

Basildon Borough Green Belt Topic Paper

October 2018

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1 Introduction

The purpose of this topic paper is to consider whether the approach to Green Belt in the preparation of the Basildon Borough Local Plan has been appropriate, and in particular if 'exceptional circumstances' exist to justify the release of land within the existing extent of the Green Belt for development purposes, and if so to what extent.

An earlier draft of the Green Belt Topic Paper (September 2017) informed the decisions taken in the Publication Local Plan, approved by the Council in March 2018.

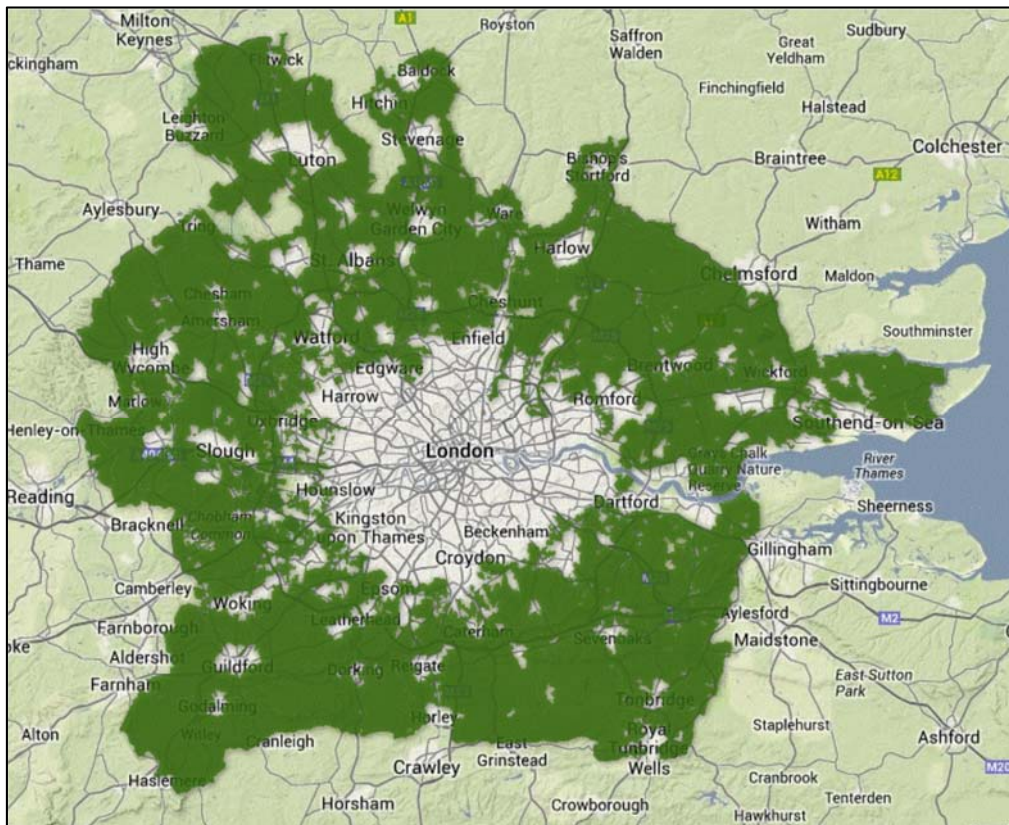
This Final Topic Paper informed the decisions taken in the Revised Publication Local Plan (Committee Version), considered on 3 October 2018. For completeness, the rationale for the Council's decisions in relation to 'exceptional circumstances' and 'harm' are therefore set out to assist in the interpretation of how the Council has made its final judgements.

1.1 Background

Green Belt is one of the best known and oldest national planning policies. Following the initial identification of a Green Belt around London, the Town and Country Planning Act 1947 allowed local authorities across the county to incorporate Green Belts into their Development Plans with the aim of preventing urban sprawl and keeping land around towns and cities permanently open.

Nationally there are 14 different Green Belts that cover a total area of over 1.6 million hectares of land. The Green Belt in Basildon Borough is part of the Metropolitan Green Belt that forms a ring around London.

Figure 1: The Metropolitan Green Belt

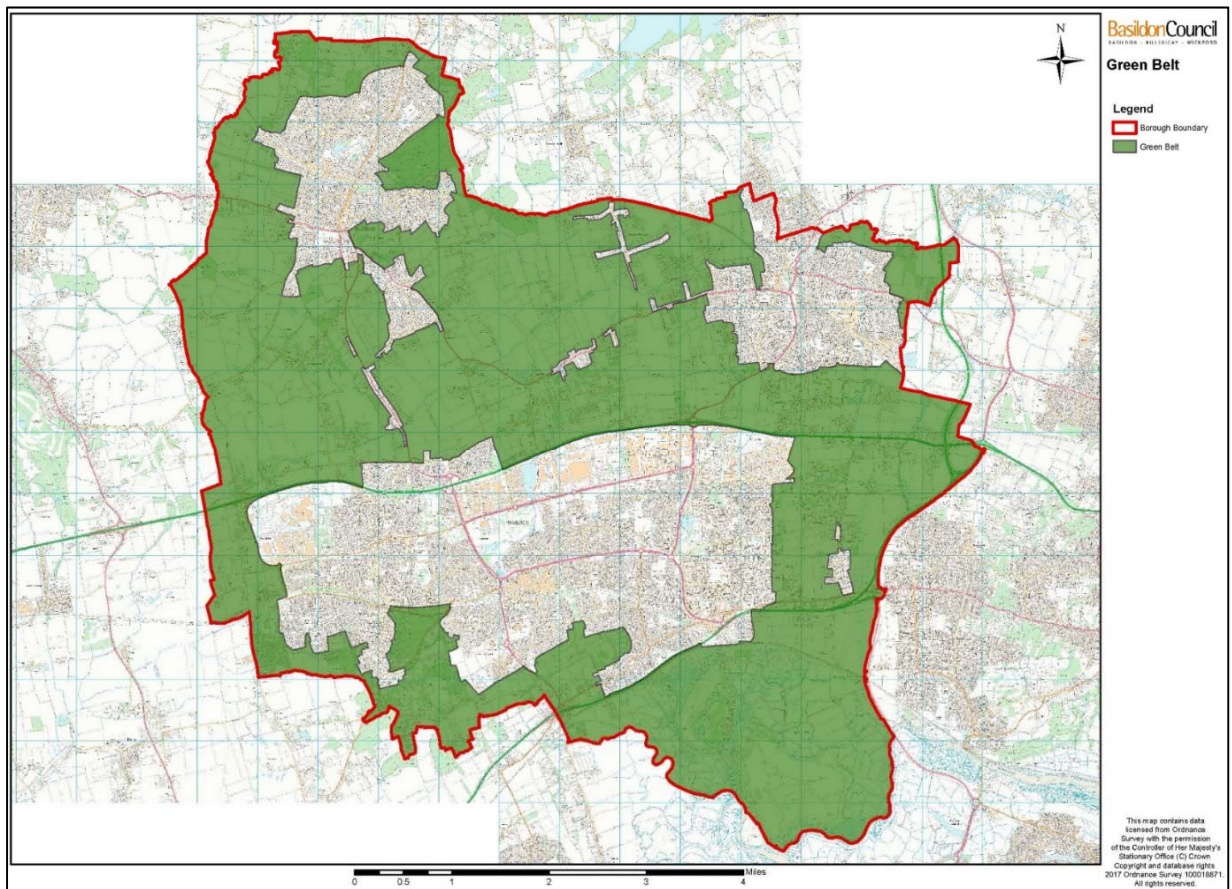


1.2 The Green Belt in Basildon Borough

The Borough's Green Belt boundaries were first designated in 1957 through the introduction of the *County Development Plan*. The *Approved Review Development Plan (1976)* and the *Approved Structure Plan (1982)* continued to set out general Green Belt boundaries that were later reviewed and defined in the *Billericay Local Plan (1989)* and the *Basildon District Local Plan (1998)* having regard to the development needs of the borough to 2011 only. They have not been the subject of amendment since that time despite substantial growth in the borough's population, which has instead had to be accommodated by brownfield and greenfield development in urban areas.

The Green Belt in Basildon Borough covers an areas of 6,950ha. This is 63% of the borough's land area. It acts to separate the main towns of Basildon, Billericay and Wickford from one another. The serviced settlements of Bowers Gifford, Crays Hill and Ramsden Bellhouse are inset within the Green Belt. There are 13 Plotland areas also located within the Green Belt extent, where Green Belt policies limit the extent to which further development can occur.

Figure 2: Current Green Belt extent within Basildon Borough



2 National Planning Policy for Green Belts

2.1 National Planning Policy Framework 2018

The National Planning Policy Framework (NPPF) was updated in July 2018 and states the following in relation to Green Belts:

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

Green Belt serves the following five purposes:

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

Green Belt is therefore a policy designation intended to keep land free from development. There is a common public misconception that Green Belt land is ‘sacrosanct’ and that once designated it should never be developed. This has never, however, been the case in legislative or policy terms.

National policy is very clear that when a planning application is submitted on Green Belt land, the applicant must demonstrate ‘very special circumstances’ exist in order to justify harm to the Green Belt. National Planning Practice Guidance (PPG) states that housing need alone is unlikely to represent these ‘very special circumstances’.

However, a different test applies when determining whether to adjust Green Belt boundaries through a Local Plan – in particular the process of plan-making requires a more strategic and longer term assessment and then judgement to be made. The NPPF states that: *‘Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans’.*

The focus of the NPPF is on promoting sustainable patterns of development: it requires consideration of the consequences of channelling development towards non-Green Belt locations, and (amongst other matters) seeks consistency with the local plan strategy for meeting identified requirements for sustainable development.

The NPPF goes on to say that *‘Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, 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.’*

This will be assessed through the examination of strategic policies and whether the strategy:

‘a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.’

2.2 Planning Practice Guidance 2012

The national Planning Practice Guidance (PPG) does not include a specific section on Green Belt, nor the interpretation of what is meant by 'exceptional circumstances'. However, the relationship between Green Belt and development needs is considered in the sections on *Housing and economic development needs assessments* and *Housing and economic land availability assessments*.

In relation to the assessment of need paragraph 001 Reference ID: 2a-001-20180913 states that plan-makers should not apply constraints to the overall assessment of need. However, it goes on to state that these [constraint] considerations will need to be addressed when bringing evidence bases together to identify specific policies within Development Plans. Therefore, constraints such as Green Belt cannot be considered in *determining* what the overall need for development, whether it be residential or commercial, should be.

In relation to the assessment of supply meanwhile, paragraph 001 Reference ID: 3-001-20140306 and paragraph 019 Reference ID: 3-019-20140306 state that local planning authorities should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which may indicate that development should be restricted and which may restrain the ability of an authority to meet its need.

The PPG as a whole therefore indicates that whilst constraints such as Green Belt should not be used to assess development needs, they can be considered in determining whether it is possible for an authority to meet its full, objectively assessed need for development. However, the PPG does not provide any guidance on the balance that should be struck between development need and the different types of constraints that exist. In relation to Green Belt, it merely refers the reader back to the NPPF, which states that Green Belt boundaries may only be amended in exceptional circumstances through the review of the Local Plan. No further guidance on what these 'exceptional circumstances' may be is offered.

3 Green Belt Policy in Practice

In addition to the criteria that should be considered before concluding that exceptional circumstances exist to justify changes to Green Belt, as set out in the NPPF and section 2.1 above, consideration should be given to how Green Belt policy has been interpreted in practice.

Numerous Local Plans for Green Belt authorities have been subject to Examination in Public over the period since the NPPF came into effect in 2012, providing a steer as to how Planning Inspectors are interpreting Green Belt policy in relation to development needs and in turn, how they are interpreted further through Judicial Review.

There are some examples where local planning authorities have submitted plans which have sought to avoid revising Green Belt boundaries, indicating that exception circumstances have not existed to justify such release. A local example of this is the neighbouring Castle Point Borough. However, the soundness of their submission New Local Plan was not examined, as it was found to be procedurally flawed through failure to meet the Duty to Cooperate. Consequently, no further consideration can be given to this case, but similar proposals include:

3.1 Reigate and Banstead

Reigate and Banstead Borough Council in Surrey has 8,890ha of London Metropolitan Green Belt; amounting to 69% of its total area. It submitted a Local Plan in 2012, which did not plan for Green Belt release, and this was subject to an Examination in Public against the requirements of the NPPF.

However, following initial consideration of the submitted plan, the Inspector issued an Interim Report highlighting legal deficits and concerns about the soundness of the Submission Local Plan. In his final report he noted:

The Submission version of the Plan was somewhat ambivalent about the need for land outside the urban area to be developed, particularly Green Belt land. Because information about potential capacity within the urban area to meet the housing and employment needs identified by the Council was not wholly convincing, it became evident that development of some land outside the urban area would be unavoidable.

The Examination was subsequently suspended for a period of seven months and the Council acknowledge the need for Green Belt release and devised an approach to identify suitable land to remove from the Green Belt in accordance with the NPPF. In his analysis of the amendments to the Green Belt subsequently proposed by the Council he reported that the debate at the

Examination concluded that exceptional circumstances for releasing land from the Green Belt would exist if:

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

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

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

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

3.2 Lichfield

Lichfield District Council in Staffordshire has 15,190ha of the West Midlands Green Belt, amounting to 46% of its total area. It submitted a Local Plan in 2014 which was not considered to identify sufficient sites to meet its full

objectively assessed need for housing. In this case the Local Plan Examination was also suspended in order for the Council to carry out additional work. However, in the case of Lichfield, there were sites both within the Green Belt and in open countryside outside the Green Belt available for consideration; which differs from Basildon Borough's situation, but is similar for comparison to that of Chelmsford City's.

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

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

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

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

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

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

In the case of **IM Properties Development Limited v Lichfield District Council [2015]** the Hon. Mr Justice Cranston considered the above interpretation of Green Belt policy as part of the complaint (ground no. 3). He

held that the approach taken by the Inspector was logical, as he had applied the appropriate legal and planning policy tests in reaching his conclusion on the matter.

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

3.3 Solihull

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

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

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

3.4 Greater Nottingham

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

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

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

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

In this case, I am satisfied that the prospective build rates for each 5 year tranche do not represent an attempt to suppress house building in the early years or rely on past poor economic conditions to justify low housing targets. The proposed build rates are supported by convincing

evidence on the operation of local housing markets in the GL Hearn report [CD/KEY/02], which found the proposed levels of housing delivery in the ACS for each of the three Authorities to be ambitious but feasible. In the first five years, housing delivery would be less than the annual averages for the 17 year period. As the Councils argued, however, significantly increasing the supply of sites in the early years would not necessarily speed delivery, would require the release of additional Green Belt land contrary to national policy, and could delay progress on some of the more challenging regeneration sites.

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

3.5 Conclusion

It is clear from practice and legal precedent that there is an imperative for ensuring that any amendments made to Green Belt boundaries can be fully justified and can be judged as amounting to exceptional circumstances which necessitate their amendment. Anything less would put the Local Plan at risk of either being found unsound by the Planning Inspector, or being found wanting at a judicial review thereafter. It is therefore recommended that the tests established by Hon Justice Jay in **Calverton Parish Council v Greater Nottingham Councils [2015]** are considered in determining the appropriateness of Green Belt boundary revisions in Basildon Borough, alongside the tests now set out in the Revised NPPF.

4 Green Belt Evidence

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

4.1 History of Green Belt Review in Basildon Borough

A Green Belt Study was originally undertaken for Basildon Borough in the period between September 2012 and October 2013 in order to inform the *Core Strategy Revised Preferred Options* consultation in early 2014. This study came under criticism as it sought to combine a Green Belt Review with a sustainability/suitability assessment of potential development locations within the Green Belt. This consequently was judged to have diluted the assessment of the role different parts of the Green Belt make towards Green Belt purposes, and strayed into policy making, as opposed to providing an evidence base on which to base an informed and balanced policy.

Consequently, the Green Belt Study was reviewed in 2015 in order to refocus its attention on the role different parts of the Green Belt fulfil in relation to the Green Belt purposes set out in the NPPF. This study formed part of the evidence base for the *Draft Local Plan*, which was subject to consultation in early 2016. As before, this study came under criticism. Part of this criticism was focused on the methodological change that occurred between 2013 and 2015, with some consultees preferring the results of the 2013 study. Others questioned the robustness of the results and the consistency of the assessment between different parts of the Green Belt.

In order to address these issues, the Council contacted the Planning Advisory Service in 2016 to seek assistance. It supported the Council in this matter by appointing a national specialist to undertake an independent review of the methodology developed and applied by the Council to ensure it was appropriate, had followed best practice and aligned with the type of review work being undertaken in other Green Belt areas. Secondly, in order to ensure consistency issues were addressed, two officers, independent of the officer tasked with the previous 2015 Study, were appointed to review the Green Belt Study according to its PAS refined methodology.

The details of the outcomes of the Independent Review are detailed below, as are the outcomes of the Green Belt Study 2017.

4.2 Independent Review 2016/2017

A copy of the note provided to the Council by the Independent Reviewer is attached to this report as Appendix 2. In relation to the methodology applied by the Council in the Green Belt Review 2015, the note concludes the following:

The assessment of the Green Belt (the December 2015 report) follows a methodology which appears sound in itself and appears consistent with what has now evolved as 'good practice' (though there is no 'official' guidance on how Green Belt assessments should be undertaken). Noting that for reasons beyond the Council's control, the work relates only to the Green Belt in Basildon rather than being more strategic, the basic principles of good practice demonstrated by the report include:

- *The assessment is solely concerned with Green Belt policy and hence avoids other issues getting mixed up in the assessment*
- *It is comprehensive in addressing all of the area in Basildon designated as Green Belt*
- *The area has been divided into 'parcels' of land to make the assessment more manageable and the results more understandable*
- *Each parcel has been assessed in terms of the contribution keeping the land open makes to the fulfilment of the five purposes of including land in the Green Belt from the Framework*
- *The interpretation placed on 'large built up areas' and 'towns' for the purposes of applying the 'tests' inherent in the purposes has been set out for the avoidance of doubt and to avoid subsequent variation in interpretation*
- *The way the 'fourth purpose' concerned with the setting of historic towns should be applied is properly discussed and a sensible interpretation set out and used*
- *The 'fifth purpose' concerned with regeneration has not been used in the assessment as it provides no means of distinguishing the role of one part of the Green Belt from another*
- *The way land performs in fulfilling the purposes that are used in the assessment is set out as far as is reasonably possible given the very poor drafting of the purposes and the inevitable element of subjectivity involved in their application, and this should have helped achieve consistency in the assessment as well as providing clarity and reassurance to those interested in the findings of the assessment.*

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- *Whilst all that the Council has now done in undertaking an assessment of the Green Belt in its area appears consistent with good practice, there are a couple of comments we would make, in relation to the use of the land parcels and in the presentation of the findings of the assessment.*
 - *First, dividing the study area into parcels to make the assessment manageable is common practice and there is nothing wrong with this approach in principle. How the division is done varies from study to study, with some approaches seeking to base the change from one parcel to another on landscape character thinking, noting the use of landscape character (not quality) assessment techniques in informing the performance of land against some of the purposes. Other approaches rely more on the use of 'lines' recognisable on the ground such as roads, rivers and railway lines. There can be no 'right' approach - many studies combine different approaches in any case. What is important is to recognise that the division into parcels is to enable the assessment to be undertaken and so care must be taken to recognise that possible boundaries for the Green Belt are to be an output and cannot therefore be a fixed input. Green Belt assessments have to allow for iteration. It may well be that in carrying out the assessment of the parcels against the purposes of Green Belt, some parts of parcels may appear to perform differently to other parts and therefore the parcel should be split if a recognisable and potentially defensible boundary can be identified. Basildon Council needs to review its assessment to reassure itself that no further iteration is required. It can be assured that the promoters of development sites will seek to show that within an assessment parcel a smaller site could be identified that would be suitable and a non-strategic housing scheme could be found.*
 - *The second point is about presentation. The 'bottom line' of the assessment, Figure 12, 'Overall Green Belt Contribution' shows the assessment findings to be that the contribution to the Green Belt purposes is overwhelmingly 'partial' or 'limited', conveyed visually by paler colours. This may come as a surprise to some given that the starting assumption is that the Green Belt was designated on sound grounds. It may provide encouragement to developers with local interests and it may be a shock to those who believe that Green Belt land can never be touched. As noted in the discussion, the*
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presentation of the study in this form is a consequence of the way that the individual assessments against the purposes have been combined. There is nothing intrinsically wrong with what has been done.

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

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

4.3 Green Belt Study 2017

In order to address the consistency issues raised by both private developers and members of the public during consultation on the Draft Local Plan, and also to address the methodological and presentation issues identified by the Independent Review, the following actions were taken in the preparation of the Green Belt Study 2017:

Consistency:

A full review of the Green Belt Study 2015 was undertaken by two officers, independent of the officer who undertook the original review.

Outputs were mapped early in the review process to check for inconsistent results.

Methodology:

Consideration was given to the sub-division of land parcels. Changes were made in areas where pockets of development in the Green Belt were significantly impacting on the score being assigned to areas of open land e.g. the Plotlands in North Benfleet.

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

Presentation:

In recognition that the assessment is of the Green Belt, a green colour gradation was used to present the results as opposed to red, amber, green (RAG) scoring.

The approach to artificially combining the four purpose results was changed to instead present the highest scoring for each parcel.

A section considering the wider Green Belt context has been included.

Indicating that the Green Belt Study captured the recommendations of the Independent Review, the Independent Reviewer, in a presentation to Members on the 19 April 2017, further advised the following assurances in respect of the Green Belt Review 2017:

- Very clear on the role of Green Belt review and the separation of evidence and policy.
- Method is well set out.
- Application of the method is well documented.
- Accessible presentation of overall findings of the review.

During discussion with Members, two queries were raised with regard to the methodology, on which the Independent Reviewer offered the following advice:

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

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

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

Our thoughts are that the purposes are poorly written and so are already difficult to interpret, but adding quasi-objectivity is not the way to overcome apparent subjectivity. What is needed and has been used is as clear as possible an explanation of the application of the assessment of the fulfillment of the purpose when assessing parts of the Green Belt so that the assessment is as robust and as consistent as it can be. There is in any case no clear basis for doing the kind of thing suggested

that would carry widespread confidence. For instance, there is far more to the interpretation of the role of open space to the maintenance of the separate identity of towns than the width of the gap. Seeking to set down a specific distance below which the towns are determined to be tending to merge would be very spurious and gain nothing in the robust practical application of the purposes. The way to deal with the (many) discretionary aspects of the planning process includes professionalism and dialogue, and such matters cannot be replaced by a system of 'planning by numbers'.

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

It is therefore considered that the Green Belt Study 2017 provides a robust basis on which to make decisions in relation to the Publication Local Plan. It identifies, with the exception of a small parcel of land within Billericay (parcel 14A), which has already been developed at urban densities due to very special circumstances, that all parts of the Green Belt in Basildon Borough make at least a partial contribution towards at least one of the purposes of including land within the Green Belt. Table 1, and figure 3 show the combined results of the Green Belt Study 2017.

In order to understand these results in the context of the wider Green Belt, the Green Belt Study 2017 also contains the map shown at figure 4 of this report. This shows the role the Green Belt in Basildon Borough plays in separating the towns across South Essex at both a local and at a strategic level. This map has both a role to play in determining the appropriateness of development locations at a local level, highlighting key areas where development may cause neighbouring towns to merge, and also at highlighting those areas where cross-boundary cooperation is needed to prevent neighbouring towns in different authority areas from merging.

Table 1: Combined results of the Green Belt Study 2017 – based on highest scoring purpose.

Key	Green Belt area
Contributes to the function of at least one Green Belt purpose	1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14A, 15, 16, 17, 18, 20, 21, 22, 25, 26, 28, 29, 30, 31, 33, 34, 35, 36, 37, 38, 40, 42, 43, 44, 45, 46, 48, 50, 51, 52, 53, 54, 55, 56, 57, 59, 60, 63, 64, 65, 67, 68, 69, 70, 71, 72, 73
Partly contributes to the function of at least one Green Belt purpose but does not strongly contribute to a purpose	3, 14B, 19, 23, 24, 27, 32, 39, 41, 47, 49, 58, 61, 62, 66, 74
Makes no contribution to the purposes of the Green Belt	14A

Figure 3: Combined results of the Green Belt Study 2017 – based on highest scoring purpose.

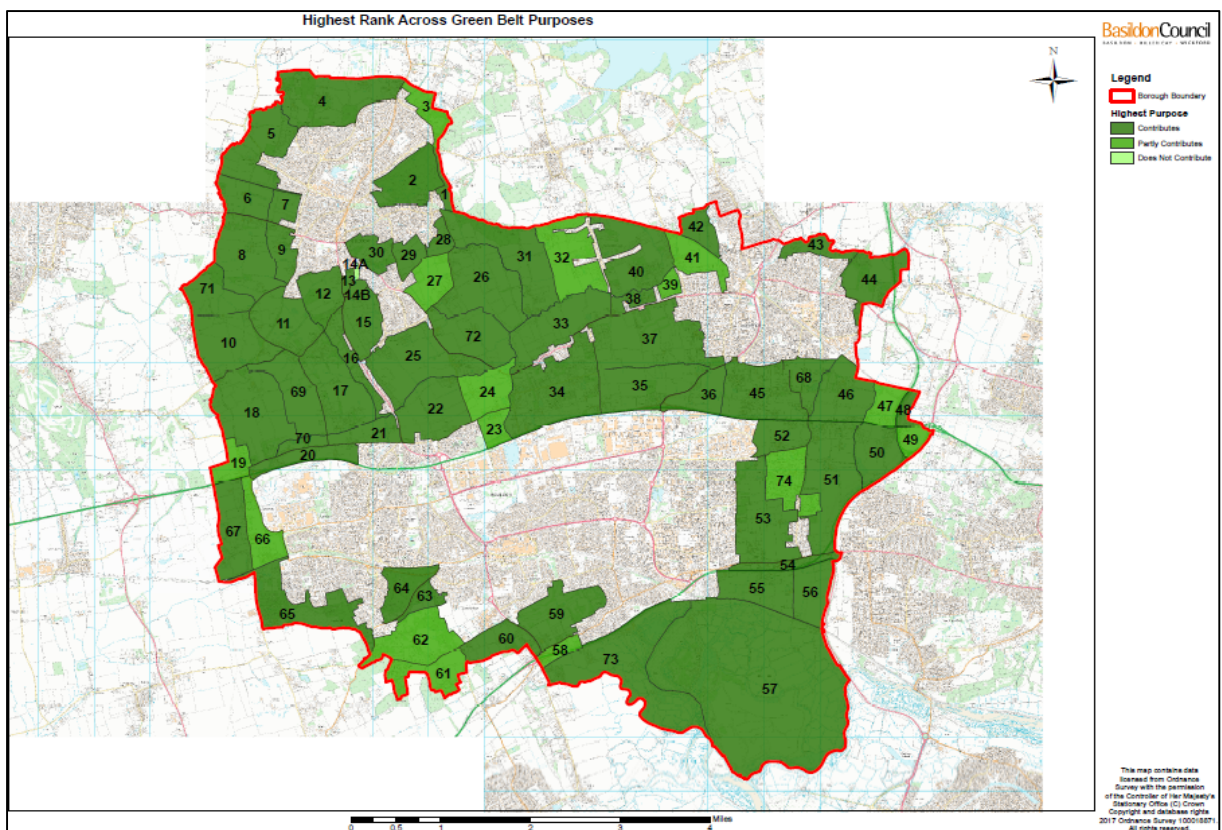
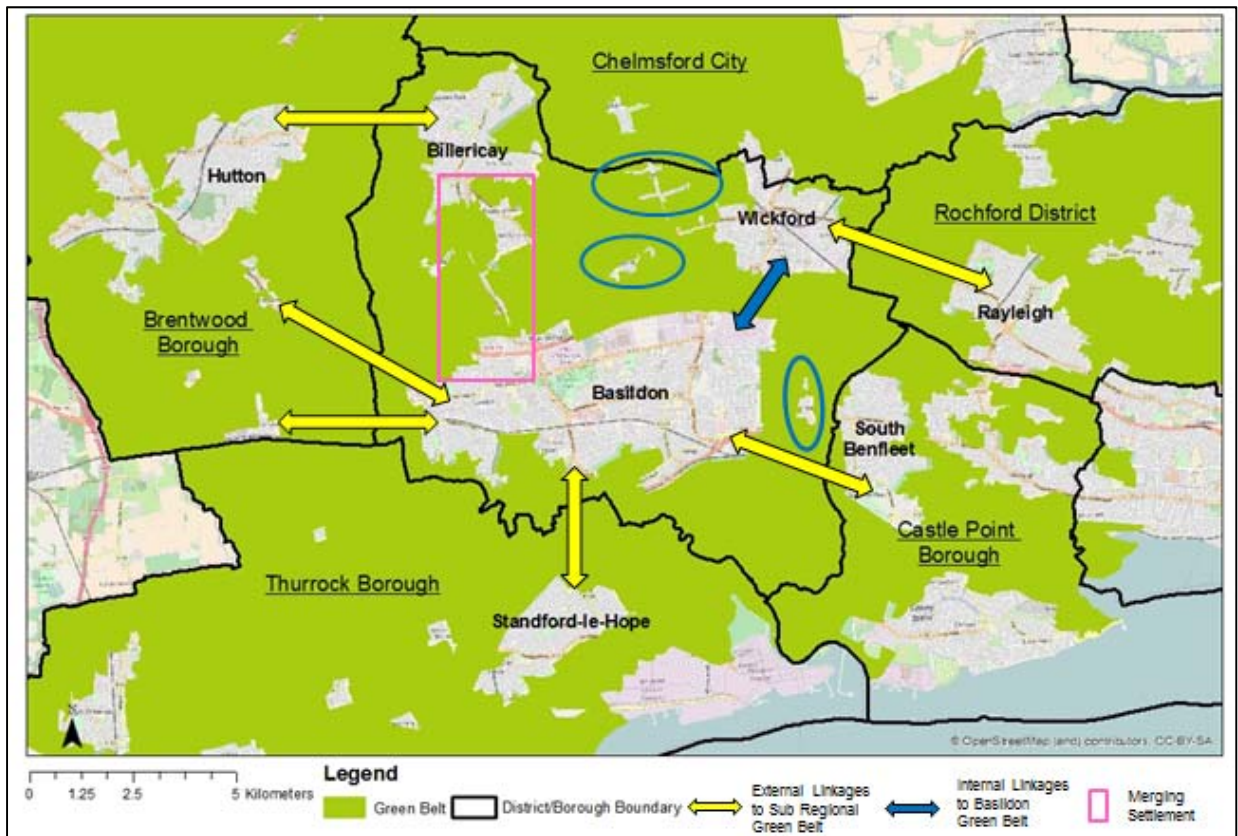


Figure 4: Relationship of the Green Belt in Basildon Borough with that in surrounding areas



4.4 Conclusions

Basildon Borough has a robust Green Belt Review that has been subject to refinement and Independent Review since 2013 and has been found to be an appropriate evidence base for informing planning policy development and decisions in Basildon Borough.

The Green Belt Assessment 2017 shows that the vast majority of the Borough's Green Belt continues to contribute towards the openness of the Green Belt and the purposes of including land within it. Consequently, it is likely that development within its current extent **will cause harm** to the Green Belt.

However, as set out in *Calverton Parish Council v Greater Nottingham Councils* [2015] there are five components to the consideration of whether exceptional circumstances exist to which may permit a degree of harm to the Green Belt to arise through the plan-making process. The extent and nature of harm to the Green Belt is only one of these tests. Furthermore, as was clear from the Lichfield Local Plan Inspector's Report, sustainable development is not the servant of Green Belt policy, and there may be instances where harm to the Green Belt is necessitated by the need to secure sustainable development patterns. The Green Belt Assessment 2017 therefore needs to be considered alongside other components of the evidence base before it can be determined

whether exceptional circumstances exist, or not to amend the Green Belt boundaries through a review of the Local Plan.

5 Testing whether there are ‘Exceptional Circumstances’ in Basildon Borough

Having regard to the National Planning Policy Framework, the Planning Practice Guidance and the application of Green Belt policy in practice, this section of the report will examine whether there are exceptional circumstances for reviewing the Green Belt in Basildon Borough.

The tests identified in **Calverton Parish Council v Greater Nottingham Councils [2015]** will be applied, with the second test which considers the constraints on supply/availability of land extended to capture those tests set out in the Revised NPPF 2018.

In undertaking this testing, the report will draw upon a wide source of evidence related to development needs, land supply and the Green Belt Study 2017, the latter as discussed in the previous section of this report.

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

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

5.1.1 Housing

The South Essex Strategic Housing Market Assessment (SHMA) 2016 identified a need for between 763 and 837 homes per annum in the period from 2014 to 2037. This results in a need for 15,260 and 16,740 homes in Basildon Borough over the plan period from 2014 to 2034 to meet the full, objectively assessed need for housing. This SHMA was prepared using the 2012-based CLG Household Projections, which were the latest available, in accordance with the methodology set out in the PPG. In order to meet this need, the Draft Local Plan identified a requirement for between 8,000 and 8,500 homes to be located within the current extent of the Metropolitan Green Belt within Basildon Borough.

Since the Draft Local Plan was prepared, the 2014-based CLG Household Projections were published and the SHMA had to be subsequently updated to reflect these, alongside new evidence regarding economic growth requirements

and best practice in relation to addressing market conditions. The SHMA Addendum 2017, which focussed on these baseline changes only, identifies a need for between 972 and 986 homes per annum in the period 2014 to 2037. This results in a need for 19,440 and 19,720 homes in Basildon Borough over the plan period to 2034. This is an uplift of around 18% compared to the SHMA 2016, and potentially requires around 4,000 additional homes to be accommodated within the Borough as part of the Publication Local Plan, compared to what was included in the Draft Local Plan. The Basildon Borough Housing and Economic Land Availability Assessment has been reviewed in light of this increased need to determine whether additional capacity could be identified from sites within the urban area, or whether higher densities could be achieved on sites to limit the loss of Green Belt land. It remains the case however, that a proportion of this additional requirement would remain unmet, unless Green Belt was considered even further to determine whether the full extent of this additional housing need could be accommodated sustainably compared to what was planned for in the Draft Local Plan.

Of particular note, the SHMA Addendum 2017 shows a considerable worsening of market conditions within Basildon Borough over time, thereby justifying this uplift in need. In particular, house prices have increased by the second highest amount in South Essex in the period from 2001 to 2014, which has resulted in Basildon Borough having the greatest increase in lower quartile affordability ratios in the South Essex over the same period. This means it has become much harder for first time buyers to access the housing market. This has resulted in an increase in the number of people still living with their parents into adulthood, including those with their own children. These are known as concealed households, and there is a risk that the number of these will continue to grow unless affordability and supply issues are not addressed.

The new standard method for calculating housing need set out in the revised NPPF 2018, if applied now, would also use the same set of household projections along with housing affordability ratios (2017 based) to calculate the requirement for housing in the Borough. The household projections provide the base for the calculation with the affordability ratio identifying the scale of uplift required to address local market conditions with the uplift capped at 40%. The standard method does not use the base date of the data (2014), but rather the current year from which the calculation is to be taken. This means that if a Local Plan was prepared today for Basildon Borough it would have a requirement for 17,232 homes over the period from 2018 to 2034 (16 years), based on data up to 31 August 2018. Whilst the OAN calculated by the SHMA Addendum is higher, it does cover a longer time period. Once completions between 2014 and 2018 have been taken into account to contribute towards supply, the remaining housing need for the plan period, including shortfall in

provision for the period 2014-2018, as set out in this Local Plan, is broadly aligned to the figure calculated by the standard method.

Combined, the scale of need, especially which cannot be met within the urban area, and also the worsening of market conditions indicate that there is an acuteness of need for housing in Basildon Borough. Therefore, it is considered that this first test in respects of demonstrating the acuteness of needs in relation to housing is passed. It should also be noted that there has been no challenge to the identified OAHN or the way it has been calculated, therefore there is no suggestion that it be revised downwards.

It should be noted that Basildon Borough sits within the South Essex Housing Market Area, and also the Wider South East. Consequently, it may receive requests from others to accommodate an element of their unmet need also. At this time, the South Essex Joint Strategic Plan are not sufficiently advanced, and the extent of any such request is not therefore known. However, if such a request was to arise, and the Council was satisfied that it was justified, then this would act to increase the acuteness of need further in Basildon Borough.

5.1.2 Economic Development

The South Essex Economic Development Needs Assessment (EDNA) 2017 identifies a need for 28ha of land to accommodate economic development needs purposes within Basildon Borough in the period to 2036. In addition to this, the Essex Grow-on Space Feasibility Study 2016 identifies a requirement for 9ha of land to provide for the concealed grow-on needs of expanding businesses in Basildon Borough. This gives a combined requirement for 37ha of land to accommodate economic development needs.

However, it is known that the provision of 37ha of land to meet this need will not be sufficient to enable this delivery. This is because there is a need to account for churn in commercial property, and also to account for losses to other uses. Changes the Government has made to permitted development rights has meant that some commercial space has been lost to residential uses in the recent past. It is also common for units originally intended for business uses falling within class B of the Use Classes Order to be reused instead for non- B class development, in particular uses falling with Use Class D2 (commercial leisure). The Council has lost a number of appeals in relation to proposals of this nature, as some modern commercial leisure operations such as karate studios, trampolining and go-karting are more suited to the types of unit that are typically found in the Borough's employment areas, than units typically found in town centres, where such uses would normally be directed through the application of the relevant sequential test.

In addition to this, it is known that there will be demand arising from both displaced economic activity, and also unmet economic growth arising from London. The EDNA 2017, has indicated that the displacement of economic activity alone could give rise to demand for up to 14ha of land within Basildon Borough, assuming all displaced economic activity from the East London Borough's moves to South Essex. This will place significant additional demand on land which is made available in Basildon Borough, and may affect the availability and/or affordability of sites and property for smaller indigenous businesses. Therefore, the Local Plan commits to the delivery of at least 51ha of employment land.

As a consequence of churn and the demand for space for other commercial uses, the Employment Land and Premises Study (2013) indicated that need should form no more than 66% of supply. Similarly, the EDNA 2017 recommends that demand should account for no more than 65% of supply.

There is some employment land supply within the Borough which is owned by significant multi-national companies. The Council is keen to encourage the retention of these companies as they respond to changes in the global economy, and therefore recognises that their land-holdings may not be available for general economic growth, but may provide opportunities for additional job growth in the Borough through business consolidation. This constrains the available supply of land for general economic growth, particularly in relation to sites suitable for office space.

Consequently, the Local Plan makes provision for 92ha of land for employment purposes, with the intention of securing at least the 51ha of B-class employment development needed. This will deliver around 14,150 B-class jobs, as part of a total jobs growth of at least 20,000 jobs within the Basildon economy.

The Employment Land and Premises Study 2013 identified a maximum of 38ha of land available for economic development needs purposes within the existing urban area of Basildon Borough. Since this was surveyed, the Council has been advised that some of this land availability immediately adjacent to the A127, will have to be subject to safeguarding for road improvements, affecting its availability for development. Consequently, there is under-provision within the existing urban area of at least 19ha of land for economic development purposes. This represents around 33% of the minimum land requirement and could be considered to represent an acute level of under-provision, particularly as there are pockets of significant employment and income deprivation within Basildon Borough, which will be exacerbated if Basildon Borough fails to meet its economic potential. Therefore, the first test in relation to acuteness of need in respect of economic development is passed.

5.1.3 Gypsies and Traveller and Travelling Showpeople Needs

The Gypsy and Traveller Accommodation Needs Assessment 2017 indicates that there is a need for 53 pitches for Gypsies and Travellers and 3 plots for Travelling Showpeople that maintain a travelling lifestyle within Basildon Borough. Furthermore, there is a need for sites to accommodate the needs of around 51 Gypsies and Travellers who no longer travel, whose needs are not accounted for in the SHMA Addendum 2017 and that have a cultural preference for living in a caravan, which needs to be planned for.

A Gypsy and Traveller Site Provision Study was prepared in 2018, updating the 2015 Study to bring it into compliance with Planning Policy for Travellers 2015. This concluded that the potential land supply available outside of the Green Belt to meet Gypsy, Traveller and Travelling Showpeople needs who continue to meet the planning definition is not sufficient. Whilst this evidence concluded that there was potential for 25 pitches to be located in urban locations, other evidence and judgements on it made by the Infrastructure, Growth and Development Committee concluded that this supply was much less and only 10 pitches could be accommodated in the urban area. This leaves an unmet need of 43 Gypsy and Traveller pitches and 3 Travelling Showpeople plots, representing 82% of the total need, and can therefore still be considered to be acute. The acuteness of this need is further evidenced by the number of both illegal residential encampments and illegal transit encampments that currently exist or periodically occur in Basildon Borough. The first test is therefore also passed in relation to Gypsy, Traveller and Travelling Showpeople Accommodation Needs.

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

5.2.1 Housing

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

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

In undertaking these tests it is important to note that, the Green Belt boundary is very tightly drawn around the existing urban areas of Basildon Borough, and most of the land falling outside the urban areas is either:

- within the extent of the Green Belt, or
- is/was part of an Area of Special Reserve (ASR) in the 1998 Local Plan, parts of which have since had planning permission granted for residential development (Dry Street, Basildon and Barn Hall, Wickford).

The Green Belt boundaries have not been reviewed in Basildon Borough since the early 1990s, as reflected in the 1998 Local Plan. The Green Belt boundaries put in place at that time were based on a consideration of needs up to 2001, with Areas of Special Reserve only identified in order to meet need up to 2011. Needs beyond 2011 did not form part of the consideration of the Green Belt reviews at that time.

The Basildon Borough Housing and Economic Land Availability Assessment (HELAA) has been developed based on an extensive survey of available land, a 'call for sites' process, and also regular updating to capture newly emerging proposals. The Council's own Corporate Property Service has been encouraged to put forward surplus public land and opportunity sites through this process, with 82 separate sites put forward for consideration in 2017 alone. Similarly, in discussions with the Homes England, Essex County Council and Essex Police, further public sector sites have been identified for inclusion.

In relation to each site, an assessment has been undertaken in line with the Council's approved HELAA Methodology 2017 (Minute 2017/331) to ensure that development locations are suitable, available and achievable as potential housing sites. This ensures that the most sustainable development locations are identified informed by the Local Plan evidence base.

Meanwhile, in order to ensure that any development which does occur is sustainable in itself, opportunities to optimise land use have been explored. As part of this process, careful consideration has been given to the potential density of development for each site, having regard to the urban character of local areas and also the opportunities to bring forward regeneration and renewal which makes more efficient use of land. Key examples of this can be found within the town centres in Basildon Borough. The Basildon Town Centre Masterplan 2012 for example sought to introduce at least an additional 2,000 homes into Basildon Town Centre, of which around 1,000 have already been secured through planning consents, or permitted development. The recently approved planning application for Laindon Town Centre meanwhile introduces 224 additional homes into that town centre. Meanwhile, a Regeneration Strategy for Wickford and Pitsea Town Centres aims to make better use of land for residential, commercial and leisure purposes.

It should be noted however that some parts of Basildon Town were developed at high densities originally, using experimental design seen throughout New Towns developed in the post war era. In some cases, the outcomes of this experimental design approach were not successful, and this has had implications for the communities that have lived in some neighbourhoods. Basildon Council has already embarked on a programme of estate renewal in those parts of Basildon Town where the design has not been successful in creating the thriving communities intended. This includes the current renewal of the Craylands Estate into Beechwood Village with Swan Housing Association, Essex County Council and Homes England. The renewal programme for the Craylands Estate is not however at the same density as the original estate, resulting in an overall loss of housing units from the area. Estate renewal will not therefore, in all cases, be contributing towards enhanced housing supply in Basildon, as there are elements of renewal that place greater weight on the quality, rather than quantum of provision.

In addition to opportunities for renewal within the urban area, there are also three strategic opportunities for greenfield development on land outside the Green Belt. The majority of land at Nethermayne/Dry Street in Basildon, adjacent to the Basildon & Thurrock University Hospital benefits from outline planning consent (12/01080/OUT), with elements of the development for 725 homes and community facilities being brought forward under reserved matters applications. This land was originally safeguarded as an ASR for housing in the 1998 Local Plan. Similarly, land at Barn Hall in Wickford was also safeguarded under the same principles. Parcels of this land have already come forward for development through outline and reserved matters applications and the remainder of this land has been considered for inclusion in the Publication Local Plan having been subject to the full suite of tests as for other strategic development locations to identify its suitability and sustainability credentials.

Finally, Land at Gardiners Lane South was allocated for mixed use development in the 1998 Local Plan, but continues to remain largely undeveloped nearly 20 years later. In order to identify whether there is a better way of bringing this site forward within a reasonable timeframe, extensive work through the Local Plan preparation process has been carried out in relation to:

- the relocation of playing pitches from this site;
- a High Level Development Framework to test options to identify its development capacity; and
- an evaluation of its likely viability to identify the most appropriate mix of development for the site.

The opportunity to maximise the potential from these non-Green Belt strategic sites has therefore been considered to minimise the need to remove land from the Green Belt elsewhere in the Borough.

Through the HELAA process, it has been possible to identify a supply of suitable land outside the Green Belt for 6,894 homes. This is the *optimal urban potential* and not the maximum potential urban supply, as it uses a strategy which protects existing public open spaces from development in accordance with evidence in the Open Space Appraisal, and policy in the NPPF. It also protects those employment areas that have been identified as worthy of protection from other forms of development in accordance with the Economic Development Needs Assessment, Employment Land and Premises Study, and policy in the NPPF.

It is however recognised that not all sources of urban supply are known at this time. As the economy and technologies change some sites in other uses may become available for housing. For example, the Government's intention to ban petrol and diesel fuelled cars from 2040 will see the demise of the petrol station format in the long-term. However, the speed of this demise is not known at this time as the current take up of electric vehicles is low. Furthermore, as the way public sector bodies work changes, it is reasonable to assume that some more surplus public sector land may become available in time. In addition to this, the housing stock itself is renewed in an adhoc way, often at a greater density than that which preceded it. An allowance can therefore be made for this 'windfall' development, although it is expected by the NPPF that such an allowance has some form of robust basis. To that end, a Windfall Assessment 2017 has been prepared for Basildon Borough, looking at all sources of windfall land supply in the past, and the potential for such sources to persist into the future. This identified the potential for 80 additional homes to be provided each year in Basildon Borough from windfall sources.

This brings the total supply potential from non-Green Belt sites within Basildon over the plan period to 9,098 homes. This is substantially less than the need for housing as identified in Test 1, indicating the presence of an inherent constraint within the Borough.

The revised NPPF 2018 sets out that there would be an expectation for local planning authorities to explore whether neighbouring authorities could accommodate need before the release of Green Belt land is permissible. Basildon Borough is located within the South Essex Housing Market Area (HMA), and therefore consideration has been given to the capacity of the other authorities in this area to accommodate the remainder of Basildon Borough's OAHN for housing, once the Borough's urban land supply has been exhausted.

As for Basildon Borough, all other authorities within the HMA are within the Metropolitan Green Belt, with their boundaries similarly tightly drawn around their urban areas. There is an area of land within Rochford District which does sit beyond the Green Belt, however, this area of land, known as Foulness Island, is owned by the Ministry of Defence and a considerable area remains in use for munition testing. It is also significantly affected by tidal flood risk and is subject to International and European nature conservation designations which make it unsuitable for anything other than the most minor forms of development.

In the cases of the other four authorities within the HMA, although Local Plans are at different stages of preparation, it is clear that they all have insufficient capacity in their urban areas to accommodate their housing need, and will all have to consider land within the current extent of their area's Metropolitan Green Belt for housing and other development purposes. This has been identified through ongoing Duty to Cooperate work, where the Council has advised the authorities within the HMA of its unmet need and those authorities have not been able to assist. There is not therefore the plausible scope within other parts of the HMA for the remainder of Basildon Borough's housing need to be met without encroaching into the Green Belt of those authorities, which would be contrary to the test set out for the receiving authority.

Whilst sitting outside the HMA, Brentwood Borough and Chelmsford City also neighbour Basildon Borough. As with the South Essex authorities, Brentwood Borough's urban areas are entirely surrounded by Metropolitan Green Belt and it is therefore having to consider applying these tests itself. At this time there, it cannot therefore assist Basildon Borough with regard to securing some of Basildon's unmet need on land outside the Green Belt.

Meanwhile, those parts of the Chelmsford City most closely related to South Essex (Runwell, Ramsden Heath and Battlesbridge) also sit within the Metropolitan Green Belt. The north-western part of the Chelmsford City (around

Broomfield) and the eastern part (South Woodham Ferrers and Danbury) do sit beyond the Green Belt, however these are already subject to substantial development proposals to meet the OAHN for Chelmsford City's Local Plan update until 2036. Furthermore, the northern parts, in particular, are more closely aligned to the North Essex HMA, of which Chelmsford City is a part. Meeting some/all of Basildon Borough's unmet housing needs in these parts of Chelmsford City, even if it were possible, may not therefore result in the most sustainable development patterns, and may increase traffic flows on the strategic road network, namely the A12, A130 and A127.

A final point is that the capacity of Chelmsford City, as with all other areas is finite, and due to its central location in Essex, the City will be subject to the same considerations by other surrounding Essex authorities, which will make the consideration of whether it can assist any specific authority/s more complex and certainly not resolvable by the time the Council intends to submit its Local Plan to the Government as set out in its approved Local Development Scheme 2018-2020.

What can be concluded therefore, is that there is an inherent constraint on land supply outside the Green Belt within the wider South Essex HMA, and also within other neighbouring authorities to Basildon Borough which means that it is not possible to meet the OAHN for housing on suitable and sustainable sites across a number of local authority areas without giving consideration to the current extent of the Green Belt.

Overall, housing Test 2 is therefore passed, as it can be demonstrated that there is an inherent constraint on land suitable for sustainable housing development.

5.2.2 Economic Development

The principal area for economic activity in Basildon Borough is the A127 Enterprise Corridor. This area is sandwiched to the north by the A127 and to the south by residential communities within the Basildon urban area. There are also smaller discrete industrial areas within Billericay and Wickford. Between the Economic Development Needs Assessment 2017 and Employment Land and Premises Study 2013 a detailed review of the land available within these existing locations for the accommodation of commercial development was carried out. This identified a maximum supply of 22.5ha of land within these existing industrial areas, which is less than the area of land required to meet arising needs. Since the Employment Land and Premises Study was undertaken, the Council has been advised that some of this land availability immediately adjacent to the A127, will have to be subject to safeguarding for road improvements, in turn affecting its availability for development.

Consequently, there is a potential undersupply within the existing urban area of at least 28.5ha of land for economic development purposes.

It is however considered that the South Essex Economic Development Needs Assessment (EDNA) 2017 which was used to determine the extent of land needed for employment purposes, was particularly pessimistic about economic growth in South Essex and may therefore have underestimated need. This would see future economic growth constrained by land supply. Evidence of this pessimism can be seen on Canvey Island, where despite very low growth predictions for Castle Point, ranging from a loss of 5ha of employment land to a maximum need for 1ha additional over the period to 2036, a developer is currently bringing forward a speculative industrial development of 6.5ha, indicating some strength in the local market for employment land above that anticipated in the EDNA.

Furthermore, there is a concern that the nature of the sites available within the existing industrial areas are not necessarily suitable to meet the needs of those companies seeking to invest in Basildon Borough, with many of the vacant sites being particularly small or awkward in shape. Consequently, not all the land available in these locations will be suitable for the growth occurring in Basildon Borough. The suitability of the land available will therefore act to further constrain economic growth. This constraint is also highlighted in the Council's Economic Development Policy 2017 (Minute 2017/676), which has been informed by additional local insight provided by the Borough's business community, and by commercial property agents.

There are therefore current constraints on land supply for commercial development which are acting as an inherent constraint on the delivery of sustainable economic development. This second test is therefore passed in relation to economic development.

5.2.3 Gypsies, Travellers and Travelling Showpeople

The site requirements for pitches for Gypsies and Travellers and Travelling Showpeople are quite specific, and consequently a Gypsy and Traveller Site Provision Study has been undertaken to identify appropriate sites. This was informed by a call for site process, which included contacting the Gypsy and Traveller community through appropriate forums to invite their proposals for potential new sites within their landownership. This did not however yield a sufficient supply of sites from the urban area, which when taking on board other evidence and supporting information means there is only one site with potential in the urban area, owned by Homes England, highlighting a limited available land supply outside the Green Belt to meet needs.

All authorities in Essex, including the neighbouring authorities have their own needs in relation to Gypsy, Traveller and Travelling Showpeople provision, although not as significant as that in Basildon Borough. Whilst not all of the other authorities have been as thorough as Basildon in their search for additional sites, it is known that there are a very limited number of sites promoted across South Essex, Brentwood and Chelmsford City for such provision, and indeed where sites are promoted they are typically in the Green Belt. Consequently, there is an inherent constraint on the supply of sites for sustainable development of Gypsy, Traveller and Travelling Showpeople accommodation in Basildon Borough specifically, but also across the wider area, and this test is therefore considered to be met in this regard.

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

So far, in the consideration of Tests 1 and 2 it is assumed that the OAHN and the employment figure identified in the EDNA represents sustainable development, and that failing to meet the OAHN or the employment requirement will result in unsustainable development. However, this may not be the case in all circumstances. It is therefore necessary to consider as part of Test 3 if the OAHN and the employment requirement represents the most sustainable level of development given that it requires the need to impinge on the Green Belt.

The Draft Local Plan was accompanied by a Sustainability Appraisal which considered in relation to policy SD1, the scale of growth proposed in the Draft Local Plan (15,260 homes and 49ha of employment land), along with reasonable alternatives including 1) No policy; 2) No development in the Green Belt; 3) More urban development to reduce Green Belt loss; and 4) Higher levels of housing growth.

The LUC Sustainability Appraisal Report 2016 summarises the outcomes of this assessment at pages 65 to 68. It identified that the main, adverse effect of the preferred option was the use of Greenfield land to accommodate development, and its implications for the landscape, biodiversity, heritage assets, flood risk and air quality. It however concluded, that other than the loss of Greenfield land itself, that other adverse effects *could be potentially be mitigated* depending on the sites selected, and that the draft development management policies in the Draft Local Plan would support this being achieved. It also identified that there would be significant positive benefits in terms of economic growth, regeneration, meeting housing needs, the creation of vibrant communities and the regeneration and renewal of disadvantaged areas.

With regards to reasonable alternative 2) *No development in the Green Belt*, the Sustainability Appraisal identified negative consequences for economic

growth, regeneration and meeting housing needs. This is because there would be insufficient housing to support the labour demands of local businesses, and a supply and demand ratio for housing which would prevent access to the housing market for lower income households and first time buyers. Overall, the Sustainability Appraisal concluded the following:

The preferred policies outlined in Chapter 6 generally score the same or better than their reasonable alternatives. However, preferred policy SD1 scores significantly worse than its reasonable alternatives against SA objective 3 (biodiversity). This is due to the fact that in order to accommodate all the growth set out in the policy, indirect and direct impacts on Local Wildlife Sites, protected species and BAP priority (as well as locally important) habitats are predicted, whereas the policy's reasonable alternatives (no development in the Green Belt and accommodating more urban development to reduce Green Belt loss) would significantly reduce the amount of greenfield land development and therefore impacts on local ecology. However, overall across all SA objectives, preferred policy SD1 scores significantly better.

Therefore, the Sustainability Appraisal concludes that a strategy which involves encroachment into the Green Belt represents a more sustainable option, than the option which would see no encroachment into the Green Belt. However, there are negative consequences arising from the strategy put forward in the Draft Local Plan, in the absence of an approach which avoids harm to wildlife.

Consequently, it cannot be said that all sites within the Green Belt represent sustainable development locations. Some sites are particularly valuable in terms of the contribution to wildlife, or perhaps to the landscape, whilst others are not well located in terms of flood risk or in terms of accessibility to services. Therefore, sustainability must also be considered at the site level to ensure that where it is necessary to impinge on the Green Belt that the resulting development will still be capable of being considered as sustainable, compared to reasonable alternatives.

The Sustainability Appraisal for the Draft Local Plan also indicates that those sites identified for housing purposes at that time were generally the most sustainable development options, although there are some sites where the potential impact on the landscape was assessed as being more harmful. In such cases, however the overall conclusions of the Sustainability Appraisal was that with mitigation measures included in the allocation policies these harmful impacts *could still be overcome*. Sites where flood risk cannot be mitigated adequately, or where there would be unmitigated harm to designated biodiversity assets were not considered suitable by the Sustainability Appraisal.

Given the evolutionary nature of Local Plans over time, additional sites were brought forward for consideration for housing purposes after the Draft Local Plan was prepared. These were subject to consultation as part of the New and Alternative Sites Consultation 2016. These sites have also now been subject to Sustainability Appraisal, along with other assessments such as Landscape Assessment, Ecology Assessment and Heritage Assessment. As part of the site selection process it is important that the most sustainable sites, from the complete suite available, are selected in order that this test is passed.

A separate paper entitled the Housing Options Topic Paper has been prepared drawing together all the different streams of evidence in relation to each site, including alternative options in terms of scale and locations. This enabled the Council to take an evidence based approach to identifying the most sustainable sites for development purposes. This has also concluded that this is likely to require the use of some land within the current extent of the Green Belt.

Overall, development which includes land within the current extent of the Green Belt has been assessed in terms of sustainability through the Sustainability Appraisal process, and has been determined to represent a more sustainable level of development. This test can therefore be considered to be met, although the specific sites which are eventually identified will also need to be considered in relation to this test to ensure it is met not just at a plan level, but also at a site level.

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

The Green Belt Review 2017 concludes that the vast majority of the Green Belt in Basildon Borough contributes towards the openness and at least one of the purposes of including land within the Green Belt, at least partially. There will therefore be inevitable harm arising from development of land within the current extent of the Green Belt. However, the nature and extent of the harm will vary from site to site depending on:

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

These matters will vary from site to site, and therefore a Green Belt Harm Assessment 2017 has been prepared and is included as an addendum to this

report. This has informed the decision-making process. Having considered these matters, it has been possible to conclude as to the extent of harm on a site by site basis, enabling Green Belt harm to be balanced against the delivery of sustainable development patterns as required by the NPPF.

The outcomes of the Green Belt Harm Assessment 2017 have been incorporated into the Housing Options Topic Paper 2018, enabling Green Belt harm to be balanced against the sustainability considerations in order to identify a suite of sites which most effectively contributes towards achieving sustainable development patterns as required by the NPPF.

As a result of this work relating to Green Belt the impact on the Green Belt has been reduced and the Revised Publication Local Plan proposes the release of 399ha of Green Belt for development purposes, which represents 4% of the borough's current Green Belt extent. This would therefore still leave a substantive area of the Green Belt remaining of the order of 6,571ha, covering 59% of the Borough's land area. Whilst the need for housing has increased since the Draft Local Plan was prepared, it is not expected that the demand on the Green Belt will exceed 10% of its current extent. Consequently, it is considered that harm to the nature and extent of the Green Belt can be limited through the careful selection of appropriate sites and necessary mitigation measures to also be required.

5.5 Test 5: The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent

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

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

These include those measures identified in respect of Test 2, where detailed investigations of urban capacity have been undertaken, including the capacity of town centres, consideration of estate renewal and optimising development on public sector land holdings. These measures should be ongoing to ensure that the windfall allowance is achieved, and where possible exceeded, along with ensuring urban capacity is optimised into the future.

Consideration can also be given to the densities achieved on any land that the Council does consider releasing from the Green Belt, as higher densities will require the release of less land from the Green Belt to deliver the same number

of homes. Densities will however need to be considered on a site by site basis, as there will be some locations where higher densities will increase harm to the Green Belt by emphasising more of the visual prominence of development on its edge, rather than reducing harm by blending in. It should however be noted that the first phase of the village of Noak Bridge, just to the north of Basildon, was developed in the 1980s at around 45 dwelling units per hectare, and through design and landscaping does not display a particular sense of visual prominence, despite being on the edge of the Green Belt. Consideration of densities up to this level on Greenfield sites may therefore be appropriate to test. Development at this density would use one-third less land than development at 30 dwelling units per hectare, but would deliver the same number of homes.

Consideration can also be given to the creation of new public open spaces at the edge of developments, or between developments, to maintain a sense of containment/ separation and bring land which may be at risk of future encroachment into a practical use that benefits existing and new local residents. This not only mitigates the effects of harm of the Green Belt, but also responds positively to the NPPF which promotes the positive use of land in the Green Belt for recreation and nature conservation purposes.

It is also likely that on a site by site basis, the design and layout of development and the use of landscaping will play an important role in mitigating harm to the Green Belt. Design and layout can ensure that development integrates into both the nearby urban area, and also the rural environment it would form the new boundary to, and particularly ensure that visually prominent parts of the site are either avoided, or else developed in a more sensitive way. Landscaping meanwhile can screen development in both nearby and long-distance views. It is also important that this landscaping is integral to the development, as when established settlements are viewed from a distance the rooftops are normally interspersed with treetops which helps to soften the relationship between the urban and rural environments. High quality design which is based on a context appraisal, and includes consideration of landscaping requirements is therefore essential to minimising harm arising from development on sites within the current extent of the Green Belt, and should therefore form a consideration in relation to Test 5 also.

5.6 Conclusions

It is clear that in relation to development needs for housing, economic development and Gypsy, Traveller and Travelling Showpeople, the circumstances certainly exist for determining that there are exceptional circumstances justifying the release of the land from the current extent of the Green Belt for development purposes. There is clearly an acute need for development, which is affected by inherent constraints on land supply. This in

turn is affects the ability of the Council to achieve more sustainable patterns of development that support economic growth and social outcomes. There will be harm to the Green Belt arising from achieving this development, however it will be limited to less than 5% of the current Green Belt extent, and there has been opportunities to minimise this harm through careful site selection and mitigation including the use of appropriate development densities, the provision of open space at the edge of development, and through high quality design and landscaping. It is considered that the tests set out in **Calverton Parish Council v Greater Nottingham Councils [2015]** have been demonstrated to be passed within Basildon Borough and land has been identified to deliver the levels of development that meet assessed development needs.

A Green Belt Harm Assessment has been prepared to consider the detailed elements of Tests 3 to 5 as part of the Housing Options Topic Paper in order to ensure that a) the most sustainable development locations were identified; b) the extent and nature of harm to the Green Belt was considered; and c) harm to the Green Belt has been ameliorated or reduced on development sites. This is included as an addendum to this report.

6 Council Consideration of Exceptional Circumstances and Harm

The Council's Committee Members met at a number of meetings to discuss the merits of development in the Green Belt and whether or not exceptional circumstances exist that would outweigh the harm. This section will summarise the outcome of each meeting in turn in relation to the Publication Local Plan, Revised Publication Local Plan and Green Belt matters. This shows how the advice provided to Members in respect of Green Belt harm was considered by Members and informed the Revised Publication Local Plan now agreed for publication and submission.

6.1 Infrastructure, Growth and Development Committee – 7 December 2017

Members acknowledged that the scale of housing need in Basildon Borough is of the order of 972-986 homes per annum, to total 19,440 - 19720 homes over a 20 year plan-period in line with the addendum to the Strategic Housing Market Assessment (SHMA).

National policy and relevant case law in relation to Green Belt, as well as an earlier version of this Draft Green Belt Topic Paper (2017) and of the Draft Housing Options Topic Paper (2017), were set out to the Committee and Members discussed the definition of the 'exceptional circumstances' that must exist in order to justify consideration of sites within the green belt. It was noted that, whilst this was seldom desirable, the reality was that additional housing was required and there was a point at which the density of Borough's current settlements could not feasibly be increased. It was agreed that exceptional circumstances may exist to justify the consideration of sites in the Green Belt for the provision of housing development, however no building on green belt would take place until the specific site has been assessed on a site by site basis and agreed by the appropriate Council committee.

The sites put forward for the Publication Local Plan were considered at this meeting and it was resolved to allocate sites with the capacity for between 8,000 – 8,500 homes in the Green Belt. However, Green Belt considerations in particular affected the Committees decisions in respect of the following sites:

- remove the allocation Land South of London Road, Wickford (formally H18) due to the concerns in respects of encroachment and impact on landscape;

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- opt for the alternative option for H8 West Basildon (H10) and reduce the size of its allocation, safeguarding the remainder of the area for the whole plan period;
 - progress the alternative option for H17 South West Billericay (H20-23) with a 'fallback' position if the biodiversity impacts are significant and cannot be overcome in order to allow the Local Plan to progress in accordance with the Local Development Scheme; and
 - increase the size of H10 Land East of Noak Bridge (H12) to facilitate the provision of an additional primary school in Noak Bridge.

6.2 Infrastructure, Growth and Development Committee – 19 March 2018 and Council – 22 March 2018

Members agreed that the Hovefield and Honiley Neighbourhood Area should not be allocated as a new housing strategic site in the Publication Local Plan due to the substantial harm it would have on the Green Belt, and the purpose of including land within the Green Belt, in particular the prevention of settlement coalescence between Wickford and Basildon. Work with the Neighbourhood Forum will continue to determine if a suitable strategy for some growth in this area can be identified, which does not result in such substantial harm to the Green Belt.

The omission sites were reconsidered on a site-by-site basis to establish whether the position of the unmet need for housing would constitute sufficient grounds to alter the planning judgements previously reached at the meeting of the Committee on the 7 December 2017. None of the sites were resolved to be included with Green Belt policy constraints quoted as the primary reason for omitting these sites.

Following an Advisory Visit from a Planning Inspector it was advised that safeguarding land, such as the area in West Basildon, would likely be subject to challenge and would be difficult in practice to justify. Members resolved to leave the sites proposed for safeguarding within the Green Belt.

It was agreed that the relief route for South West Billericay be revised to avoid Frith Wood without any reduction of the site allocation in this location H17 South West Billericay (H20-23). The extent of the Green Belt loss associated with this allocation was deemed appropriate at that time, despite the south-western most part of the allocation not being defined by a clear boundary feature.

It was resolved that the Publication Local Plan be approved for recommendation to Council at its meeting on 22 March 2018. This was

subsequently approved at the Council meeting for Regulation 19 publication consultation.

6.3 Extraordinary Meeting of the Council – 7 June 2018

Following a change in administration, an Extraordinary Meeting of the Council was held on 7 June 2018, in order to consider a Notice of Motion signed by 23 Members of the Council concerning the Publication Local Plan and the previous decisions the Council made in respects of the plan on 22 March 2018. The Notice of Motion was passed, and the decision made by the Council on 22 March to consult on the Local Plan, and to submit it to the Government, was withdrawn. The Strategic Planning and Infrastructure Committee was asked to look again at specific aspects of proposals before the Basildon Borough Publication Local Plan 2014-2034 is taken forward.

6.4 Strategic Planning and Infrastructure Committee – 17 July 2018

Following reconsideration of the merits of including 300 homes in H18: South West Billericay, in addition to those recommended in the High Level Development Framework 2017, having had regard to those matters raised in the Agenda report, and the evidence presented, the steer to officers provided by the Committee as to their preferred option in relation to South West Billericay, based on lawful, sound and logical planning reasons, the allocation at H18 will be reduced to exclude the land to the south of the relief route in former site H20 (Kingsman Farm) to reflect that shown in the High Level Development Framework, due to greater weight being granted to green belt and landscape issues, compared to housing need.

6.5 Strategic Planning and Infrastructure Committee – 25 July 2018

Following reconsideration of the merits of including site H10 Land East of Noak Bridge, Wash Road (H12), in addition to site Land North of Wash Road, Noak Bridge (Alternative Site 5), the committee decided to retain only site H10 Land East of Noak Bridge (H12), one of the reasons for not including Land North of Wash Road, Noak Bridge (Alternative Site 5) in the Plan is due to the impact on the openness and purposes of including land within the Green Belt is more significant than site H10 Land East of Noak Bridge, Wash Road (H12).

6.6 Strategic Planning and Infrastructure Committee – 29 August 2018

The options for the Hovefields and Honiley Neighbourhood Area (HHNA) previously considered were reviewed and the Council considered that Green Belt constraints on the site area, particularly which could result in coalescence between Basildon and Wickford, restrict an allocation for the area being possible, therefore a policy will offer a greater level of commitment within the

wording of the Local Plan to work with the Neighbourhood Forum to determine if there are any opportunities to incorporate a suitable strategy for growth to the south of Wickford, including the HHNA, as part of a strategic policy in the first review of the Local Plan.

The options for the Bowers Gifford and North Benfleet Neighbourhood Area were also considered and it was resolved that an alternative policy be included which provides the Parish Council with a housing target of 1,350 homes, and allow them through a Neighbourhood Plan to determine their own locations for housing allocations to meet the target. The policy will allow for the Parish Council to amend the Green Belt boundaries to provide their housing target as requested by the Committee. As a result, 650 homes east of Pitsea and the community hub would remain, as required to meet housing need and deliver Gardiners Lane South.

6.7 Strategic Planning and Infrastructure Committee – 13 September 2018

All omission sites were reconsidered as part of this Committee meeting in relation to the unmet housing needs. All but one site was not recommended for inclusion in the Local Plan, reasons given to justify this decision include the site(s) making a good contribution to the Green Belt purposes and degradation to landscape.

The broader area to the South of Crays Hill, Billericay, including Dale Farm, Crays Hill (New Site 4) is proposed to be a broad location for new housing growth within the Local Plan, subject to further studies and investigations through the South Essex Joint Strategic Plan and the first review of the Local Plan to determine a sustainable scale & form, access and approach to delivery. In reaching this conclusion concerns about Green Belt harm were noted, however weight was attached to the extent of landscape degradation for this site.

6.8 Strategic Planning and Infrastructure Committee – 3 October 2018

It was resolved at this meeting that the employment allocation (E6) at Burnt Mills is increased to cover all of the land with the exception of the Gypsy and Traveller site to the north of Burnt Mills Road, to the south of the A127 and to the west of Pound Lane as exceptional circumstances are judged to exist to amend the Green Belt boundary in this location.

An amendment to the boundary of the allocation to the West of Basildon was agreed to ensure it remains justified and deliverable and has a robust green

belt boundary, also designating the Council owned woodland to the north-east of the site as a public open space, protecting it from development in the future.

The Committee determined that the status of broad location also be applied to non-allocated land to the south of Wickford, as there are similarities with the other broad location that has been allocated in terms of the extent of landscape degradation that exists. Weight was attached to the potential to address this degradation through alternative land uses.

It was decided that the Publication Local Plan be approved for recommendation to Council at its meeting on 18 October 2018.

6.9 Full Council – 18 October 2018

The Revised Publication Local Plan was approved to go out for Regulation 19 public consultation.

7 Addendum - Site Appraisals

Site Option	Green Belt Sub-Area	Green Belt Assessment 2017				Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
		Purpose 1	Purpose 2	Purpose 3	Purpose 4			
Recommended Options								
H5 – Gardiners Lane South All Options	N/A	-	-	-	-	Nil – land located outside the Green Belt		
H6 – Land North of Dry Street, Basildon All Options	N/A	-	-	-	-	Nil – land located outside the Green Belt		
H7a – Land South of London Road (50 homes)	Area 58	Partial	Partial	Partial	None	<p>Given the limited extent to which this parcel of land contributes towards Green Belt purposes, the level of harm to the Green Belt through a small scale development to the east of this parcel is likely to be limited and very local in effect.</p> <p>Although it is acknowledged that the area proposed for development is largely open field, it is partly contained by woodland to the south and hedgerows to the north and east which will serve to limit the harm of development on the remaining Green Belt in the area.</p>	<p>It is proposed that landscape buffering is retained to the south of the development location for air quality and noise reasons. This will reduce the visual impact of development from the south. Furthermore, it is proposed that land to the west of the proposed allocation is brought forward as open space to provide a setting to the listed building in this location. This will further limit the extent and impact of development on the Green Belt.</p>	Would remain unchanged.
H7b – Land North of London Road (600 homes)	Area 59	Contributes	None	Contributes	None	<p>This proposal is for a large scale development on the southern slope of an escarpment rising upwards towards Basildon. Development on this site would therefore be visually prominent.</p> <p>In terms of urban sprawl, although the extent of the proposal will see a large chunk of the Green Belt area lost to development, any development on this site would be contained by roads to the west and south, and by existing urban development to the east. While there is no logical boundary to the north, the presence of a golf course which is also covered by a Local Wildlife designation will limit the northern extent of any development. The harm in relation to urban sprawl is therefore contained, and manageable in its wider and long-term effect.</p> <p>Harm is more significant in this location in relation to encroachment into the countryside, which is exacerbated by the visual prominence of the site. The site is visually open and rural in character when viewed both locally and from a distance.</p>	<p>The extent to which the harm arising from encroachment into the countryside can be mitigated on this site is limited due to its visual prominence. However, the use of landscaping, including the retention of hedgerows and mature trees and the provision of additional tree planting, throughout the development, and the use of lower density development on key frontage sites along the London Road, and adjacent to the remaining countryside, can soften the impact of development in this location to a degree.</p> <p>It remains the case that the harm to the Green Belt in this location would need to be balanced against the</p>	<p>The role of the remaining Green Belt to the north of the site would remain unchanged as it will remain visually open and continue to contribute towards managing urban sprawl and preventing encroachment into the countryside. The countryside to the north of the site potentially has a higher value from a public perspective due to its recreational use and nature conservation designations. These would not be affected by the development proposed.</p>

Site Option	Green Belt Sub-Area	Green Belt Assessment 2017				Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
		Purpose 1	Purpose 2	Purpose 3	Purpose 4			
						Development would significantly change the appearance of this area and constitute significant harm in this regard.	sustainability of the site as a development location.	
H8 – West Basildon Urban Extension (2,300 homes)	Area 66 (east of Lower Dunton Rd)	Partial	None	Partial	None	<p>This Green Belt area contains a number of woodlands, fields in agricultural use and farm buildings which have not been subject to urban sprawl, and are appropriate countryside uses. The location of large scale development to the east of Lower Dunton Road would therefore result in a change of character to the area, which would cause some harm to the purposes of preventing urban sprawl and encroachment into the countryside.</p> <p>However, there is already significant encroachment into the Green Belt in this area, to the extent to which its contribution to Green Belt purposes is more limited than that fulfilled by other parts of the Green Belt in Basildon Borough. This ultimately means that the extent of any harm would be less than that which could occur elsewhere. Furthermore, the Lower Dunton Road would provide a clear and logical Green Belt boundary which could provide a logical Green Belt boundary to limit further urban sprawl and encroachment into the Countryside in this part of the Green Belt.</p>	Appropriate landscaping, design and layout could be used to minimise the harm of development in this location, particularly as this area of land is less visually prominent in the wider landscape than land further to the west, particularly land in Brentwood borough.	This entire land parcel would be removed from the extent of the Green Belt. However, in terms of the wider Green Belt, the development of this area alone would not cause harm to the strategic purpose of the Green Belt in separating the Basildon Urban Area from West Horndon in the west. Indeed, development up to the Lower Dunton Road would bring parcels of urban sprawl within the extent of the Basildon Urban Area, and provide a firmer and distinct edge to the settlement helping to prevent further sprawl going forward.
	Area 67 (west of Lower Dunton Rd)	None	None	Contributes	None	<p>Despite some development having encroached into the countryside within this area, the area is still considered to make a good contribution to safeguarding the countryside due to the sporadic nature of the existing development. The location of large scale development to the west of the Lower Dunton Road would therefore result in a significant change of character to the area, which would cause notable harm to the countryside in this location. There are however limited views into and out of this area providing a perception of enclosure which may act to limit this harm to a degree.</p> <p>Another consideration in relation to this parcel is that whilst due to the distance between the current settlement of West Horndon and the Basildon Urban Area, this area of Green Belt does not fulfil the purpose of preventing neighbouring towns from merging currently, Brentwood Borough are proposing a village in this gap. Whilst, for a number of reasons Basildon Borough Council is objecting to this proposal, there is nonetheless the chance that it may go ahead in the future. This would diminish the separation between settlements and have implications for the role this area of land fulfils in maintaining separation between settlements. There is therefore a risk of urban areas merging if development were to be permitted in this area through the Basildon Local Plan as it would bring development in Basildon right up to the administrative boundary.</p>	<p>A joint piece of work has been commissioned by Basildon Borough Council and Brentwood Borough Council with regard to identifying the location for a landscaped gap between potential development locations in Basildon and the potential village in Brentwood borough. However, it is not known at this time whether Brentwood will apply the outcomes of this work in planning for their village. Consequently, the resultant gap, in practice, may not be sufficient to prevent the sense that neighbouring towns have merged along the corridor resulting in a sense of 'urban sprawl' along the A127 corridor.</p> <p>If this land is allocated for development, it may not be possible to mitigate the harm to the Green Belt purposes in the long-term, to their detriment at a strategic scale.</p>	<p>There would not be any Green Belt remaining in this location, and consequently the Borough would be reliant on Brentwood to ensure that separation is maintained between settlements in this location. This is a risk given that Brentwood Borough Council are proposing a village in this location.</p> <p>It may not therefore be appropriate to allocate the full extent of H10, and perhaps seek to limit development to that part of H10 falling within Area 66 of the Green Belt Assessment.</p>

Site Option	Green Belt Sub-Area	Green Belt Assessment 2017				Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
		Purpose 1	Purpose 2	Purpose 3	Purpose 4			
H9 – Land west of Steeple View	Area 20	Contributes	None	Partial	None	<p>This is a visually open area of land that can be viewed from the north in long distance views, and from the A127 to the south. The area boundary is clearly defined to the north by the Dunton Road, by the A127 to the south and by existing residential development to the east. This area has however been more significant in contributing to checking urban sprawl from the east, as it is not constrained in its western extent. Therefore, development of this area could increase the risk of further sprawl from the east. It should however be noted that this site, when viewed in the landscape is set against a pattern of development which does extend further west to the south of the A127, so is not necessarily out of context in its westward extent. The harm in relation to urban sprawl is not therefore significant when viewed in this wider context, but could be considered to be harmful at a local level.</p> <p>The site also makes a contribution towards protecting the countryside from encroachment, with its northern boundary formed by what has the appearance of a rural road. It is nonetheless immediately adjacent to the A127 and also contains some ribbon development which already constitute encroachment into the countryside. Consequently, the Green Belt area is currently considered to make a partial contribution towards this purpose, and development of this site would therefore be less harmful in relation to the countryside than sites located in more rural locations. Nonetheless, some localised harm to the countryside will arise from the development of this site, which is otherwise open in character and in agricultural use currently.</p>	The use of appropriate landscaping, design and layout can minimise the impacts of development on this site on the openness of the wider Green Belt in this location. The visual impact of development in this location will particularly be minimised through the use of landscaping which is already required along the A127 frontage to minimise air quality and noise impacts from passing traffic.	The remaining Green Belt in this location, and to the north, will continue to function as currently in its purposes.
H10 – Land east of Noak Bridge	Area 23	Partial	Partial	Partial	None	<p>The location of urban development to the east of Noak Bridge Road would result in some change of character to the area which would cause some harm to the purposes of the Green Belt.</p> <p>With regard to encroachment into the countryside, there is already encroachment into the Green Belt in this area but there is a risk that further countryside would be lost if this area were to be developed. However, the proposed development area is well screened from surrounding roads and public footpaths and in long distance views, to the extent to which its contribution to this Green Belt purpose is more limited than that fulfilled by other parts of the Green Belt in Basildon Borough. This ultimately means that the extent of any harm on the countryside would be less than that which could occur elsewhere.</p> <p>The area also contributes to preventing sprawl from the nearby urban area. While elements of sprawl already exists, this is relatively limited and contained. Nonetheless, the developable area will be constrained to the north by Wash Road, to the south by the A127 and to the west by the settlement of Noak Bridge which will serve to limit further sprawl; but will not be constrained</p>	This site is already significantly visually contained by existing landscape features. It is recommended that these are enhanced and the design of development on this site is complimentary to the landscape, including the Local Wildlife Site to the south and west, in order to ensure the harm arising from development on this site is minimised.	There would be little of this Green Belt area remaining as a consequence of this development proposal. However, Green Belt parcels to the north and east would remain. The Green Belt parcel to the east (no. 34) would have an enhanced role to play in maintaining the separation of Noak Bridge from Crays Hill. It is within the ability of Basildon Borough Council to ensure this, and does not therefore give rise to the same concerns as site H10.

Site Option	Green Belt Sub-Area	Green Belt Assessment 2017				Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
		Purpose 1	Purpose 2	Purpose 3	Purpose 4			
						to the east. There is therefore the risk of further sprawl to the east. In addition, the area forms part of an important rural break between Noak Bridge and Crays Hill to the north east, and if developed, would increase the risk of settlements merging especially if proposals for Crays Hill are also pursued. However, for those reasons set out in the Housing Options Topic Paper, proposals for Crays Hill are not recommended, and consequently this risk of harm is minimised. Furthermore, there are sufficient field boundaries and landscape features which can be used to form a robust eastern boundary.		
H11 – East Basildon HLDF Preferred Option (circa 2,500 homes, extension to nursing homes and 40ha employment)	Area 51	Contributes	Contributes	Partial	None	<p>It is proposed that development would occur to the west of this area adjacent to the existing plotlands. Development would be constrained to the west by Pound Lane and would not extend eastwards any further than the existing plotlands. It would be constrained to the south by the existing plotlands, but there is no physical boundary constraining its northern extent, although due to flood risk, land to the north is not recommended for development purposes. The vast majority of Area 51 would be left undeveloped.</p> <p>This area of Green Belt plays an important role in separating development in East Basildon from that in Thundersley to the east. The limitations on the eastward extent of the proposed development location maintains the current width of that separation, and therefore the harm to this purpose is limited as a consequence.</p> <p>In relation to urban sprawl and encroachment into the countryside, this part of the Green Belt is largely open and undeveloped. There is some sporadic development including residential dwellings, a residential institution, some industrial units and some farm buildings however, it primarily comprises open fields. Development of this site will therefore change the character of this component of area 51, and could be concluded as causing harm to these Green Belt purposes. However, the land in this location slopes westwards, away from the strategic road network, and is therefore screened from most long distance views. Locally, there are mature field boundaries which would act to both contain and screen this site. Consequently, the degree of harm to urban sprawl and to the countryside is more limited in this location than in other parts of the borough.</p>	As proposed, the limitations to the eastward and northern extent of this development proposal act to limit the harm it may cause to the Green Belt purposes. Furthermore, the retention of existing landscape features, the intensification of landscaping along boundaries and the appropriate design and layout of development on this site would act to minimise impacts further.	The remaining Green Belt in this location, and to the east and north, will continue to function as currently in its purposes.
	Area 52	Contributes	Partial	Partial	None	Whilst there is some frontage development in this location along the A127 frontage and also along Burnt Mills Road, it is primarily comprised of open fields with mature tree or hedgerow boundaries. Development of this site will therefore be visually notable, particularly as it is intended that this area would accommodate commercial buildings which typically have greater	The retention of existing landscape features, the intensification of landscaping along boundaries, along with appropriate design and layout of	This entire land parcel would be removed from the extent of the Green Belt. However, in terms of the wider Green Belt, the development of this area would not cause harm to the strategic

Site Option	Green Belt Sub-Area	Green Belt Assessment 2017				Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
		Purpose 1	Purpose 2	Purpose 3	Purpose 4			
						<p>bulk and massing than residential properties. There will therefore be a harmful impact in this area in relation to urban sprawl and encroachment into the countryside.</p> <p>However, this area is bounded on all sides by highway or existing development, and therefore its impact on sprawl, particularly as it extends no further east than Bowers Gifford/North Benfleet, and no further north than the existing A127 Enterprise Corridor immediately to the west, is limited.</p> <p>In terms of the countryside meanwhile, it is immediately adjacent to the A127, and therefore is only considered to make a partial contribution towards this purpose. Therefore, development of this site would be less harmful in relation to the countryside than sites located in more rural locations. Nonetheless, some localised harm to the countryside will arise from the development of this site, which is otherwise largely open in character and mainly in agricultural use.</p> <p>It is considered that this site also contributes towards the separation of Basildon from Thundersley to the east. The development of this site would not reduce the width of separation between Basildon and Thundersley, as the existing plotland developments comprising area 74 extend further eastwards than this location. The harm against this purpose is therefore limited.</p>	development on this site would act to minimise impacts.	purpose of the Green Belt in separating the Basildon Urban Area from Thundersley in the east. Indeed, development up to Pound Lane would bring some smaller parcels of urban sprawl within the extent of the Basildon Urban Area, and provide a firmer and distinct edge to the settlement helping to prevent further sprawl going forward.
	Area 53	Partial	Contributes	Contributes	None	<p>These proposals would see two large areas of residential development provided within Area 53, along with a third area of development comprising a community hub. The first area of development is located to the south-west of the area, adjacent to Pitsea, and behind frontage development on the London Road. The second area would be located further north, adjacent to Bowers Gifford and bound by the North Benfleet plotlands to the north. The community hub would sit towards the north of this area between the North Benfleet plotlands and Pitsea. A narrow gap of area of open land would separate the development adjacent to Pitsea from the development adjacent to Bowers Gifford. The frontage along the London Road between Pound Lane and existing development near the junction with Ilfracombe Avenue will be retained as open land to provide a clear publicly visible separation between Bowers Gifford and Pitsea.</p> <p>The scale of development in this location is expected to cause some harm to the purposes of including land within the Green Belt in this location, particularly as it will notably change the character of land from a complex of fields to that of urban development. Consequently, there are implications for urban</p>	<p>The retention of the London Road frontage between Pound Lane and Ilfracombe Avenue as open land, with this frontage extending northwards along Pound Lane to the existing development, will help to ensure a sense of separation between Pitsea and Bowers Gifford.</p> <p>The provision of open space extending northwards through the site from London Road towards Burnt Mills Road will add to this sense of separation.</p> <p>The retention of existing landscape features, the intensification of landscaping along boundaries, along with appropriate design and layout of development on this site would act to further minimise impacts.</p>	<p>This entire land parcel would be removed from the extent of the Green Belt, although a strategic gap of open land will be retained through the centre of this site to ensure a distinction between Pitsea and Bowers Gifford.</p> <p>In terms of the wider Green Belt, the development of this area would not cause harm to the strategic purpose of the Green Belt in separating the Basildon Urban Area from Thundersley in the east. However, it would increase the importance of area 51 in maintaining this separation.</p>

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						<p>sprawl, the separation of towns and encroachment into the countryside arising from development in this location.</p> <p>However, in developing the High Level Development Framework, consideration was given as to how the sense of separation between Pitsea and Bowers Gifford could be maintained. The assessment concluded that this could best be achieved by leaving the existing open frontage along the London Road from Pound Lane to Ilfracombe Avenue open. This open field also extends northwards along Pound Lane, further emphasising the role of this land in providing separation. It is envisaged that the impact of development would be tempered by the provision of this green open space, however, this will be minimal, and the sense of a clearly defined separation between urban areas would be considerably eroded. At a strategic level therefore these proposals seek to limit harm to the purpose of preventing neighbouring towns from merging by limited development on key frontages, although it is recognised that there will be localised harm affecting local views and private views further northwards within the area.</p> <p>In terms of urban sprawl meanwhile, these proposals seek to incorporate existing urban sprawl near Pitsea and adjacent to the plotland area within the urban area. This will help to provide a clear distinction between the urban edge and open land. This will therefore minimise the impact of the proposals on urban sprawl.</p> <p>In terms of encroachment into the countryside, it is considered that the proposed development will give the area an increased urban character and reduce the existing perception of a countryside location. However, the areas of land identified for development purposes are mainly of lower landscape value, and are more enclosed than other parts of the site, such as the London Road frontage. However, there is some extension of the development areas into areas of a higher landscape value, and therefore there will be some harm to the countryside role of this area as a consequence.</p>		
	Area 54	None	Contributes	None	None	<p>The eastern extent of this area contributes towards the separation of the Basildon Urban Area from Thundersley and Benfleet to the east. However, these proposals do not extend to the east to such a degree, and therefore it is not considered that the extension to the nursing home in this location will cause harm to the purposes of including land within the Green Belt. Furthermore, the proposed extension to the nursing home will sit behind the existing care home, and will therefore not be any more intrusive in relation to the openness of the Green Belt than that which is already there when viewed either from the London Road frontage</p>	<p>Due to the location of the development proposed, no mitigation is necessary to minimise harm to the purpose of including land within the Green Belt in this location. However, it is appropriate for this development to be appropriately screened by landscaping to the south to prevent harm arising from air quality and</p>	Would remain unchanged.

Site Option	Green Belt Sub-Area	Green Belt Assessment 2017				Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
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						or the A13. There will therefore be limited harm in relation to the openness of the Green Belt in this location.	noise. Consequently, its impact will be minimised in any event.	
	Area 74	None	Partial	None	None	<p>Proposals for site H13 do not include development within the plotland areas covered by Area 74. However, in surrounding the plotlands with urban development there are implications for their continued role within the Green Belt.</p> <p>The plotlands to the west of Pound Lane will see residential development to the south and east, the community hub to the west and commercial development to the north. Meanwhile, the plotlands to the east of Pound Lane will see new residential development to the north and west, and already have residential development to the south.</p> <p>As these areas currently make limited contribution to the purposes of including land within the Green Belt, and are not particularly open in character, it would seem that their Green Belt function will become even more limited, and these areas could potentially be removed from the Green Belt.</p> <p>The removal of the eastern portion of these plotlands could however result in an intensification of development along the eastern most boundary of this area, potentially impacting on separation between the Basildon Urban Area and Thundersley.</p>	A special development control policy could be put in place to ensure that development within this plotland area is appropriate, having regard to harm to the neighbouring Green Belt as well as other matters specific to the character of these areas.	This area would be removed from the Green Belt. This would increase the importance of area 51 in maintaining the separation between the Basildon Urban Area and Thundersley.
H12 – South Wickford	Area 46	Contributes	Partial	Partial	None	<p>The element of the proposal for H14 sits to the north of this area, sandwiched between the railway line and Wickford Business Park to the north, and a significant light industrial development at Fanton Hall to the south. Fanton Hall is within the middle of this Green Belt area, with open land and frontage development on the A127 to the south.</p> <p>This Green Belt area presently makes a good contribution to the Green Belt purposes, particularly in checking unrestricted sprawl. The location of urban development to the south of Wickford would therefore result in some change of character to the area which would cause some harm to the purposes of the Green Belt.</p> <p>The proposed development will be contained both to the north and south, which will prevent further harm on the Green Belt from sprawl. The eastern extent of the proposal meanwhile aligns with the current eastern most extent of Wickford in this location, and therefore, while this proposal will bring development closer to the borough boundary, it will not encroach into the gap between Wickford and Rayleigh. Furthermore, harm on the countryside will be minimal as Dollymans Farm is located to the east. This has been allocated as an inert waste site in the Essex and Southend-on-Sea Waste Local Plan, and will therefore be subject to</p>	Whilst this site is largely enclosed, it is recommended that appropriate design, layout and landscaping is applied to ensure that harm is minimised as far as is possible.	In removing the proposed development location from the Green Belt, the gap between Wickford and Basildon is reduced. The remaining Green Belt therefore has an increasingly important role to play in ensuring the sense of separation is maintained.

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						<p>landscape changes which will screen this development site from long distance views. The Wick Country Park is also located to the south-west of this location preventing further extension of development into this area, except along the frontage with Tresco Way.</p> <p>It is therefore considered that the component of this development proposal which falls within Area 46 will have limited harm on the openness of the Green Belt, or the purposes of including land within it.</p>		
	Area 68	Contributes	Partial	Contributes	None	<p>The element of the proposal for H14 sits to the north of this area, with Salcott Crescent and Tresco Way forming the northern boundary, and the western and southern extents defined by Cranfield Park Road and the access road to Sappers Farm. The Wick Country Park sits to the south limiting further southwards extent for most of the area, although there has been pressure for development to the west of the Country Park up to Cranfield Park Road also.</p> <p>This area of Green Belt largely comprises open fields, and consequently there is the potential for development in this location to cause harm to the openness and purposes of including land within the Green Belt, particularly in relation to confining urban sprawl and protecting the countryside from encroachment. However, the confinement of development to the north of this site, adjacent to the existing urban area, and contained by the Country Park to the south will act to limit the impacts on the openness of the countryside, and also to prevent further urban sprawl.</p> <p>This area also, in conjunction with area 45 contributes towards the separation of Wickford from Basildon. Constraining the southern extent of development by the Country Park, and by Cranfield Park Road will act to ensure that the sense of separation is maintained. Development extending further southwards would erode this gap and is not recommended, particularly as there are limited opportunities to create a robust Green Belt boundary further south.</p>	As with the remainder of this site, it is recommended that appropriate design, layout and landscaping is applied to ensure that harm is minimised. Furthermore, in relation to this element of the site, it may be appropriate to extend the Wick Country Park westwards to Cranfield Park Road in order to provide a more robust southern boundary to the development extent.	In removing the proposed development location from the Green Belt, the gap between Wickford and Basildon is reduced. The remaining Green Belt therefore has an increasingly important role to play in ensuring the sense of separation is maintained.
H13 – Shotgate	Area 44	Contributes	Partial	Partial	None	This development site comprises open land to the north of Southend Road in Shotgate. There is residential development located to the south of the site, and also to the west. The northern extent of this site is formed by the Wickford Water Recycling Centre. There are electricity pylons running roughly north-south through this area. These sit to the east of the proposed development extent. A football academy is also located on open land to the east.	The harm arising from this development proposal could be managed through the appropriate design and layout of development on this site, accompanied by the use of a strong landscaped boundary along its eastern edge. This may require mature planting to be provided.	Would remain unchanged.

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						<p>As this land is open in character, the development of this site will cause harm to the openness of the Green Belt, and the purpose of including land within it. The presence of trees and woodland blocks to the north and east of this development site would however provide screening to views from the wider landscape. These would mitigate the landscape and visual effects of any proposed development in this location.</p> <p>The site is also contained to the north, south and west, and it is proposed that the eastern extent is limited to align with eastern most extent of Wickford. This means that there is no reduction in the separation between Wickford and Rayleigh compared to that which already exists. Urban sprawl beyond this however remains a concern, given that there is already significant development around Shot Farm and the Shotgate plotlands. It is expected that the presence of the Pylons and the football academy will limit further encroachment to a reasonable extent.</p>		
H14 – Barn Hall	Area 42	Contributes	Partial	Contributes	None	<p>The eastern extent of site H16 does not fall within the Green Belt. It comprises of land currently in use as amenity green space and a children’s play area on the western edge of Wickford. There are also redundant allotments and a redundant community building included with the development area.</p> <p>The western portion of this site meanwhile falls within the Green Belt. This area of Green Belt acts to separate Wickford from Ramsden Bellhouse to the west. It comprises a series of large open fields with mature field boundaries. Development within this area of the Green Belt does have the potential to cause harm to the openness and purposes of including land within the Green Belt.</p> <p>In terms of urban sprawl, the area is adjacent to the built up area of Wickford and Runwell to the east, and the railway line to the south which will act to contain development on this site. Although, this will not be constrained to the north and west. There is also a plotland area located to the west of this area, between Wickford and Ramsden Bellhouse. The development of this site therefore has the potential to increase the sense of urban sprawl and the perception of towns merging in this area by bringing development closer together. However, with the exception of some footpaths, there is limited public access into this area, reducing the extent to which the public is likely to experience the narrowing of the gap. There would therefore only be moderate harm to the purposes of including land within the Green Belt. Furthermore, in relation to the railway line which runs to the south of this area, a gap of around half a mile would be maintained between the development in Wickford and the plotland area.</p>	<p>It is proposed that the existing open space is replaced to the west of the site. As there is currently no logical Green Belt boundary limiting the westward extent of development, this would help to ensure that urban sprawl is contained in the long-term to the benefit of maintaining separation between towns.</p> <p>Additionally, it is recommended that existing landscape features are retained and enhanced to limit the extent of harm to the Green Belt.</p>	The remaining Green Belt in this location will play an enhanced role in maintaining the sense of separation between Wickford and Ramsden Bellhouse.

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						In addition to this, the land in this location is sloped, screening the site from long distance views to the north-west. This acts to create a sense of enclosure for the site, which helps to limit the extent to which development in this location would cause harm to the openness of the Green Belt and the purposes of including land within it.		
H15 – North of London Road, Wickford	Area 39	Partial	None	Partial	None	<p>This development location comprises a pocket of Green Belt bound frontage development on London Road, frontage development on Castledon Road, and existing development at Sugden Avenue. The main residential area of Wickford is located to the east of the site. The River Crouch forms the norther extent of both the development area and the Green Belt area in this location. To the north, beyond the River sits plotlands, and ribbon development along Castledon Road.</p> <p>This Green Belt area partly contributes to checking unrestricted sprawl and safeguarding the countryside from encroachment. However, given the containment of this site, and also the quantum of urban sprawl evident within the wider Green Belt in this location, it is considered that the harm to the openness of the Green Belt and to the purposes of including land within it is limited in this location. Other than the river corridor on the northern edge and the woodlands within the site which contribute to the character of the local area, the rest of the site is well screened from public view. Development in this location if integrated with the existing woodland blocks and the corridor of the River Crouch will therefore limit the extent of harm on the Green Belt.</p>	Whilst this site is largely enclosed, it is recommended that appropriate design, layout and landscaping is applied to ensure that harm is minimised as far as is possible.	This area of Green Belt would be entirely removed from the Green Belt extent. However, its removal will not have a significant impact on the role of the remaining Green Belt in this location due to its limited contribution in the first instance.
H16 – Land north of Potash Road, Billericay	Area 3	Partial	None	Partial	None	<p>This site is located on the northern edge of Billericay adjacent to the boundary with the Chelmsford City area, although the nearest settlement beyond the boundary is Stock, some 2km away.</p> <p>To the west of the site is a residential development comprising a cul-de-sac of properties on The Vale. To the south of the site, there is suburban frontage development along the northern side of Potash Road. The urban area of Billericay sits to the south of Potash Road. Sporadic frontage development continues south-eastwards along the northern side of Potash Road, although the extent of intervening vegetation means that Potash Road becomes increasingly more rural in nature as it extends south-eastwards.</p> <p>Given the existing residential cul-de-sac to the west and the frontage development to the south, this site is partially enclosed by development. Meanwhile, there are tree belts completing the remainder of the western boundary and the northern and eastern boundaries of the site. These provide a defined boundary,</p>	The retention and enhancement of existing tree belts along the western, northern and eastern edges of this site are necessary to ensure that harm to the Green Belt is minimised.	Would remain unchanged.

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						<p>separating the development site from the remainder of the Green Belt area.</p> <p>The site is also obscured in views from the Stock Road, and invisible in views from Stock. The enclosure of this site therefore acts to limit harm of development on this site to the openness of the Green Belt and the purposes of including land within it.</p>		
H17b – Land south of London Road, Billericay	Area 9	Contributes	Partial	Contributes	None	<p>The development proposals include all but the southernmost part of this Green Belt area. This Green Belt area comprises a mixture of sports facilities, buildings clustered around farms, and open fields. The development of this location will therefore cause harm to the openness of the Green Belt and the purposes of including land within it.</p> <p>In relation to urban sprawl however, the extent of the proposals would incorporate a number of existing incursions in the Green Belt into the urban area. This would therefore result in a more robust, distinct edge to the urban area than currently exists, with the emphasis enhanced by the enclosure of the proposed development by the new SW Billericay Relief Route. This will provide a robust and logical Green Belt boundary, which will contain the extent of further sprawl. It should however be noted that there is sporadic ribbon development further west along the London Road which will not be incorporated and will still contribute towards a sense of sprawl.</p> <p>By defining the western extent of the development with the SW Billericay Relief Route, the extent to which development causes Billericay to merge with the settlement of Hutton is also managed. Without this boundary, it would not be so easy to identify a robust and defensible Green Belt boundary in this location and consequently there would be a long-term risk of further encroachment and a reduction in separation.</p> <p>In terms of encroachment into the countryside, both the development itself, and the proposed relief route will extend into an area which is open and green, and is visible in long-distance views from Brentwood. Consequently, there will be harm to the appearance of the countryside, although this is against the backdrop of existing development in Billericay, and potentially less harmful than if development were to be located away from the urban edge.</p>	<p>The design and layout of development will be key to ensuring that harm to the Green Belt, particularly the openness of the Green Belt and the protection of the countryside is minimised. Furthermore, the use of tree planting along the western boundary of the development, and also within the development itself, including the use of mature trees will further help to minimise impacts especially in relation to long distance views.</p>	<p>Almost the entire land parcel would be removed from the extent of the Green Belt. However, in terms of the wider Green Belt, the development of this area alone would not cause harm to the strategic purpose of the Green Belt in separating the Billericay from Hutton and Brentwood in the west. Indeed, development up to the new SW Billericay Relief Route would bring parcels of urban sprawl within the extent of Billericay, and provide a firmer and distinct edge to the settlement helping to prevent further sprawl going forward.</p>
H17c – Land west of Tye Common Road, Billericay								
H17a – Land north of London Road, west of	Area 7	Contributes	Partial	Contributes	None	<p>The development proposal includes all but the westernmost part of this Green Belt area. This Green Belt area mainly comprises open fields, however, there are residential gardens in the south-eastern corner of this area.</p>	<p>The design and layout of development will be key to ensuring that harm to the Green Belt, particularly the openness of the Green Belt and the protection of the</p>	<p>Almost the entire land parcel would be removed from the extent of the Green Belt. However, in terms of the wider Green Belt, the development of this area alone</p>

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Mountnessing Road, Billericay						<p>The railway line forms the northern extent of this area. To the north of the railway line there is existing residential development within the urban extent of Billericay. To the east of the site is Mountnessing Road. Residential properties lining this road back onto the site. The eastern extent of the southern boundary comprises residential development in the form of two cul-de-sacs accessed from the London Road. The remainder of the southern extent is an open field viewed from the London Road. The proposals for site H21 would be opposite this site, to the south of the London Road.</p> <p>Due to the open nature of the main extent of this site, development in this location will therefore cause harm to the openness of the Green Belt and the purposes of including land within it.</p> <p>However, in relation to urban sprawl and the separation between settlements, the extent of proposed development is enclosed on two and a half sides by existing development, and would extend no further westwards than existing development to the north, or proposed development to the south. As a consequence, its harm to these purposes is limited.</p> <p>The greatest harm will be in relation to encroachment into the countryside as this land is open and largely agricultural in nature. It has a westward facing slope and is visible in the landscape when approached from the west. Consequently, there will harm to the appearance of the countryside, although this is against a backdrop of existing development in Billericay, and potentially less harmful than if development were to be located away from the urban edge.</p>	<p>Countryside is minimised. Furthermore, the use of tree planting along the western boundary of the development, and also within the development itself, including the use of mature trees will further help to minimise impacts especially in relation to long distance views.</p>	<p>would not cause harm to the strategic purpose of the Green Belt in separating the Billericay from Hutton and Brentwood in the west.</p>
H17d – Land between Laindon Road and Frithwood Lane	Area 12	Contributes	Partial	Contributes	Contributes	<p>This Green Belt area sits to the South of Billericay and comprises a number of open fields and also areas of woodland and common land and a small number of residential properties. It is proposed that development occurs in the northern most element of this area.</p> <p>The northern extent of the development parcel will be defined by the current extent of the residential area within this part of Billericay. Meanwhile the western extent would be contained by the residential frontage on Frithwood Lane. Further extension of development southwards in this part of the site is prevented by ancient woodland, as it is assumed that such woodland is irreplaceable and cannot be removed. The eastern extent of the development proposal is defined by the Laindon Road, including some frontage development. The southern extent of the development on this frontage is defined by the current extent of development along the eastern frontage of Laindon Road which is</p>	<p>The design and layout of development will be key to ensuring that harm to the Green Belt, particularly the openness of the Green Belt, the protection of the countryside and the preservation of historic settings is minimised. Furthermore, the use of tree planting along the boundaries of the development, and also within the development itself, including the use of mature trees will further help to minimise impacts.</p>	<p>Would remain unchanged.</p>

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						<p>more urban in nature. The development proposal is therefore largely enclosed, although there is a risk arising from developer pressure associated with the southern extent of development on the eastern most portion of this site. The provision of the SW Billericay Relief Route will however assist in containing this southward extent, and defining the edge of the urban area. Consequently, the harm arising from urban sprawl will be limited due to the sense of enclosure that already exists and can be created by the Relief Route.</p> <p>Furthermore, the limitations placed on the southward extent of this proposal means that development in this location will extend no further southwards towards Little Burstead and Noak Hill compared to any development which already exists. This means that the sense of separation between these settlements will be maintained and not harmed by this proposal.</p> <p>The greatest harm therefore will be in relation to encroachment into the countryside, as this land largely comprises open fields. Although the topography and tree belts in parts of the site mean that a portion of the site is not prominent in the wider landscape, there are parts of the site considered to be sensitive due to the elevated position and increased visibility in the landscape, as well as their relationship with the adjacent Ancient Woodland. Consequently, some harm will be expected through the loss of countryside. A significant part of Area 12 would however be left undeveloped, and it is considered that the visual impacts of development on this site will be localised in character. The harm to the countryside is therefore considered to be moderate in relation to other sites.</p> <p>Some harm will also arise in relation to preserving the setting and special character of historic towns. The site is adjacent to Billericay High Street Conservation Area, as well as Frith Wood Ancient Woodland which is a sensitive feature around the site. However, it is possible to design any new development in a way that will preserve any special architectural or historic interest to enhance or better reveal their significance.</p>		
H18 – Land Adjacent to Windmill Heights	Area 14b	Contributes	Partial	Contributes	None	<p>Development would occupy this entire Green Belt parcel which is comprised of open fields currently. Consequently there will be harm to the openness of the Green Belt and the purpose of including land within it in this location.</p> <p>This parcel of land sits to the south of Billericay and to the west of South Green. Its western boundary is formed by the A176, which has a significant tree belt screening it from that road. The southern boundary is provided by Kennel Lane. Views into the site from Kennel Lane are more open in nature, and consequently</p>	The design and layout of development will be key to ensuring that harm to the Green Belt, particularly the openness of the Green Belt and the protection of the Countryside is minimised. Furthermore, the use of tree planting along the southern boundary of the development, and also within the development itself, including the use	Almost the entire land parcel would be removed from the extent of the Green Belt. However, in terms of the wider Green Belt, the development of this area alone would not cause harm to the strategic purpose of the Green Belt in separating Billericay from

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						<p>the impact on the openness of the Green Belt from a public perspective is most significant from this boundary.</p> <p>Due to the level of containment of this site by the existing urban form and the highway network, development on this site would not logically open up other parts of the Green Belt to development, either planned or unplanned. Consequently, it is not considered that this proposal would give rise to urban sprawl. Nor would it constitute urban sprawl in itself, as it extends no further southwards or westwards than other parts of Billericay. Consequently, it will not result in neighbouring towns merging, particularly as the neighbouring settlements of Noak Bridge and Basildon are some distance away and other parts of South Green and Great Burstead are closer to these settlements already.</p> <p>The greatest harm therefore in relation to this development proposal is in relation to encroachment into the countryside, as this site comprises open fields. Additionally, the topography is such that this site is visible from the south, and may feature in long distance views from the Basildon area. It is however well screened from view from the A176 limiting local visibility as people travel into and out of Billericay from this direction.</p>	of mature trees will further help to minimise impacts.	Noak Bridge and Basildon to the south.
H19 – Land East of Greens Farm Lane, Billericay	Area 29	Contributes	None	Contributes	None	<p>This Green Belt area comprises a series of fields with an undulating topography. The fields are separated from one another by significant tree belts and hedgerow. This, along with the topography means that some fields within this wider area are enclosed from longer distance views.</p> <p>The development proposal in relation to this site would see development concentrated in three fields to the north of the site, and one field to the south. In all cases these sites are screened from long distance views by existing tree belts, and the topography of the site which is highest in the central western part of the site and slopes both north-east and south/south-east, also screening the proposed development parcels for one another. It is proposed that the most visually prominent parts of the site are retained free from development.</p> <p>The established tree belts will also serve to contain the proposed development, and prevent further sprawl. It is proposed that the central part of the Green Belt area will provide an extension to the adjacent Mill Meadows Nature Reserve, which is considered an appropriate use within the Green Belt, thereby retaining the sense of separation in the area and providing a distinct urban/rural boundary.</p>	This site is already significantly visually contained by existing landscape features. It is recommended that these are retained and enhanced, and the design of development on this site is complimentary to the landscape in order to ensure the harm arising from development on this site is minimised.	Would remain unchanged.

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		Purpose 1	Purpose 2	Purpose 3	Purpose 4			
H20 - Land east of Southend Road, Great Burstead and South Green	Area 27	Partial	None	Partial	None	<p>This Green Belt area contains some development within it, particularly along its southern boundary which can be considered as sprawl. The middle and the north are however quite open in nature, and have long distance views from across Upper Crouch Farmland, and from some houses within the built up area of Billericay.</p> <p>It is proposed that development would occur in the west corner of the area, which contains infill plots and adjoins the built up area of South Green. The site also has very limited views mainly due to its low topography and the tree coverage. Development would therefore be constrained to the east by mature vegetation and natural field and ditch boundaries. Consequently, the enclosure of this site acts to limit harm of development, in terms of urban sprawl.</p> <p>In relation to encroachment into the countryside, the Green Belt area is only considered to make a partial contribution towards this purpose. There has already been development around the periphery of this Green Belt area, and the middle of the area is contained countryside that cannot be accessed publicly. The site proposed for development sits along the existing edge of South Green, and is visually contained by blocks of woodland and the elevated landforms to the east. Therefore, development of this site would be less harmful in relation to countryside encroachment.</p>	This site is already significantly visually contained by existing landscape features. It is recommended that these are retained and enhanced, and the design of development on this site is complimentary to the landscape in order to ensure the harm arising from development on this site is minimised.	Would remain unchanged.
New Site 1 - Land South of Outwood Common Road (Brooklands Farm), Billericay	Area 27	Partial	None	Partial	None	<p>It is proposed that development would occur in the middle section of Area 27, where much of the elevated and prominent nature of the landform across the area is visible in the surrounding landscape. Development on this site would therefore be visually prominent, and constitute significant harm in this regard.</p> <p>In terms of urban sprawl, the development site has very limited connections or relationship with the existing urban edge, although the south-western corner of the site has capacity to accommodate some development, particularly if draft allocation H27 comes forward for development. However, this would not result in a logical and robust Green Belt boundary, with implications on limiting further urban sprawl in the future.</p> <p>This ultimately means that the extent of harm on the Green Belt, and to the purpose of keeping the land permanently open would be more than that which could occur elsewhere.</p>	It is considered that the greater portion of this site does not have the potential to be developed without causing adverse effects on the Green Belt. In the absence of a strong landscaped edge to any new development, the risk of further urban sprawl would be increased.	The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would not help in preventing further sprawl going forward.
New Site 2 - Land East of Southend	Area 72	Contributes	Partial	Contributes	None	The development of this site will not lead to the physical coalescence of Billericay and Crays Hill or a perception that they have merged, given the limited extent of its footprint. Harm is	It is considered that the greater portion of this site does not have the potential to be developed without causing adverse effects on the	The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the

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Road (Foot Farm), Billericay						<p>however more significant in this location in relation to encroachment into the countryside and urban sprawl.</p> <p>This Green Belt area has a varied topography and is predominantly agricultural land. It forms part of the rural break between Billericay and Crays Hill, offering a picturesque landscape in parts and long distance views across to the wider countryside due to its openness and a lack of vegetation enclosure. The proposal for 150 homes in this location falls within the north-western corner of the area, which plays an important role in restricting further sprawl from the ribbon development that already extends southwards from South Green. There is therefore limited opportunity for development in this location. In addition, it is considered that development of this site would result in an illogical Green Belt boundary.</p>	Green Belt. In the absence of a strong landscaped edge to any new development, the risk of further urban sprawl would be increased.	new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would not help in preventing further sprawl going forward.
New Site 3 - Land West of Southend Road (Maitland Lodge), Billericay	Area 25	Contributes	Contributes	Contributes	Contributes	<p>Area 25 makes a significant contribution to all the Green Belt purposes and to keeping the land permanently open. The area comprises mainly of agricultural fields and grasslands, with a small number of buildings including the Great Burstead church and cemetery buildings.</p> <p>This proposal would see a small portion of the north-eastern corner of the Green Belt area developed. The site is visually contained by well-established hedges to the north, west and south, and connected to the existing built edge of South Green to the east. There are residential gardens adjacent to its northern boundary. The site's relative flatness compared to the surrounding wider slopes also means that the site is well-screened from wider views. This development site is therefore considerably less open to public view than Area 25 as a whole. Likewise, having regard to the site's limited visual influence on the wider landscape, development would be unlikely to impact the setting and special character of Great Burstead Conservation Area. More so, development of this site is unlikely to compromise the separation or rural break between Billericay and Basildon, having regard to its relatively small footprint.</p> <p>It is therefore considered that this development proposal will have limited harm on the openness of the Green Belt, or the purposes of including land within it.</p>	This site is already significantly visually contained by existing landscape features. It is recommended that these are retained and enhanced, and the design of development on this site is complimentary to the site character in order to ensure any harm arising from development on this site is minimised.	Would remain unchanged.
New Site 4 - Dale Farm, Oak Lane, Crays Hill	Area 34	None	Contributes	None	None	This development proposal is located within an area of Green Belt which represents a key strategic gap between Crays Hill to the north, and Basildon to the south. There is already a lot of existing development within the area, providing an urban character and environment, and if developed any further, could risk the two settlements fully merging. The extent of harm on preventing	It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt. The area represents a key strategic gap which must be protected.	As this area currently makes limited contribution to the purposes of including land within the Green Belt, and is not particularly open in character, it would seem that its Green Belt function will become even more

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						<p>neighbouring towns from merging would therefore be more than that which could occur elsewhere.</p> <p>The sense of a clearly defined separation between urban areas would be considerably eroded if this development were to come forward. Whilst there would still be a gap maintained between Crays Hill and Basildon, the development would give the area an increased urban character and increase the vulnerability of the strategic gap.</p> <p>In addition, it is considered that development of this site would result in a Green Belt boundary that is neither logical nor robust.</p>		limited, and this area could potentially be removed from the Green Belt.
New Site 5 - Additional land at Greenleas Farm, South of London Road, Billericay	Area 8	Partial	Partial	Contributes	None	<p>The majority of this Green Belt area is not adjacent to a town, and although there is some ribbon development along London Road to the north, the area separates the towns of Hutton and Billericay. It is proposed that development would occur in the north eastern corner of the area, behind the existing residential properties to the north.</p> <p>The development site extends further east to Area 9 where it adjoins draft allocation H21. The northern extent would be defined by the existing ribbon development to the north, and there are tree belts defining the southern boundary. The site is however not constrained to the west where it abuts an open field. In terms of urban sprawl therefore, the development would not result in a more robust, distinct edge to the urban area than currently exists, as it would extend beyond the new SW Billericay Relief Route. As such, the opportunity to create a robust and logical Green Belt boundary, which will contain the extent of further sprawl would be missed.</p> <p>Without a clear and robust edge, it would not be so easy to identify a defensible Green Belt boundary in this location and consequently there would be a long-term risk of further encroachment and a reduction in separation between Billericay and Hutton.</p> <p>In terms of encroachment into the countryside, the development will extend into an area which is open and green, and is visible in long-distance views from Brentwood. Consequently, there would be harm to the appearance of the countryside, as the development site is located away from the urban edge.</p> <p>It is therefore considered that the component of this development proposal which falls within Area 8 would harm the openness of the Green Belt, and the purposes of including land within it.</p>	It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt. The area represents a key strategic gap which must be protected.	The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would not help in preventing further sprawl going forward.

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	Area 9	Contributes	Partial	Contributes	None	<p>This Green Belt area comprises a mixture of sports facilities, buildings clustered around farms, and open fields. The development of this location will therefore cause harm to the openness of the Green Belt and the purposes of including land within it.</p> <p>This element of the proposal for New Site 5 sits to the north of this area, with London Road forming its northern boundary. The Cricket Club is located to the south of the site, draft allocation H21 sits to the east, while the proposal extends beyond this Green Belt area westwards. Although, the development proposal is relatively enclosed, there is a risk associated with the western portion of this site and defining the edge of the urban area. The eastern boundary also relies on draft allocation H21 coming forward. Consequently, harm is likely to arise due to the poor sense of enclosure on this site.</p> <p>In terms of encroachment into the countryside, the development will extend into an area which is open and green, and is visible in long-distance views from Brentwood. Consequently, there would be harm to the appearance of the countryside, as the development site is located away from the urban edge.</p>	<p>In relation to this element of the site, the design and layout of development will be key to ensuring that harm to the Green Belt, particularly the openness of the Green Belt and the protection of the countryside is minimised. Furthermore, the use of tree planting along the western boundary of the development, and also within the development itself, including the use of mature trees will further help to minimise impacts especially in relation to long distance views.</p>	<p>The development of this area alone would not cause harm to the strategic purpose of the Green Belt in separating the Billericay from Hutton and Brentwood in the west. The new SW Billericay Relief Route could provide a firmer and distinct edge to the settlement helping to prevent further sprawl going forward.</p>
New Site 7 - Hovefields and Honiley Neighbourhood Area, Wickford	Area 45	None	Contributes	None	None	<p>This Green Belt area contains a considerable amount of development for a range of uses, to the extent that it makes a limited contribution to the Green Belt purposes. However, the area plays an important role with regard the separation of Wickford and Basildon, and is the narrowest part of the Green Belt in Basildon. The proposal for a comprehensive redevelopment of this site will therefore compromise the separation of Wickford and Basildon, and the identity of Nevendon.</p> <p>The sense of a clearly defined separation between urban areas would be considerably eroded if this development were to come forward. Whilst there would still be a gap maintained between Wickford and Basildon, the development would give the area an increased urban character and increase the vulnerability of the strategic gap.</p> <p>In addition, it is considered that development of this site would result in a Green Belt boundary that is neither logical nor robust.</p>	<p>It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt. The area represents a key strategic gap which must be protected.</p>	<p>As this area currently makes limited contribution to the purposes of including land within the Green Belt, and is not particularly open in character, it would seem that its Green Belt function will become even more limited, and this area could potentially be removed from the Green Belt.</p>
Alternative Site 1 - Alpha Garden Centre, Wickford	Area 38	None	Contributes	None	None	<p>This is a mixed area including plotland areas, arable farmland, children's playground and a garden centre with associated small business and retail units. This Green belt area plays an important role in the separation between Ramsden Bellhouse and Wickford.</p>	<p>The harm arising from this development proposal could be managed through the appropriate design and layout of development on this site, accompanied by the use of a strong landscaped boundary along</p>	<p>Would remain unchanged, although the extent of green open space between the development and Ramsden Bellhouse would be reduced. This would increase the importance of the remaining</p>

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						<p>The development proposal encompasses the garden centre which lies to the east of the area, where it adjoins the main built up area of Wickford. River Crouch flows along the northern edge of the site and borders an area of open landscape to the north, while the A129 forms its southern boundary. The site is however not constrained in its western boundary, which raises potential issues regarding the creation of a defensible Green Belt boundary in order to avoid further sprawl and ultimately, physical coalescence. There would therefore be additional, albeit moderate, harm to the purpose of preventing neighbouring towns from merging into each other. The proposal will however remove some elements of sprawl that already exists in this Green Belt area.</p>	<p>its western edge. This may require mature planting to be provided.</p> <p>In the absence of a strong landscaped edge to this development, the risk of further urban sprawl and the sense that settlements are merging would be increased.</p>	Green Belt area in maintaining this separation.
Alternative Site 4 - Outwood Farm, Billericay	Area 28	Contributes	None	Contributes	None	<p>The development proposal in relation to this site would see the entire Green Belt area lost to development. The area comprises a series of fields and woodland and has an undulating topography with long distance views from elevated land noticeably to the north-east corner. The north and north-west boundary is formed by the existing built limit of Billericay, which is partly contained by vegetation. Meanwhile, a band of mixed farmland borders the site to the south, south-west and east. The location of large scale development on this site would result in a change of character to the area, which would cause notable harm to the purposes of preventing urban sprawl and encroachment into the countryside.</p> <p>The development would constitute sprawl in area which is predominantly free of development. Most of the site is open to view from the public footpath running through the centre of the site, adjacent to a small tributary stream associated with the River Crouch. Consequently, there are limited opportunities to create a sense of enclosure for this site.</p> <p>The greatest harm however will be in relation to encroachment into the countryside as this land is open and largely agricultural in nature, connecting with the wider landscape of the Upper Crouch Valley to the east. The elevated nature of the landform makes it more prominent in views from the wider landscape, and any development would erode the strong rural character of the site.</p>	It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt.	This entire land parcel would be removed from the extent of the Green Belt, which would cause harm to the strategic purpose of the Green Belt in preventing urban sprawl and encroachment into the countryside.
Alternative Site 5 - Land North of Wash Road, Noak Bridge	Area 22	Contributes	Contributes	Contributes	None	<p>This is an area of open arable land to the north of Noak Bridge Conservation Area. The development site runs alongside Wash Road to the south, and along the rear gardens of houses on Martindale Avenue to the west. Its northern and eastern boundary is formed by open farmland.</p> <p>The lack of vegetation to the northern and eastern boundary makes the entire site open to long distance views, and to views from local roads and public footpaths. In the absence of features</p>	It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt.	The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would

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						<p>within the natural or built landscape to create a robust Green Belt boundary, the proposed development will be classed as urban sprawl.</p> <p>This site is also part of the wider belt of open landscape creating a sense of separation between Basildon and Billericay. As it is, there is already a limited sense of arrival or gateway to Basildon from Billericay on the A176, and further development on this site will only accentuate this situation, with a significant risk of coalescence.</p> <p>Furthermore, there is a risk that countryside would be lost if development took place on this site as the area is quite open and can be seen from the surrounding roads and settlements.</p>		not help in preventing further sprawl going forward.
Land South and West of Cranfield Park Road	Area 45	None	Contributes	None	None	<p>This Green Belt area contains a considerable amount of development for a range of uses, to the extent that it makes a limited contribution to the Green Belt purposes. However, the area plays an important role with regard the separation of Wickford and Basildon, and is the narrowest part of the Green Belt in Basildon. The proposal to redevelop this site will therefore compromise the separation of Wickford and Basildon, and the identity of Nevendon. The sense of a clearly defined separation between urban areas would be considerably eroded if this development were to come forward, particularly when considered alongside other proposals for the area.</p>	It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt. The area represents a key strategic gap which must be protected.	As this area currently makes limited contribution to the purposes of including land within the Green Belt, and is not particularly open in character, it would seem that its Green Belt function will become even more limited, and this area could potentially be removed from the Green Belt.
Land at Greenacres Farm, Castledon Road	Area 40	None	Contributes	None	None	<p>This Green Belt area plays an important role in the separation between Wickford and Ramsden Bellhouse. The area also has a close relationship with Ramsden Heath to the north which has little physical separation from Ramsden Bellhouse. There is some existing development within the area including the New House Farm and Castledon Road Plotland, interspersed with a number of open fields, wooded plots and mature trees. The compact nature of the Plotland gives the area a village feeling.</p> <p>The location of large scale development on open fields to the north-east corner of the area would change the character and appearance of the area, and compromise the separation between Wickford and Ramsden Bellhouse as the area is the only piece of Green Belt land separating the two settlements.</p>	It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt. The area represents a key strategic gap which must be protected.	Would remain unchanged, although the extent of green open space between the development and Wickford would be reduced. As this area currently makes limited contribution to the purposes of including land within the Green Belt, it would seem that its Green Belt function will become even more limited.
Land adjacent Stock Brook Manor	Area 4	Contributes	None	Contributes	None	<p>This is a relatively flat area with scattered dense woodland, tree belts and open recreational uses, on the north-western edge of Billericay. The development site sits at the interface between the urban area of Billericay to the south and east, and open landscape to the north and west. Queens Park Avenue forms the southern boundary, with the eastern boundary formed by Stock Road. Queens Park Country Park, a Local Wildlife Site, is on the</p>	It is considered that this site would constitute inappropriate development in the Green Belt. The site does not have the potential to be developed without causing adverse effects on the Green Belt.	The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would

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						<p>western boundary, and formal recreation facilities are located to the north of the site.</p> <p>The urban/rural boundary is currently well defined by Queens Park Avenue, and further development close to this urban fringe would constitute sprawl, and weaken the edge to the Green Belt and existing urban area.</p> <p>The site also makes a contribution towards protecting the countryside from encroachment, with its character closely associated with the rural area to the north. The site is visible from the surrounding landscape, and its development would adversely impact the character of the band of agricultural landscape that encloses the northern edge of the Billericay as well as the setting of the Local Wildlife Site to the west.</p>		make light of this well preserved historic agricultural landscape.
Land South of Laindon Road	Area 13	Contributes	Partial	Contributes	None	<p>Area 13 is a small area where the majority of the land use is recreational and outdoor sports, including the Billericay School playing fields. The area is adjacent to the built up town of Billericay in the north. The rest of the area is bounded by Laindon Road and the A176. The development proposal is for an infill development to the north west of the area.</p> <p>The development site is bounded to the north by existing residential properties along Laindon Road, with Laindon Road also forming the western boundary of the site. The eastern and southern boundaries are formed by existing tree belts. Due to the fact that the area is quite small and surrounded by infrastructure, there would be a limited perception that countryside has been lost if development were to be permitted in this area,</p> <p>Development on this site would not be visually prominent, and the level of harm to the Green Belt through a small scale development is therefore considered to be limited and contained.</p>	This site is already significantly visually contained by existing features within the built and natural landscape, and it is recommended that these are retained and enhanced. Appropriate landscaping, design and layout could be used to minimise any residual harm of development in this location.	Would remain unchanged.
Land at Church Street, Great Burstead	Area 15	Contributes	Contributes	Contributes	Contributes	<p>This proposal is for infill type development on the southernmost fringe of the Green Belt area. The site occupies a triangular area, and is entirely contained by Church Street to the north, the A176 to the west, and a private road to its south which leads to the residential properties adjacent to its southern boundary. As such, the harm of development in relation to urban sprawl is largely restrained. Likewise, having regard to the site's relatively small footprint and containment, it is unlikely that development of this site would have an adverse impact on the Green Belt and the purposes of including land within it, and any resulting harm is likely to be limited and very local in effect.</p>	This site is already significantly visually contained by existing features within the natural and built landscape. Appropriate landscaping, design and layout could be used to minimise the harm of development in this location,	Would remain unchanged.

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Land South of Church Street, Great Burstead	Area 25	Contributes	Contributes	Contributes	Contributes	This proposal would see a small section along the northern boundary of the Green Belt area developed. The site abuts the existing built edge of South Green to the north, while to the south, east and west are open fields with farm houses and ancillary buildings. The location of the site is such that it would compromise the existing settlement edge to Billericay in this location, and would be visually prominent. Although the site occupies a relatively small footprint, its development would not result in a logical and robust Green Belt boundary, with implications on limiting further urban sprawl in the future. It is therefore considered that this development proposal will cause harm to the openness of the Green Belt, and the purposes of including land within it.	It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt.	The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would not help in preventing further sprawl going forward.
Land Adjacent the Mount, Billericay	Area 1	Contributes	None	Contributes	None	<p>This Green Belt area is made up mainly of two open fields to the north and south. It is proposed that development would occupy the parcel of land to the north-western corner of the southern field, which is closely associated with the existing housing around The Mount.</p> <p>The northern boundary of the site follows the edge of Norsey Wood, and the southern and western boundaries follow the edges of The Mount. These boundaries are framed by areas of semi natural woodlands which screen views into the site. The woodland also extends into the north-eastern corner of the site, however, views into the site from the south east are more open in nature. Given the relative visual containment of the site and its direct association with the existing built edge of The Mount, the harm in relation to urban sprawl is limited and contained.</p> <p>In terms of encroachment into the countryside, the proposed development is less visible in long-distance views and would be against the backdrop of existing development, and consequently less harmful to the openness of the Green Belt.</p>	This site is already significantly visually contained by existing landscape features. Appropriate landscaping, design and layout could be used to minimise the harm of development in this location, particularly as this area of land is less visually prominent in the wider landscape.	Would remain unchanged.
Land adjacent Barn Hall Cottages, Wickford	Area 42	Contributes	Partial	Contributes	None	<p>This proposal would see a small section along the north-eastern boundary of the Green Belt area developed. The eastern boundary of the site follows the existing built edge of Wickford, where it is enclosed by tree belts; to the north and west are open fields; while the new housing development at Barn Hall forms its southern boundary.</p> <p>The location of the site is such that it would compromise the existing settlement edge to Wickford in this location, and would be visually prominent especially to the west, where it is less enclosed than other parts of the site. Although the site occupies a relatively small footprint, its development would not result in a logical and robust Green Belt boundary, with implications on preserving the countryside and limiting further urban sprawl in the future. It is</p>	It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt. However, the use of landscaping, including the retention of hedgerows and mature trees and the provision of additional tree planting throughout the development, can soften the impact of development in this location to a degree.	The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would not help in preventing further sprawl going forward.

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						therefore considered that this development proposal will cause harm to the openness of the Green Belt, and the purposes of including land within it.		
Hannakins Farm, Linda Gardens, Billericay	Area 5	Contributes	Partial	Contributes	None	<p>This Green Belt area mainly consists of farmland, which sits to the west of the site. There are open fields to the north, and the site is separated from the urban part of Billericay by the Hannikins Farm Recreation Ground to the east and south.</p> <p>The site occupies a rectangular area, and is largely contained by tree belts. As such, the harm of development in relation to urban sprawl is largely restrained.</p> <p>Harm is more significant in this location in relation to encroachment into the countryside, which is exacerbated by the site's separation from the main urban area of Billericay, and raises potential issues regarding the creation of a defensible Green Belt boundary. Development would therefore significantly change the appearance of this area, which is mainly classed as being in natural use.</p>	The extent to which the harm arising from encroachment into the countryside can be mitigated on this site is limited due to its physical separation from the existing built-up area, and its relationship with adjoining natural uses. The retention of existing landscape features, the intensification of landscaping along boundaries, along with appropriate design and layout of development on this site could however act to minimise impacts.	It is considered that the proposed development will give the area an increased urban character and reduce the existing perception of a countryside location. Therefore, there will be some harm to the countryside role of this area as a consequence.
Land North of Linda Gardens and Cherry Gardens, Billericay	Area 5	Contributes	Partial	Contributes	None	<p>This is a relatively flat area with scattered dense woodland and tree belts. A tree belt surrounds much of the site, protected by a Tree Preservation Order. Hannikins Farm Recreation Ground lies to the north of the site, a woodland/scrubland lies to the west, and residential areas border the site to the south and east.</p> <p>The proposed development site is well screened from public views by mature field boundaries which would act to both contain and screen this site. Consequently, the degree of harm to urban sprawl and to the countryside is more limited in this location than in other parts of the Green Belt area.</p>	This site is already significantly visually contained by existing features within the natural and built landscape. Appropriate landscaping, design and layout could be used to minimise the harm of development in this location.	Would remain unchanged.
Land adjacent to Bluebell Lodge, Billericay	Area 5	Contributes	Partial	Contributes	None	This is a small area of grassland with residential properties to the east, and farmland to the west, north and south. Although it is acknowledged that the area proposed for development is largely open field, it is well contained by woodland and hedgerows to the north, south and west, which will serve to limit the harm of development on the remaining Green Belt in the area.	This site is already significantly visually contained by existing features within the natural and built landscape, and it is recommended that these are retained and enhanced. Appropriate landscaping, design, and layout could be used to minimise the harm of development in this location.	Would remain unchanged, although the extent of green open space between the development and Hutton would be slightly reduced. This would increase the importance of the remaining Green Belt area in maintaining this separation.
Land adjacent to 6 Lee Chapel Lane, Langdon Hills, Basildon	Area 62	Partial	Partial	Partial	Partial	This site fronts Lee Chapel Lane to the north. It is surrounded by fields and woodland to the south and east, and residential properties to the west. The proposal would see a small section along the north-western boundary of the Green Belt area developed. Although there are a few scattered dwellings throughout Area 62 which are classed as sprawl from the built up	It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt. However, the use of landscaping, including the retention of hedgerows and mature trees and	The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct

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		Purpose 1	Purpose 2	Purpose 3	Purpose 4			
						<p>area, the urban edge is clearly defined and a large part of the parcel has remained untouched.</p> <p>The location of the site is such that it would compromise the existing settlement edge to Basildon in this location. Although the site occupies a relatively small footprint, its development would not result in a robust Green Belt boundary, with implications on preserving the countryside and limiting further urban sprawl in the future. It is therefore considered that this development proposal will cause harm to the openness of the Green Belt, and the purposes of including land within it.</p>	<p>the provision of additional tree planting throughout the development, can soften the impact of development in this location to a degree.</p>	<p>edge to the settlement, and would not help in preventing further sprawl going forward.</p>
Land at Homestead Drive, Langdon Hills, Basildon	Area 62	Partial	Partial	Partial	Partial	<p>This is an irregular shaped parcel of land, bordered by vegetation on all sides. The north-western portion of the site however abuts the settlement boundary of Langdon Hills.</p> <p>The development site has very limited connections or relationship with the existing urban edge, although the northern corner of the site could have capacity to accommodate some development, particularly if Site SS0093 comes forward for development. This Green Belt area also provides recreational use in the form of a country park and green space, and the proposal for 45 homes in this location would reduce the existing perception of a countryside location. There is therefore limited opportunity for development in this location. In addition, it is considered that development of this site would result in an illogical Green Belt boundary.</p>	<p>It is considered that this site does not have the potential to be developed without causing adverse effects on the Green Belt.</p>	<p>The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would not help in preventing further sprawl going forward.</p>
Vange Hill Drive Open Space, Vange, Basildon	Area 59	Contributes	None	Contributes	None	<p>The site is adjacent to the large built up area of Basildon, with housing to the north and east, and open space to the west and south. This Green Belt parcel contains large open swaths of countryside including a Local Nature Reserve, LoWS, and a golf course. As such the parcel contributes to checking unrestricted sprawl and safeguarding the countryside from encroachment.</p> <p>The proposal is for a small scale development on the north-eastern corner of the area. Development on this site would be contained by existing urban development to the north and east. The presence of a golf course which is also covered by a Local Wildlife designation will limit the western and southern extent. The harm in relation to urban sprawl is therefore contained, and manageable.</p> <p>In terms of countryside encroachment, the site sits on a higher point to the east of the Green Belt parcel, and as such is enclosed countryside due to the presence of the tree belts. Development would therefore not significantly change the appearance of this area and would not constitute significant harm in this regard.</p>	<p>This site is already significantly visually contained by existing features within the natural and built landscape, and it is recommended that these are retained and enhanced. Appropriate landscaping, design, and layout could be used to minimise the harm of development in this location.</p>	<p>Would remain unchanged.</p>

Site Option	Green Belt Sub-Area	Green Belt Assessment 2017				Harm likely to arise	Mitigation of Harm	Role of Remaining Green Belt
		Purpose 1	Purpose 2	Purpose 3	Purpose 4			
Land North East of Potash Road, Billericay	Area 3	Partial	None	Partial	None	<p>This site is located on the northern edge of Billericay, adjacent to the boundary with the Chelmsford City area, although the nearest settlement beyond the boundary is Stock, some 2km away. Potash road and Goatsmoor Lane provide a defined boundary to the site in the south, west and east. To the north of the site is draft allocation H19. Meanwhile, open fields and woodlands complete the remainder of the eastern boundary, where it also abuts the borough boundary.</p> <p>The urban/rural boundary is well defined by existing features within the natural and built landscape in this part of the site. Therefore, the proposed development would constitute sprawl and encroachment into the countryside. Development would also change the character and appearance of this site, which mostly comprises woodland, thereby reducing the existing perception of a countryside location. It is therefore considered that this development proposal will cause harm to the openness of the Green Belt, and the purposes of including land within it.</p>	If this land is allocated for development, it may not be possible to mitigate the harm to the Green Belt purposes.	Given planned development in draft allocation H19, there would be little or no Green Belt remaining in this location. It would therefore not assist in checking unrestricted sprawl and safeguarding the countryside from encroachment. However, in terms of the wider Green Belt, the development of this area alone would not cause harm to the strategic purpose of the Green Belt in separating the Billericay Urban Area from Stock in the north.
Land South of Burnt Mills Road, Basildon	Area 53	Partial	Contributes	Contributes	None	<p>These proposals would see a small parcel to the north-east of the area, adjacent to Burnt Mills Road developed. On its eastern extent this site borders the Bowers Gifford and North Benfleet Neighbourhood Area.</p> <p>In terms of the wider Green Belt, the development of this site would not cause harm to the strategic purpose of the Green Belt, although the development will change the character and appearance of the site. Consequently, there are implications for urban sprawl and encroachment into the countryside arising from development in this location.</p>	There may scope for limited frontage development in this location. The harm arising from this development proposal could be managed through the appropriate design and layout of development on this site	Comprehensive development on this site could result in an illogical Green Belt boundary. However, the impact of development could be tempered by landscape improvements.
South of London Road, Wickford	Area 37	Partial	Contributes	Partial	None	<p>This development site is located to the south of the London Road in Wickford. To the north is frontage development along the London Road. This frontage development continues to run westwards of the site, although on the southern side of the road it is relatively less dense than to the north. To the east of the site, is the current westward extent of Wickford comprised of residential properties. To the south and west of the site is open land, with some incursion of residential properties along road frontages. Tracks and footpaths provide access into this area.</p> <p>The site itself is an open field at present, and therefore development would impact on the openness of the Green Belt. However, as noted in the Green Belt Assessment 2017, this element of Green Belt area 37 is adjacent to a busy urban area and contributes less to the purpose of protecting the countryside from encroachment than southern portions of this Green Belt</p>	<p>The harm arising from this development proposal could be managed through the appropriate design and layout of development on this site, accompanied by the use of a strong landscaped boundary along its southern and western edges. This may require mature planting to be provided.</p> <p>In the absence of a strong landscaped edge to this development, the risk of further urban sprawl and the sense that</p>	The remaining Green Belt in this location will play an enhanced role in maintaining the sense of separation between Wickford and Crays Hill.

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						<p>area. Existing housing and roadside vegetation also screen views into this site from London Road and the wider landscape.</p> <p>This area also contributes towards managing urban sprawl and preventing Wickford from merging with Crays Hill. There is already substantive development in this Green Belt area, particularly ribbon development along road frontages which is creating a sense of urban sprawl, and reducing the sense of separation between Wickford and Crays Hill. There is the potential for this site to contribute towards this harm. In order to minimise this risk, the westward extent of development has been limited to extend no further than that already existing at Sugden Avenue to the north of the London Road. However, there are no existing features which provide a robust and logical Green Belt boundary at this site. Furthermore, there is already developer pressure to extend beyond that identified in the Housing Topic Paper, risking the separation that can be achieved in the long term.</p>	settlements are merging would be increased.	
Land west of Kennel Lane, Great Burstead and South Green	Area 15	Contributes	Contributes	Contributes	Contributes	<p>This development proposal is within an area of Green Belt which contributes to all Green Belt purposes and to keeping the land permanently open. This is a visually open area of land that is visible in the wider landscape due to the elevated landform. There are however small areas of fields on lower ground which could accommodate small scale development, without causing significant harm to the countryside. It is therefore proposed that new development would follow the existing development along the west side of Kennel Lane, where the openness to public view is contained.</p> <p>The level of harm on the strategic gap between Billericay and Noak Hill, as well as the setting of the adjacent Great Burstead Conservation Area through a small scale development is also likely to be limited due to the proposal's direct association with the built edge of Great Burstead and South Green.</p> <p>The greatest harm therefore will be in relation to urban sprawl. Whilst there is an existing natural boundary formed by Kennel Lane, the new Green Belt boundary would be defined by boundary vegetation. This will however not provide a clear and logical Green Belt boundary to the north and west of the site, to limit further urban sprawl and encroachment into the countryside in this part of the Green Belt.</p>	Appropriate landscaping, design and layout could be used to minimise the harm of development in this location on the countryside, particularly as this area of land is less visually prominent in the wider landscape.	The remaining Green Belt in this location will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would not help in preventing further sprawl going forward.