of variations in Green Belt contribution to the Green Belt purposes.

**3.8** Parcels vary in size depending on the range of factors (within and in their immediate vicinity) affecting their contribution. For example, parcels closer to urban areas are likely to be subject to a greater range of factors influencing their contribution compared to more remote areas in the open countryside, resulting in smaller ‘parcels’ at urban edges and larger ‘outer areas’ in the open countryside respectively.

**3.9** Parcel boundaries typically follow readily recognisable physical features, including natural features such as waterways and water bodies, woodlands and topographical features, and manmade features such as roads and railway lines and field boundaries) where possible. This is an approach that LUC has successfully used in all its recent Green Belt assessments and has been considered robust by inspectors at Local Plan Examinations. The benefits of this approach are that:

- it avoids misleading results where predefined areas have variations in contribution within a parcel that are averaged out.
- it enables the potential development sites to be overlaid on the findings of the Green Belt assessment to get a clear understanding of the contribution they make to the Green Belt purposes without the need for further evaluation (unless the sites are less than one hectare in size – see below for further information on the granularity of the assessment).

**3.10** Contribution to Purposes C and E is not relevant to the identification of grey belt but Purpose C in particular is still an important consideration in Green Belt planning decisions, particularly in scenarios involving the release of Green Belt land that is not defined as grey belt land. Purpose C and E have also been assessed in this study.

**3.11** The granularity of the study in terms of the resultant number of identified assessment parcels has been influenced by the rating scale and defined minimum parcel size of one hectares.

## Rating scale

**3.12** Annex E is not prescriptive in terms of the definition of rating scales but, for the purposes of identifying grey belt land, it provides illustrative examples of features which would characterise ‘strong’, ‘moderate’ and ‘weak/no’ levels of contribution to the relevant Green Belt purposes (A, B and D). To minimise complexity, this assessment of Green Belt land has followed the rating scale referenced in Annex E.

**3.13** Even where grey belt areas are defined through the study, a plan area’s growth needs, other locationally specific development requirements, the need for development to be in sustainable locations, and the specific constraints and opportunities of sites, may still require consideration of the release of Green Belt land that does not meet the grey belt definition. Therefore, Green Belt purposes C and E must also be rated.

**3.14** The release and/or development of strongly contributing Green Belt land is harder to justify, but NPPF policy GB7 makes it clear that more sustainable greenfield sites (such as around train stations) on higher-performing Green Belt land can still be considered for allocation or permission where Exceptional or Very Special Circumstances are demonstrated to apply.

**3.15** The splitting of land which does not perform strongly into two levels – moderate and weak/no – is in line with Annex E on grey belt and has helped, alongside sustainability considerations, to inform more nuanced judgements as to what land should be considered for release and development within lower contributing, including grey belt, locations.

## Minimum parcel size

**3.16** The number of parcels which has resulted from the analysis process has been influenced by setting a minimum parcel size. The higher the minimum parcel size, the greater the likelihood that smaller areas may exist within a parcel that perform less strongly in relation to one or more of the Green Belt purposes than the parcel as a whole.

**3.17** In order to make the outputs useful for development management purposes and to reduce the likelihood of more localised variations in Green Belt contribution being

identified at a later stage, the minimum parcel size for the assessment has been defined as one hectare.

**3.18** This enables potential strategic development sites to be displayed over the findings of the Green Belt assessment to get a clear understanding of the contribution they make to the Green Belt purposes without the need for further evaluation (unless the sites are less than one hectare in size). It ensures that the Council can have confidence that the findings of the Green Belt assessment are applicable to sites / locations of one hectare or more.

## NPPF footnote 7 areas and assets

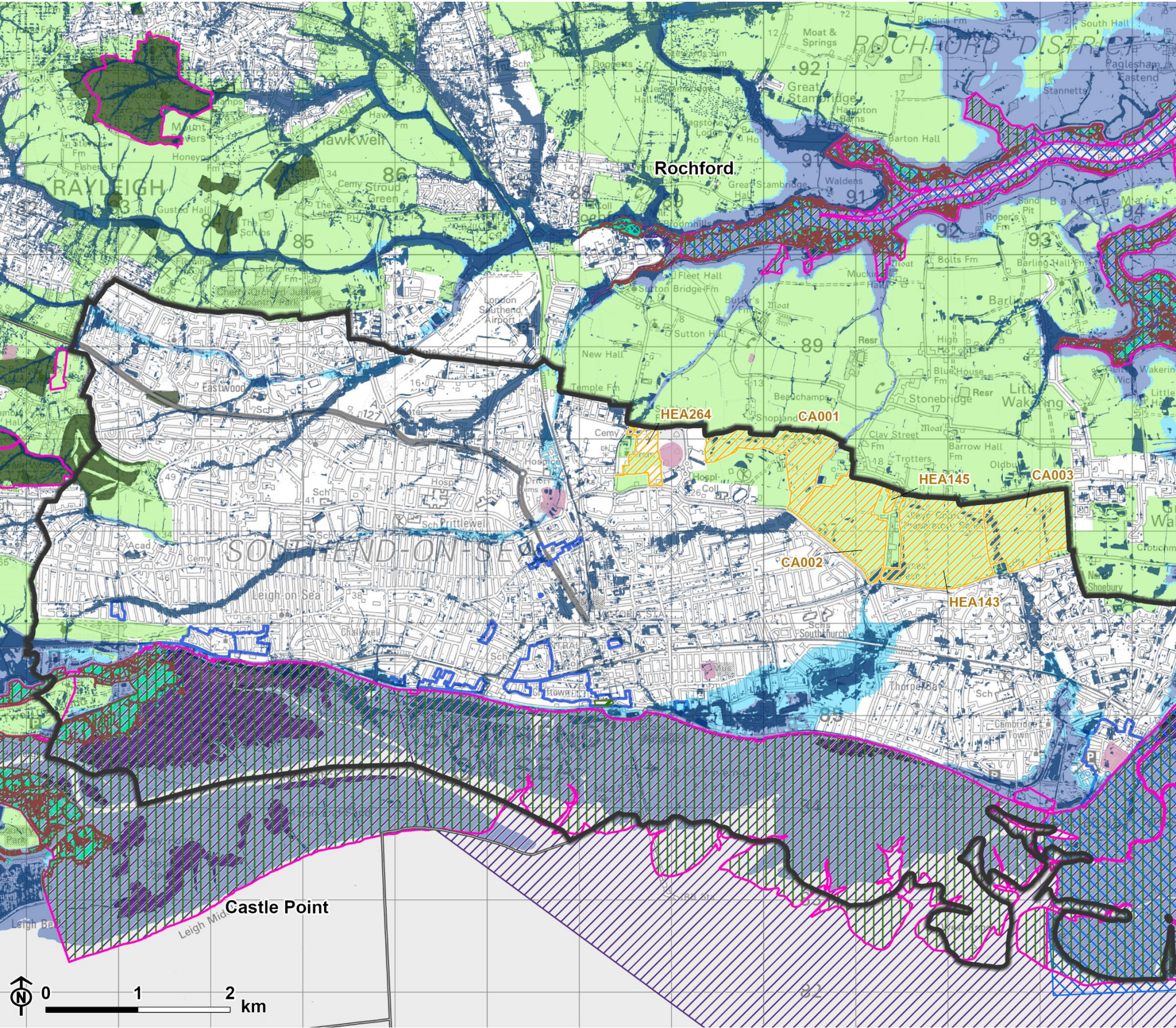
**3.19** The August 2026 NPPF amended the grey belt definition such that consideration of the 2024 NPPF's footnote 7 designations [\[See reference 3\]](#) are no longer relevant. Due to the timing of the production of this study, LUC has mapped the relevant footnote 7 areas and assets in Southend, but this has not been used to identify what grey belt land is 'provisional grey belt' as there is no longer a need to do so. The Council requested that the footnote 7 constraints were included to assist them with future sustainability considerations.

**3.20** The following designations in the Green Belt around Southend have been included on the mapping:

- Special Areas of Conservation (SAC) – include possible SACs;
- Special Protection Areas (SPA) – including potential SPAs;
- RAMSAR sites – including proposed RAMSAR sites;
- Sites of Special Scientific Interest (SSSI);
- Marine Conservation Zones;
- Irreplaceable habitats [\[See reference 4\]](#);
- Scheduled Monuments;
- Registered Parks and Gardens;
- Conservation Areas;
- Listed Buildings;
- Heritage Coast; and
- Flood risk areas – including Flood Zones 2 and 3, surface water and ground water flood risk areas.

**3.21 Figure 3.1** below maps the extent of these designations across the Southend Plan area.

Figure 3.1: Designations



Legend

- Southend-on-Sea
- Neighbouring authority
- Green Belt
- Potential development site
- NPPF Footnote 7 designations**
- Special Area of Conservation
- Special Protection Area
- Ramsar site
- Site of Special Scientific Interest
- Ancient woodland
- Coastal saltmarsh
- Saltmarsh
- Seagrass
- Marine Conservation Zone
- Conservation area
- Scheduled monument
- Registered Parks and Gardens
- Risk of surface water flooding
- Flood zone 2
- Flood zone 3

**NPPF Footnote 7 designations:**  
NPPF Footnote 7 designations not listed and mapped in this figure are generally not located within the Southend-on-Sea or local data sets were not readily available. Listed Buildings have not been included to improve legibility. These assets may provide a strong reason for refusing or restricting development and should therefore be reviewed separately. The locations of these assets are illustrated in parcel proforma. Note that where present, saltmarsh is mapped, which could support spartina saltmarsh swards and mediterranean saltmarsh scrub irreplaceable habitats, but further site specific study may be required to identify these accurately.

## Previously developed land

**3.22** The NPPF defines grey belt ‘as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2.’ The definition makes it clear that only previously developed land (PDL) that does not make a strong contribution to the Green Belt purposes can be defined as grey belt land, i.e. that PDL in isolation is insufficient justification to define Green Belt land as grey belt. This is supported by recent appeal decisions directly relevant to the matter [\[See reference 5\]](#).

**3.23** The NPPF glossary defines Previously Developed Land (PDL) as “Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed but where provision for restoration has been made through development management procedures (including development related to minerals extraction, waste disposal by landfill and renewable and low carbon energy development, where provision for restoration exists); land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

**3.24** The majority of significant (larger than one hectare) activities and land uses that qualify for definition as PDL will likely be defined as making less than a strong contribution to Green Belt purposes A, B and D (by virtue of their urbanising influence and/or effect on the openness of the Green Belt) and therefore fall within defined grey belt locations through the strategic assessment process. Some PDL such as large areas of fixed surface infrastructure may in certain locations maintain a strong sense of openness such that they make a strong contribution to Green Belt purposes A, B or D and are not eligible for definition as grey belt land.

**3.25** PDL and grey belt at a scale less than one hectare in area has not been identified through this strategic assessment.

## Assumed future development

**3.26** The assessment process assumes that land adjacent to, but inset from, the Green Belt that is not currently developed will, unless constrained by footnote 7

designations, be developed in the future. When assessing the relationship between urban and open land, such areas are therefore treated as though already developed, with the assumption that existing Green Belt edge boundary features will be retained.

**3.27** Similarly, where land within the Green Belt has consent (or a resolution to grant consent) for major development, it is assumed that this will proceed, resulting in a loss of openness but with the retention of existing boundary features. No consideration has been given to specific development proposals or associated landscaping.

## Parcel assessment process

**3.28** A flow diagram illustrating the steps in defining and assessing Green Belt parcels is shown in Figure 3.2.

**Figure 3.2: Stages of the parcel assessment process**



### Step 1: Analysis of relationship between urban and open land

**3.29** Working outwards from the settlement edge, the analysis process identified variations in the relationship between urban and open land. A series of paragraphs, under the heading ‘description’, sets out these findings in a consistent manner for each identified parcel:

- The first paragraph comments on boundary features between the urban area and the parcel, giving an indication of their strength. Features such as woodlands, major roads and rivers would typically be considered strong boundary features, and consistency of a distinctive boundary feature over distance also adds to its strength. Where a parcel does not lie directly adjacent to an urban area there may be a number of ‘layers’ of boundary feature to consider. Hedgerows (unless containing a strong component of mature trees),

garden fence-lines or minor roads (unless combined with strong hedgerows) are considered weak boundaries.

- The second paragraph notes any changes in landform which strengthen the sense of separation from the urban area. A sharp change in slope or crossing of a ridgeline are examples of changes in landform which would significantly increase sense of separation from an urban area.
- The third paragraph summarises the degree of urbanising influence from defined urban areas, taking into consideration the above plus any other relevant factors, such as the scale of development in the settlement and the distance between the parcel and the settlement edge.
- The fourth paragraph comments on the extent of development and/or activity in the Green Belt that would increase urbanising influence. Locations above the minimum parcel size (1ha) which lack openness, and therefore make no contribution to the Green Belt purposes, are noted. These would generally be considered previously developed land (PDL), but there are also areas of land meeting the definition of 'previously developed' that still retain some openness and therefore still perform a role in relation to one or more of the Green Belt purposes. The NPPF's definition of grey belt makes it clear that only PDL that does not make a strong contribution to the Green Belt purposes can be defined as grey belt land (this is supported by recent case law [\[See reference 6\]](#)).
- The final paragraph notes the relationship between the parcel and the wider Green Belt, with reference to visual connectivity and the role of natural or built features in limiting this relationship.

**3.30** Overlaying lines that mark variations in the overall strength of relationship with urban areas, together with consideration of variations in the relevance of each Green Belt purpose, will result in the definition of parcels which each make a consistent level of contribution to each assessed Green Belt purpose.

**3.31** The paragraphs below identify the factors relevant to the assessment of each of the Green Belt purposes and detail the assessment outputs specific to each purpose.

## Step 2: Assess contribution to each purpose

Purpose A – to check the unrestricted sprawl of large built-up areas

### NPPF Annex E illustrative criteria for Purpose A

**3.32** The following features in combination have been identified as being illustrative of a **‘strong’** contribution:

- Absence of existing development.
- Proximity to a large built-up area.
- Lack physical features in reasonable proximity that could restrict and contain development.
- A location which, if developed, would form an incongruous pattern in relation to the large built-up area.

**3.33** The presence of one or more of the following features, in addition to being near to a large built-up area, have been identified as being illustrative of a **‘moderate’** contribution to Purpose A:

- Presence of, or containment by, development such that any new development would not result in an incongruous pattern of development.
- Being subject to other urbanising influences.
- Having physical feature(s) in reasonable proximity that could restrict and contain development.

**3.34** Either lack of proximity to a large built-up area or the presence of, or containment by, significant existing development, has been identified as being illustrative of a **‘weak/no’** contribution to Purpose A.

### Purpose A definitions

**3.35** Annex E uses several terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

### **‘Large built-up area’**

**3.36** Annex E states that ‘villages should not be considered large built-up areas’. The implication of this is that towns and cities are large built-up areas.

**3.37** The Southend Green Belt forms part of the Metropolitan Green Belt surrounding Greater London, preventing the sprawl of the city. However, the Green Belt within Southend 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 as well as the merging of the settlements in the wider area.

**3.38** All settlements defined as towns and cities have been treated as large built-up areas. In SCC this includes:

- Southend-on-Sea.

**3.39** In neighbouring local authority areas, this includes:

- Basildon;
- Canvey Island;
- Hadleigh;
- Hockley merged with Hawkwell;
- Rayleigh;
- Rochford merged with Ashingdon;
- South Benfleet;
- South Woodham Ferrers; and
- Wickford.

### **‘Near to’**

**3.40** Purpose A is relevant to land which is ‘adjacent or near to’ a large built-up area. The extent to which land in the vicinity of a large built-up area relates to it is a question of judgement based on a range of factors including:

- Distance proportional to the size and proximity of large built-up areas.
- Features that create a sense of physical and/or visual separation.
- Features that weaken the sense of separation through physical and/or visual connection.

■ Urbanising development and activity within the Green Belt.

**3.41** Although villages are not large built-up areas, villages or other distinct settlement areas that lack significant separation from or are relatively close to a large built-up area as a result of one or more of the factors outlined above are considered to be near to a large built-up area. Land between such a settlement (which can be termed a ‘satellite’) and the large built-up area, as defined above, will contribute to Purpose A. Where the gap between a satellite and the large built-up area is very fragile, expansion of the satellite away from the large built-up area would also be considered sprawl associated with the large built-up area.

**3.42** The point beyond which Green Belt land is not considered to be ‘near to’ a large built-up area is where development, whether it be the expansion of existing villages or the creation of new settlements would be sufficiently distinct from the large built-up area as to not be perceived as sprawl associated with it.

**‘Free of existing development’**

**3.43** ‘Existing development’ has not been considered to include the appropriate development ‘exceptions’ listed in NPPF policy GB7, such as agricultural buildings, which case law [\[See reference 7\]](#) generally considers does not affect the openness of the Green Belt.

**3.44** ‘Free of’ is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on the basis of a combination of an area’s visual and spatial openness.

**‘Physical features in reasonable proximity...that could restrict and contain development’**

**3.45** Many features could be considered to define the edge of a developed area, including features created in association with new development, but the concept of ‘restricting’ and ‘containing’ development is considered to relate to the extent to which new development would be prevented from having an urbanising influence on land immediately beyond by intervening physical features. Urbanising influence (defined under the header ‘other urbanising influences’ directly below) is one of the factors identified in Annex E as being indicative of a ‘moderate’ contribution to Purpose A. If adjacent land which currently makes a ‘strong’ contribution to Purpose A would, as a result of increased urbanising influence, make a weaker contribution, such that it became grey belt, then physical features would not be deemed to ‘restrict and contain’ development.

**3.46** For the purposes of a strategic assessment of existing Green Belt land, this judgement has been based on existing physical features in reasonable proximity of existing urban areas, without consideration of potential strengthening of boundaries that could be associated with particular development proposals. Physical features that restrict and contain development would typically be:

- strong natural landscape elements such as woodlands or changes in topography, which limit views or create a stronger sense of separation between urban and open land; or
- natural or manmade features that present a physical barrier to movement, and which have some visual screening role, such as tree-lined rivers or canals, motorways and railway lines with embankments, or main roads with strong boundary vegetation.

**3.47** Such features are not considered to restrict and contain development if they emanate out from a large built-up area.

**3.48** As assessment parcels are defined to reflect variations in contribution to the Green Belt purposes, physical features that restrict and contain development are typically parcel boundaries. Where this is the case, they have been judged to be in reasonable proximity. The question of the extent to which a physical feature that is some distance away would limit impact on undeveloped Green Belt land is more likely to arise when harm of the release of a specific site is being addressed.

#### **‘Enclosed by existing development’ (‘partially’ or ‘largely’)**

**3.49** The extent to which land can be considered to be enclosed by development is a judgement which depends on the strength of the existing development’s urbanising influence on neighbouring Green Belt land and the strength of the neighbouring Green Belt land’s physical and/or visual relationship with the wider countryside. The greater the proportion of a defined Green Belt area’s boundary that adjoins urban development (whether that is inset from the Green Belt or washed-over by it) the greater its enclosure. Strong urban edge boundary features which limit urbanising influence can limit a sense of enclosure or containment by adjoining development, as long as there is some sense of connectivity with the wider countryside. Conversely, a lack of physical and visual connectivity with the wider countryside can increase the sense of enclosure, even if urban development around a Green Belt area is not strongly visible.

### **‘Other urbanising influences’**

**3.50** Separate to the consideration of existing development within the Green Belt, ‘other urbanising influences’ could be land use or activity without development which is generally associated with urban areas, or it could be an urbanising influence from adjacent development, either inset within the Green Belt or outside but adjacent to Green Belt land.

**3.51** The PPG refers to activity in the Green Belt, such as traffic generation, having an impact on openness. In some cases, there may be land uses which, although appropriate and not therefore affecting openness, still have an association with the urban area that constitutes a degree of urbanising influence. Notable examples could include sport and recreational playing fields or “*large areas of fixed surface infrastructure such as large areas of hardstanding [that have not blended into the landscape]*”, the latter of which is defined in the NPPF as PDL.

**3.52** The urbanising influence of renewable energy and power infrastructure has been judged on a case-by-case basis based on their permanence and scale of fixed surface infrastructure, such as large areas of hardstanding, associated with them. For example, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore have not been judged as notable urbanising influences affecting contribution to the Green Belt purposes in perpetuity, whereas permanent substations set on fixed surface infrastructure, do affect the contribution to the Green Belt purposes over the long term.

**3.53** The strength of urbanising influence associated with such areas depends on a number of factors, including the presence or lack of intervening physical boundary features, the scale/visibility of development in the associated urban area, landform change, distance from the existing urban edge and strength of relationship with the wider countryside.

### **‘An incongruous pattern of development’**

**3.54** Annex E cites an extended ‘finger’ of development into the Green Belt as an example of an incongruous pattern of development. Where parcels are defined to reflect variations in contribution to the Green Belt purposes they are unlikely to be finger-like in form, so this scenario would more typically relate to the assessment of specific development proposals. There may, however, be smaller ‘satellite’ settlements around large built-up areas which lie close enough to them to be at risk of merger were development to reduce separation between them. Significant loss of

separation in such a gap, could in effect lead to the satellite settlement becoming an extended finger of the large built-up area.

**3.55** Any breaching of a significant existing physical feature, or a significant combination of adjacent physical features, that currently serve to restrict and contain the existing large built-up area, would also form an incongruous pattern of development. Examples of this sort of step-change in settlement form would be development crossing a major retaining and containing road, railway or river, or extending out from a valley onto a hilltop into open Green Belt land that does not relate well to existing development.

### Purpose A outputs

**3.56** The contribution to Purpose A has been determined in line with the illustrative factors listed in Annex E, denoting strong, moderate and weak/no contributions.

**3.57** The supporting analysis of contribution to Purpose A is set out in parcel assessment outputs in five boxes, each with a header. These draw on information set out in the ‘description’ section:

- The first box indicates whether the parcel is adjacent or near to a large built-up area, with additional text to note if the parcel is close to a village which is near enough to the large built-up area to contribute to preventing its sprawl (termed a ‘satellite’ settlement).
- The second box indicates whether the parcel is free from development.
- The third box indicates whether the parcel is subject to urbanising influences from outside of the parcel.
- The fourth box notes whether there are physical features which could restrict and contain development.
- The fifth box states whether development in the parcel would have an incongruous impact on the pattern of development.

Purpose B – to prevent neighbouring towns merging into one another

### NPPF Annex E illustrative criteria for Purpose B

**3.58** The following features in combination have been identified as being illustrative of a ‘strong’ contribution:

- Land forming a substantial part of a gap between towns.
- Absence of existing development.
- Development would result in the loss of visual separation of towns.

**3.59** The presence of one or more of the following features in a gap between towns have been identified as being illustrative of a '**moderate**' contribution to Purpose B:

- Land forming a small part of a gap between towns.
- Development would not result in the loss of visual separation of towns, for example due to the close proximity of structures, natural landscape elements or topography that preserve visual separation.

**3.60** Green Belt land that does not have a relationship with a gap between towns or forms only a very small part of a gap between towns, such that it makes no contribution to visual separation, has been identified as being illustrative of a '**weak/no**' contribution to Purpose B.

## Purpose B definitions

**3.61** Annex E uses several terms which require further definition to be applied as part of the assessment process for Purpose B. These are addressed in the paragraphs below.

### 'Town'

**3.62** Annex E states that 'this purpose relates to the merging of towns, not villages' and that 'for this purpose 'towns' includes cities'. As all towns and cities have been treated as 'large built-up areas' for Purpose A, the same list of settlements is applicable to Purpose B.

### 'A substantial part of a gap'

**3.63** Whether part of a gap can be described as substantial is a function not just of its relative size to a gap as a whole but also the physical features in it. Some 'separating' physical features, such as woodlands, landform features, major roads, railways and rivers strengthen perceived separation, particularly where they contribute to visual separation. Roads and railways can also be 'connecting' features that strengthen the link between towns, reducing the time taken to pass through a gap and weakening the role of visual separators.

**3.64** Other areas of built form – villages and hamlets, industrial, educational and retail estates – between towns can be physically and visually connecting features. However, if the scale of intervening development and/or the size of gap between the towns means that these towns are not considered ‘neighbouring’ then Purpose B will be less directly relevant. In these cases the contribution of open land in gaps between towns and other areas of built form is addressed through Purpose A, which recognises the role of such land in preventing smaller ‘satellite’ settlements/developments from merging with towns.

**3.65** A parcel has been considered to contribute more to the ‘substance’ of a gap between towns if it contains key separating physical features, and the more fragile a gap the smaller a part of a gap might be to be considered substantial.

**3.66** The fragility of a gap is a key consideration to establish what is and is not substantial within or adjacent to a gap between neighbouring towns. Gap fragility has been judged based on a combination of factors including the relative size of the gap and/or the presence/absence of connecting and separating features:

- A robust gap will typically be relatively wide and contain significant physical features that maintain visual separation.
- A moderate gap may be relatively wide but lack significant physical features that maintain visual separation or be relatively narrow but contain physical features that maintain visual separation.
- A fragile gap will typically be relatively narrow and lack physical features that maintain visual separation.

**3.67** Green Belt land can play a peripheral role and therefore make a more limited contribution to a gap between towns where it does not lie directly in a gap but its development would weaken Green Belt land in a gap. Green Belt land on the periphery of fragile gaps may still be judged to be a substantial part of it but otherwise will generally not. Green Belt land within a gap may also to an extent be considered peripheral if the neighbouring towns in question are already to a significant extent connected by development. This may be because the functional role of the gap has already been eroded by the partial merging of the towns.

**3.68** Relatively wide gaps between towns generally have scope for some new development within them without significant loss of visual separation between neighbouring towns. Consequently, large parcels or ‘outer areas’ within or on the periphery of relatively wide gaps that only represent ‘a substantial part of a gap’ between towns by virtue of their size have generally been rated as making a ‘moderate’ contribution to Purpose B, in acknowledgement of their potential to accommodate development in smaller parts of them without loss of visual separation

of towns. In this way the assessment findings help point to areas of search where there could be potential (in Green Belt terms) for development, including new settlements, in gaps between neighbouring towns.

**3.69** Development expanding a town out into the core of a gap, removing a relatively large part of it, would clearly represent a substantial impact, but such scenarios would generally be captured as making a ‘strong’ contribution to Purpose A (and therefore not be eligible for definition as grey belt) as a consequence of a likely resulting incongruous pattern of development.

#### **A ‘small’ or ‘very small’ part of a gap’**

**3.70** ‘A small part of a gap’ is judged to be an ‘insubstantial’ part of it – that is, land in a gap that does not meet the ‘substantial’ definition above – but one which still provides a degree of visual separation.

**3.71** A ‘very small’ part of gap is an area which does not contribute to visual separation, generally as a result of their existing development and/or containment and significant urbanisation. These areas generally also make a weak/no contribution to Purpose A.

**3.72** It is not appropriate to define fixed gap widths for the terms ‘substantial’, ‘small’ and ‘very small’. As with the definition of ‘near to’ set out above, this will depend on site-specific factors, including the distance in proportion to the size of towns, the degree of visual separation, and the presence of urbanising development or activity within the Green Belt.

#### **‘Loss of visual separation’**

**3.73** ‘Loss’ is interpreted as a ‘significant reduction’ in visual separation, rather than its complete removal. Typically the development of a substantial part of a gap has the potential to equate to a significant loss of visual separation although, as noted in the section above, relatively wide gaps between towns could accommodate some degree of new development, isolated from any town, without a significant loss of visual separation, i.e. no more than a minor reduction in visual separation. Negligible reductions in visual separation have generally been limited to areas already containing existing development and/or are contained and significantly urbanised by urban areas.

### **‘Free of existing development’**

**3.74** ‘Existing development’ has not been considered to include the appropriate development ‘exceptions’ listed in NPPF policy GB7, such as agricultural buildings, which case law [\[See reference 8\]](#) generally considers does not affect the openness of the Green Belt. The NPPF policy GB6 states ‘In the case of proposals for renewable and low carbon energy development, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources’, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore has not been judged as existing development affecting contribution to the Green Belt purposes in perpetuity.

**3.75** ‘Free of’ is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on the basis of a combination of an area’s visual and spatial openness.

### **Purpose B assessment outputs**

**3.76** The contribution of a parcel to Purpose B has been determined in line with the illustrative factors listed in Annex E, denoting strong, moderate and weak/no contributions.

**3.77** The supporting analysis for contribution to Purpose B is set out in parcel assessment outputs in three boxes, each with a header. These draw on information set out in the ‘description’ section:

- The first box states whether the parcel lies in a gap between towns and, if so, gives an indication of the strength of the gap, with reference to distance, separating and connecting features and visual openness. This helps to support judgements as to whether the parcel forms a substantial part of the gap.
- The second box indicates whether the parcel is free from development.
- The third box states whether the parcel forms a substantial, small or very small part of the gap, with reference to separating features that would be lost were development to take place.
- The fourth box comments on the extent of loss of visual separation.

## Purpose C – to protect the countryside from encroachment

**3.78** Purpose C is not relevant to the identification of grey belt and is not referenced in Annex E, but it is still one of the five purposes of Green Belt set out in the NPPF. Ratings of contribution to Purpose C has still been used to help inform judgements regarding which grey belt areas are more suitable for release than others in Green Belt terms. In addition, if the release and/or development of Green Belt land outside of defined grey belt areas needs to be considered, contribution ratings for Purpose C have been an important consideration. For example, in locations not near to and remote from towns and cities, variations in contribution to Purpose C have generally provided the only source of comparison in the contribution of Green Belt land to the Green Belt purposes.

### Purpose C definitions

**3.79** Purpose C has been assessed by determining the extent to which a location can be considered part of the countryside, the level of urbanising influence affecting it and whether or not development in the parcel would significantly increase urbanising influence on adjacent open land.

#### **‘Part of the countryside’**

**3.80** Green Belt land is part of the countryside where it is open and has a clear connection with the wider open countryside. Physical isolation from the wider countryside, uses which create a strong association with an urban area, or the presence of existing urban development can affect what is judged to be countryside in Green Belt terms. This is not a judgement which considers the scenic beauty, ecological value or condition of land.

#### **‘Urbanising influence’**

**3.81** This is defined as a combination of both the influences of ‘existing development’ and ‘other urbanising influences’ (both defined under Purpose A above). This includes urbanising development washed over by, inset within or directly adjacent to the outer edges of Green Belts, such as villages and hamlets, industrial, educational and/or retail estates.

**3.82** Relevant factors influencing the significance of urbanising influence include separating/screening physical boundary features, the scale/visibility of urbanising development and associated land uses and activity, landform change, distance from the urban areas, and the strength of relationship with the wider countryside.

## Purpose C assessment outputs

**3.83** The contribution of a parcel to Purpose C has been determined in terms of whether land makes a strong, moderate and weak /no contribution to this Purpose.

**3.84** The following features in combination have been identified as being illustrative of a '**strong**' contribution:

- Land is part of the countryside.
- No significant but some urbanising influence but a lack of features to restrict and contain development, such that were development to take place, there would be a stronger urbanising impact on adjacent Green Belt land than is currently the case.

**3.85** The following features in combination have been identified as being illustrative of a '**moderate**' contribution:

- Land is part of the countryside.
- Some urbanising influence.
- The presence of features to restrict and contain development, such that were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.

**3.86** The following features in combination have been identified as being illustrative of a '**weak/no**' contribution:

- Land is wholly or largely contained from the wider countryside by development, or openness is significantly limited by existing development.
- Significant urbanising influence.
- Were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.

**3.87** The supporting analysis for contribution to Purpose C is set out in parcel assessment outputs in four boxes, each with a header. These draw on information set out in the 'description' section:

- The first box indicates whether the parcel is perceived as part of the countryside or whether urban containment or development weaken its relationship with the wider countryside.
- The second box indicates whether the parcel is free from development.

- The third box indicates whether the parcel is subject to urbanising influences from outside of the parcel.
- The fourth box states whether development in the parcel would significantly increase urbanising influence on adjacent open land.

## Purpose D – to preserve the setting and special character of historic towns

**3.88** NPPF Annex E illustrative criteria for Purpose D The following features in combination have been identified as being illustrative of a '**strong**' contribution to Purpose D:

- Absence of existing development.
- Form part of the setting of a historic town.
- Land makes a considerable contribution to a historic town's special character – being within, adjacent, or of significant visual importance to historic aspects.

**3.89** The presence of one or more of the following features, in addition to being part of the setting and/or contributing to the special character of a historic town, has been identified as being illustrative of a '**moderate**' contribution to Purpose D:

- Containing existing development.
- Separated from historic aspects of the town by existing development or topography.
- No important visual, physical, or experiential relationship to historic aspects of a town.

**3.90** Land that does not form part of the setting of a historic town, with no visual, physical, or experiential connection to the historic aspects of a town has been considered illustrative of a '**weak/no**' contribution to Purpose D.

## Purpose D definitions

**3.91** Annex E uses several terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

### **‘Historic town’**

**3.92** Annex E is clear that this purpose relates to historic towns, not villages. An extract from Hansard in 1988 clarified which historic settlements in England were certainly considered ‘historic towns’ in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge [See reference 9]. Durham has since been added to this list.

**3.93** It has been LUC’s experience through consultation with Historic England on several Green Belt study method statements, that Historic England do not consider the list on towns quoted in Parliament to necessarily be exclusive. Therefore, the settlements referenced under the definitions of ‘large built-up area’ (see section titled Purpose A definitions) and ‘town’ (see section titled Purpose B definitions) above all have the potential to be defined as ‘historic towns’ relevant to the assessment of Purpose D, subject to the definition of their historic settings or special character.

**3.94** Clearly, there are historic aspects to towns and smaller settlements within the study area, but the important aspect in terms of contribution to this purpose is that there needs to be a significant relationship between Green Belt land and historic aspects of a settlement’s setting, such that some degree of special character results. Many towns have designated conservation areas, but these are commonly focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than key to special character.

### **‘Setting and special character’**

**3.95** The extent to which the Green Belt contributes to the setting and special character of a historic town is related to the visual, physical and/or experiential relationship between Green Belt land and historic aspects of a town.

**3.96** What forms part of a historic towns setting and/or contributes to the special character of a historic town is a matter of professional judgement that cannot be defined in general terms. It is unique to each historic town’s character, townscape and connections to the wider landscape.

**3.97** The connection between a historic town’s historic character and the wider countryside does not have to be physical; indeed, successive waves of development often isolate core historic areas from the surrounding countryside, meaning it is often more a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement.

**3.98** The assessment has considered whether any Green Belt land contributes to the special character of any of the towns listed above and, if so, to what extent.

### **‘Historic aspects’**

**3.99** In order to establish the relevance of Green Belt land to historic aspects of a historic town it is necessary to review and research each historic town’s historic aspects in turn. This has been done with reference to historic environment evidence for each historic town, such as historic town setting studies and conservation area appraisals.

**3.100** Recorded references to the open countryside or key physical features and/or landmarks in the Green Belt are useful in judging and justifying the appropriate level of contribution relevant Green Belt land makes to a historic town’s setting and special character.

**3.101** Many historic towns have historic aspects that have little to no relationship with their setting and special character, and many historic towns contain historic areas focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than part of the historic town’s setting and special character. Where this is the case, contribution to Purpose D has often been ruled out, noting that this does not mean such places do not have special and unique characteristics worthy of preservation, just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D.

### **‘Free of existing development’**

**3.102** ‘Free of existing development’ is defined under Purpose A and B above. The same definition applies to Purpose D.

## **Purpose D outputs**

**3.103** Preliminary analysis comprising a combination of documentary evidence review; high-level assessment and professional opinion was applied in order to identify settlements that can be considered ‘historic towns’ for the purposes of this review.

**3.104** Appendix B sets out the criteria by which each town was assessed to determine whether it can be considered a ‘historic town’.

**3.105** Applying the above methodology to the study area, the following towns within SCC have been determined as historic towns and were relevant to the assessment of Purpose D:

- Southend-on-Sea - Meets criteria 3 and 4.

**3.106** The following towns that lie within neighbouring council areas have been determined as historic towns and therefore relevant to the assessment of Purpose D:

- Rayleigh – Meets criteria 2,3 and 6.
- Rochford – Meets criteria 2,3,4,5 and 6.

**3.107** The contribution of a parcel to Purpose D has been determined in line with the illustrative factors listed in Annex E, denoting strong, moderate and weak/no contributions.

**3.108** The supporting analysis of contribution to Purpose D has been set out in parcel assessment outputs under three boxes. These in part draw on information set out in the ‘description’ section and include:

- The first box indicates whether the parcel forms part of the setting of a historic town;
- The second box indicates whether the parcel is free from development; and
- The third box states whether the parcel makes a considerable contribution to special character, some contribution or little/no contribution, with supporting text to justify this judgement.

## Purpose E – to assist in urban regeneration

**3.109** Purpose E is not relevant to the identification of grey belt and is not referenced in Annex E, but it is one of the five purposes of Green Belt set out in the NPPF.

**3.110** Most Green Belt studies do not assess individual Green Belt land parcels against Purpose E, and either do not rate them or rate them all equally, on the grounds that outside the definition of PDL, it is difficult to justify why the release and/or development of one area of Green Belt land has a greater impact on encouraging re-use of urban land than another. This is supported by planning inspector’s judgements on the matter, such as the inspector’s report re: the London Borough of Redbridge’s Local Plan (January 2018), which noted that with regards to Purpose E “this purpose applies to most land’ but that ‘it does not form a particularly useful means of evaluating sites” [\[See reference 10\]](#).

**3.111** More generally regarding plan-making, policy GB3 of the NPPF sets out that exceptional circumstances for altering Green Belt boundaries must be fully evidenced and justified, having examined all other reasonable options for doing so, including, a) making as much use as possible of suitable previously developed and underutilised land; b. Optimising the density of development in accordance with policy L1; and c. Assessing whether sufficient suitable sites can be identified outside the Green Belt. In other words, Purpose E must have already been followed before options in the Green Belt are considered further.

**3.112** Using evidence to inform meaningful judgements on the collective contribution Green Belt land makes to Purpose E is also difficult. In the absence of any clear guidance on what percentage of recorded brownfield land enables a Green Belt to play a stronger or more limited role in encouraging urban regeneration, all Green Belt land in the study area is considered to contribute equally to Purpose E.

### Step 3: Identify grey belt

**3.113** Having assessed strength of contribution to Green Belt purposes A, B and D, areas of grey belt have been defined and are mapped. A line of text at the end of each parcel assessment concludes on whether land is grey belt.

**3.114** Critically, even where Green Belt land is identified as grey belt, if proposed for development there remains the need to consider such factors as whether:

- Its release and such development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (as set out below);
- There is an evidenced unmet need for the type of development proposed;
- The development would be in a sustainable location, with particular reference to policy TR3 of this Framework; and
- Where applicable, the major development proposed meets the 'Golden Rules' requirements set out in policy GB8.

### Step 4: Consider potential mitigation for sites

**3.115** The final section in the output for each parcel assessment, headed 'Potential development sites', provides a brief commentary on whether landscaping or other physical measures could, for any of the sites in a parcel, potentially reduce harm by limiting the impact of development on the wider Green Belt.

**3.116** This analysis does not consider specific development proposals for a site (which will have been prepared to differing levels of detail from site to site) but makes the assumption that development in the site area would result in loss of openness (and so loss of contribution to the Green Belt purposes).

**3.117** The analysis considers the feasibility of employing physical measures to offset the impact of development in a parcel on the contribution of adjacent Green Belt land. A reduction in impact on contribution through boundary strengthening is more likely to be a possibility where lack of containment is the key reason for land making a stronger contribution. It is less likely to be the case where lack of distance between urban areas and/or the breaching of strong boundary features is the key reason for land making a stronger contribution.

**3.118** This analysis only suggests potential to reduce harm. The uncertainties around the application of landscaping measures to strengthen boundaries - their effectiveness will depend on the type of landscaping proposed and the type of development proposed, and it may be a relatively long period of time before new planting has a significant impact - means that post-mitigation contribution ratings have not been provided.

## Fundamental undermining of the purposes

**3.119** As set out in Annex E and the PPG, Green Belt assessments must also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole. The PPG states that, 'in reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.'

**3.120** What is meaningful could vary significantly based on the scale and nature of the plan area and the range, significance and extent of contribution Green Belt land makes to the Green Belt purposes within it.

**3.121** To effectively judge the potential for fundamental undermining in the context of a set of proposed local plan site allocations, it is necessary to consider not only the impacts arising from the release of individual sites, but also any cumulative impacts resulting from the allocations as a whole.

## Definitions for fundamental undermining

**3.122** Annex E and the PPG uses a few terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

### ‘Plan area’

**3.123** The plan area is the area covered by the Southend-on-Sea Council Local Plan.

### ‘Purposes (taken together)’

**3.124** Most Green Belt land does not contribute to all Green Belt purposes to the same degree, with large areas of Green Belt land not contributing or contributing weakly to multiple purposes. Consequently, what constitutes a fundamental and meaningful impact varies from borough to borough depending on which purposes are important in the borough. Release or development that fundamentally and meaningfully impacts Green Belt land contributing to one Green Belt purpose would in effect affect its ability to serve the purposes (taken together) in a meaningful way.

### “Meaningful”

**3.125** Some proposals may only fundamentally undermine the ability of the remaining Green Belt land in the plan area to serve a single important purpose to have a meaningful impact. Other proposals may undermine multiple purposes to a degree that in combination their impact is meaningful.

**3.126** The scale and contiguity of Green Belt land within a district may also play a role in what is meaningful. Release or development of smaller areas of Green Belt land could potentially be more meaningful in a district with smaller areas of Green Belt land. Release or development of pockets of Green Belt land that are isolated from the wider designation within urban areas are less likely to have a meaningful impact.

**3.127** A fundamental and meaningful impact on Purpose A (to check the unrestricted sprawl of large built-up areas) may include, but is not limited to, where release or development of land would result in the physical or perceived merging of a large built-up area with an adjacent satellite settlement such that the adjacent settlement would be perceived to be part of a larger ‘sprawling’ large built-up area. How fundamental and meaningful the loss of a such a gap would be is dependent on its current contribution to Purpose A. Most sprawl of a large built-up area has not been

considered to fundamentally undermine the ability of remaining Green Belt land to continue to fulfil this function.

**3.128** A fundamental and meaningful impact on Purpose B (to prevent neighbouring towns from merging into one another) include but is not limited to release or development that would result in the physical or perceived merging of two currently distinctly separate neighbouring towns, or where release or development would result in the loss of the most substantial part of a gap separating neighbouring towns such that it no longer played a meaningful role in relation to Purpose B. Whether the merging of two neighbouring towns is meaningful may also be influenced by the number of neighbouring towns that could remain distinctly separate by remaining Green Belt land.

**3.129** A fundamental and meaningful impact on Purpose C (to assist in safeguarding the countryside from encroachment) may include but is not limited to where release or development would sever and isolate an area of Green Belt land contributing strongly to Green Belt Purpose C from the wider designation. The vast majority of Green Belt land has at least some countryside function. The release or development of the vast majority of Green Belt land would likely not fundamentally and meaningfully influence the function of adjacent Green Belt land such that it would be cease be considered countryside.

**3.130** A fundamental and meaningful impact on Purpose D (to preserve the setting and special character of historic towns) may include but is not limited to the release or development of an important or very important part of the setting of a historic town, integral to its special character.

**3.131** A fundamental and meaningful impact on Purpose E (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) is not considered likely given that other Green Belt policy prioritise the use of non-Green Belt locations first followed by previous developed land in the Green Belt, i.e. it is unlikely that Green Belt release or development could be justified having not already demonstrated that this purpose has not been fundamentally and meaningfully undermined.

## Fundamental undermining outputs

**3.132** SCC has provided details of potential development sites located within the Green Belt, so the assessment has considered the potential for development of these sites, individually or in any cumulative combinations, to result in a fundamental undermining of the Green Belt purposes across the plan area.

**3.133** These are not definitive judgements, as specific development proposals have not at this stage been taken into consideration, but analysis of the variations in contribution to each Green Belt purpose identified in this assessment has highlighted the areas where Green Belt contribution is at its greatest within Southend. These areas of highest contribution have been reviewed in the round to judge where release or development of the identified sites could fundamentally and meaningfully undermine the purposes in the borough.

## Methodology Consultation Responses

**3.134** This methodology was shared with neighbouring local authorities Rochford District Council and Castle Point Borough Council prior to the undertaking of the assessment process. All comments received were reviewed and applied to refine the methodology as appropriate. The consultation responses are summarised in **Appendix C**

## Potential Minor Green Belt Realignment

**3.135** As part of LUC's Southend Green Belt assessment undertaken in 2020, 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 are set out in **Appendix D**.

## Chapter 4

# Green Belt Assessment Findings

**4.1** This chapter summarises the findings of the assessment of Green Belt contribution.

### Contribution ratings and grey belt

**4.2** The contribution findings (i.e. the ratings assigned to each parcel for each Green Belt purpose) are presented in **Table 4.1** below. The table also identifies whether each parcel is classified as grey belt. **Figures 4.1 to 4.6** provide a visual summary of these findings:

- Land identified as grey belt (**Figure 4.1**)
- Contribution to Purpose A (**Figure 4.2**)
- Contribution to Purpose B (**Figure 4.3**)
- Contribution to Purpose C (**Figure 4.4**)
- Contribution to Purpose D (**Figure 4.5**)
- The highest contribution rating for each parcel (**Figure 4.6**)

**4.3** As noted above, in the absence of any clear guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or more limited, role in encouraging urban regeneration, and the fact that Purpose E must have already been followed before options in the Green Belt are considered further, a uniform level of 'Equal' contribution to Purpose E has been applied to all Green Belt land in Southend.

**4.4** The detailed proforma reports are contained in **Appendix E**. They set out the following information:

- Broad overview context map showing the parcel locations and any footnote 7 area and assets designations identified from the 2024 NPPF guidance.
- Broad overview context map showing the areas identified for definition as grey belt.
- Broad location-level context map showing the highest contribution ratings, including NPPF purposes A, B, C and D.

**4.5** Following this, each parcel assessment is set out separately and includes the following information:

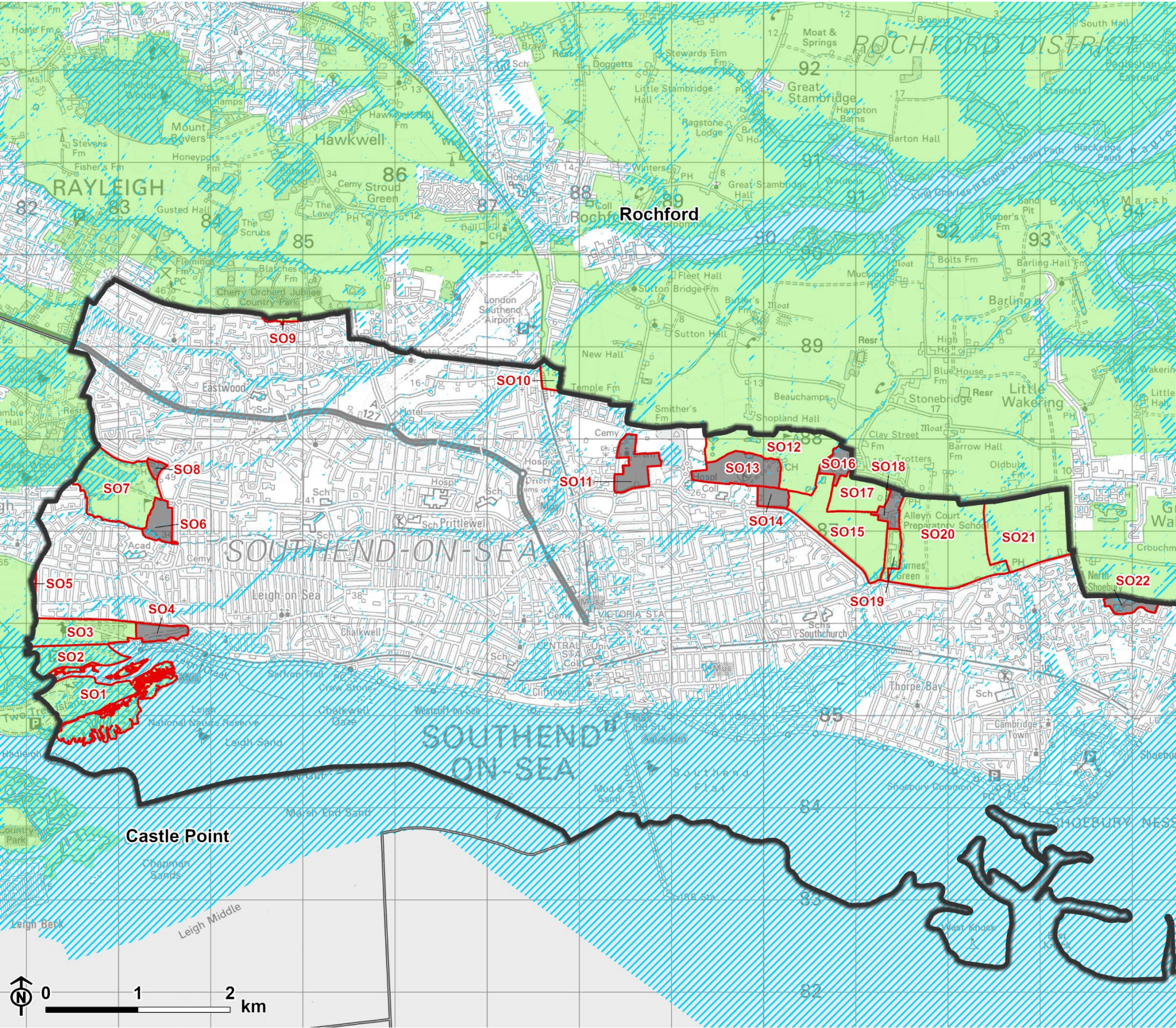
- An OS map showing the parcel, any footnote 7 areas and assets and potential development site locations.
- An aerial view showing the parcel.
- A description section summarising information relevant to the contribution assessment, including:
  - Boundary features between the urban area and parcel area.
  - Any changes in landform which strengthen the sense of separation from the urban area.
  - The degree of urbanising influence from defined urban areas, taking into consideration the above plus any other relevant factors, such as the scale of development in the settlement and the distance between the assessment area and urban areas.
  - The extent of development and/or activity in the Green Belt that would increase urbanising influence.
  - The relationship between the assessment area and the wider Green Belt, with reference to visual connectivity and the role of natural or built features in limiting this relationship.

**4.6** The contribution ratings assigned for each Green Belt purpose for the release of the parcel area, with supporting analysis as described in Chapter 3 above.

**Table 4.1: Contribution Rating Summary**

| Parcel | Settlement      | Area (ha) | Purpose A | Purpose B | Purpose C | Purpose D | Highest Contribution | Grey belt |
|--------|-----------------|-----------|-----------|-----------|-----------|-----------|----------------------|-----------|
| SO1    | Southend-on-Sea | 67.97     | Strong    | Strong    | Strong    | Moderate  | Strong               | No        |
| SO2    | Southend-on-Sea | 23.13     | Strong    | Moderate  | Strong    | Weak/No   | Strong               | No        |
| SO3    | Southend-on-Sea | 30.47     | Strong    | Moderate  | Strong    | Weak/No   | Strong               | No        |
| SO4    | Southend-on-Sea | 8.88      | Moderate  | Weak/No   | Strong    | Weak/No   | Strong               | Yes       |
| SO5    | Southend-on-Sea | 1.19      | Moderate  | Weak/No   | Moderate  | Weak/No   | Moderate             | Yes       |
| SO6    | Southend-on-Sea | 11.23     | Moderate  | Weak/No   | Moderate  | Weak/No   | Moderate             | Yes       |
| SO7    | Southend-on-Sea | 53.89     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| SO8    | Southend-on-Sea | 2.53      | Moderate  | Weak/No   | Moderate  | Weak/No   | Moderate             | Yes       |
| SO9    | Southend-on-Sea | 2.40      | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| SO10   | Southend-on-Sea | 5.89      | Strong    | Strong    | Moderate  | Weak/No   | Strong               | No        |
| SO11   | Southend-on-Sea | 17.15     | Weak/No   | Weak/No   | Weak/No   | Weak/No   | Weak/No              | Yes       |
| SO12   | Southend-on-Sea | 55.21     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| SO13   | Southend-on-Sea | 26.45     | Moderate  | Weak/No   | Strong    | Weak/No   | Strong               | Yes       |
| SO14   | Southend-on-Sea | 7.03      | Moderate  | Weak/No   | Moderate  | Weak/No   | Moderate             | Yes       |
| SO15   | Southend-on-Sea | 53.89     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| SO16   | Southend-on-Sea | 9.04      | Moderate  | Weak/No   | Moderate  | Weak/No   | Moderate             | Yes       |
| SO17   | Southend-on-Sea | 21.10     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| SO18   | Southend-on-Sea | 8.02      | Moderate  | Weak/No   | Moderate  | Weak/No   | Moderate             | Yes       |
| SO19   | Southend-on-Sea | 7.85      | Strong    | Weak/No   | Moderate  | Weak/No   | Strong               | No        |
| SO20   | Southend-on-Sea | 92.51     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| SO21   | Southend-on-Sea | 66.86     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| SO22   | Southend-on-Sea | 8.07      | Moderate  | Weak/No   | Moderate  | Weak/No   | Moderate             | Yes       |

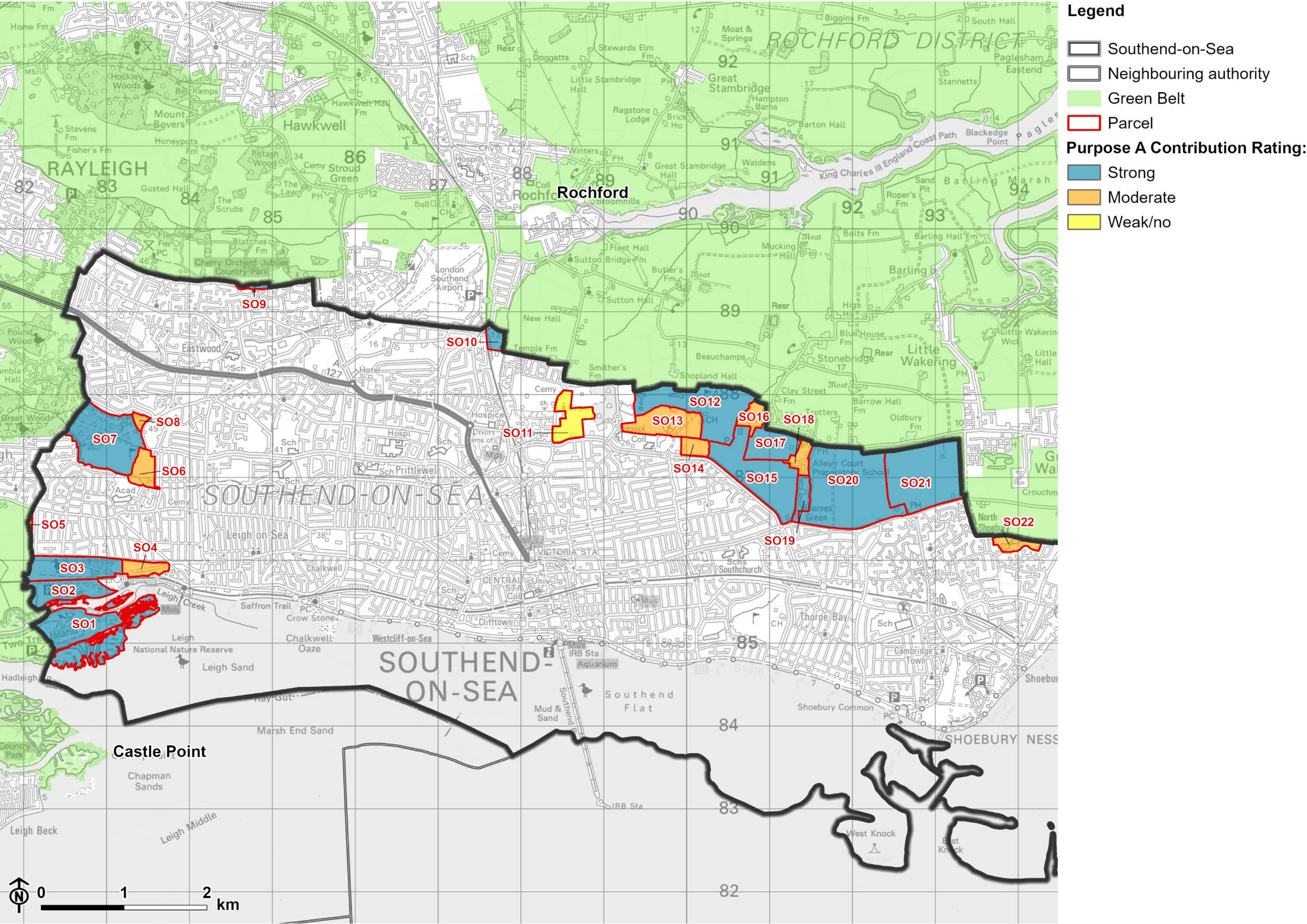
Figure 4.1: Grey belt



- Legend**
- Southend-on-Sea
  - Neighbouring authority
  - Green Belt
  - Parcel
  - Grey belt
  - Footnote 7 designation

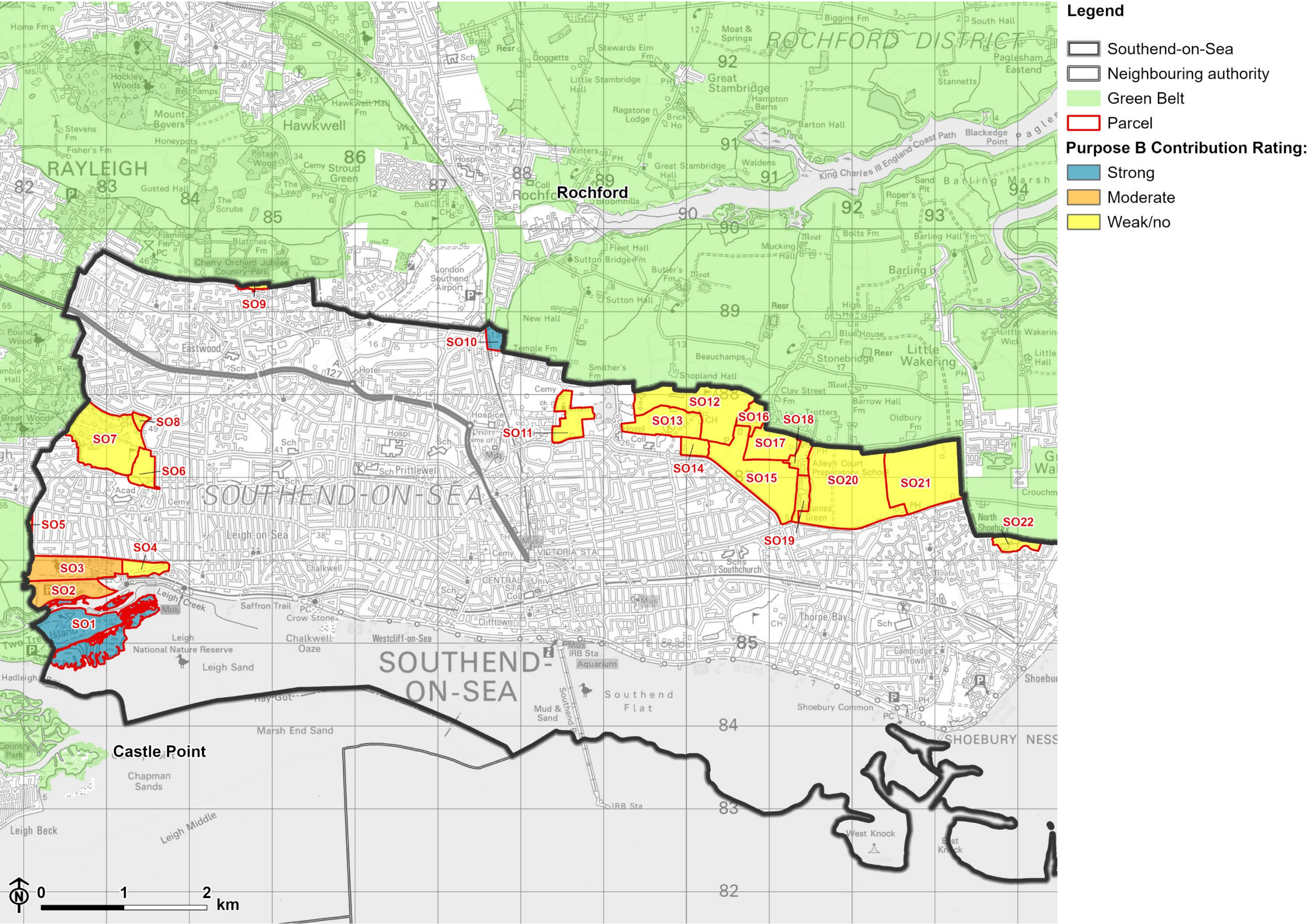
**Footnote 7 designations note:**  
 Listed Buildings have not been included to improve legibility. These assets may provide a strong reason for refusing or restricting development and therefore should be reviewed separately. The locations of these assets are illustrated in parcel proforma reports. Each NPPF footnote 7 designation is individually mapped on Figure 3.1.

Figure 4.2: Purpose A Contribution



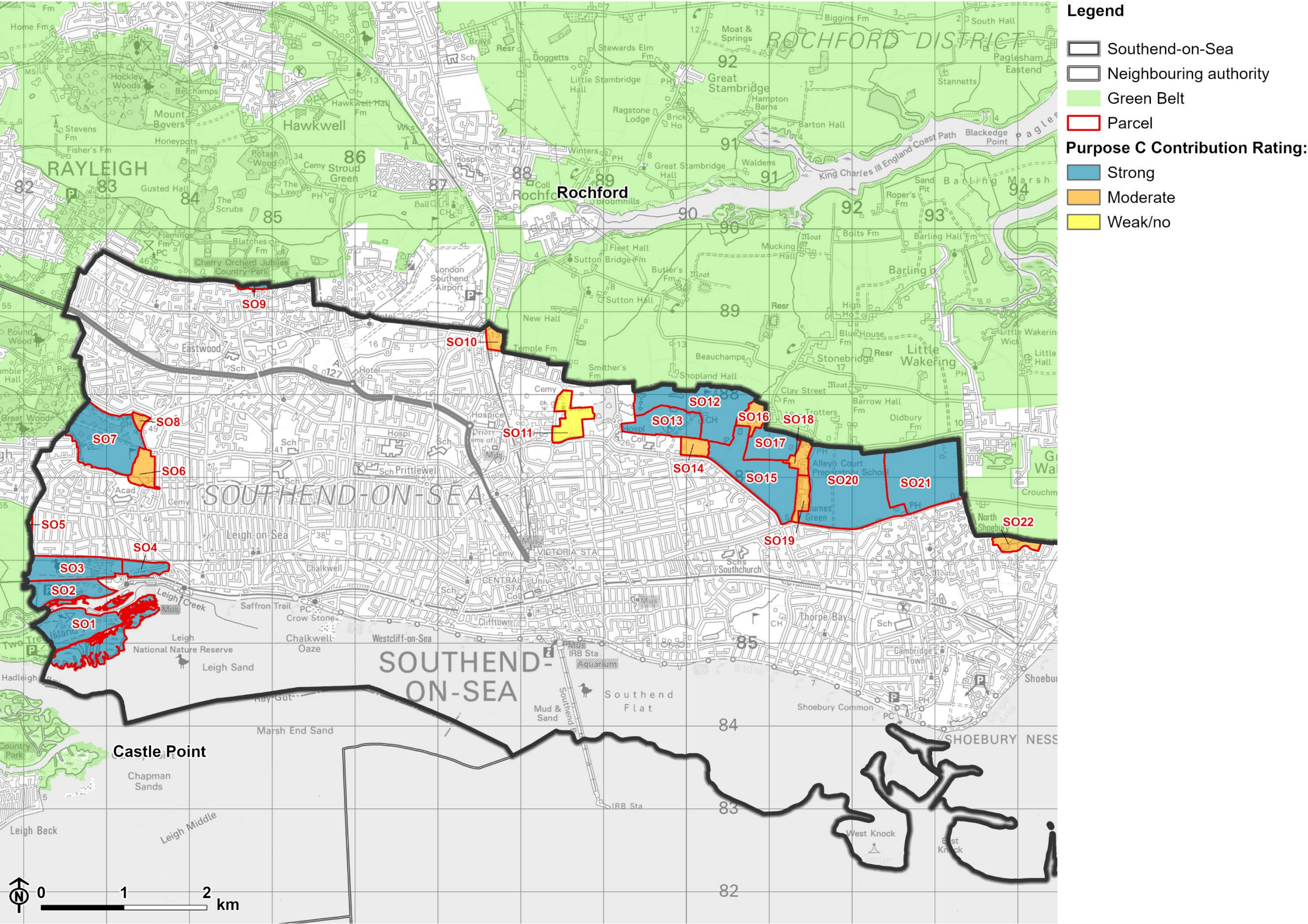
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Figure 4.3: Purpose B Contribution



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Figure 4.4: Purpose C Contribution

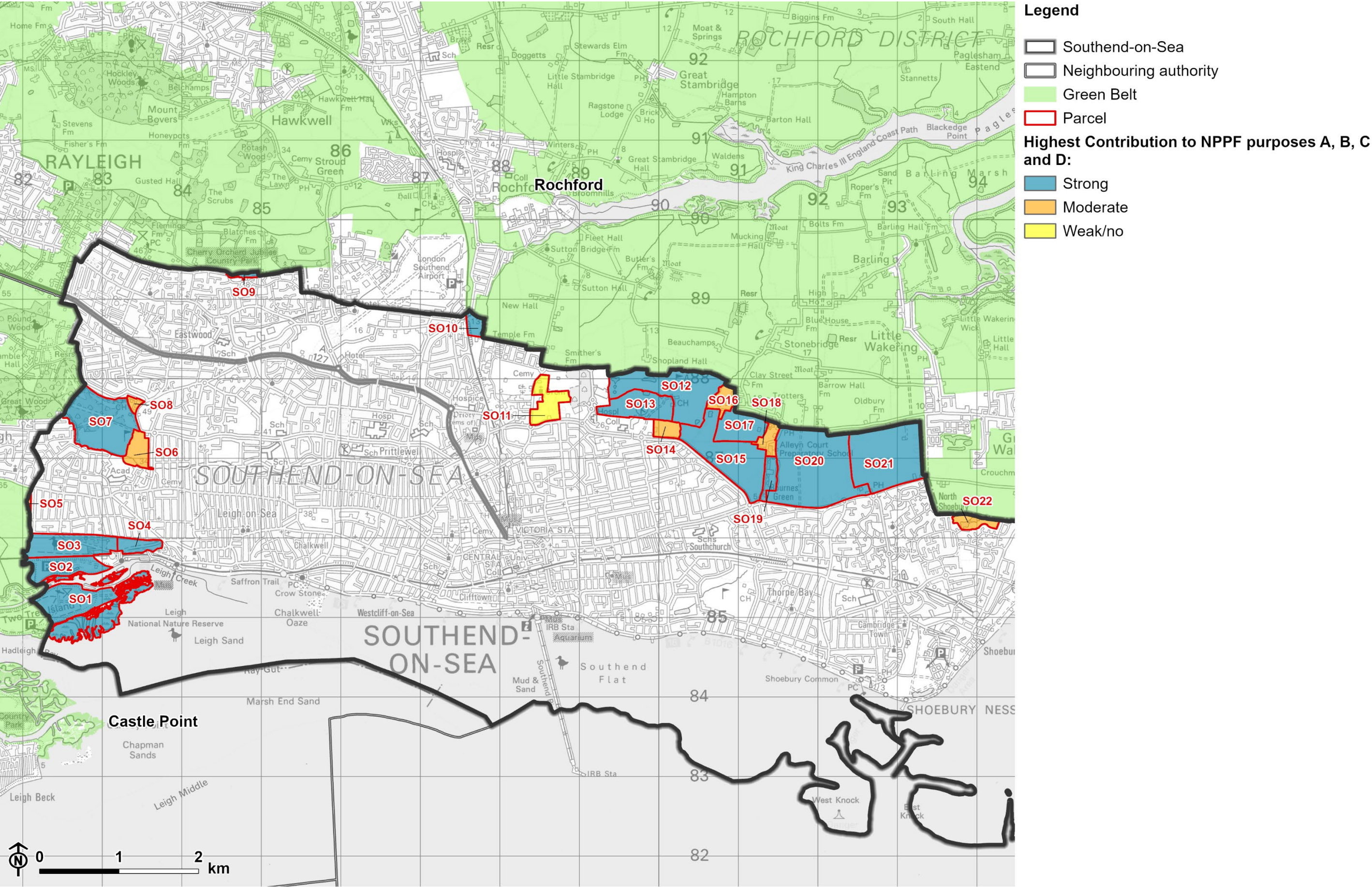


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The map displays the administrative boundaries of Southend-on-Sea, divided into SOA (Southend-on-Sea Area) and SOI (Southend-on-Sea Island) regions. The SOA areas are numbered SO1 to SO22, and the SOI areas are labeled HEA143, HEA145, HEA264, and CA001 to CA003. The map also shows the River Arkel, Leigh Creek, and various local landmarks like Victoria Station and the National Nature Reserve. The map includes a scale bar (0 to 2 km) and a north arrow.

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Figure 4.6: Highest contribution rating



## Potential for Fundamental Impacts

**4.7** As noted in Chapter 3, the variations in Green Belt contribution identified in this assessment indicate the contribution that land within potential development sites makes to the Green Belt purposes. By overlaying the potential development sites onto areas identified as making highest contribution, it is possible to give an indication of where release or development of these sites could, individually or cumulatively, fundamentally and meaningfully undermine the purposes (taken together) across the plan area as a whole.

**4.8** However, it is important to recognise that considering impact of development on the purposes across the plan area does not mean that Green Belt land in Southend should be considered in isolation from Green Belt land outside of the SCC area. The functions performed by Green Belt land in Southend are inextricably linked to those performed by land in the neighbouring district of Rochford, in terms of limiting the extent of sprawl of the large built-up area of Southend (Purpose A), preventing the merger of towns (Purpose B) and in safeguarding the countryside from encroachment (Purpose C).

**4.9** All six of the potential development sites identified in the SCC Green Belt lie to the north of the city and east of the railway line. Other than one small strip of Green Belt on the edge of the Nobles Green area, west of Cherry Orchard Jubilee Country Park and Friars Park, a protected green space north of Shoeburyness, the remainder of Southend's Green Belt lies to the west of the city in two locations: Belfairs Park and the Belton Hills and adjacent coastal lowlands and marsh. Parts of the former are designated Ancient Woodland and all of the low-lying coastal area is subject to significant constraints (flood zone but also, to the south of the King Charles III England Coast Path, significant ecological habitat designations).

**4.10** The large proportion of Southend's Green Belt lies between Garon Park and Great Wakering, and almost all of this area, other than the core Garon Park sporting facilities (but not the golf course) and land already to some degree developed, is being promoted for development. The contribution to the Green Belt purposes of land on which these sites are located is set out in **Table 4.2** and presented visually in the overview **figures 4.7 - 4.9** below.

**4.11** As shown in Table 4.2, almost all the Green Belt land on which the assessed sites are located, covering all sites except HEA145 and HEA264, makes a strong contribution to Purpose A, checking the unrestricted sprawl of a large built-up area, and therefore is not identified as grey belt. The majority of the sites also make a strong contribution to Purpose C, safeguarding the countryside from encroachment. None of the land makes more than a weak contribution to preventing neighbouring

towns merging into one another (Purpose B) or preserving the setting and special character of historic towns (Purpose D).

**4.12** In terms of its relationship with other urban development, the most significant area of Green Belt where a site is located is parcel S021, almost all of which contains site CA003. This parcel has greater importance than neighbouring sites to the west because it is playing the strongest role in preventing development that would merge the village of Great Wakering into the large built-up area of Southend. Great Wakering is in turn contiguous with Little Wakering and Barling, so this merger would result in an incongruous northward extension of Southend.

**4.13** However, the extent to which this can be considered a fundamental undermining of the Green Belt purposes is limited by the narrowness of the existing gap between Southend and Great Wakering. Great Wakering is already close enough to Southend for land all around it to be considered to contribute to Purpose A, so the loss of the gap, which is less than 270m along Star Lane on the eastern edge of CA003, would not represent a fundamental undermining of Purpose A, or the purposes taken together, within the plan area as a whole. Green Belt land in this part of Southend is preventing a degree of urban sprawl but Green Belt land in Rochford is preserving a buffer to further expansion of Southend..

**4.14** Further west, land on which sites HEA143 and CA002 are located is helping to prevent urbanising washed-over (that is, in the Green Belt) development in the Barling Road area from being merged into Southend. However, this eventuality would be a less substantial sprawl than that of merger with Great Wakering, both in terms of the size and distinctive character of the settlement that would be merged into Southend, and the distance by which the large built-up area would be extended.

**4.15** Development of sites CA001, CA002, HE143, HE145 and CA003 would remove the vast majority of the remaining open countryside within the Plan area, but extensive areas of open countryside are designated as Green Belt immediately north of the potential development sites in neighbouring Rochford. Assuming the wider open countryside designated as Green Belt remains in close proximity to the existing and potential future urban edge of Southend to the north and would continue to safeguard the countryside from encroachment, development of the potential sites would not fundamentally undermine the role of the remaining Green Belt in serving Purpose C across the plan area.

**4.16** Development of sites CA002, HEA143, HEA264 and the western part of CA001 would breach the 'A' road urban edge boundary. However, the existing and forthcoming development to the south and west of Garon Park has already breached this 'A' road boundary so there would not be a fundamental change in the urban form

of Southend and any fundamental undermining of the Green Belt purposes within the plan area.

**4.17** When considering the local plan area in isolation, sites CA001, CA002, HE143, HE145 and CA003 all extend up to the local authority boundary, meaning that the release of these sites individually would mean that Southend would increasingly cease to have its own Green Belt buffer. However, it is already the case that most of the urban edge of Southend lacks a buffer of Green Belt land lying within the SCC area, with land in Rochford and Castle Point playing a more substantial role in maintaining a buffer around the city and, in particular, in preventing merger with other towns.

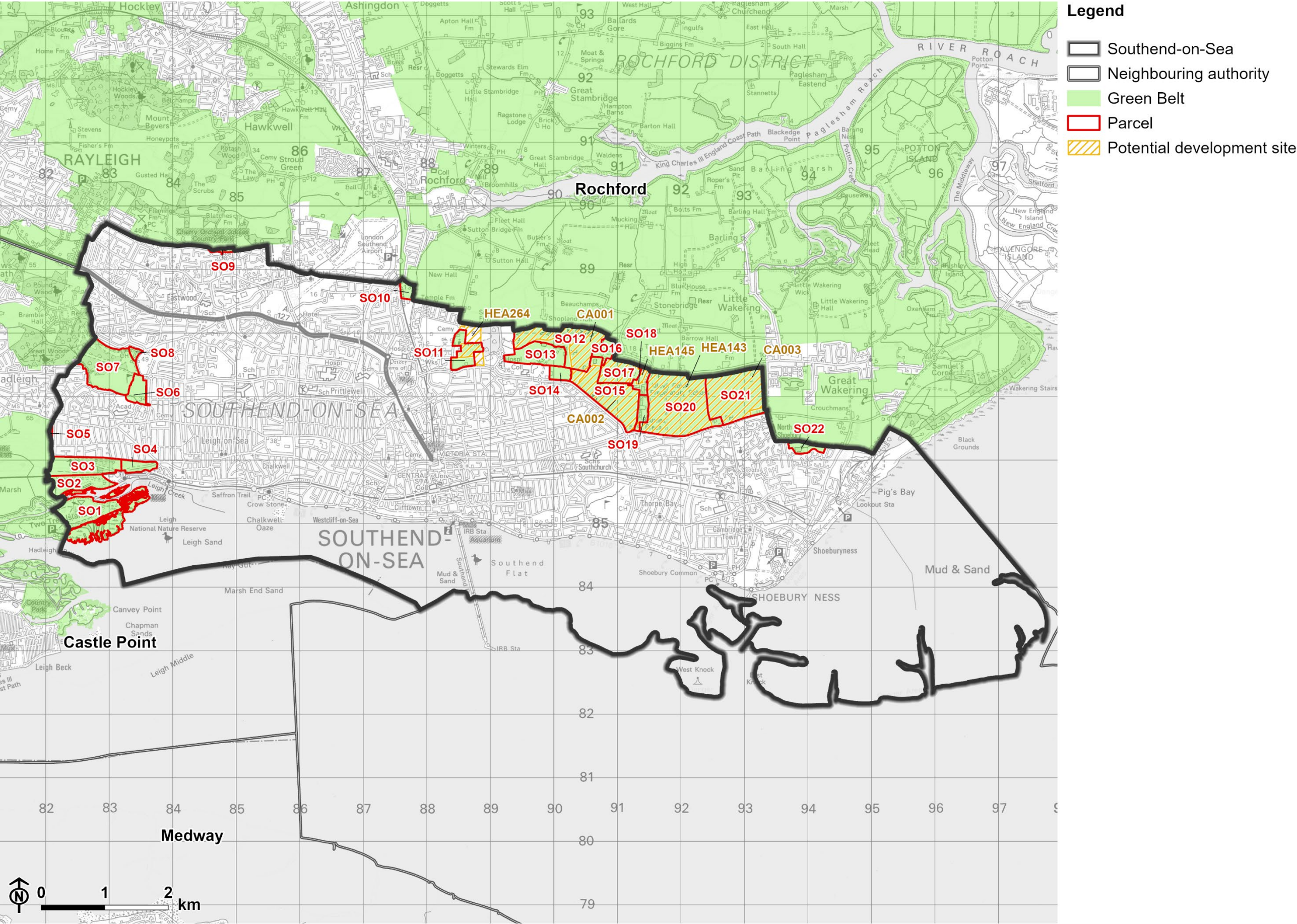
**4.18** This limited role of Green Belt land in the Southend plan area means that, although the potential development sites cumulatively form a substantial proportion of Southend's Green Belt, their development would not fundamentally undermine the remaining Green Belt across the area of the plan. The Green Belt land to the west of Southend, including parcels SO1 – 10, and SO22 to the east of Southend, is physically and functionally separated from the potential development sites. Therefore, development or release of the sites would not impact this remaining Green Belt from serving the Green Belt purposes in a meaningful way. Should CA001 be excluded from site allocation, development of the remaining sites would be likely to impact the contribution of the Green Belt land within CA001, but not to the extent that it would cease to perform a meaningful contribution to the Green Belt purposes as a whole.

**4.19** Moreover, a substantial area of Green Belt in the southern part of Rochford would continue to serve the Green Belt purposes in relation to development in both Rochford and Southend. It should be noted, however, that development of Green Belt land in Rochford would have potential to affect the role of Green Belt in the SCC plan area, either in isolation or in combination with the development of Green Belt land in Southend.

**Table 4.2: Contribution of sites to the Green Belt purposes**

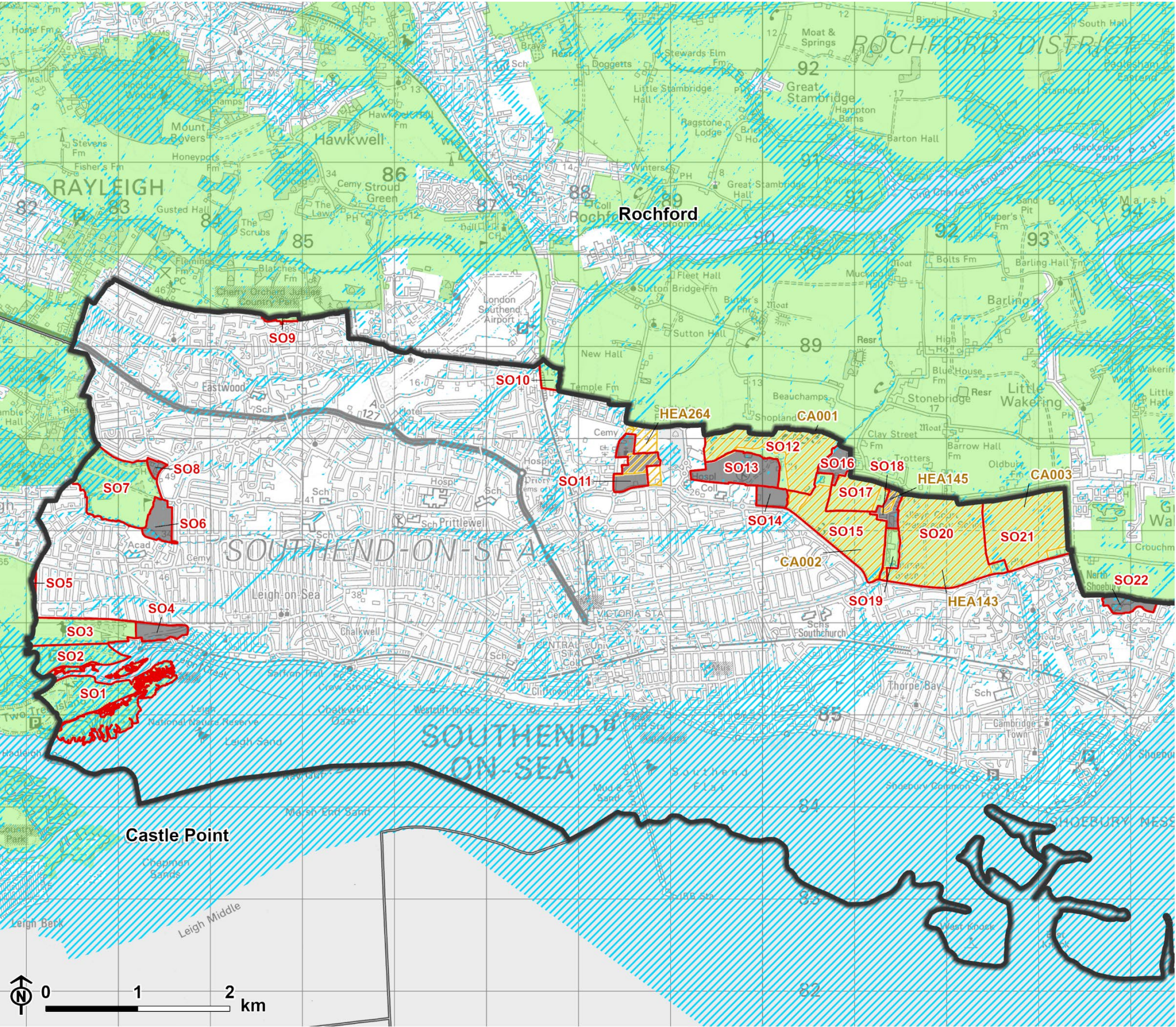
| Site   | Parcel | Area (ha) | Purpose A | Purpose B | Purpose C | Purpose D | Highest Contribution | Grey belt |
|--------|--------|-----------|-----------|-----------|-----------|-----------|----------------------|-----------|
| HEA143 | SO20   | 89.59     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| HEA143 | SO19   | 0.96      | Strong    | Weak/No   | Moderate  | Weak/No   | Strong               | No        |
| HEA145 | SO17   | 0.14      | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| HEA145 | SO18   | 2.54      | Moderate  | Weak/No   | Moderate  | Weak/No   | Moderate             | Yes       |
| HEA264 | SO11   | 6.94      | Weak/No   | Weak/No   | Weak/No   | Weak/No   | Weak/No              | Yes       |
| CA001  | SO12   | 48.32     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| CA001  | SO15   | 3.41      | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| CA002  | SO17   | 18.43     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| CA002  | SO15   | 46.77     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |
| CA003  | SO21   | 64.37     | Strong    | Weak/No   | Strong    | Weak/No   | Strong               | No        |

Figure 4.7: Context parcel PDS



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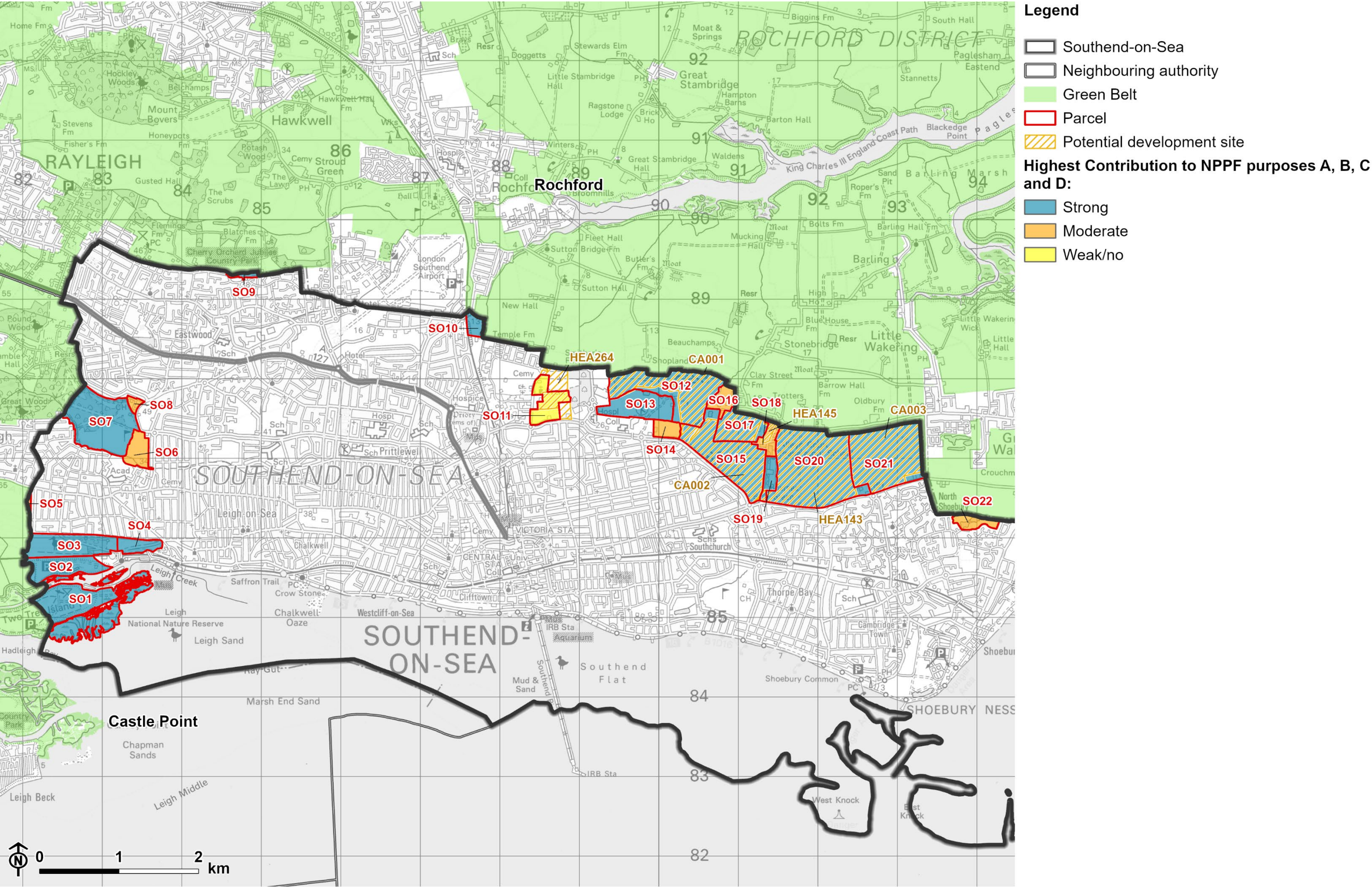
Figure 4.8: Grey Belt PDS



- Legend**
- Southend-on-Sea
  - Neighbouring authority
  - Green Belt
  - Parcel
  - Grey belt
  - Footnote 7 designation
  - Potential development site

**Footnote 7 designations note:**  
Listed Buildings have not been included to improve legibility. These assets may provide a strong reason for refusing or restricting development and therefore should be reviewed separately. The locations of these assets are illustrated in parcel proforma reports. Each NPPF footnote 7 designation is individually mapped on Figure 3.1.

Figure 4.9: Highest PDS



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## Chapter 5

### Next Steps

**5.1** This chapter sets out the key issues that the Council will need to consider when considering the findings of this report and if they decide to proceed with the release of Green Belt land.

### Exceptional Circumstances

**5.2** As noted in NPPF policy GB3, Green Belt boundaries should only be altered through the preparation or updating of plans where exceptional circumstances are fully evidenced and justified. However, policy GB3 also provides that where a development plan's spatial strategy identifies suitable land around well-connected stations for development, exceptional circumstances do not need to be demonstrated to justify alterations to Green Belt boundaries.

**5.3** Where exceptional circumstances are required, the NPPF states that the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before concluding that changes to Green Belt boundaries are justified. This includes consideration of suitable previously developed land; optimisation of the density of development; making efficient use of land, and opportunities to accommodate development needs through engagement with neighbouring authorities.

### Prioritisation

**5.4** Should it be considered that exceptional circumstances for development or release of Green Belt land are justified, priority should be given to Green Belt land in the following order:

- Previously developed land (PDL), including land that is grey belt;
- Grey belt which is not previously developed land;
- Other Green Belt locations.

**5.5** PDL, by definition, generally makes a more limited contribution to the purposes of the Green Belt and is generally regarded as being more suitable for development, subject to detailed considerations. Where PDL is not available or insufficient to meet identified needs, attention may then focus on other areas of grey belt.

**5.6** If the necessary exceptional circumstances for making alterations to the Green Belt are identified, consideration may then be given to:

- Defining grey belt land at a more granular level.
- Address the potential for the purposes of the Green Belt to be fundamentally undermined across the plan area as a whole by considering the cumulative effect of specific proposed allocations.
- Defining defensible boundaries for the masterplans associated with allocated sites and safeguarded land.
- Identifying opportunities within and around proposed releases and developments to minimise the harm to the wider Green Belt designation.

## Sustainability

**5.7** Notwithstanding the hierarchy for the release of Green Belt land, national policy requires development to support sustainable patterns of development and maximises opportunities for sustainable transport solutions. In short, where land is not in a location that is, or can reasonably be made, sustainable, its release for development would be inappropriate. In considering whether land is suitable for allocation or development, regard should be had to the accessibility of the location, the availability of infrastructure and services, and the extent to which sustainable travel choices can be supported, in line with NPPF policy TR1.

**5.8** It is important to recognise that, despite policy provisions relating to grey belt land, authorities are still required to plan positively for sustainable development. Policy GB3 confirms that, when reviewing Green Belt boundaries, the need to promote sustainable patterns of development remains an important consideration in determining whether locations are appropriate for release from the Green Belt.

**5.9** Where identified development needs cannot be met through previously developed land and grey belt land alone, consideration may need to be given to other Green Belt locations. In such circumstances, this assessment should be read alongside the Sustainability Appraisal and other supporting evidence to inform the identification and selection of site options that best support sustainable development objectives and sustainable patterns of growth sought by NPPF policies S1-S6 and GB3.

## Definition of Green Belt Boundaries

**5.10** Should the Council conclude that Green Belt release is necessary, close attention must be given to the definition of Green Belt boundaries. Policy GB4 of the NPPF requires Green Belt boundaries to be clearly defined using readily recognisable and defensible features. Establishing clear and defensible boundaries is central to ensuring the long-term permanence and integrity of the Green Belt.

**5.11** Boundary treatment can help to limit the impact of development on remaining Green Belt land, so the Council could give consideration to the following:

- Using landscape to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance. This can help to maintain a sense of separation between urban and open land. A boundary that is relatively homogeneous over a relatively long distance, such as a main road, is likely to be stronger than one which has more variation.
- Strengthening boundaries at weak points – for example where ‘breached’ by roads. This can help reduce opportunities for sprawl. The use of buildings and landscaping can create strong ‘gateways’ to strengthen settlement-edge function.
- Defining Green Belt edges using strong, natural elements which form a visual barrier – for example a woodland belt. This can help to reduce the perception of urbanisation and may also screen residents from intrusive landscape elements within the Green Belt (for example major roads). Boundaries that create visual and movement barriers can however potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents so this needs to be carefully considered.
- The ownership and management of landscape elements which contribute to Green Belt purposes. Control of boundary features can help to ensure the 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 (for example within back gardens).
- Use of sustainable drainage features to define/enhance separation between settlement and countryside. This can help to strengthen the separation between urban and open land. It is important however to determine if local topography and ground conditions are suitable.

## Enhancement of Green Belt

**5.12** Policy GB5 of the NPPF states that local planning authorities should plan positively to enhance the beneficial use of the Green Belt. This includes providing opportunities for access to the open countryside; providing opportunities for outdoor sport, outdoor recreation and burial grounds and memorial sites; retaining and enhancing landscapes, visual amenity and biodiversity; or improving damaged and derelict land

**5.13** Policy GB8: The Golden Rules applies where Green Belt land is released for development through plan preparation or review. The Golden Rules include are supported by the PPG which suggest the following considerations:

- New residents and the wider public should be able to access good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.
- Accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions.
- Where possible access to green spaces should include safe active travel routes and should be served by public transport, which also means providing the necessary infrastructure (such as footpaths and bridleways).
- Proposals should consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.
- Where appropriate, authorities should consider the use of conditions or planning obligations. The Community Infrastructure Levy can also be used to fund improvements to existing greenspaces or the provision of new ones. Local authorities should consider arrangements for the long-term maintenance of green spaces.

**5.14** It is therefore important that the Council considers where and how the Green Belt can be enhanced, particularly the relationship between the Council's preferred sustainable pattern of development and the designations' potential for new and improved appropriate uses. Introducing or enhancing uses of Green Belt land that add to its value will strengthen the case for that land's future protection. Some examples are provided in the list below:

- Improving access. Enhancing the coverage and condition of the rights of way network and increasing open space provision is a key enhancement opportunity.
- 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.
- 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 – for example the management of hedgerows and agricultural field margins, provision of habitat connectivity and planting of woodland. There may also be opportunities to link enhancements with requirements to deliver ‘biodiversity net gain’ associated with development proposals.
- Improving damaged and derelict land. Giving land a functional, economic value is a key aspect in 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.

**5.15** Beneficial uses could be achieved through planning conditions, Section 106 obligations and/or the Community Infrastructure Levy.

**5.16** There is benefit in early engagement with landowners and other interested parties, to obtain the necessary local consents, establish a detailed scope of works and identify a means of funding design, construction and management.

# Appendix A

## Glossary

### Golden Rules

Whilst not directly concerned with undertaking Green Belt Assessments, the NPPF (Aug 2026) sets out requirements for major development involving the provision of housing either on land within the Green Belt or on land released from the Green Belt. These requirements include provision of a minimum level of affordable housing exceeding that required in other parts of the Local Plan area, the provision of necessary improvements to local and national infrastructure, and the provision of new / improvements to existing green spaces accessible to the public – with the expectation that new residents should be able to access good quality green spaces within walking distance of their home. These are referred to in policy GB8: The Golden Rules at page 63-64 of the NPPF.

### Grey belt

The concept of 'grey belt' was only introduced into the NPPF in December 2024. It is defined in Annex B of the NPPF as 'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2.

### Not inappropriate development

New buildings are inappropriate in the Green Belt. There are exceptions to this which are set out in the list in policy GB7 of NPPF:

- buildings for agriculture, horticulture and forestry, or which is solely for nature conservation, restoration and/or enhancement;
- 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 reuse, extension or alteration of an existing 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 (including policies for rural exception sites);
- limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt; and,
- Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
  - i. mineral extraction and processing, engineering operations, transport, electricity network, water and telecommunications infrastructure which can demonstrate a requirement for a Green Belt location;
  - ii. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.
  - iii. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
  - iv. The provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments.

In addition, policy GB7 states that the following categories of development should also not be regarded as inappropriate where:

- the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- there is an evidenced unmet need for the type of development proposed;
- the development would be in a sustainable location, with particular reference to policy TR3 of this Framework; and
- where applicable the development proposed meets the 'Golden Rules' requirements set out in policy GB8.

## Previously developed land

The NPPF glossary defines Previously Developed Land (PDL) as ‘Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed but where provision for restoration has been made through development management procedures (including development related to minerals extraction, waste disposal by landfill and renewable and low carbon energy development, where provision for restoration exists); land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.’

## Habitat Site

The NPPF definition of a ‘Habitat Site’ specifies: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

## Heritage Asset

The NPPF definition of ‘Heritage Asset’ specifies: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

## Appendix B

### Historic towns assessment

#### Purpose D preliminary analysis

**B.1** Preliminary analysis comprising a combination of documentary evidence review, high-level assessment and professional opinion has been applied in order to identify settlements that can be considered 'historic towns' for the purposes of this assessment. This has provided a preliminary assessment of whether towns are for the purposes of this study:

- Historic towns, which will be subject to comprehensive further study to determine contribution to Purpose D; or
- Not historic towns and no further study is required.

**B.2** Each town has been assessed against the following criteria:

1. The town is named in the Hansard / government list of historic towns.
  - Source: existing data / publications.
  - Reason: this list of historic towns was identified in Parliament by the Secretary of State for Environment in 1988 with reference to green belts in England.
  - Limitations: this list includes only six towns in England and has not been reviewed since the 1980s.
2. The town has an Extensive Urban Survey (EUS) with a study area that may relate to the Green Belt.
  - Source: existing data / publications: Archaeology Data Service
  - Reason: this national programme of surveys launched in 1992. It is funded by Historic England and is carried out by District Councils, County Councils and Unitary Councils across England. The programme's aims span the implementation of national planning policy and guidance, and the planning of regeneration and conservation initiatives. As each EUS is a substantial piece of work, Historic England and the relevant Council must be satisfied that the town that is the subject of the EUS is of sufficient historic interest. Each EUS has a study area, which may overlap, border or be proximate to or have intervisibility with the green belt. Where an EUS covers a historic centre that is remote from the green belt, especially considering topography and intervening development, they may be scoped out.

- Limitations: the survey generally excludes larger conurbations. The ongoing nature of the EUS programme means not all counties have complete sets of EUSs. In the study area there are EUSs for Northumberland and Tyne and Wear, but not County Durham.
3. The extent or proportion to which the town is covered by area-based designations and contains clusters of individual designated heritage assets.
- Source: Professional opinion with reference to the National Heritage List for England and the conservation area designations of the local planning authorities.
  - Reason: the greater the number, variety, coverage and pervasiveness of historic environment designations there are in a town, the more likely it is to be historic. Area-based designations include world heritage sites, registered parks and gardens, battlefields and conservation areas. Individual heritage assets include scheduled monuments and listed buildings. It should be noted that scheduled monuments can cover substantial features of the townscape, such as defences, religious institutions and complexes, earthworks, industrial sites and infrastructure, and therefore be larger in scale than a single structure, building, or open space. Wide coverage of the town by area-based designated, and/or dense clusters of individual heritage assets are initial indicators that a town is historic.
  - Limitations: It excludes non-designated heritage assets, including townscape that is historic in character but is not within an area-based designation.
4. Historic Maps indicate expansive pre-1900 development relative to the overall geographical scale of the settlement today.
- Source: Professional opinion with reference to present-day maps and historic maps held by the National Library of Scotland.
  - Reason: the greater the proportion of the current extent of the town that was developed pre-1900 as opposed to post-1900, the more likely the character and townscape of the town is to be perceived as 'historic'.
  - Limitations: settlement and urban expansions erected post-1900 can be of historic value. Assumes the pre-1900 townscape identified remains largely pervasive with limited redevelopment.
5. Heritage assets that link the town with the Green Belt.
- Source: Professional opinion with reference to present-day maps and historic maps held by the National Library of Scotland, the National Heritage List for

England and the conservation area designations of the local planning authorities.

- Reason: Some heritage assets, whether designated or undesignated or historic activity that has since ceased, can provide tangible links between the urban core of a settlement and its present day green belt. These include routes and infrastructure such as highways, navigations, canals, tramways, railways; 'green wedges' of parkland; landscape features such as Hadrian's Wall; or industrial valleys. These serve to either extend the activity of the town out into the green belt, or bring the green belt into the urban area. Historic 'green wedges' and linear heritage assets or linear areas of historic townscape or landscape will be of particular relevance to green belt review, and are therefore important to consider in identifying historic towns.
- Limitations: local knowledge and need for site survey.

6. The existence of a medieval market charter and continued market activity.

- Source: existing data: publications: Gazetteer of Market and Fairs in England and Wales to 1516.
- Reason: the historic status of a settlement as a functional town (and is therefore a historic town today) is usually linked to whether it was granted by the monarch the right to hold weekly markets and annual fairs. This function elevated a village to a town, and was usually given to an important religious institution or member of the nobility. If the market prospered, it brought with it a growing and more diverse economic base, and with it, more people and development. It is therefore reasonable for a settlement granted a market charter in medieval times that operated into the 20th century (or still operates) can be identified as a historic town.
- Limitations: this excludes post-1516 market charters that were usually granted to settlements that grew exponentially in their populations as a consequence of the industrial revolution.

**B.3** A town is considered a historic town if it:

- Meets criteria 1 or 2, OR
- Criteria 3, 4, 5 and 6 provide sufficient evidence to suggest the town may be historic.

## Purpose D conclusions

**B.4** Applying the above methodology to the study area, Southend-on-Sea has been determined as historic towns as it met criteria 3 and 4 of the assessment. Therefore, parcels surrounding the historic town are relevant to the assessment of Purpose D.

**B.5** The following towns that lie within neighbouring council conurbations have been determined as historic towns and are also relevant to the assessment of Purpose D:

- Rayleigh – Meets criteria 2, 3 and 6.
- Rochford – Meets criteria 2,3,4,5 and 6.

## Appendix C

### Methodology Consultation Responses

**C.1** The assessment methodology was sent to the neighbouring local authorities, Castle Point Borough Council and Rochford District Council, who were invited to review and comment on its contents. All comments received were reviewed and applied to refine the methodology as appropriate. A summary of these comments can be found below.

#### Rochford District Council

**C.2** LUC has also prepared the Green Belt study for Rochford District Council (RDC) which has allowed for consistency across these two studies. RDC highlighted a small number of cross-boundary and methodological matters for consistency, transparency and examination robustness

**C.3** This includes achieving cross-boundary consistency through setting out any changes in Green Belt contribution since the 2020 Joint Study undertaken with RDC, and how cross-boundary Green Belt parcels and functions are being considered in light of the previous joint evidence base.

**C.4** To futureproof the methodology against the merging NPPF, RDC recommended that the study clarifies the extent to which the approach aligns with Annex E of the emerging 2025 NPPF, where divergence is unavoidable due to timing and how this will be transparently explained, and how the study will remain adaptable should the new NPPF come into effect during the assessment process.

**C.5** RDC noted that the methodology adopts LUC's functional approach to parcel definition, which RDC is also likely to apply. However, practical differences may arise where parcels span the administrative boundary. Therefore, to avoid inconsistent conclusions on the same physical areas, RDC requested to confirm how parcels straddling or abutting the boundary will be handled, whether both authorities will apply equivalent parcel boundary rules, and how consistency of scoring and narrative will be maintained where parcels are reported separately for administrative reasons

**C.6** RDC highlighted that Southend's draft methodology does not currently identify Great Wakering as a large built-up area, and that this classification informs assessments of sprawl, settlement containment and gap analysis. RDC recommended that to ensure consistent treatment of shared settlement edges, it would be beneficial for both authorities to agree a common list of towns / large

built-up areas, merged settlements, and settlement groupings relevant to purposes A and B.

**C.7** RDC recommended that to ensure consistent interpretation in shared geographies, it would be useful to confirm how cross-boundary gaps will be assessed using a common set of robustness indicators, and that judgements about “substantial”, “limited” or “fragile” gaps are reached on a comparable basis on both sides of the boundary. RDC highlighted that this is particularly important if either authority intends to rely on similar gaps to inform spatial strategy choices.

**C.8** RDC noted that LUC, for both authorities, references Hansard in listing nationally recognised historic towns, while acknowledging that the list is not exclusive. Given the presence of significant heritage assets at Rochford (including Rochford Hall and the parish church) that are framed by Green Belt land, it may be appropriate for Southend’s methodology to:

- acknowledge that Rochford is an area where heritage significance may contribute to Green Belt sensitivity; and
- consider whether any adjacent parcels play a role in preserving the setting or special character of these assets.

**C.9** To ensure comparability in shared areas, RDC recommended that it would be helpful to confirm that the same datasets are used for constraint severity, and that equivalent thresholds and criteria are applied to determine whether land is “highly constrained”. This is to avoid divergent classifications on either side of the boundary.

**C.10** RDC noted that while the PPG states that the “fundamental impact” test applies at the plan-area scale, the cross-boundary context remains relevant. They recommended that cumulative effects on the Metropolitan Green Belt should be acknowledged where both authorities may consider release in proximity, and that both authorities may wish to agree how Purpose D is applied along the shared boundary to avoid inconsistent interpretations.

**C.11** RDC also commenced a Pilot Scheme and lessons learnt from this were taken on board.

## Castle Point Borough Council

**C.12** Castle Point Borough Council (CPBC) recommended that the methodology explains how any changes in Green Belt are accounted for. They have recommended that the methodology accounts for the draft 2025 NPPF and to ensure consistency with the February 2025 PPG and clearly identify Grey Belt areas,

ensuring that land subject to footnote 7 constraints is excluded when considering potential Grey Belt.

**C.13** CPBC also recommended that cross boundary gaps are assessed using a transparent set of indicators; and that any judgements made about the strength of contribution which parcels make, or the meaning/interpretation of criteria such as “substantial”, “limited” or “fragile” gaps must be done on a like-for-like basis across the boundary.

**C.14** In addition, CPBC highlighted that if there are proposed development sites in close proximity to the Southend/Castle Point borough boundary, the study would need to be particularly mindful of the conclusions of CPBC's Green Belt review. This would particularly be the case where sites in the east of Castle Point have been recommended or not recommended for further consideration for development.

## Appendix D

### Potential Minor Green Belt Realignments

**Table D.1: Potential Minor Green Belt Realignments**

| Figure                                                                                        | Realignment                                                                                                               |
|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Figure A: Green Belt addition to the north of Shoeburyness.                                   | Green Belt boundary realigned along the property perimeter, which forms a more readily recognisable Green Belt boundary.  |
| Figure B: Green Belt addition to the north of Fossetts Way, Southend.                         | Green Belt boundary realigned to abut with Fossetts Way, which forms a more readily recognisable Green Belt boundary.     |
| Figure C Green Belt addition south of Southend Road.                                          | Green Belt boundary realigned along Southend Road, which forms a more readily recognisable Green Belt boundary.           |
| Figure D Green Belt addition along the Prittle Brook, north of Temple Farm Industrial Estate. | Green Belt boundary realigned to include the narrow gap.                                                                  |
| Figure E Green Belt addition south of Belton Way, Leigh-on-Sea rail station.                  | Green Belt boundary realigned to Belton Way and adjacent road, which form a more readily recognisable Green Belt boundary |
| Figure F Green Belt addition south of Leigh-on-Sea rail station.                              | Green Belt boundary realigned along the access track which acts as a boundary feature.                                    |

# Appendix E

## Parcel Assessments

### Parcel assessment outputs

**E.1** The individual parcel proformas include:

- Map of each parcel with footnote 7 designations, and an aerial view
- Locational description, and description of the relationship between the parcel and the settlement, and with the wider countryside
- Parcel ratings for contribution to each of the Green Belt Purposes, and summary of the key factors supporting the assessed contribution ratings
- Concluding text to indicate whether the parcel is identified as grey belt on the basis of its contribution ratings and in line with Annex E of the 2026 NPPF.
- Comment, in general terms, on whether there is scope for mitigation measures (other than reduction in the proposed development area) to reduce the harm to the Green Belt purposes that would result from any potential site development in the parcel.

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## References

- 1 Ministry of Housing, Communities and Local Government (2026) National Planning Policy Framework. Available at: <https://www.gov.uk/guidance/national-planning-policy-framework>
- 2 LUC (2020) Rochford District and Southend-on-Sea Borough Joint Green Belt Study
- 3 The 2024 NPPF footnote 7 stated ‘The policies referred to are those in this Framework (rather than those in development plans) relating to: habitat sites [See reference ] (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75; and areas at risk of flooding or coastal change.’
- 4 Some Irreplaceable Habitat data sets are more up-to-date than others. Consequently, their extent mapped in this study may require refinement following detailed site-specific work through the typical development management process.
- 5 Robin Buchanan, January 2025 with regards to Suite 1, The Stables, Cannons Mill Lane, Bishop’s Stortford CM23 2BN (Appeal Ref: APP/J1915/W/24/3339916)
- 6 Robin Buchanan, January 2025 with regards to Suite 1, The Stables, Cannons Mill Lane, Bishop’s Stortford CM23 2BN (Appeal Ref: APP/J1915/W/24/3339916)
- 7 The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.
- 8 The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.

## References

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- 9 Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3
- 10 Planning Inspectorate, David Smith (2018) Report to the Council of the London Borough of Redbridge regarding the Examination of the Redbridge Local Plan 2015-2030. Available at: <https://www.redbridge.gov.uk/media/4732/redbridge-local-plan-inspectors-report.pdf>