

Thurrock Council

Thurrock Stage 2 GBA

Stage 2 Final Report

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1. Introduction

Ove Arup and Partners Limited (Arup) has been appointed by Thurrock Council (TC) to undertake a Stage 2 Green Belt Assessment (Stage 2 GBA), and in parallel with the Stage 2 assessment, complete a review of their existing Stage 1 Green Belt Assessment to ensure it remains fit-for-purpose to support the finer-grain Stage 2 methodology and assessment.

The Thurrock Green Belt extent covers the local planning authority (LPA) area of TC, with the wider Green Belt extending into neighbouring authorities Brentwood, Basildon, Castle Point and the London Borough of Havering. The scope of the Stage 1 review and Stage 2 GBA is within TC authority area only.

1.1 Report purposes

The purpose of a Green Belt Assessment (GBA) is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the NPPF (2024). The local planning authority (LPA) then takes the findings of the assessment into account alongside other evidence in making decisions about the Local Plan strategy, site allocations / broad locations and ultimately possible alterations to Green Belt boundaries.

A GBA forms an important part of the Local Plan evidence base. It helps the LPA determine the manner and degree to which change in the Green Belt should be considered without undermining the purposes for including land in the Green Belt and the degree to which harm to the Green Belt would result if development were to take place.

The Stage 1 review was undertaken in August 2025 and the purpose of this review was to confirm that it remains fit for purpose following policy changes at the end of 2024 and is suitable as a strategic-level baseline to support a further Stage 2 GBA.

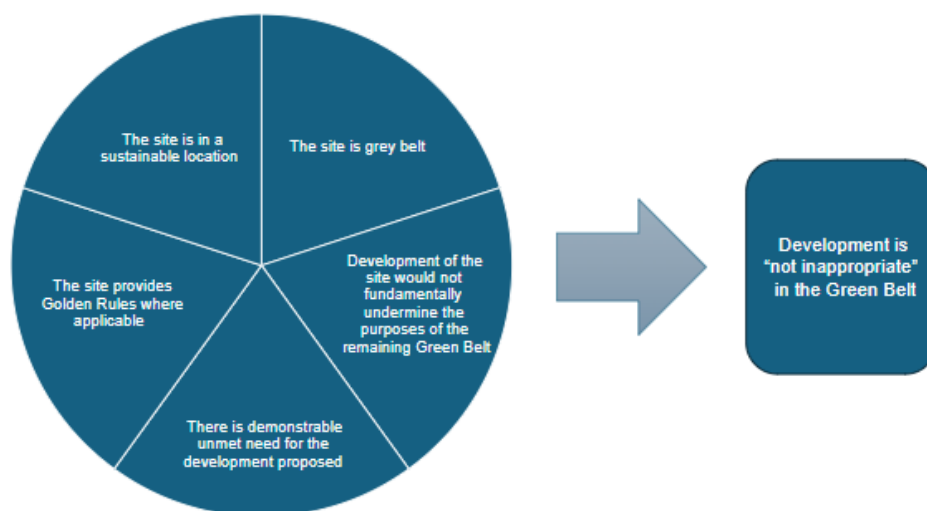
The purpose of the Stage 2 GBA is to provide a more fine-grained assessment within strategic parcels and assess how different areas of these perform against the Green Belt purposes, as set out in the National Planning Policy Framework (NPPF, 2024). The Stage 2 GBA will form part of the evidence base to inform local plan-making for the emerging TC Local Plan, including site allocations.

The Stage 2 GBA also provisionally identifies grey belt land, a sub-category of Green Belt land introduced following NPPF changes in 2024. While grey belt land is provisionally identified based on whether or not a sub-area scores strongly against purposes (a), (b) or (d) and is not restricted by the application of policies relating to NPPF footnote 7 constraints, it is stressed that this level of identification is high-level and subject to further analysis by the Council on a case-by-case basis to determine whether or not development within the Green Belt is appropriate. The key steps required to identify grey belt are:

- Identify the sub-areas to be assessed
- Evaluate contribution to purposes (a), (b) and (d)
- Consider if any of footnote 7 restrictions apply
- Identify provisional grey belt
- Consider whether the release of Green Belt will fundamentally undermine the five Green Belt purposes taken together.

Confirmation of grey belt status will not necessarily equate to land being allocated for development or released from the Green Belt, and the Council will undertake further consideration of wider planning factors, and balance these against one another as part of the plan-making process. This includes determining whether or not development is ‘not inappropriate’ in the Green Belt as outlined in paragraph 155 of the NPPF and includes a number of further criteria to be considered as outlined in Figure 1 below.

Figure 1 When development in the Green Belt is 'not inappropriate' (NPPF paragraph 155)



A GBA is not a policy or decision-making document that proposes any release of Green Belt land, as this is for the LPA to determine as part of the wider plan making process. Green Belt is not the only consideration when assessing the suitability and deliverability of sites. LPAs are not precluded from allocating Green Belt sites for development if other factors in favour of the site outweigh this consideration, and an 'exceptional circumstances' case can be made. Such factors might include:

- Housing or employment need and a lack of supply of more preferential sites (i.e. those that the NPPF directs towards before considering Green Belt).
- Adverse implications for the sustainable development strategy within the borough/authority area.
- Inherent sustainability of directing growth in a particular direction.
- Tightly drawn Green Belt boundaries and constraints on alternative sites.
- The opportunity to deliver social infrastructure, which would bring about long-term benefits for local residents.
- Boosting housing delivery in areas with past issues of deliverability to increase the supply of affordable housing.

Whilst the outcomes from a GBA will form part of any exceptional circumstances case presented to support Green Belt alterations, the GBA itself does not set out exceptional circumstances arguments, which are necessary if an LPA proposes release of land from the Green Belt. Any future boundary refinements will be undertaken by Council as part of the Local Plan process. In addition, permissions, allocations and strategic decisions made after the assessment fall outside the scope of the report.

1.2 Report structure

This section is structured as follows:

- **Section 2** presents an overview of the Thurrock Green Belt context, including the current and emerging planning policy context, the extent of the Green Belt and existing Green Belt Assessment work.
- **Section 3** presents an overview of updated national policy and planning guidance in relation to Green Belt, incorporating a review of 2024-25 updates (supplemented by Appendix A.1), and introduces the series of review questions/topics underpinning the Stage 1 review based on new policy and guidance.
- **Section 4** sets out the Stage 1 GBA review findings, consolidates relevant and recent planning appeal decisions relating to Green Belt and Benchmarks the Stage 1 GBA with Arup experience elsewhere.

- **Section 5** provides a summary, recommendations and proposed next steps to progress the Stage 2 GBA, based on the findings and analysis of Section 4.
- **Section 6** sets out the Stage 2 GBA methodology, including the approach to sub-area definition and purpose assessment definitions.
- **Section 7** presents the summary of findings for the Stage 2 assessment following completion of the assessments of sub-areas against the approach set out in section 6, including provisional grey belt identification.
- **Section 8** summarises the final conclusions from the Stage 2 GBA.

2. Thurrock Green Belt context

2.1 Overview of the history of the Green Belt in Thurrock

With the exception of the principal urban area of Thurrock and the other settlements (towns and villages) in the Borough, all of the land within the Borough is currently designated as Green Belt. The current extent of the Green Belt within Thurrock is shown in Figure 2 overleaf.

Whilst land is designated as Green Belt in Thurrock, these areas of Green Belt are Metropolitan Green Belt. This means that they were included in the Green Belt designated around London in the 1950s under the Ministerial Guidance¹ prevailing at the time that suggested that the Green Belt be drawn ‘several miles wide so as to ensure an appreciable rural zone around all the built-up areas concerned’. The designation aimed to prevent urban sprawl from London and protect the rural character of the Borough.

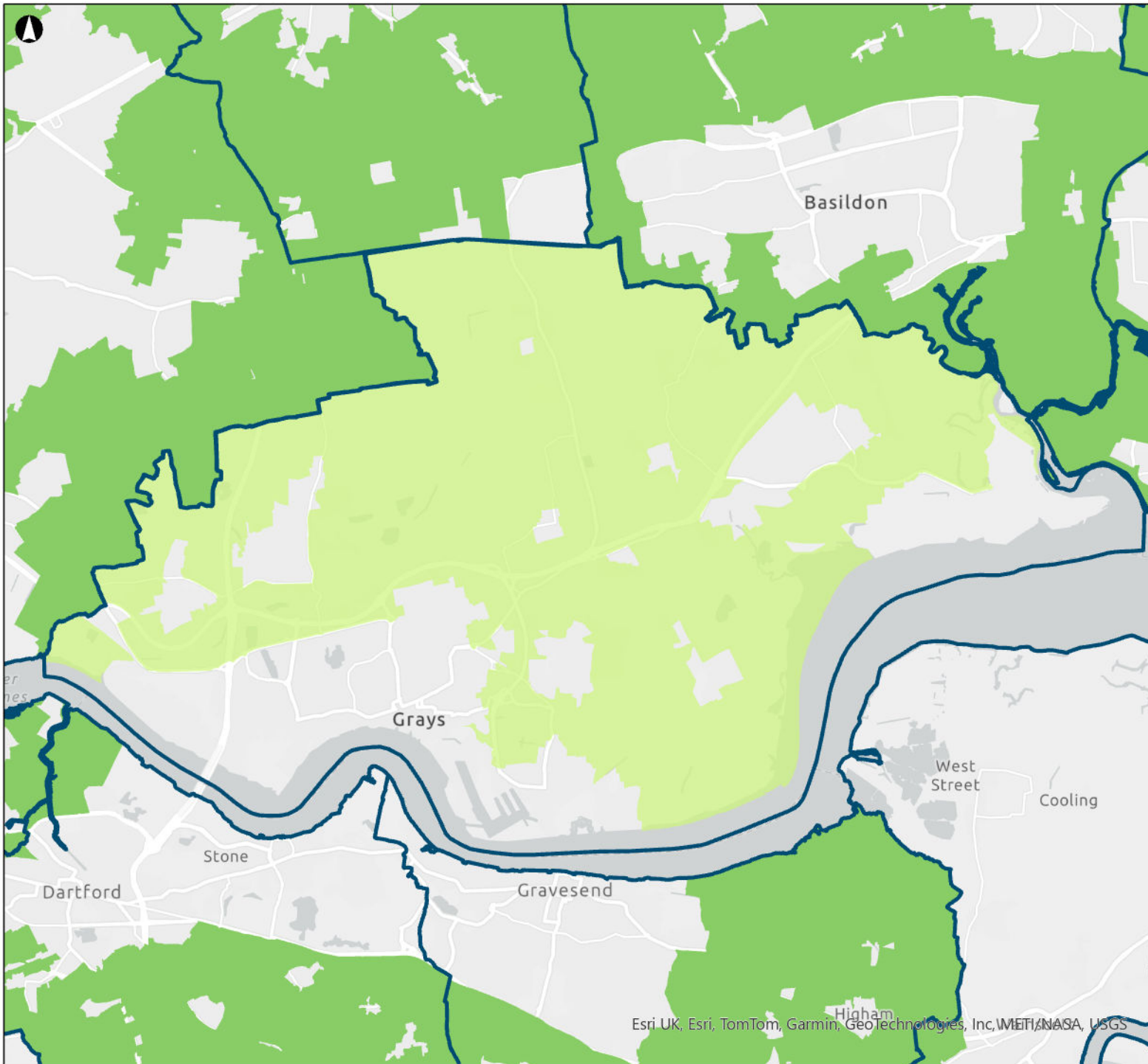
The Government’s Circular 42/55 included the following purposes of Green Belts:

- *To check the growth of large built-up areas;*
- *To prevent neighbouring towns from merging into one another; and*
- *To preserve the special character of towns.*

The extent of the Green Belt has previously been subject to a comprehensive review, by the Council, as part of work undertaken on the Thurrock Local Plan (1997). The Green Belt had been extended eastward across the Borough in earlier development plans. A subsequent net addition to the Green Belt land was made in boundary changes under the adopted Core Strategy of 2011. The Green Belt work was informed initially by the Thurrock Landscape Capacity Study (2005) which post-dates the Essex Landscape Character Area (2003).

The Council has acknowledged the need to review Green Belt boundaries to meet housing delivery targets, as outlined in its adopted Core Strategy (2015) and subsequent Local Plan reviews. In 2019, Thurrock Council commissioned the Strategic Green Belt Assessment (Stages 1a and 1b) to evaluate the performance of Green Belt parcels against national policy objectives. These assessments are reviewed as part of this Report.

¹ Ministry of Housing and Local Government (1955). Circular 42/55.



- Local Authority Boundaries
- Thurrock Green Belt
- Neighbouring Green Belt

Coordinate System: British National Grid

Metres
0 200

--	03/02/2026	SP	NS	AR	--
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Rev	Date	By	Chkd	Appd	Authd
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Client

Thurrock Council

Project Name

Green Belt Assessment (Stage 2, 2025)

Drawing Title

Figure 2: Extent of Green Belt

Scale at A4

1:120,000

Role

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Suitability

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Project Number

312159-01

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Drawing Number

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Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI, NASA, USGS

2.2 Local Planning Policy context

The TC Core Strategy and Policies for Management of Development was originally adopted in December 2011 and updated in January 2015 following a focussed review to align with the NPPF. The Core Strategy sets out the spatial vision, strategic objectives, and planning policies for Thurrock, including Green Belt protection. Key policies within the Core Strategy relating to Green Belt include CSSP4 (Sustainable Green Belt) and PMD6 (Development in the Green Belt), which aim to balance development needs with environmental protection and prevention of urban sprawl.

TC is currently preparing a new Local Plan to replace the Core Strategy and has completed Initial Proposals Consultation (Regulation 18) and a recent Call for Sites process. The Local Development Scheme² (approved October 2024 and updated March 2025) sets out the timetable for preparing the new Local Plan and other evidence base documents, as required under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended). The LDS confirms that Publication Draft Consultation (Regulation 19) will commence Spring 2026, with submission of the Local Plan for Examination (Regulation 22) expected in Summer 2026, and adoption of the Local Plan in Spring 2028.

Preparation of the new Local Plan also requires a review of the Green Belt, with a decision to be taken about whether there are exceptional circumstances for the Green Belt to change, and if so how.

A range of evidence to support the new Local Plan has been completed including several with some relevance to Green Belt Assessment, such as the Thurrock Settlement Hierarchy (2025), the Thurrock Open Space Assessment (2025), the Thurrock Landscape Capacity Study (2026), the Essex Local Nature Recovery Strategy (2025) and the Transport Assessment (2026).

The South Essex Framework is being prepared in partnership by Basildon Borough Council, Brentwood Borough Council, Castle Point Borough Council, Rochford District Council, Southend-on-Sea Borough Council and Thurrock Council, working together with Essex County Council. The partnership of all seven councils is called South Essex Councils (SEC). The framework will set out overall guidance for development across the whole area which will help achieve synergy and consistency across each individual authorities' Local Plans.

2.3 Existing Green Belt Assessment work

The Thurrock Green Belt Assessment Stage 1 work was prepared by Peter Brett Associates (now part of Stantec) in 2019 on behalf of TC. The Stage 1 work is split into Stage 1a and 1b, where:

- *Stage 1a* identifies Green Belt parcels and assesses these against the NPPF Green Belt purposes; and
- *Stage 1b* includes implications for the Green Belt assessment of the preferred route of the Lower Thames Crossing Development Consent Order (DCO).

The Thurrock Green Belt Assessment Stage 1 work was prepared in the context of the 2018 version of the NPPF, and refers to several associated studies and strategies used for the assessment, including:

- Landscape character assessments at county and district level;
- Thurrock Integrated Landscape Character Assessment (2018);
- Green Belt studies undertaken in neighbouring districts;
- Previous Green Belt work undertaken in Thurrock (site suitability not assessment against purposes);
- The Thames Gateway South Essex Greengrid Strategy; and
- Thurrock Greengrid Strategy (site suitability not assessment against purposes).

In addition, the Thurrock Stage 1 Green Belt Assessment (2019) considered neighbouring local planning authorities' Green Belt studies.

² Thurrock Council (2024). Local Development Scheme.

3. National policy, guidance, appeals and experience elsewhere

3.1 Overview

This section provides a summary of relevant national Green Belt policy within the NPPF (2024) and guidance in the PPG (2025), before considering the implications for the Stage 1 review and Stage 2 GBA methodology. It also includes analysis of how Inspectors have been interpreting this policy and guidance in recent planning appeal decisions, and experience in other authorities and insights from Independent Examinations on the topic.

3.2 National Planning Policy Framework (2024)

Although there have been some key changes in relation to Green Belt policy since the NPPF was first published in 2012, the majority of the policies in relation to Green Belt and plan making have been retained and remain unchanged in the updated version published in December 2024. These include:

- The fundamental aim of Green Belt policy to “prevent urban sprawl by keeping land permanently open” (NPPF 2024, para 142).
- The five main purposes of Green Belt (NPPF 2024, para 143):
 - a. to check the unrestricted sprawl of large built-up areas;
 - b. to prevent neighbouring towns merging into one another;
 - c. to assist in safeguarding the countryside from encroachment;
 - d. to preserve the setting and special character of historic towns; and
 - e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- The intended permeance of the Green Belt (NPPF 2024, paras 144, 145).
- Alterations to Green Belt only to be undertaken in exceptional circumstances (NPPF 2024, para 145)
- The need to take into account sustainable patterns of development (NPPF 2024, para 148)
- Boundary definition requirements (NPPF 2024, para 149)
- Considerations as to whether villages should be included or excluded from the Green Belt (NPPF 2024, para 150).
- Need for positive planning in the use of Green Belt land (NPPF 2024, para 151).

Nevertheless, the NPPF (2024) includes a number of significant changes for plan making relating to exceptional circumstances, grey belt and sequential release of Green Belt land, each of which are summarised below.

3.2.1 Exceptional circumstances

The 2024 NPPF requires authorities that cannot meet their identified need for homes, commercial or other development through other means to review their Green Belt boundaries: *“If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alternations to meet these needs in full”* (NPPF 2024, paragraph 146). The review of Green Belt boundaries for this reason now constitutes grounds for exceptional circumstances to release Green Belt land.

The requirement to consider Green Belt land to meet housing and other requirements is mitigated at a high-level by an additional test introduced in paragraph 146, which requires the Council to demonstrate its exceptional circumstances case. The test stipulates that Green Belt boundaries should not be altered where that would *“fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan”* (NPPF 2024, paragraph 146).

3.2.2 Grey belt

The NPPF 2024 introduced a sub-category of Green Belt land called grey belt. Grey belt is defined as:

“Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development” (NPPF 2024, glossary).

Footnote 7 identifies several constraints which may preclude land from being considered as grey belt. The PPG provides further guidance on how footnote 7 should be applied when identifying land as grey belt.

3.2.3 Sequential release of Green Belt land

Paragraph 148 of the NPPF 2024 sets out a sequential approach to the release of Green Belt land: *“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”* As in the previous NPPFs, when applying this approach and the release of Green Belt is proposed, consideration still needs to be given to promoting sustainable patterns of development, in particular whether *“the site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework”* (NPPF 2024, paragraph 148). Paragraphs 110 and 115 of the NPPF focus on sustainable development locations and sustainable transport solutions.

3.2.4 ‘Golden Rules’ for Green Belt release

Paragraph 156 of the NPPF sets out that where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made:

- a. *affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b. *necessary improvements to local or national infrastructure; and*
- c. *the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.*

Paragraph 157 stipulates the affordable housing provision relating to 156(a), requiring provision of 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.

Paragraph 159 details the green space improvements required as part of the Golden Rules, including that such improvements should *“contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan.”* In the absence of locally specific standards, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). It further sets out that *“where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.”*

3.3 Planning Practice Guidance (2025)

The PPG provides guidance for plan making on:

- How to assess Green Belt to identify grey belt within it, in particular how to assess land against the NPPF Green Belt purposes (a), (b) and (d);
- How to consider the impact of development, or of release of land on the remaining Green Belt in the plan area;

- When a proposal on grey belt land may not constitute inappropriate development in the Green Belt; and
- How to identify sustainable locations when considering release of Green Belt land.

The PPG also provides guidance on how to consider proposals on potential grey belt land for the purpose of decision-making. This summary focuses on the plan-making guidance.

3.3.1 Grey belt

PPG makes it clear that the identification of grey belt land does not necessarily mean that the land should be allocated for development or released from the Green Belt. The contribution of the land to the Green Belt purposes needs to be considered alongside wider NPPF policies in making any decisions about Green Belt land.

Green Belt reviews, and the identification of grey belt, should be part of the plan making process, with the expectation that the identification of grey belt land will allow for the prioritisation of land detailed in paragraphs 147 and 148 of the NPPF (2024).

3.3.2 Assessing Green Belt to identify grey belt land

Local authorities should produce a Green Belt Review in order to identify grey belt land. When updating or preparing plans, authorities will need to consider whether any existing Green Belt assessment remains up to date.

3.3.3 Key steps in a Green Belt Review to identify grey belt land

The key steps of a Green Belt Review used to identify grey belt are:

1. Identify the location and appropriate scale of area to be assessed.
2. Evaluate contribution to purposes (a), (b) and (d)
3. Consider if any of footnote 7 restrictions apply
4. Identify provisional grey belt
5. Consider whether the release of Green Belt will fundamentally undermine the five Green Belt purposes taken together.

3.3.4 Green Belt Review spatial scope

The PPG stipulates that the Green Belt should be divided into assessment areas for the purpose of identifying grey belt. The number and size of assessment areas should respond to local circumstances. The whole Green Belt should be considered in the first instance.

Assessment areas should be sufficiently granular to enable assessment of the variable contribution of the Green Belt to the purposes. A small number of large assessment areas will not be appropriate in most circumstances and to better identify grey belt, assessment areas should be further sub-divided. Finer grained assessment may be appropriate in specific locations, such as around existing settlements or public transport hubs or corridors.

3.3.5 Purpose assessment

The PPG provides explicit guidance on how to conduct a Green Belt Assessment to identify grey belt in relation to purposes (a), (b) and (d). It is silent on purposes (c) and (e) as they are not included within the grey belt definition.

Large built-up areas, towns and villages

The definition of towns, and large built-up areas for the purpose of assessing purposes (a), (b) and (d) has been clarified. Villages should not be included for the purpose of assessing these purposes.

To check the unrestricted sprawl of large built-up areas (purpose a)

The PPG sets out illustrative factors that should be considered when assessing performance against purpose (a):

- Adjacency to large built-up area(s).
- Extent of existing development in assessment area and impact of other urbanising influences.
- Presence, or otherwise, of physical feature(s) in reasonable proximity that could restrict and contain development.
- Shape of development if released, with degree of enclosure and incongruous patterns of development considered.

To prevent neighbouring towns merging into one another (purpose b)

The PPG sets out illustrative factors that should be considered when assessing performance against purpose (b):

- Location of assessment area in relation to defined towns.
- Extent of existing development in assessment area.
- Scale to which the assessment area forms part of the gap between towns.
- Degree to which the development of the assessment area would result in loss of visual separation of towns, including whether there are any physical or natural features that might preserve visual separation.

To preserve the setting and special character of historic towns (purpose d)

The PPG notes that if there are no historic towns, a detailed assessment may not be necessary. It sets out illustrative factors that should be considered when assessing performance against purpose (d):

- Extent of existing development in assessment area.
- Role that the assessment area plays in the setting of the historic town.
- Contribution that the assessment area makes to the special character of the historic town. This should consider physical, visual and experiential links between the assessment area and the historic aspects of the town.
- Degree of separation of assessment area from the historic aspects of the town by existing development or topography.

3.3.6 Application of footnote 7

The grey belt definition excludes land where the constraints identified in NPPF footnote 7 would provide a strong reason for refusing or restricting development. Designations listed as effective constraints in footnote 7 include: habitat sites, Sites of Special Scientific Interest (SSSI); Local Green Space, National Parks or Heritage Coasts; irreplaceable habitats; designated heritage assets; and areas that are at risk of flooding or coastal change.

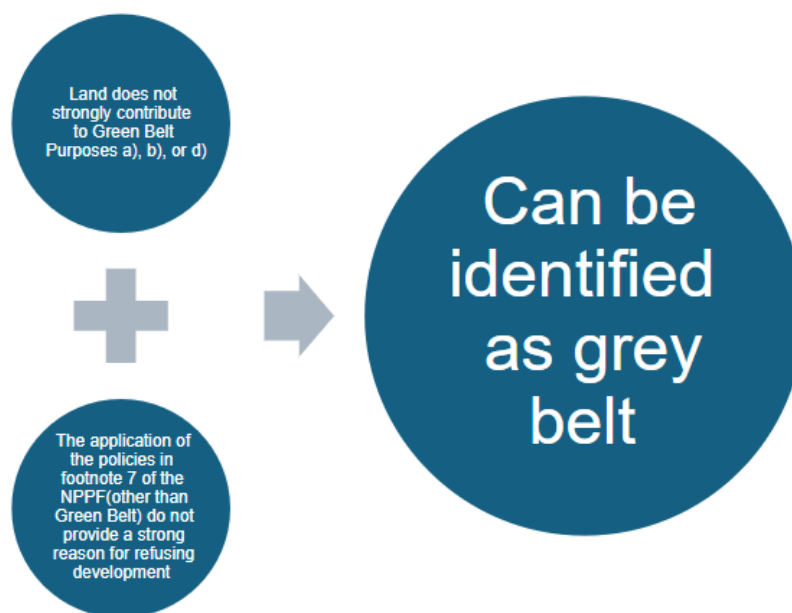
The PPG makes it clear that authorities need to consider not only areas where grey belt would be covered by these designations but also whether it would affect these definitions. Where these constraints are present within a local authority area, it is likely to only be possible to provisionally identify such land as grey belt in advance of more detailed specified proposals and impact assessment³.

³ Paragraph: 006 Reference ID: 64-006-20250225

3.3.7 Assessing whether land is grey belt

Green Belt land judged not to strongly contribute to any one of the purposes (a), (b) and (d) can be provisionally identified as grey belt, subject to the footnote 7 exclusions (as outlined above in 3.3.6). Figure 2 demonstrates this assessment ⁴.

Figure 3 When can land be identified as grey belt?



Source: UK Government Planning Practice Guidance, Green Belt, 2025

3.3.8 Assessing the impact of Green Belt release on the remaining Green Belt in the plan area

The PPG provides guidance of the application of the new NPPF test which of: *“whether the release of Green Belt land would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.”* (NPPF 2024, paragraph 146). The PPG explains that *“In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.”*⁵

3.3.9 Identifying sustainable locations

The PPG highlights that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a location is appropriate for development. Where grey belt land is not in a location that is or can be made sustainable, then development of that land is inappropriate. The PPG elaborates that the definition of sustainable locations should be determined for the local context, taking into account opportunities to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115⁶.

3.4 Draft National Planning Policy Framework (December 2025)

In December 2025, the Government commenced a consultation on proposed reforms and other changes to the planning system. The consultation closes on 10 March 2026.

⁴ Paragraph: 007 Reference ID: 64-007-20250225

⁵ Paragraph: 008 Reference ID: 64-008-20250225

⁶ Paragraph: 011 Reference ID: 64-011-20250225

This consultation includes a new draft version of the NPPF. There are minor changes to the Green Belt sections of the NPPF. One of the key changes is in relation to the definition of grey belt in Annex B which no longer refers to footnote 7 and states: “*For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2.*”

Under transitional arrangements the Council’s Local Plan will be assessed based on the December 2024 NPPF therefore, whilst the draft NPPF has been noted, it does not have implications for the approach taken to this study.

3.5 Appeal decisions

As the NPPF (2024) and Green Belt PPG (2025) have only relatively recently been published, they have yet to be tested at any Local Plan examinations. Therefore, it is helpful to look at recent planning appeals to see how they are being interpreted with respect to decision making to identify any relevant lessons learnt that can be applied to plan-making.

Openness

Before looking at recent appeals, it is helpful to reflect on more historic appeals, which have established some key points in relation to openness that are still considered relevant for GBA.

- Openness is generally considered to be ‘land free from built development’, which should be assessed on an individual area basis as well as in terms of the cumulative impact on adjacent areas.⁷
- Openness should be considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’ (for example, visual linkages between settlements in relation to purpose b, or functional character and linkages to the wider Green Belt in relation to purpose (c)).⁸
- While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, is not a mandatory determinative factor of openness.⁹

Exceptional circumstances

Similarly, whilst more historic, key points in relation to exceptional circumstances for Green Belt are established within Keep Bourne End Green v Buckingham Council [2020] EWHC 1984 of Compton Parish Council v Guildford Borough Council [2020] JPL 661, which confirmed that at [68]-[72]:-

- There is no definition of the policy concept of "exceptional circumstances". The expression is deliberately broad and not susceptible to dictionary definition. The matter is left to the judgment of the decision-maker in all the circumstances of the case;
- Whether a factor is capable of being an exceptional circumstance may be a matter of law, as an issue of legal relevance. But whether it amounts to such a circumstance in any given case is a matter of planning judgment;
- But the suggestion that a factor is legally incapable of amounting to an exceptional circumstance will generally require caution and judicial restraint. The breadth of the phrase and the array of circumstances which may qualify as "exceptional" indicate that judicial emphasis is very much more on the rationality

⁷ The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

⁸ See: Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin).

⁹ Further information available here: <https://www.supremecourt.uk/cases/uksc-2018-0077.html>

of the judgment made by the decision-maker than on seeking to define what can or cannot amount to "exceptional circumstances";

- "Exceptional circumstances" is a less demanding test than the "very special circumstances" test (as explained in paragraphs 87-88 of NPPF 2012 and now paragraphs 153-154 of NPPF 2024) used in development control in the Green Belt;
- There is no requirement that Green Belt land may only be released as a last resort,
- There is no requirement to show that the assumptions upon which a Green Belt boundary was originally drawn up have been falsified by subsequent events;
- Exceptional circumstances may comprise one factor or a combination of factors of varying natures;
- General planning needs, for example general housing, are not excluded from amounting to exceptional circumstances. The need does not have to relate to a special form of housing or to a particular level of intensity.

Summary of recent planning appeals

Following a review of around 50 recent planning appeals that have been determined since the publication of the NPPF (2024) and PPG (2025) and which featured Green Belt as a main issue, a number of key lessons have been identified:

- A site may be grey belt but if it is not in a sustainable location, its development would be inappropriate in the Green Belt.
- 'Sustainable location' can be defined in relation to distance from facilities and services, and access to public transport options rather than reliance on private vehicles.
- The definition of 'large built-up areas' and 'towns' within purposes assessments is significant and should align with how these places are defined within the development plan. There can be no ambiguity as to whether places are villages or towns. The definition of settlements in a settlement hierarchy has significant weight when determining what constitutes a town for Green Belt purposes.
- The footnote 7 designation does not automatically mean that a site fails the grey belt test; there needs to be a strong reason for refusal.
- Looking at strategic assessment areas or parcels within a GBA is helpful at a strategic level for plan making. However, when considering the identification of grey belt in decision making, it is more relevant to assess at a site-specific level to ensure the assessment outcomes reflect the site itself and is not skewed by the characteristics of land potentially some distance from the actual site.
- Purpose (a) is concerned with the sprawl in relation to large built-up areas only. The fact that a development would create ribbon development is not relevant to the assessment of purpose (a).
- The proportional loss of Green Belt should be considered in relation to the totality of the Green Belt within a local authority. If the proportional loss is small, it would be less likely to fundamentally undermine the Green Belt purposes, taken together.

Appendix A.2 sets out in greater detail the most significant and salient decisions from the reviewed appeals.

3.6 Experience elsewhere

GBAs should take account of good practice advice and comparator studies¹⁰. Although no GBAs have yet been tested at Local Plan examination under the new national policy and guidance, it is still useful to understand how other local authorities have conducted GBAs to date, as key principles still apply.

Existing GBAs in other authorities, including neighbouring authorities, have therefore been reviewed, alongside gathering insights from Local Plan examinations nationally.

3.6.1 Existing Green Belt assessments

Prior to the publication of the Green Belt PPG in 2025, there had been no defined Government methodology for carrying out a GBA and local authorities took a variety of approaches. Even with the publication of the Green Belt PPG (2025), which is primarily focused on providing guidance on grey belt identification, there is only limited advice on how to conduct a full Green Belt assessment. Therefore, it is useful to understand how other authorities have approached these studies. **Appendix A.3** sets out the studies reviewed.

In addition to a review of Thurrock's direct neighbouring authorities, this review draws on insights collated by Arup from a review of Green Belts across the Southeast of England region more generally.

It should be noted that the timescales for undertaking some of the studies reviewed pre-date the NPPF (2024), and some of the studies had not been subject to Independent Examination. Therefore, to identify good practice from the approaches adopted by other authorities, these factors have been taken into account to ensure the methodology adopted is sound and reflects the latest requirements of the 2024 NPPF.

The following points were noted from the review:

- Green Belt evidence base usually comprises multiple studies. The main GBA typically takes the form of a strategic / district level assessment and a spatially focused/local level assessment. These tiered studies are typically known as Stage 1 and Stage 2 GBA. Other additional Green Belt evidence base studies can include washed over village assessment, boundary review and exceptional circumstances case.
- Despite the variety of approaches, there is good deal of commonality across GBAs, in particular assessment against the NPPF Green Belt purposes and the need to consider the essential characteristics of Green Belt, i.e. openness and permanence.
- Authorities have only used those purposes deemed relevant to context, with purpose (d) sometimes and purpose (e) usually scoped out of the assessment.
- Qualitative approaches are primarily used in assessments, although some authorities have used more quantitative measures.
- The approach to scoring in assessments varies from simplistic traffic light systems to more complex approaches. A variety of scales, from three to seven points, are used to assess performance.
- Stage 1 GBAs focus on the entirety of the Green Belt within an authority dividing the Green Belt into strategic parcels for assessment areas. Assessment areas may vary in size across GBAs, with some studies applying a minimum threshold for the size of an assessment, below which assessment areas are aggregated to avoid inadvertent assessments at a site or plot level. A Stage 1 assessment typically:
 - Considers the whole of the Green Belt within the plan area.
 - Sub-divides the area into parcels / assessment area based on a variety of boundary types, including durable and significant physical features, areas of similar character or land use or the variation in performance against the NPPF purposes.
 - Assesses the individual performance of the assessment areas against purposes (a) to (d) and applies a blanket score for purpose (e).
 - Considers strength of contribution and potential harm of the areas in context of all adjacent Green Belt, including that across administrative boundaries where appropriate

¹⁰ Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

- Does not include recommendations for further consideration by the Council.
- Stage 2 GBAs focus on strategic areas of the Green Belt within an authority, dividing the land into assessment areas primarily using readily recognisable boundary features which are clearly defined in the methodology, though some have used grid squares of a defined size to identify the assessment areas and others have used sites as submitted through the Call for Sites. A Stage 2 assessment typically:
 - Removes land subject to major policy constraints from consideration.
 - Assesses sub-areas / parcels / sites around existing urban areas (rather than the whole district).
 - Considers whether there are Green Belt boundaries that are likely to be permanent and readily recognisable and occasionally offers minor boundary corrections.
 - Assesses whether the removal of the assessment area would cause wider impact or harm.
 - Presents overall recommendations suggesting whether, or not, the assessment area should be considered further.

3.6.2 Independent Examinations

Inspector's letters and reports from a range of Local Plan examinations across the country have been reviewed insofar as they relate to Green Belt methodologies. Although they pre-date the publication of the latest policy and guidance, they nevertheless provide some useful pointers for carrying out GBA.

Key points of note are:

- A staged approach to GBA is appropriate and has been commended at examination¹¹.
- Any methodology should clearly set out how the purposes have been interpreted, should respect the local context in relation to the definition of key terms¹² and only use those purposes deemed relevant to the local context.
- Openness and permanence are key considerations in terms of Green Belt; and are therefore integral to the assessment of Green Belt across all purposes.¹³
- A thorough approach must be taken to the identification of assessment areas for Stage 2 GBA, particularly where there is a risk that local housing need would not be met without amending Green Belt boundaries.¹⁴
- Detailed GBA (i.e. Stage 2) does not need to be carried out for land covered by major policy constraints, for example flood zone 3b or sites of international or national nature conservation importance, which would preclude development in any case.¹⁵
- Local purposes of the Green Belt should not necessarily be given the same consideration as the NPPF defined purposes. This is a question for professional judgement¹⁶.

¹¹ Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

¹² David Smith, Inspector, (24 January 2018), Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030

¹³ NPPF (2021)) paragraph 137; and Mel Middleton, Inspector (December 2017) Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan.

¹⁴ See: Mel Middleton, Inspector (December 2017) Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan.

¹⁵ Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan.

¹⁶ Mel Middleton, Inspector (December 2017) Welwyn Hatfield Local Plan Examination Green Belt Review

3.7 Implications for this study

The following section outlines the implications of policy changes detailed under 3.5 for the Stage 2 GBA, as well as relevant considerations for the Stage 1 review in section 4.

National policy consistency:

- Green Belt policy has remained consistent in relation to fundamental aim, purposes, permanence, requirement to demonstrate exceptional circumstances before making changes, sustainable patterns of development, washed-over village definition and positive planning within the Green Belt. Therefore, previous approaches to GBA are likely to be broadly still applicable. However, the development of the methodology should be cognisant of the detailed points of difference in national policy in relation to grey belt, exceptional circumstances and sequential release of Green Belt land, insofar as they are relevant to the scope of a GBA.

Stages and geographic scope:

- As well as a review of the performance of the whole of the Green Belt within an authority; there needs to be subsequent assessment at a sufficiently granular scale to enable the assessment of variable contribution to the Green Belt purposes, to inform the identification of grey belt.
- Authorities have typically undertaken a staged approach to Green Belt assessment, which is supported by the PPG and historically has been supported at examination. Thurrock has a Stage 1 GBA (2019) which focuses on the entirety of the Green Belt within the authority, dividing the Green Belt into strategic parcels for assessment. The current commission will develop the Stage 2 GBA which is more spatially focussed and assesses smaller, site-level areas of Green Belt land.
- Grey belt is a sub-set of Green Belt which can only be identified at a small scale, usually by a granular, site level assessment. Therefore, grey belt identification is most appropriately undertaken as part of a Stage 2 GBA.

Assessment process:

- Green Belt should be assessed against the purposes set out in the NPPF. The methodology must clearly set out how the purposes have been interpreted and should respect the local context, for example in relation to the definition of key terms, whilst reflecting the PPG.
- In terms of interpreting the national Green Belt purposes, definition of terms is of key importance to a successful and transparent assessment. Guidance on the interpretation of the purposes and the criteria to be used for assessment of purposes (a), (b) and (d) is provided by the Green Belt PPG. The GBA needs to establish appropriate criteria for purposes (a), (b) and (d), reflecting the illustrative factors identified in the PPG.
- The definitions of large built-up areas, neighbouring towns and historic towns used for the assessment of purposes (a), (b) and (d) respectively, are not villages. There should be no ambiguity in the definition, and the adopted definitions should align with the settlement hierarchy for the district as appropriate.
- The essential characteristics of openness and permeance should be considered within the performance assessment. Various planning appeals and the PPG have highlighted important considerations around the interpretation and importance of ‘openness of the Green Belt’ and these should be applied in a GBA.
- Historically some authorities have scoped out purposes (d) and (e) due to the local context, which was considered appropriate at the time. However, given the need to identify whether Green Belt release will fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan as part of the development of the exceptional circumstances case, it is necessary for the assessment of performance to cover all the purposes (a-e).
- When authorities are assessing whether an area can be removed from the Green Belt, consideration should be given to the presence or otherwise of readily recognisable and likely to be permanent boundary features. This should be considered within the Stage 2 GBA to enable authorities to refer back to the evidence later in the plan making process.

Grey belt identification:

- Grey belt needs to be provisionally identified (normally within the Stage 2 GBA) as part of plan making following the process set out in the PPG. However, not all grey belt will necessarily be allocated for development or released from the Green Belt. It will be for the Council to decide the extent to which this takes place in considering the balance of planning factors as part of the wider plan making process.
- There is no requirement in the NPPF or the PPG for all Green Belt land to be assessed to determine whether it is grey belt. The implication is that grey belt identification is one component of a GBA that local authorities with Green Belt land are expected to deploy, based on local circumstances which help to determine a specific ‘area of search’ within the Green Belt.
- When identifying grey belt, the area of search should be focused on sustainable locations in line with NPPF para 155c. Within sustainable locations, the identification of grey belt will be based on the performance scores for NPPF purposes (a), (b) and (d).
- A GBA can only provisionally identify grey belt areas due to the need for further assessment at a later stage of the plan making process to identify any effects on footnote 7 designations. This will confirm grey belt status or otherwise.

Amendments to Green Belt boundaries:

- Changes to Green Belt boundaries are not generally supported by the NPPF, as the general extent has already been established and given Green Belt’s intended permanence. Any proposed changes will need to be supported by a robust exceptional circumstances case, which is fully justified and evidenced.
- The GBA will only provide the starting point for any exceptional circumstances cases and it will be necessary for the Council to develop the exceptional circumstances case, both at strategic and site level, as part of the wider Local Plan process.
- A new ‘fundamentally undermine’ test has been introduced, which will need to be set out as part of any exceptional circumstances case. High-level conclusions of what constitute ‘fundamentally important’ parcels can be drawn at Stage 2, to inform this case later in the plan making process, once the combination of sites for release are known.
- When considering the ‘fundamentally undermine’ test, considering the proportional loss of total Green Belt within the district may be helpful.

4. Review of existing Stage 1 Green Belt

4.1 Purpose of this review

4.1.1 Scope and aims

The purpose of this section is to present the review of the existing Stage 1 Green Belt evidence and confirm whether it is ‘fit for purpose’ and relevant for the Stage 2 GBA, based on new national policy and guidance for Green Belt introduced since the December 2024 update to the NPPF and 2025 update to Planning Practice Guidance (PPG).

The following documents have been reviewed to inform this section:

- Thurrock Strategic Green Belt Assessment Stages 1a and 1b (2019); and
- Appendix E Stage 1a: Maps of the Findings of the Assessment of Parcels Against Green Belt Purposes (hereafter referred to as the Thurrock Stage 1 Green Belt Assessment (2019))

Recommendations are made at the end of this section, including any implications for Stage 2 to ensure the Green Belt evidence as a whole is fit-for-purpose.

4.1.2 Exclusions and assumptions

This review is intended to inform TC on whether the Stage 1 GBA remains ‘fit for purpose’ and the most appropriate next steps for the Stage 2 GBA. It assesses existing Green Belt evidence against updated policy and guidance introduced since December 2024. It does not seek to ‘critique’ or comment on the way in which previous GBAs were carried out, nor does it provide a comprehensive assessment of all existing and ongoing Green Belt evidence across neighbouring local planning authorities. It instead focuses on the documents as set out in 2.2.1 above.

4.1.3 Approach to Stage 1 Review

In order to focus the review, key questions were developed based on the updated national policy requirements and guidance for Green Belt. Table 1 in Appendix A.1 details the review questions and highlights how these are linked to the 2024 NPPF and 2025 PPG in respect of Green Belt matters. The review below is subsequently framed against the questions.

4.2 Review of Existing Evidence

This section sets out our review of the Thurrock Stage 1 Green Belt Assessment (2019) to establish its alignment with updated national policy and guidance (with key questions outlined Appendix A.1) The review is framed against those key questions based on updated NPPF (2024) and PPG (2025) in relation to Green Belt.

Given that the updated NPPF and PPG were published relatively recently, they are yet to be tested at Local Plan examinations; therefore, this review refers to relevant planning appeals to better understand how new policy and guidance is being interpreted with respect to decision-making on Green Belt matters.

Similarly, this review considers comparative Green Belt Assessments and emerging approaches being employed by other authorities in their updates to Green Belt Assessment in light of new policy and guidance, including those Arup is currently commissioned to support.

To note, the Green Belt purposes within the NPPF 2024 are identified by letters (Purpose (a), Purpose (b) etc.), and within the Thurrock Green Belt Assessment work they are numbered (Purpose 1, Purpose 2 etc.). For clarity, in the analysis below we have referred to the purposes by their corresponding letter within the NPPF (2024).

4.2.1 Geographic scope

4.2.1.1 *Does the assessment consider all of the Green Belt within the plan area?*

The Thurrock Stage 1 Green Belt Assessment (2019) assesses the whole area of Green Belt within the Borough.

Review of existing and emerging practice (Arup and elsewhere)

Our review of Green Belt assessments elsewhere (Appendix A.3) highlights that Green Belt evidence usually comprises multiple studies; with the main Green Belt assessment typically taking the form of a strategic or district level assessment, followed by a spatially focussed / local level assessment.

A Stage 1 Green Belt assessment focuses on the entirety of the Green Belt within an authority dividing the Green Belt into strategic parcels for assessment areas. Some authorities assess the strategic as well as local roles of the Green Belt in a Stage 1 Green Belt assessment.

Our review highlights that a Stage 1 assessment typically:

- Consider the whole of the Green Belt within the plan area.
- Sub-divide the area into parcels / assessment area based on a variety of boundary types, including durable and significant physical features, areas of similar character or the variation in performance against the NPPF purposes.
- Assess the individual performance of the assessment areas against purposes (a) to (d) and apply a blanket score for purpose (e).
- Do **not** include recommendations for the Council in relation to Green Belt release or boundary amendments.

Following Stage 1, later stage Green Belt assessments (Stage 2/3) typically involve significant subdivision of parcels used in Stage 1 to be able to undertake a more granular, or site-specific analysis.

Related Case Law and Independent Examinations

Relevant to the geographic scope and assessment approach of Green Belt Assessment, a staged approach to Green Belt assessment is appropriate and has been commended at examination (Runnymede Local Plan Examination, 2020)¹⁷.

¹⁷ The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan.

Concluding summary on geographic scope of assessment:

Overall, the geographic scope of the Thurrock Stage 1 Green Belt Assessment (2019) is appropriate and aligned with the new national policy and guidance insofar as they consider the extent of the Green Belt within administrative boundary of TC.

The staged approach to Green Belt assessment remains aligned with the new PPG and accords with comparative studies for Stage 1 Green Belt assessment (Appendix A.3). We consider that a two-stage process which firstly considers the performance of the entire extent of the Green Belt (Stage 1) at a strategic level, followed by assessment of more granular, site-level areas of Green Belt land (Stage 2) is appropriate.

4.2.1.2 Are assessment areas sufficiently granular to enable assessment of their variable contribution to Green Belt purposes?

The Thurrock Stage 1 Green Belt Assessment (2019) includes 42no. strategic parcels for assessment. Parcel definition is based on features on the ground which could provide ‘meaningful boundaries’, identified from both desk-based review, site work and mapping information (para 3.6.5). The assessment notes that the strategic nature of the Stage 1 assessment led to the definition of relatively large parcels in many areas, and as such their consideration of contribution to Green Belt purposes is strategic (para 4.2.1).

Review of existing and emerging practice (Arup and elsewhere)

The majority of Stage 1 Strategic Green Belt Assessments reviewed for this Report (Appendix A.3) identified parcels according to ‘recognisable boundaries’¹⁸, however, do not apply an approach to area thresholds. The approach to area thresholds (i.e. minimum and maximum) is relatively uncommon but not unique. For example, Bournemouth, Christchurch and Poole (BCP) Council and Dorset Council Strategic Green Belt Assessment Stage 1 Study¹⁹, which also took a threshold approach to assessment areas. Here, inner parcels ranged from 0.78 to 228.54 hectares and outer areas from 11.53 to 13,787.12 hectares²⁰.

In addition, in the Warrington Council Green Belt assessment, the General Areas for the Stage 1 assessment were initially identified using ‘strong permanent boundaries’ e.g. motorways and waterways. The result of this was disproportionately small General Areas which were more akin to sub-areas and therefore did not accord with the purpose of undertaking a General Area assessment. As a result of this, professional judgement was applied and a number of these ‘small’ General Areas (150ha or less) were merged together. In Cheshire East, this parcel size was specifically applied in their Green Belt Assessment Update given that the Local Plan Inspector had noted an inconsistency in the scale of the parcels assessed in the Council's previous Green Belt Assessment and had raised this as a flaw in the methodology in the Inspector's Interim Views. It should be noted however, that the imposition of these size thresholds on parcels was applied after parcels were initially identified using ‘strong’ or ‘moderate’ boundary features.

From those LPA examples referenced above regarding approach to parcel definition identified, the following have been found ‘sound’ following Local Plan Examination (or were not challenged and therefore we assume are sound):

- Cheshire East Council Local Plan Strategy (adopted 27 July 2017)²¹
- Greater Manchester Combined Authority Places for Everyone Plan (adopted 21 March 2024)²²

¹⁸ LUC (2016). Greater Manchester Green Belt Assessment (2016); and LUC (2015). Oxford Green Belt Study.

¹⁹ LUC (2020). Bournemouth, Christchurch and Poole Council and Dorset Council Strategic Green Belt Assessment, Stage 1 Study.

²⁰ N.B. Whilst it is recognised that the BCP Local Plan has been recently withdrawn on 19 June 2025, comments only related to Duty to Cooperate requirements and unmet housing need and not issues with the methodology used within the Green Belt Assessment itself.

²¹ Arup (2015). Cheshire East Green Belt Assessment Update.

²² LUC (2016). Greater Manchester Green Belt Assessment (2016).

- Oxford Local Plan (adopted 8 June 2020)²³
- Warrington Local Plan (adopted 4 December 2023)²⁴

Related Case law and Independent Examinations

Recent appeal decisions relevant to Green Belt assessment parcels (Table 1 below) highlight that parcels are useful in a strategic sense to inform plan-making and in particular for future development growth within an authority area. Within a group of appeal decisions in the London Borough of Brentwood (Ref: APP/H1515/W/24/3341474-79)²⁵, the Inspector considered that a site-specific level is more relevant for determining grey belt land, rather than a larger strategic Green Belt assessment parcel. This is due to the potential for ‘skewed’ assessment effects that could be introduced by parcel variation. It is acknowledged that this particular appeal pre-dates publication of the 2025 PPG however given the recent publication of updated national policy and guidance, and therefore limited appeals/case law, this is considered to be helpful.

Table 1 Recent appeal decision: scale / granularity of Green Belt assessment parcels

Theme	Appeal Ref	Date	Summary
Scale / granularity of Green Belt parcels	APP/H1515/W/24/3341474-79	16 Jan 2025	The inspector stated the following: <i>“Looking at parcels is helpful in a strategic sense to inform plan making and future development growth. However, for decision making, it seems more relevant to look at a site-specific level for determining grey belt land, otherwise the scale could be too large and skewed by land some distance from the actual site”</i>. Whilst this appeal pre-dates the PPG updates for Green Belt, this aligns with PPG which indicates that, when identifying grey belt land, using a small number of large parcels will generally not be an appropriate approach and assessment areas should be sufficiently granular to enable their varied contributions to the Green Belt purposes to be functionally determined²⁶.

Concluding summary in relation to parcelling process:

The review confirms that it is appropriate for a Stage 1 study to use generally larger parcels given it is a strategic-scale study, with parcels defined based on strong boundary features. The Stage 1 parcels followed this approach and therefore remain fit-for-purpose as strategic areas to be used as a baseline against the finer-grained sub-area assessments undertaken as part of the Stage 2 GBA.

In relation to the parcelling process, it will be beneficial for the Stage 2 GBA to adopt a step-by-step approach to parcelling and boundary definition. The approach should also reflect updated PPG in relation to the requirement that Green Belt assessment areas are ‘sufficiently granular’ to determine the variable contribution to Green Belt purposes; and should consider the potential for assessment areas to be subdivided in certain locations such as around existing settlements, or public transport hubs or corridors.

²³ [LUC \(2015\). Oxford Green Belt Study.](#)

²⁴ [Arup \(2016\) Warrington Borough Council Green Belt Assessment.](#)

²⁵ [Planning Inspectorate \(2025\). Appeal Decisions against Brentwood Borough Council.](#)

²⁶ [National Planning Practice Guidance \(2025\). Green Belt Paragraph: 004 Reference ID: 64-004-20250225.](#)

4.2.2 Green Belt Purposes

4.2.2.1 *Does the assessment consider all five purposes of the Green Belt?*

The Thurrock Stage 1 Green Belt Assessment (2019) includes the first three purposes (a), (b) and (c) (para 1.6.1) only. The reasons for excluding purposes (d) and (e) are set out within the relevant review sections below.

4.2.2.2 *How does the assessment deal with assessment of overall contribution to Green Belt purposes?*

Each strategic parcel with the Thurrock Stage 1 Green Belt Assessment (2019) includes an overall contribution to Green Belt purposes ((a), (b) and (c)) which mirrors the qualitative scoring used across the assessment of purposes (i.e. ‘fundamental’, ‘major’, ‘moderate’ etc). A detailed methodology for aggregating scores for each purpose is not set out within the assessment.

Appendix E of the Thurrock Stage 1 Green Belt Assessment (2019) includes maps of the findings of the assessment of parcels against Green Belt purposes, including variations in overall contribution for each strategic parcel. This Appendix includes a map with each parcel’s ‘overall importance as area of search’.

Review of existing and emerging practice (Arup and elsewhere)

Historically, some authorities have scoped out purposes (d) and (e) due to the local context, which was considered appropriate at the time based on previous versions of policy and guidance, and this approach has been generally deemed acceptable at Examination (see below). However, given the need to identify whether Green Belt release will fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan as part of the development of the exceptional circumstances case, it is necessary for the assessment of performance to cover all the purposes (a-e). This approach is being undertaken by Arup for ongoing GBAs in Birmingham, Sevenoaks, Tonbridge and Malling, SW Herts, amongst others (see Appendix A.3).

For instance, in the Cheshire East Green Belt Assessment Update (2015) which Arup prepared, purpose (e) was assessed for all Green Belt parcels to provide an understanding of the potential for the Green Belt around each settlement to assist in the urban regeneration of that settlement. In order to do this, the brownfield capacity of each settlement was calculated by considering the deliverable and developable brownfield supply within that settlement against the existing number of dwellings within the settlement. Assessment thresholds were applied based on the range of brownfield capacity percentages across the authority area linking to a contribution rating (i.e. strong, moderate, weak or no contribution). This approach provided a theoretical assessment of the potential for urban regeneration, and it was acknowledged there is no guarantee that restricting development on Green Belt land will result in the development of brownfield sites in a settlement. It was considered to represent a proportionate and reasonable approach to purpose (e) based on available data. The approach was not challenged by the Cheshire East Local Plan Inspector during the Local Plan Examination and the Plan was adopted in 2017. Arup adopted a similar approach in the Warrington Green Belt Assessment (2016); however, the brownfield capacity was calculated on an authority wide basis instead of a settlement basis and therefore all parcels were attributed the same rating based on this. This approach was not also challenged during the Warrington Local Plan Examination and the Plan was adopted in 2023.

In relation to overall NPPF purpose performance / assessment, Arup typically report overall performance against the purpose assessment criteria. This is determined through the following approach:

- Any sub-area scoring strongly or very strongly (4 or 5) against the criteria for one or more NPPF purpose is judged to meet the purpose assessment criteria strongly.
- Any sub-area scoring moderately (3) against at least one NPPF purpose and failing to score strongly or very strongly (4 or 5) against any purpose is judged as meeting the purpose assessment criteria moderately.
- Any sub-area scoring weakly or very weakly (1 or 2) across all NPPF purposes is judged to meet the purpose assessment criteria weakly.

Related Case Law and Independent Examinations

Relevant to the assessment against Green Belt purposes, the Inspector's Report to London Borough of Redbridge in relation to the Examination of the Redbridge Local Plan (adopted 2018)²⁷ noted that any [Green Belt] methodology should clearly set out how the purposes have been interpreted and should respect the local context in relation to the definition of key terms and only using those purposes deemed relevant to the local context. In addition, the Independent Examination of the Welwyn Hatfield Local Plan (adopted 2023) highlighted that openness and permanence are key considerations in terms of Green Belt and are therefore integral to the assessment of Green Belt across all purposes²⁸. In relation to exclusion of assessment against purpose (e), key findings from our review of Independent Examinations of North Hertfordshire Local Plan (adopted 2022) and Greater Manchester Combined Authority Joint Plan (adopted 2024) indicates that this has generally been accepted by Inspectors where a justification for this has been provided.

Concluding summary in relation to NPPF purposes assessment and assessment of overall contribution:

As the Thurrock Green Belt Assessment (2019) carried out assessments against three NPPF purposes only, the approach to the purpose assessment is not considered appropriate for use in future analysis by the Council in relation to the 2024 NPPF's 'fundamentally undermine' test of the impact of potential release of sites upon the Thurrock Green Belt, which requires assessment of NPPF purposes (taken together). The timing of the fundamentally undermine test is subject to TC's plan-making timescales. However, assessment of fundamental importance of various parcels can be observed from the findings of Stage 1 (Appendix D Stage 1a: Green Belt Parcel Assessments).

However, assessment approaches appear to align with Independent Examinations noted above, which advise that the methodology should clearly articulate interpretation of the Green Belt purposes and use those deemed relevant to local context (Redbridge), in this case the exclusion of purpose (d) assessment, which is further explored in the following purpose sections.

In relation to the overall contribution to purposes assessment, Appendix E of the Thurrock Stage 1 Green Belt Assessment (2019) includes maps of the findings of the assessment of parcels against Green Belt purposes, including variations in overall contribution for each strategic parcel. We recommend that the Stage 2 GBA has a clear methodology for the assessment of overall contribution and how this is applied on a sub-area basis.

4.2.3 Green Belt Purpose (a) Definitions and Assessment Criteria

4.2.3.1 Are the definitions of large built-up area clear and consistent in consideration of the new PPG?

The Thurrock Stage 1 Green Belt Assessment (2019) sets out that PBA confirmed with TC the categorisation of settlements in Thurrock, including 'large built-up areas' and 'neighbouring towns'. The large built-up areas for the purposes of assessment comprises the Thurrock urban area, involving multiple settlements within Thurrock to create a 'combined area', as set out within Table 2 below.

Table 2 Large built-up areas as defined within the Thurrock Stage 1 Green Belt Assessment (2019)

Settlements inside the assessment area considered to be large built-up areas
The Thurrock urban area comprising: – Chadwell St Mary – Chafford Hundred – Grays/Stifford Clays – Lakeside/West Thurrock – Little Thurrock/Socketts Heath

²⁷ Planning Inspectorate (2018). Report on the Examination of the Redbridge Local Plan 2015-2030.

²⁸ Planning Inspectorate (2016). Report on the Examination of the Welwyn Hatfield Local Plan.

– Purfleet – South Stifford – Tilbury In addition: – Stanford-le-Hope/Corringham (combined area), – Coryton/London Gateway
Settlements outside the assessment area considered to be large built-up areas
The separate urban areas of – Basildon – South Benfleet/ Thundersley – Brentwood – Upminster/ Hornchurch/ Rainham

Review of existing and emerging practice (Arup and elsewhere)

In emerging Stage 1 / Strategic Green Belt Reviews such as Birmingham (Stage 1 and Stage 2), Sevenoaks (Stage 1) and SW Herts (Stage 1) (prepared in the context of new Green Belt policy and guidance), Arup is utilising ONS statistics for built up areas, as it is considered that this provides a useful classification of settlements based on population sizes (see Table 3 below). It should be noted that this approach is not being employed across all our GBAs, as it is acknowledged such approach is contingent on authority agreement.

Table 3 Built Up Area (BUA) Size Classification

Population range (usual resident population)	BUA size classification	Approximate settlement type
0 – 4,999	Minor	hamlet or village
5,000 – 19,999	Small	larger village / small town
20,000 – 74,999	Medium	medium towns
75,000 – 199,999	Large	large towns / smaller cities
200,000+	Major	Cities

Source: *Office for National Statistics (ONS) (2023)*

The advantage of using this data source is that it allows consistent comparison / categorisation of places across England. However, it should be noted that the classification is not completely clear cut in terms of using as a definitive source to define large built up urban areas and towns with Green Belt Reviews, as for example, ‘larger village’ and ‘small towns’ are grouped together and some of the geographical units used within the statistics do not align with how places are viewed within settlement hierarchies or with respect to administrative boundaries. Nevertheless, the ONS statistics provide a useful starting point for defining large built-up areas and towns, which can be further refined with reference to published settlement hierarchies for districts and boroughs.

Additionally, Arup’s emerging approaches seek to clearly define the term ‘sprawl’ to ensure robust application for purpose (a) assessment. As it is a multi-faceted concept, it is important that such definition is understood and secured via agreement amongst relevant stakeholders. Our emerging methodologies for Sevenoaks, Birmingham, and SW Herts consider the extent to which a parcel exhibits relationship with the respective built-up area(s), in particular the degree / nature of containment by built form. Assessment areas that are almost entirely surrounded by built development as part of a single built-up area (enclosed) do not prevent sprawl, rather potential development could be classified as infill. Whereas assessment areas between two built-up areas (contiguous) or on the edge of a built-up area (connected) have a role in preventing sprawl.

4.2.3.2 Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose a?

The Thurrock Stage 1 Green Belt Assessment (2019) does not explicitly define the term ‘sprawl’, however the assessment maintains that “*well located and planned urban extensions are unlikely to constitute ‘sprawl’ (a term that is based on negativity suggesting the unplanned, uncontrolled spread of development).*” (para 4.2.2). The assessment considers that the sense of permanence provided by Green Belt is fundamental to the limitation of sprawl. It is noted that this purpose has a strong relationship with purpose (c) (safeguarding of the countryside from encroachment).

The assessment sets out the broad assumption that land that is situated close to the periphery of an urban area is likely to contribute the most to purpose (a), as it is that land which provides the boundary and zone of constraint to urban expansion. Land that is more remote is likely to become progressively less important to this Purpose (although ‘free-standing’ development in such areas, by virtue of being remote, is likely to be perceived potentially as ‘sprawl’) (para 4.2.3). The assessment also considers the potential of land parcels in terms of whether land is well-contained by ‘logical and clearly identifiable physical and/or visual boundaries’ or not; in the case that it is considered well-contained it may be able to accommodate development without giving rise to perceptions of sprawl. Detailed criteria for purpose (a) assessment are set out in Table 4.

Table 4 Thurrock Stage 1 Green Belt Assessment (2019) criteria for assessment against purpose (a)

Contribution rating	Criteria used (emphasis added)
Fundamental	Land where strategic level of development would conflict fundamentally with Green Belt purpose. – The land provides a distinct, well-defined area that contains the large built-up area and provides strong containment that prevents the perception of ‘sprawl’. – There may be/is no alternative strong physical/landscape boundary(s) further from the edge of the large built-up area that would perform a similar role in containing growth and ensuring a ‘good fit’ for development - strategic level of development may lead to perception of uncontained growth. – The land may/may not be affected already by the existing physical/visual presence of the large built-up area and may have a varied character.
Major	Land where strategic level of development would conflict substantially with Green Belt purpose. – The land contains/contributes to the containment of the large built-up area (although its character may be influenced by it). – Strategic level of development has potential to create perception of poorly contained growth, although other physical/landscape boundaries may exist further from the edge of the large built-up area that could define and contain growth and prevent the perception of ‘sprawl’ (although these may require reinforcement to achieve a well-defined limit to development and a new Green Belt boundary).
Moderate	Land where strategic level of development would conflict significantly with Green Belt purpose. – The land provides some containment of the large built-up area although it is significantly influenced by its presence and related features/land uses leading to a poorly defined edge, or it may be slightly removed from the edge of the large built-up area and therefore contribute less to the purpose (other land closer to the edge performs the function of containment).
Slight / Negligible	Land where strategic level of development would have limited/negligible impact on this purpose of Green Belt. – The land may be physically and visually related to the large built-up area and already perceived to be part of/closely related to the built-up area, giving a poorly defined edge and possibly the perception of ‘sprawl’; or is an area that has very little relationship to the large built-up area and of little importance to containing ‘sprawl’ (land closer to the built-up area fulfils this function to a greater degree). – Development may allow opportunities for enhancement of degraded land and the definition of a stronger long-term Green Belt boundary, or there are other strong boundaries that would contain development.
None	Land where strategic level of development would have no impact on this purpose of Green Belt. – Land is largely contained by existing development and already forms part of, and is perceived as, part of the large built-up area; or

Contribution rating	Criteria used (emphasis added)
	– Land is <i>unrelated /has no significant relationship</i> with a large built-up area.

Review of existing and emerging practice (Arup and elsewhere)

Within existing GBAs, criteria to assess purpose (a) have previously involved consideration of a range of factors. Greater Manchester Combined Authority considered existing sprawl/open character, boundary features, nature of the settlement form (including potential for rounding off), potential for ribbon development, and potential for sprawl to occur beyond the parcel boundary. Warrington and Cheshire East considered adjacency to the large built-up area, whether there were existing durable boundaries to prevent sprawl, the potential for rounding off, and the parcel's role in preventing ribbon development. Calderdale considered boundaries, ribbon development, irregular settlement patterns, connection to the built-up area, and proximity to the built-up area. North Hertfordshire considered the role of the land in preventing the spread of development.

Related case law and Independent Examinations

The judgment made in APP/H2265/W/24/3347410 considers the definition of the ‘large built-up area’ and how sprawl is considered in the context of determining whether a site should be ‘grey belt’. A recent judgment made in South Gloucestershire, sets out a number of key points in relation to assessment of contribution to purpose (a). This is summarised in Table 5 below.

Table 5 Recent appeal decisions: Definition of sprawl and purpose (a) criteria

Theme	Appeal Ref	Date	Summary
Definition of sprawl	APP/H2265/W/24/3347410 ²⁹	13 Feb 2025	This appeal provides guidance on the interpretation of Green Belt purposes with regard to preventing urban sprawl and the merging of neighbouring towns. The appellant’s site was argued by the council to play a role in preventing urban sprawl as the proposals would contribute to ribbon development along the A20, however the inspector judged that paragraph 143(a) only refers to the unrestricted sprawl of large built-up areas. The nearest settlement (Wrotham) was judged to be a village and therefore not of relevance to this purpose, so the inspector determined that although the site would contribute to ribbon development, this did not amount to the sprawl of a large built-up area. The same appeal judgement also stated that London is the most relevant large built-up area with respect to paragraph 143(a), and that the site in question therefore did not perform strongly against this purpose.
Purpose (a) criteria in the PPG	APP/P0119/W/24/3357956 ³⁰	4 July 2025	This appeal is a recent example of a decision made in respect of grey belt. The Inspector sets out that “ <i>the PPG makes clear that [a site being free from existing development] is not the only relevant consideration. The presence of development is one example of a feature that potentially weakens the land’s contribution to purpose (a)</i> ”. The SGC Stage 2 Green Belt Assessment was referred to in the Appeal Decision as ‘comprehensive and robust’ despite it pre-dating the concept of grey belt as defined in 2024 NPPF and updated PPG. It was noted that whilst the site was free of existing sprawl, was ‘physically connected’ to the large built-up area of Bristol. In the assessment’s review of site boundaries that these were ‘mixed’, being defined by ancient woodland, residential curtilages and a

²⁹ Planning Inspectorate (2025). Appeal Ref: APP/H2265/W/24/3347410 Land part of Wrotham Water Farm, off London Road, Wrotham, Sevenoaks, Kent.

³⁰ Planning Inspectorate (2025). Appeal Ref: APP/P0119/W/24/3357956 Land south of Hencliffe Way and west of Castle Farm Road, Hanham

Theme	Appeal Ref	Date	Summary
			road, but ‘on the whole consists of a defensible boundary which would prevent unrestricted sprawl’.

Concluding summary in relation to assessment of Purpose (a):

Overall, the Thurrock Stage 1 Green Belt Assessment (2019) criteria for Purpose (a) aligns with new PPG illustrative features where they review level containment of parcels through assessment of the strength of boundary features (i.e. ‘physical features in reasonable proximity that could restrict and contain development’); and consider land use within the parcels (i.e. ‘existing development’).

However, ‘fundamental’ contribution criteria do not explicitly examine relationships between land parcels and the large built-up area (i.e. proximity to large built-up area), which forms part of the updated PPG illustrative features for purpose (a). Another area where there is minor discrepancy observed between the assessment and updated PPG is that it is unclear how the assessment has analysed whether development of parcels would result in an ‘incongruous’ pattern of development. The assessment criteria which examine ‘containment’ (in all contribution categories above) can be seen to support a degree of understanding as to whether development of parcels may introduce negative patterns in relation to the large built-up area. Here, areas with higher levels of containment may result in more congruent or appropriate patterns of development extending from the large built-up area.

Regardless of the above, given the Stage 1 parcel assessments only form a basis against which the Stage 2 finer-grained is compared to understand its relative contribution, the Stage 1 purpose (a) criteria are deemed to be fit-for-purpose. It is recommended that Stage 2 GBA criteria for purpose (a) should align with new PPG illustrative features. In addition, in defining the ‘large built-up areas’ as part of Stage 2 work it would be worthwhile reviewing the identified built up areas in the Thurrock Stage 1 Green Belt Assessment (2019) against the ONS data set referenced above and consider this along with the local context. Given the more granular nature of the Stage 2 GBA, it is appropriate for some differentiation between it and the earlier strategic GBA, which is outlined in the Stage 2 methodology.

4.2.4 Green Belt Purpose (b) Definitions and Assessment Criteria

4.2.4.1 Are the definitions of towns consistent in consideration of the new PPG?

It is noted that the Thurrock Stage 1 Green Belt Assessment (2019) does not draw upon the adopted or emerging Local Plan evidence pertaining to the authority’s settlement hierarchy.

Towns that are defined within the assessment are listed in Table 6 below.

Table 6 Review of defined ‘towns’ within the Thurrock Stage 1 Green Belt Assessment (2019)

Settlements inside the assessment area considered to be Green Belt towns
The following are considered to form one contiguous large town (combined area): – Chafford Hundred – Grays/Stifford Clays – Lakeside/West Thurrock – Little Thurrock/Socketts Heath – Purfleet – South Stifford In addition: – Aveley – Chadwell St Mary – South Ockendon – Stanford-le-Hope/Corringham (combined area) – Tilbury

Settlements outside the assessment area considered to be Green Belt towns

- Basildon
- South Benfleet/ Thundersley
- Brentwood
- Upminster/ Hornchurch/ Rainham
- Canvey Island

Review of existing and emerging practice (Arup and elsewhere)

Refer to earlier commentary provided for purpose (a) assessment in relation to definition of towns (section 4.1.4.1).

Related case law and Independent Examinations

The way in which ‘towns’ and ‘villages’ have been defined in GBAs has been the subject of many appeals as presented in Table 7.

Table 7 Recent appeal decisions: Definition of towns

Theme	Appeal Ref	Date	Summary
Definition of towns	APP/D3640/W/24/3347530 ³¹	12 March 2025	An inspector ruled that the settlements of Bagshot and Windlesham did not constitute towns, being instead “villages of varying scales”, and that the appellant’s site which fell in between the two settlements did not play a role with respect to paragraph 143(b). Both Bagshot and Windlesham had been defined as towns in the LPA’s Green Belt Review, but the Inspector ruled that this carried less weight than the council’s Core Strategy, in which the settlement hierarchy defined Bagshot as a large village and Windlesham as a smaller village. The Inspector also opined that even if both settlements were considered towns, that the parcel of land in their view would not materially erode the gap between them if released for development. Given that the site did not play a role with regards to paragraph 143(b), the Inspector determined that it constituted grey belt land.
Definition of towns Role of Green Belt in preventing merging between towns	APP/G5180/W/24/3354266 ³²	31 March 2025	In this appeal, the Inspector judged that neighbouring settlements of Chislehurst, Bickley and Petts Wood had the character of local centres rather than distinct towns as they have significantly merged, and that therefore the appellant’s site had an essentially suburban setting and could not be considered to play a role with regards to preventing neighbouring towns from merging. Given this context, the Inspector additionally judged that the site could not play a role in preserving the setting or special character of historic towns and the site did not fulfil the purposes set out in paragraphs 143(b) or (d).
Definitions of towns and villages	APP/M1520/W/24/3351658 ³³	15 April 2025	The Inspector acknowledged that the settlement of Daws Heath in Essex had been classed as a town in the latest Green Belt review and a village in other development plan documents. The Inspector deemed Daws Heath to be a village for the purposes of judging an appeal site close to the settlement on the basis stated that as services and facilities are limited and Daws Heath is not of a large scale, it must be considered a village. The Inspector reiterated that the appeal site could not, therefore, contribute to Purposes (a) or (b) given this relates to large built-up areas and towns and not villages.

³¹ Planning Inspectorate (2025). Appeal Ref: APP/D3640/W/24/3347530 Land at Grove End, Bagshot.

³² Planning Inspectorate (2025). Appeal Ref: APP/G5180/W/24/3354266 Bickley Manor Hotel, Thornet Wood Road, Bickley, Bromley BR1 2LW

³³ Planning Inspectorate (2025). Appeal Ref: APP/M1520/W/24/3351658 Land adjoining 451-469 Daws Heath Road, Hadleigh, Essex SS7 2UG

4.2.4.2 Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose (b)?

The Thurrock Stage 1 Green Belt Assessment (2019) assumed that the main towns (as defined in the study and listed in Table 6 above) should remain separate with a clear physical and visual distinction between them such that they retain their separate identities and setting (para 4.2.15). The assessment also refers to the relationship between neighbouring towns and large built-up areas. Significant smaller settlements are also considered to be of ‘some relevance’ and these are considered within the assessment, but do not influence the assessment of the performance of land against purpose (b) (paras 3.6.7 and 4.2.15).

The assessment goes on to state that the review of the performance of areas of Green Belt against purpose (b) is informed by an understanding of whether there is the potential for the intervening land between towns to accommodate a strategic level of development without prejudicing their physical and visual distinction (para 4.2.15).

The broad approach to assessment assumes that the performance of parcels against purpose (b) reduces with the increase in distance between towns. The assessment acknowledges that the Thames estuary provides complete, permanent separation between Thurrock towns and towns within north Kent, therefore any parcels that intervene between towns on either side of the estuary are deemed to make no contribution to this purpose (para 4.2.17). Criteria for purpose (b) assessment are set out Table 8 below.

Table 8 Thurrock Stage 1 Green Belt Assessment (2019) criteria for assessment against purpose (b)

Contribution rating	Criteria used (emphasis added)
Fundamental	Land that is fundamental to physical separation of neighbouring towns. Any significant reduction in extent would result in <i>physical coalescence</i>, or a <i>perception of merging</i> that would erode the <i>distinct separate identity and character</i> of the <i>towns/large built-up areas</i>.
Major	Land that provides substantial contribution to separation between neighbouring towns. - There is <i>no significant inter-visibility</i> between the towns/large built-up areas currently. - Some development may be possible without causing <i>merger or perception of merging</i> between the <i>towns/large built-up areas</i>
Moderate	Land that provides <i>significant contribution to separation</i> between neighbouring towns/large built-up areas. - Land may be part of a <i>substantial gap (3km or more)</i> between <i>neighbouring towns/large built-up areas</i> with separate identities. - Land where <i>well-planned strategic level of development</i> unlikely to result in <i>merger or a perception of merging</i> as a consequence of <i>inter-visibility</i> (although intervening smaller settlements within Green Belt may be affected significantly by reduction of separation, merger or inter-visibility).
Slight / Negligible	Land does not lie between towns/large built-up areas or makes <i>limited/negligible contribution to separation</i> ; or land does not provide strategic level of separation. <i>Strategic level of development</i> would have little impact on this Green Belt purpose, although smaller settlements may be affected by reduction in separation, merger, or inter-visibility depending on their <i>proximity to the existing edge of the town/large built-up areas</i>. - Other <i>strong/well-defined boundary(s)</i> may exist to <i>restrain growth/prevent merging</i>. - Width of Green Belt may already be narrower at an adjacent location.
None	Land does not lie between towns/large built-up areas and makes <i>no contribution to separation</i> . It may lie between parts of the same town and fulfil a local purpose of maintaining the separation/identity of communities.

Review of existing and emerging practice (Arup and elsewhere)

Refer to earlier commentary provided for purpose (a) assessment in relation to definition of towns.

Related case law and Independent Examinations

The definition of ‘towns’ and ‘villages’ in GBAs has been the subject of many appeal decisions as presented in Table 7 (above). In particular, these appeals highlight that settlement hierarchy should be considered when identifying towns for the purposes of GBA (APP/D3640/W/24/3347530).

Concluding summary in relation to assessment of Purpose (b):

The Thurrock Stage 1 Green Belt Assessment (2019) aligns with PPG where it confirms that purpose (b) assessment does not include villages or other small settlements, although reference is made to these where there is the potential for merging to occur.

Overall, the Thurrock Stage 1 Green Belt Assessment (2019) criteria for Purpose (b) broadly aligns with new PPG illustrative features where they examine whether a land parcel falls within a substantial gap between towns; and whether development within parcels would cause merging or perception of merging; degree of inter-visibility between towns/large built-up areas (i.e. visual separation of towns).

However, the criteria employed in the assessment do not include reference to existing development or land form within the parcel, as per the new PPG illustrative features for ‘strong’ contribution. Whilst the assessment criteria refer to effects of intervening development in the form of ‘smaller settlements’, this is potentially different in its interpretation or application to the updated PPG’s ‘existing development’ – as within the context of the assessment, it is not clear whether intervening development applies to that located within or outside the assessment parcel. In view of the above, it is therefore recommended that the criteria for purpose (b) be revisited to align with new PPG requirements to consider the range of illustrative features included in PPG at Stage 2.

Finally, the implications of recent appeal decisions emphasise the importance of consistency between a Green Belt Assessment and the relevant authorities’ adopted settlement hierarchy. Settlement hierarchy information should therefore be utilised and referred to given new PPG emphasis that purpose (b) relates to the merging of towns, not villages (and recent planning appeal outcomes). In combination with purpose (a) and (d) (discussed later in this section) there is need to define large built-up areas, towns and historic towns (which exclude villages) based on local settlement information. The Stage 2 GBA should therefore align with the Borough’s adopted or emerging settlement hierarchy evidence base categorisation of towns.

4.2.5 Green Belt Purpose (c) Definitions and Assessment Criteria

4.2.5.1 Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose (c)?

The Thurrock Stage 1 Green Belt Assessment (2019) sets out consideration of purpose (c) has been informed by an understanding of the principal landscape and visual characteristics of land parcels based on site work and informed by information provided in the Thurrock Landscape Capacity Study (2005) and the Thurrock Integrated Landscape Character Assessment (2018). The rationale for using these evidence base documents is cited within the assessment as consideration of landscape character and the potential ability of the landscape to accommodate change play an important role in balanced decision-making (para 4.2.26). In addition, the assessment sets out that where distinct relationships between Conservation Areas and Green Belt land beyond are noted, this is referred to in the consideration of the purpose (c) (para 3.6.8).

The broad approach to scoring within the assessment outlines that where land was identified as possessing a strong unspoilt rural character this purpose may be considered to be of higher importance in protecting that countryside from encroachment. Criteria used for the assessment of contribution to purpose (c) are set out in Table 9 below.

Table 9 Thurrock Stage 1 Green Belt Assessment (2019) criteria for assessment against purpose (c)

Contribution rating	Criteria used (emphasis added)
Fundamental	Countryside is fundamental to the purpose of retaining land within Green Belt. – Land possesses a <i>strong, unspoilt rural character</i> which Green Belt designation protects.

Contribution rating	Criteria used (emphasis added)
Major	Countryside is of substantial importance to the purpose of retaining land within the Green Belt. – Land possesses a <i>predominantly rural character</i>. – There may be <i>other constraints</i> (such as a noticeable landscape feature) that would <i>limit encroachment</i>, but the Green Belt provides valuable protection.
Moderate	Countryside is of significant importance to the purpose of retaining land within the Green Belt. – There may already be a <i>perception of significant encroachment</i> by development (or other uses, such as large-scale mineral extraction) and land may possess a <i>semi-rural character</i>. – There may be <i>other constraints to further encroachment</i>.
Slight / Negligible	Countryside is of limited/negligible importance to the purpose of retaining land within the Green Belt. – Land may possess a <i>semi-urban character</i> and is no longer perceived to be part of the open countryside. – It may contain <i>degraded land</i> that provides opportunities for enhancement.
None	Countryside is of no importance to this purpose of Green Belt. – Land forms <i>very narrow area</i> between existing parts of an urban area or other strong boundary. – Such areas may be <i>protected by other policies/designations</i> (such as open space or Green Wedge).

Review of existing and emerging practice (Arup and elsewhere)

In emerging Stage 1 / Strategic Green Belt Reviews such as Sevenoaks (Stage 1) and SW Herts (Stage 1) (prepared in the context of new Green Belt policy and guidance), Arup is utilising percentage of built form using GIS, based on the land area of manmade (constructed) features as classified by the Ordnance Survey MasterMap data. This data includes buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures but excludes roads and railway lines.

For the interpretation of purpose (c), Sevenoaks is considering openness (in terms of extent of existing built development which may encroach on the sense of spatial and visual openness due to urbanising influences) and the degree to which the Green Belt can be characterised as countryside. The score attributed to each assessment area is based on a qualitative assessment of character from site visits, including the sense of openness within the assessment area and with the neighbouring Green Belt and the extent of urbanising influences within and around the assessment areas. Within the emerging methodology, the term ‘countryside’ typically refers to land beyond a defined settlement boundary and which does not comprise built development. For purpose (c), the assessment considered the degree to which an assessment area can be characterised as having a rural (as opposed to urban) character.

Related case law and Independent Examinations

Before looking at recent appeals, it is helpful to reflect on more historic appeals which have established some key points in relation to openness. These are still considered relevant for Green Belt assessment on the basis that openness remains a fundamental principle of the role of Green Belt within the 2024 NPPF and that updated PPG does not introduce new requirements specific for purpose (c) assessment.

Key points established through historic appeals are as follows:

- Openness is generally considered to be ‘land free from built development’, which should be assessed on an individual area basis as well as in terms of the cumulative impact on adjacent areas³⁴.
- Openness should be considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’ (for example, visual linkages between settlements in

³⁴ The Planning Inspectorate (2017). Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust.

relation to purpose b, or functional character and linkages to the wider Green Belt in relation to purpose (c))³⁵.

- While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, is not a mandatory determinative factor of openness³⁶.

Recent case law on the subject of openness and encroachment as it relates to purpose (c) is set out in Table 10 below. It is noted that recent decisions consider openness in a visual sense, with development activity cited as a factor that can impact a parcel's contribution to openness. Whilst it is apparent that there are alternative views as to the strength of natural boundary features in creating containment of Green Belt parcels within recent appeals (Ref: APP/M3645/W/24/3354630 and APP/C4615/W/24/3345744), it is considered that this is indicative of the need to apply a contextual approach to such matters.

Table 10 Recent appeal decisions: Openness and encroachment

Theme	Appeal Ref	Date	Summary
Openness	APP/M3645/W/24/3354630 ³⁷	14 Mar 2025	The appellant's site was in use as a storage yard for construction materials, equipment and machinery and the inspector judged that the intensity of activity and use meant that the site's existing state made a limited contribution to Green Belt openness. In addition, the inspector noted that hedgerows around the site formed a defensible boundary which screened views of the storage yard, resulting in negligible impacts on visual openness.
	APP/C4615/W/24/3345744 ³⁸	2 Apr 2025	In contrast to the above, this appeal was dismissed by the Inspector as it was judged that existing mature planting around the site perimeter was insufficient to screen the proposed development from adjacent rights of way, and that the proposed Battery Storage System would therefore be visually intrusive in its rural location.
Encroachment	APP/H2265/W/24/3347410 ³⁹	13 Feb 2025	The Inspector noted that the proposal for a secure 24-hr truck facility for HGVs incorporating a fuel station and amenity building and new access to A20, would represent an irreversible encroachment of built form into open and undeveloped countryside. However, it was judged that the site's area would be small in relation to the totality of the Green Belt within the Borough, and that it would therefore not fundamentally undermine the purposes of the Green Belt across the local authority area. The local authority in this instance (Tonbridge & Malling) was covered by over 70% Green Belt by total area, resulting in the impact of the release of a small land parcel being judged to be proportionally much less significant.
	APP/P0119/W/24/3357956 ⁴⁰	4 July 2025	The Inspector acknowledged that whilst the development of the appeal site (for residential development) would run counter to the aim of purpose (c), and there would be some encroachment, the effects of the proposal would be limited in the wider context. Factors taken into account included the enclosure of the site by defensible boundaries, its limited site area and the scale of the scheme. The Inspector determined that its " <i>effect would be localised: the site cannot be said to have a strategic role in the</i>

³⁵ Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin).

³⁶ Supreme Court Judgment (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3.

³⁷ Planning Inspectorate (2025). Appeal Ref: APP/M3645/W/24/3354630 Redeham Hall Industrial Yard, Redeham Road, Smallfield, Surrey RH6 9RJ

³⁸ Planning Inspectorate (2025). Appeal Ref: APP/C4615/W/24/3345744 Land at Illeybrook Farm, Illey Lane, Halesowen B62 0HE

³⁹ Planning Inspectorate (2025). Appeal Ref: APP/H2265/W/24/3347410 Land part of Wrotham Water Farm, off London Road, Wrotham, Sevenoaks, Kent

⁴⁰ Planning Inspectorate (2025). Appeal Ref: APP/P0119/W/24/3357956 Land south of Hencliffe Way and west of Castle Farm Road, Hanham.

Theme	Appeal Ref	Date	Summary
			<i>functioning of the green Belt, meaning its development would not undermine any strategic role”.</i>

Concluding summary in relation to assessment of Purpose (c):

Given that both the 2024 NPPF and updated PPG does not amend or introduce new requirements for purpose (c), the Thurrock Stage 1 Green Belt Assessment (2019) is considered to accord with the latest policy requirements for assessment. Overall, analysis of relevant case law demonstrates that the above criteria used for assessment of purpose (c) remain broadly valid in consideration of recent planning appeals.

4.2.6 Green Belt Purpose (d) Definitions and Assessment Criteria

4.2.6.1 What does the assessment consider as ‘historic towns’?

The Thurrock Stage 1 Green Belt Assessment (2019) notes that landscape character is relevant to the consideration of setting in relation to the special character of historic towns. However, it is noted in paragraph 1.5.2 of the assessment that purpose (d) is not a Green Belt purpose that is relevant to the Green Belt in the Borough which “*does not possess truly historic towns (although there are smaller village settlements of historic interest, notably East Tilbury)*”. The assessment further states that there are no towns in the Borough which may be regarded as having a particularly ‘special’ historic character or where such character is particularly derived from or complemented by to its landscape setting (para 3.6.8).

Whilst the Borough contains several Conservation Areas, the assessment notes that the majority of these are part of smaller settlements. It is considered that the relationship between such areas and their surroundings which contributes to their local character and setting is not relevant to the strategic nature of the Stage 1 GBA (para 3.6.8).

Review of existing and emerging practice (Arup and elsewhere)

In emerging Stage 1 / Strategic Green Belt Reviews such as Sevenoaks (Stage 1) and SW Herts (Stage 1) (prepared in the context of new Green Belt policy and guidance), the historic significance of towns in the authority area and neighbouring authorities have been defined based on the professional judgement and local knowledge of authority officers. For Sevenoaks, key historic towns were identified through specific reference to Kent and Medway Supplementary Planning Guidance; an equivalent evidence study is not available for Surrey and other neighbouring authorities and in those instances, the presence of a Conservation Area within the town has been used a proxy to identify historic towns. In the context of the SW Herts Strategic GBA, only towns which were judged to have a ‘regional’ historic significance were considered. This approach is considered to not prejudice the ability of other historic towns to be considered as such within Stage 2 Green Belt Assessments (conducted at local authority level).

Related Case Law and Independent Examinations

The recent appeal decisions in Table 7 (above) are also of relevance to purpose (d) as the way in which ‘towns’ are defined will have a knock-on impact on what are considered to be ‘historic towns’.

4.2.6.2 Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose (d)?

Within the Thurrock Stage 1 Green Belt Assessment (2019) no assessment is provided for purpose (d) contribution and therefore, no detailed criteria for review.

Review of existing and emerging practice (Arup and elsewhere)

Refer to earlier commentary provided for purpose (a) assessment in relation to definition of towns. Appendix A.3 sets out our emerging good practice assessment criteria for purpose (d) in light of the new PPG.

Related case law and Independent Examinations

At the time of writing there is yet to be planning appeal that specifically addresses purpose (d) other than matters raised in relation to purpose (b) ‘towns’ definitions.

Concluding summary in relation to assessment of Purpose (d):

Whilst it is acknowledged that the Thurrock Stage 1 Green Belt Assessment (2019) was subject to review by TC, it is recommended for the Stage 2 GBA that the definition of the ‘historic towns’ for assessment be reviewed in tandem with how ‘towns’ are considered for assessment under purpose (b) to confirm that this position regarding historic towns remains applicable going forward.

In the instance that the Stage 2 GBA retains the position that no towns are considered ‘historic’ requiring purpose (d) assessment, this is considered to align with Independent Examinations noted in section 3.6.2 of this Report, which advise that the methodology should clearly articulate interpretation of the Green Belt purposes and use those deemed relevant to local context (Redbridge).

4.2.7 Green Belt Purpose (e) Definitions and Assessment Criteria

4.2.7.1 Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose (e)?

Purpose (e) is not used in the Thurrock Stage 1 Green Belt Assessment (2019), on the basis that it is “generally not possible to judge how any given parcel of land would contribute to the fulfilment of this purpose, or to distinguish between different parcels” (para 3.6.9). It further states that this purpose is therefore not included as all land in the Green Belt inside and beyond the borough would contribute to this purpose equally (para 4.2.38).

In relation to future Stage 2 GBA, the assessment notes that the Council has identified a number of regeneration initiatives aimed at encouraging re-use of underused or derelict land, which could potentially be explored further in the Stage 2 GBA, if required.

Review of existing and emerging practice (Arup and elsewhere)

Our review of existing Green Belt assessments highlights that historically, authorities have only used those Green Belt purposes deemed contextually relevant, with purpose (d) sometimes and purpose (e) usually scoped out of the assessment.

Arup’s emerging approach being taken, for example in Sevenoaks, considers assessment of areas against purpose (e) is unlikely to lead to a differentiation between areas as it is difficult to attribute regeneration and brownfield land development to a particular area of Green Belt, as it is the designation of all the areas collectively as Green Belt which encourages the recycling of derelict and other urban land. As such, it is not possible to apply the assessment of purpose (e) for assessment areas. The performance of the Green Belt against this purpose has therefore been assessed for the entire Green Belt in Sevenoaks as a whole and does not form part of the Stage 1 or Stage 2 area assessments.

The performance of the Green Belt in assisting urban regeneration has been assessed by using the following criteria:

- A comparison of Sevenoaks Local Housing Need and of the completions figures available in the Sevenoaks Annual Monitoring Report with the number of permitted and developed applications recorded on the Brownfield Land Register.
- Whether there have been any major regeneration schemes around Sevenoaks over the last Local Plan period.
- The extent to which the District has required neighbouring authorities to address some of its housing need through plan making.

Related Case Law and Independent Examinations

At the time of writing there is yet to be a planning appeal that specifically addresses purpose (e) other than where it has been raised in relation to assessment against purposes as a whole (as discussed elsewhere in this section).

Concluding summary in relation to assessment of Purpose (e):

Whilst the 2024 NPPF and updated PPG does not amend or introduce new requirements for purpose (e), we recommend that the Stage 2 GBA methodology incorporates an approach to purpose (e) assessment of Green Belt, given this assessment is required to underpin the ‘fundamentally undermine’ test in relation to proposed Green Belt release, as introduced in the 2024 NPPF. In order to undertake this, there is need to identify if there are relevant data sources to inform the overall purpose (e) conclusions such as the Council’s Local Housing Need, Brownfield Land Register, and/or completion rates for major regeneration schemes within the Borough (as noted within the Thurrock Stage 1 Green Belt Assessment (2019)).

4.2.8 Amendments to Green Belt

4.2.8.1 Does the strategic / Stage 1 assessment make recommendations for amendments to the Green Belt?

The Thurrock Stage 1 Green Belt Assessment (2019) does not propose a new Green Belt boundary, consider the impact of release of specific sites or recommend areas of land for potential release. Stage 1a assessment looks at the functionality of the Green Belt parcels, against the purposes of the Green Belt set out in the NPPF. Stage 1b relates to implications for the strategic Green Belt assessment of the preferred route announced by Government on the route and location of the proposed Lower Thames Crossing. The Thurrock Stage 1 Green Belt Assessment (2019) confirms that the Stage 2 GBA should explore whether the Green Belt boundary should be redefined (para 1.6.4) and recommends 12no. parcels for more detailed assessment as part of Stage 2 GBA.

Review of existing and emerging practice (Arup and elsewhere)

Based on previous examinations of Local Plans (as detailed in Appendix A.3), Arup considers that the Stage 1 assessment should provide a strategic, high-level understanding of the performance of the Green Belt across the whole strategic area / district and should not seek to identify potential boundary alterations.

Updated national guidance states that ‘authorities should consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary’⁴¹ which is considered to be the role of a Stage 2 Green Belt Assessment. As such, given the strategic scale of assessment parcels, a Stage 1 Green Belt Assessment may only provisionally identify grey belt land and therefore sought to ascertain:

- Whether all land designated fulfils the Green Belt purposes; and
- The degree of ‘fundamental importance’ attached to various parts of the Green Belt in strategic terms. This will form part of the evidence base to assist the Council in undertaking the 2024 NPPF ‘fundamentally undermine’ test which will need to be set out as part of any exceptional circumstance case.

Related Case Law and Independent Examinations

The judgement made within Tonbridge and Malling Borough Council (Ref: APP/H2265/W/24/3347410), factored the size of the Green Belt parcel proposed for release (relative to the wider Green Belt) in the consideration of whether its release would fundamentally undermine the purposes of the Green Belt within the local authority area. This decision is summarised in Table 11 below.

⁴¹ National Planning Practice Guidance (PPG) 2025. Green Belt Paragraph 004 Reference ID: 64-004-20250225

Table 11 Recent appeal decision: ‘fundamentally undermine’ test

Theme	Appeal Ref	Date	Summary
Fundamentally undermine test	APP/H2265/W/24/3347410 ⁴²	13 Feb 2025	The inspector noted that the proposal for a secure 24-hr truck facility for HGVs incorporating a fuel station and amenity building and new access to A20, would represent an irreversible encroachment of built form into open and undeveloped countryside would represent an irreversible encroachment of built form into open and undeveloped countryside. However, it was judged that the site’s area would be small in relation to the totality of the Green Belt within the borough, and that it would therefore not fundamentally undermine the purposes of the Green Belt across the local authority area. The local authority in this instance (Tonbridge & Malling) was covered by over 70% Green Belt by total area, resulting in the impact of the release of a small land parcel being judged to be proportionally much less significant.

Concluding summary in relation to amendments to Green Belt:

It is appropriate that the Thurrock Stage 1 Green Belt Assessment (2019) does not recommend sites for release from or amendments to Green Belt boundaries.

Whilst the development of an exceptional circumstances case lies outside the remit of a Green Belt assessment, high-level conclusions of what constitute ‘fundamentally important’ parcels can be drawn at Stage 1 GBA, to inform this case later in the plan-making process, once the combination of sites for release are known. The Stage 1 GBA would only provide the starting point for any exceptional circumstances case, and it will be necessary for the Council to develop the exceptional circumstances case, both at strategic and site level, as part of the Local Plan process.

When considering a more detailed Stage 2 GBA, the appeals decision in Tonbridge and Malling Borough Council highlights that when considering the ‘fundamentally undermine’ test, considering the proportional loss of total Green Belt within the authority area may be helpful.

The Stage 1 GBA generally aligns with what is considered appropriate as part of a strategic assessment and is therefore fit-for-purpose.

⁴² Planning Inspectorate (2025). Appeal Ref: APP/H2265/W/24/3347410 Land part of Wrotham Water Farm, off London Road, Wrotham, Sevenoaks, Kent

4.2.9 Grey Belt Identification

4.2.9.1 *How does the assessment deal with NPPF Footnote 7 constraints?*

The Thurrock Stage 1 Green Belt Assessment (2019) overlays the Green Belt with ‘principal environmental constraints’ including:

- Ancient Woodland;
- Registered Parks and Gardens of Special Historic Interest;
- Sites of Special Scientific Interest (SSSI);
- Ramsar sites;
- Special Protection Area (SPA);
- Flood Zone 3;
- Special Area of Conservation (SAC); and
- Grade 1 and 2 agricultural land (grade 3 land has not been considered as the data available does not differentiate between grade 3A land – ‘best and most versatile’ (BMV) – and grade 3B which is not BMV).

Para 3.5.2 of the Thurrock Stage 1 Green Belt Assessment (2019) confirms that following a Cross-Boundary workshop, it was agreed that areas subject to key constraints listed would not be excluded from the assessment parcels. Constraints are noted (where applicable) within the assessment of Green Belt parcels.

4.2.9.2 *Is the approach taken to the assessments against the purposes of the Green Belt suitable for them to be used for conducting Grey Belt identification?*

The Thurrock Stage 1 Green Belt Assessment (2019) does not consider the impact of the release of specific sites of Green Belt land on the Green Belt purposes or recommend any areas of land for potential release. Assessment of the strategic assessment parcels in terms of their contribution to NPPF purposes is provided for purposes (a) and (b), however not for purpose (d) for reasons noted in section 4.2.6 above.

Concluding summary in relation to grey belt identification:

The Thurrock Stage 1 Green Belt Assessment (2019) allows for provisional identification of grey belt land insofar as it provides an assessment against Green Belt purposes (a) and (b). This would allow for the sequential approach to release of Green Belt land as set out in paragraph 148 of the 2024 NPPF to be followed. The way in which any future Green Belt assessment considers grey belt land will be considered as part of the Stage 2 GBA methodology.

5. Summary, Recommendations and Conclusions of Stage 1 Review

5.1 Summary

The overarching purpose of this Report is to present a review of the Thurrock Stage 1 Green Belt Assessment (2019) and advise as to whether it is ‘fit for purpose’ and remains relevant in consideration of new national policy and guidance for Green Belt introduced by the NPPF 2024 and PPG updates published in 2025.

Figure 4 (overleaf) provides an illustrative summary of the findings and conclusions. Overall, based on the contents of this review, it is considered that there are no fundamental methodological issues within the Thurrock Green Belt Stage 1 Assessment work. This largely reflects the fact that many of the central aspects of Green Belt policy remain unchanged from previous version of the NPPF. Notwithstanding this, there are some specific points within the methodologies reviewed which may require further consideration through the Stage 2 GBA and these are reflected within the recommendations and next steps set out in 5.2 below.

One of the more fundamental changes made to GBA through the NPPF 2024 was the introduction of ‘grey belt’. PPG implies that grey belt identification follows evaluation of the contribution to purposes (a), (b) and (d), and whether the footnote 7 areas would provide a ‘strong reason for refusing or restricting development of the assessment area’, prior to identifying if the proposed release or development of the assessment area(s) would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt.

Whilst PPG itself does not specify at what stage in a Green Belt Review grey belt should be identified, nor how this should be conducted in detail, it does set out that the identification of grey belt should take place as part of the review and alteration of Green Belt boundaries, where necessary, as part of the plan making process⁴³. Therefore, it can be viewed that within a Stage 1 GBA, provisional and high-level identification of grey belt land could be an appropriate step in the context of the sequential approach to decisions regarding Green Belt release; however, noting the typical scale (including assessment parcels) and role of Stage 1 GBA, provisional grey belt identification is more appropriate to be undertaken at Stage 2 GBA.

Indeed, recent appeal decisions suggest that grey belt identification is more appropriate later in the Green Belt Assessment process, at a more site-specific level to ensure that the assessment outcomes reflect the site itself and are not skewed by characteristics of land potentially some distance from the actual site. In consideration of this, this review has provided broad conclusions to confirm that the GBA reviewed would allow for future grey belt identification. The way in which the TC takes forward the need for grey belt identification in the Stage 2 GBA is explored further as part of the methodology.

5.2 Conclusion and Recommendations for Stage 2

Overall, based on the findings of this review, it is considered that the Stage 1 methodology and assessments remain fit-for-purpose as a strategic-level report for the Stage 2 GBA to be based on and undertake a finer-grained assessment from. Other specific considerations for the Stage 2 include:

- **Parcel identification:** The Stage 2 Green Belt Assessment methodology should follow a clear, sequential approach to parcel identification in consideration of recognisable boundaries and use the strategic parcels as a baseline for contribution to Green Belt purposes.
- **Purpose (a):** A review of the criteria used to assess purpose (a) to ensure assessment is limited to assessing the sprawl of large built-up areas and ensure clarity around how ‘incongruous’ patterns of development are assessed.
- **Purpose (b):** Ensure that purpose (b) assessment draws upon the adopted settlement hierarchy information for TC and neighbouring authorities where relevant; ensure that criteria in relation to

⁴³ [National Planning Practice Guidance \(PPG\) \(2025\). Green Belt Paragraph: 001 Reference ID: 64-001-20250225](#)

existing development within assessment parcels are included alignment with updated PPG illustrative features (purpose (b)).

- **Purpose (d):** Include justification of the exclusion of purpose (d) assessment within Stage 2 Green Belt Assessment methodology.
- **Purpose (e):** Include purpose (e) assessment and/or ensure that the justification for purpose (e) assessment approach is sufficiently clear and robust, given this assessment is required to underpin the ‘fundamentally undermine’ test introduced in the 2024 NPPF.

Figure 4 Summary of Stage 1 findings

Geographic scope The Stage 1 GBA geographic scope of the assessment is appropriate in line with the NPPF 2024 and updated PPG	Parcelling process The Stage 1 GBA parcelling process is appropriate in line with the NPPF 2024 and updated PPG.	Amendments to Green Belt The Stage 1 GBA is appropriate as it does not recommend sites for release or amendments to Green Belt boundaries.	Overarching approach to NPPF purposes assessment/overarching assessment The Stage 1 GBA only assesses 3 of 4 applicable NPPF purposes. The Stage 2 GBA should assess purpose (e) to ensure a further ‘fundamentally undermine’ test can be completed (para 146)	Grey Belt identification The Stage 2 GBA method should identify how grey belt land is identified.
Approach to purpose (a) The Stage 1 GBA is appropriate in line with the NPPF 2024. The Stage 2 GBA must clearly define the approach to assessing the key components of purpose (a), including what constitutes an ‘incongruous’ pattern of development.	Approach to purpose (b) The Stage 1 GBA is in line with the NPPF 2024. The Stage 2 GBA should utilise existing and emerging settlement hierarchy in defining towns and make note of any differences from Stage 1.	Approach to purpose (c) The Stage 1 GBA is considered appropriate as policy and guidance has not changed since it was completed.	Approach to purpose (d) Not applicable for Stage 1 GBA as no towns identified. The Stage 2 GBA should review the definition of ‘historic towns’ to confirm this approach remains applicable going forwards.	Approach to purpose (e) Policy and guidance do not amend or introduce new requirements for the assessment of this purpose. The Stage 2 GBA should undertake an assessment of purpose (e)

6. Stage 2 Green Belt Assessment

6.1 Overview

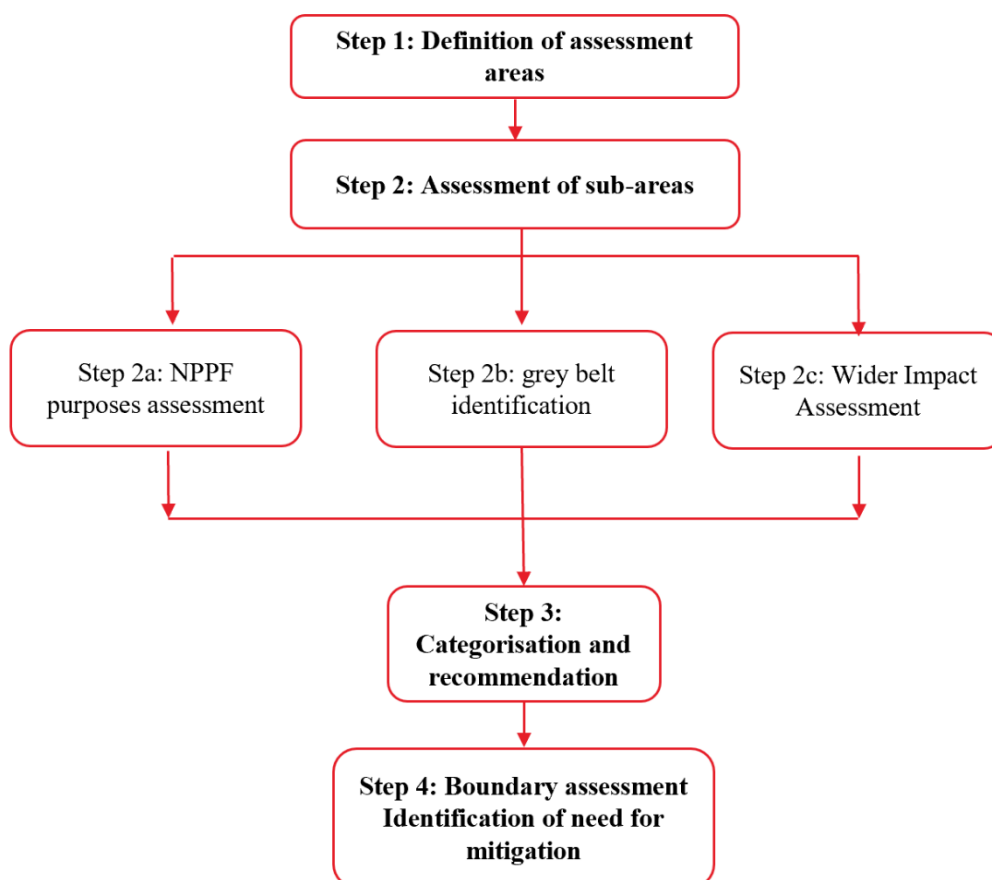
This section sets out the approach and methodology for undertaking the Stage 2 GBA following on from the review and findings from the Stage 1 GBA review. The methodology has been developed to complement the Stage 1 GBA and updated where applicable to align with updated national policy and guidance. The Stage 2 GBA provides a finer grain assessment to feed directly into decision making on suitable amendments to the Green Belt boundary within Thurrock Council.

The primary aim of the Stage 2 assessment was to determine the extent of differentiation, if any, in terms of how Green Belt sub-areas function and their performance against the purposes of the Green Belt- in other words, the same NPPF Paragraph 143 test as for Stage 1 but at sub-area level, where the performance and results tends to differ. Stage 2 assessment, again in common with Stage 1, also considers the role of sub-areas with respect to the wider Green Belt to understand the potential impact(s) of removing them from the Green Belt. Stage 2 then concludes with recommendations to the Council as to whether the sub-area should be considered for release.

The recommendations at the conclusion of Stage 2 are based partly on whether the sub-area can be identified as grey belt, which depends on its performance on the NPPF purposes. The Stage 2 recommendations align with the PPG, which makes clear that just because an area of Green Belt is identified as grey belt, it does not automatically follow that it should be allocated for development or released from the Green Belt.

The overall process followed to undertake the Stage 2 GBA is summarised in Figure 5.

Figure 5 Summary of Stage 2 Green Belt Assessment process



6.2 Step 1: Definition of assessment areas

The Stage 1 GBA assessed the entirety of the Green Belt in Thurrock against the NPPF purposes. Given the Stage 2 GBA provides a finer grain assessment to feed directly into decision making on suitable amendments to the Green Belt boundary, it was appropriate to undertake a more spatially focussed piece of work.

To ensure that the assessment is proportionate and assesses available locations for growth, Stage 2 provides an assessment of submitted sites which have been promoted to the Council through their Call for Sites process. This is in support of the NPPF paragraph 72, a requirement that planning policies should identify a supply of “*specific, deliverable sites for five years following the intended date of adoption*”, and paragraph 72.b “*specific, developable sites or broad locations for growth, for subsequent years 6-10, and where possible, for years 11-15 of the remaining plan period*”.

The Council has applied an initial sift of promoted sites to remove any clear showstoppers and has included sites outside of the immediate extent of identified towns for the following reasons:

- Proximity to the Lower Thames Crossing (LTC)
- Associated with a new settlement or proposed area for growth outside of the Tier 1-4 settlements. These areas include Fobbing, which is a Tier 5 settlement, due to land being promoted for development through the Local Plan between the eastern edge of Corringham and the western edge of Fobbing.
- Sites promoted for employment, given some of these may be more appropriately located in isolated locations.
- In order to assess areas where there is pressure for development and to inform the site assessment process.

These sites have then been provided to Arup by the Council and further refined using the following principles:

- In cases where multiple sites overlap, a single large boundary which encompasses all those that overlap will be considered as one site. Where sites overlapped but only along their edge, edges were redrawn to align with visible boundary features (including hedgerows, tree lines, edges of road, etc).
- Duplicate sites were removed.
- In cases where a single promoter has put forward a development proposal comprising of multiple sites in close proximity but not being physically joined (e.g. with a road in between) these have been split into separate sites. The boundaries used were roads, railways and bodies of water.
- Application of footnote 7 constraints which are detailed below.

A filtering process was undertaken to remove areas or sites, which were entirely or largely constrained by major policy constraints, which effectively rule out development of the land. This resulted in the exclusion of four sub-areas.

The following ‘major’ policy constraints were used:

- Sites of Special Scientific Interest (SSSI)
- Scheduled Monuments
- Registered Parks and Gardens
- Ancient Woodland
- Special Protection Areas (SPA)
- Ramsar Sites
- Flood Zone 3b

There are no Battlefields or Special Areas of Conservation (SAC) in Thurrock.

Live planning applications and planning permissions have not been taken into consideration as part of this Stage 2 GBA.

The inclusion of a site or area should not be taken as an indication that this land is necessarily the most sustainable, suitable or deliverable option for any future development. Areas of land which are assessed to perform less strongly against the Green Belt purposes and less important within the context of the wider Green Belt, will need to be balanced by the Council against wider Local Plan work to determine the preferred spatial growth option.

Once the area(s) of search were defined and the major policy constraints filter applied, the boundaries of individual sub-areas needed to be defined. As the boundary of any sub-area may, in time, become the new boundary of the Green Belt itself, if that sub-area is released, boundary definition followed NPPF paragraph 149 (f), which requires Green Belt boundaries to be defined ‘clearly, using physical features that are readily recognisable and likely to be permanent’. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent, and in some specific cases follow the promoted site boundary due to no defined boundary feature in proximity.

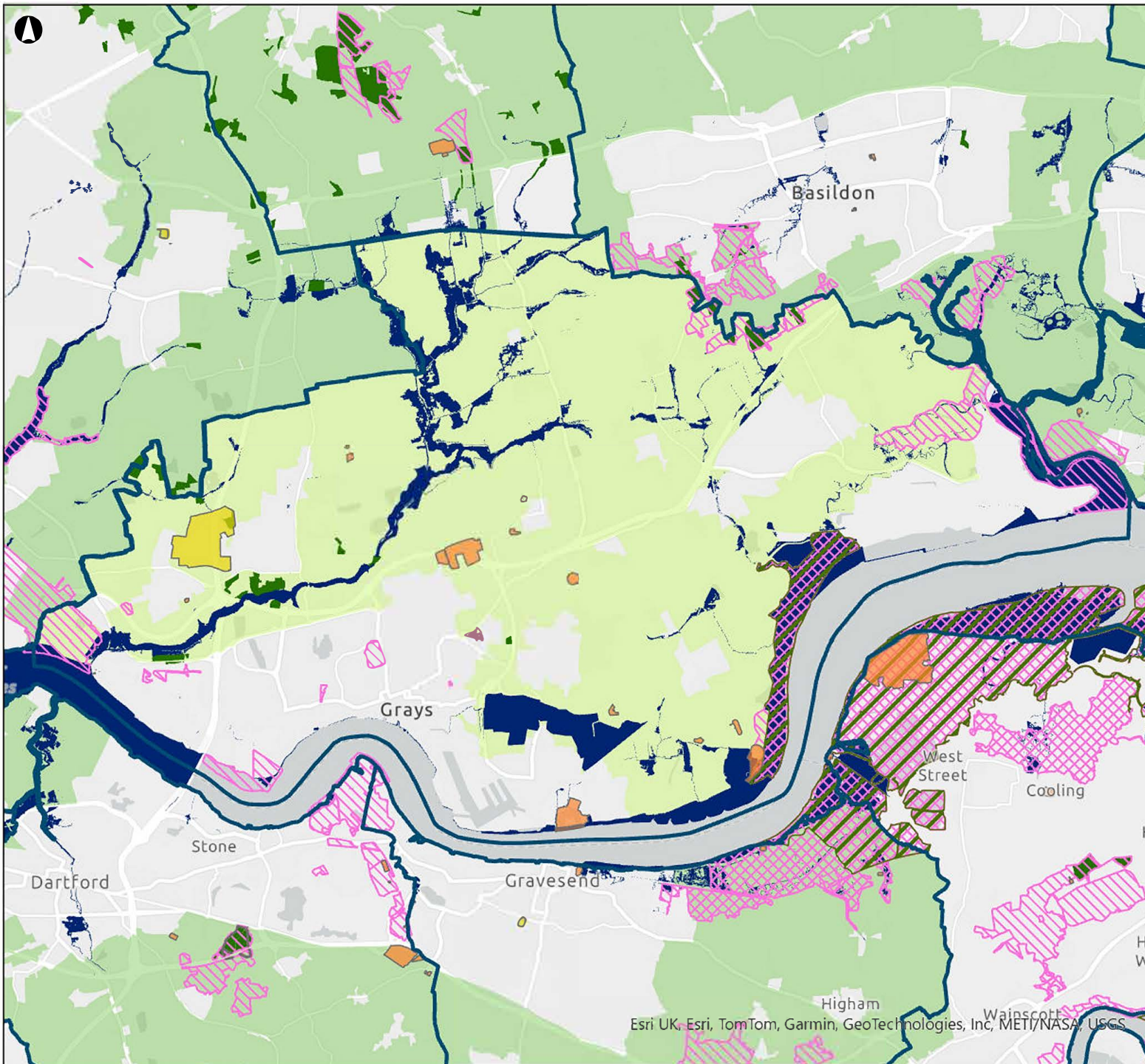
Table 12 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Features
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and/or hedgerows
Natural ‘buffer’ features such as ridgelines	

Following boundary definition, each sub-area was then assigned a unique reference number, with 145 sub-areas in total. Boundaries were subsequently refined as necessary based on observations during site visits, using professional judgement, to reflect any characteristics or features not apparent from desktop review. Figure 7 presents the final sub-areas used in Stage 2.

6.3 Step 2: Site Visits

All sub-areas were visited to understand their immediate context, character and boundary features, and to refine the initial analysis. Photographs of all sub-areas were taken (where access and views permitted) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider Green Belt and adjacent settlement(s). The photographs were used as an aide-memoir for assessors/illustrate context for readers rather than for assessment purposes *per se*. If it was not possible to obtain site photographs, or only limited photographs could be acquired, aerial photography was used as supplementary illustration. Pro-forma for each sub-area were used to record the assessments.



- Scheduled Monuments
- Parks and Gardens
- Special Protection Areas
- Sites of Special Scientific Interest
- Ramsar Sites
- Ancient Woodland
- Flood Zone 3B
- Thurrock Green Belt
- Neighbouring Green Belt
- Local Authority Boundaries

Coordinate System: British National Grid

Metres
300

--	03/02/2026	SP	NS	AR	--
Rev	Date	By	Chkd	Appd	Authd

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8 Fitzroy St
London W1T 4BJ
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Client

Thurrock Council

Project Name

Green Belt Assessment (Stage 2, 2025)

Drawing Title

Figure 6: Major policy constraints

Scale at A4

1:120,000

Role

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Suitability

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Project Number

312159-01

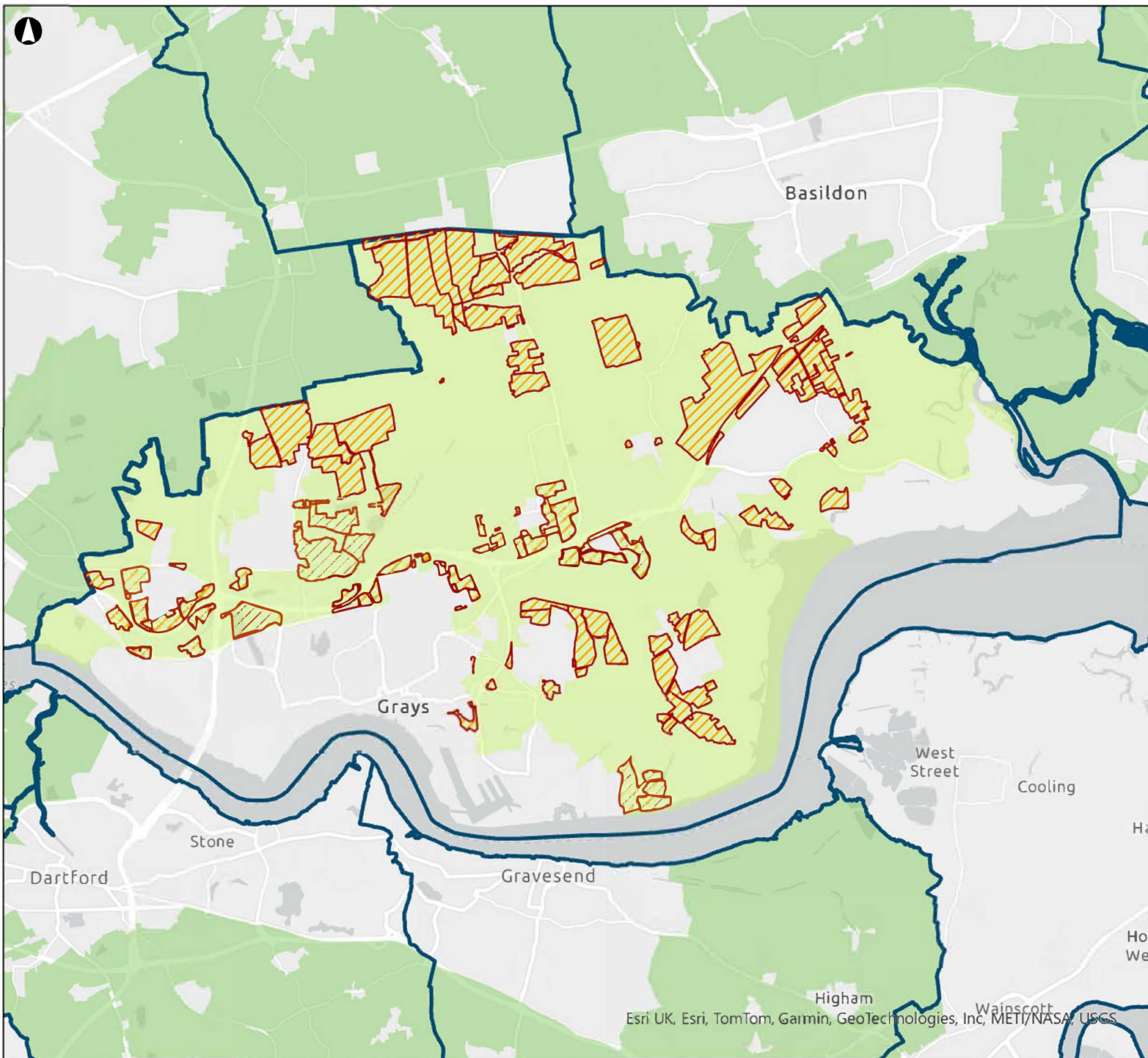
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Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, MET/NASA, USGS



- Sub-area for assessment
- Thurrock Green Belt
- Neighbouring Green Belt
- Local Authority Boundaries

Coordinate System: British National Grid

Metres
300

--	03/02/2026	SP	NS	AR	--
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Drawing Title

Figure 7: Green Belt sub-areas

Scale at A4

1:120,000

Role

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Suitability

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Project Number

312159-01

Drawing Number

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Rev

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Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

6.4 Step 2a: Assess sub-areas against NPPF Purposes

The intention of the assessment is to establish any differentiation in terms of how the assessment areas in the existing Green Belt function and fulfil the NPPF Green Belt purposes.

Each of the assessment areas was assessed against the purposes of Green Belt, as set out in the NPPF. The Green Belt PPG (2025) provides guidance on how to assess purposes (a), (b) and (d) and the guidance was used to inform assessment criteria for those purposes. No national guidance exists for purposes (c) and (e) and the assessment criteria for these purposes were based on previous experiences, best practice and recent examples. In both cases and where possible, consideration was given to the need to respect local circumstances and the unique characteristics that affect the way the NPPF Green Belt purposes are appraised.

Openness and permanence are essential characteristics of Green Belt; and were therefore integral to the assessment of Green Belt across all purposes. Openness was considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’.

For each purpose, one or more criteria were developed using both qualitative and quantitative measures. A score out of five was attributed for each criterion (Table 13). If, following detailed analysis, an assessment area was considered to have no contribution to a specific purpose, a statement was added to the pro-forma to this effect and no score was attributed.

It is important to note that each of the NPPF purposes is considered equally significant, thus no weighting or aggregation of scores across the purposes was undertaken. As such, a composite judgement was necessary to determine whether, overall, Green Belt assessment areas were meeting Green Belt purposes strongly or weakly.

Table 13 Criterion Scores

Overall strength of Green Belt assessment area against criterion	Score	Equivalent Wording
	5	Meets criterion strongly
	4	Meets criterion relatively strongly
	3	Meets criterion moderately
	2	Meets criterion relatively weakly
	1	Meets criterion weakly
	0	Does not meet criterion

The following sections examine the definition of each of the five purposes of the Green Belt in relation to local context; and set out the criteria and scoring applied.

6.4.1 Purpose (a)

Purpose (a): To check the unrestricted sprawl of large built-up areas

The original strategic purpose of the Metropolitan Green Belt was to check the sprawl of London. However, it is recognised that the wider Green Belt also plays a role in preventing the unrestricted growth of other large built-up areas, where they are of sufficient scale. This assessment therefore considered the role of Green Belt assessment areas in preventing the sprawl of London and where appropriate other large built-up areas of relevance in the Thurrock context.

National policy provides some guidance over what might constitute ‘large built-up areas’ by stating that ‘*Villages should not be considered large built-up areas*’⁴⁴. To ensure a robust and comparable definition of large built-up areas, ONS data provides a helpful classification of built-up areas based on population range (Table 14). This provides a useful ‘sense check’ of the definition of settlements prior to comparison against

⁴⁴ [National Planning Practice Guidance \(PPG\) \(2025\). Green Belt. Paragraph: 005Reference ID: 64-005-20250225.](#)

locally prepared adopted settlement hierarchies and/or adopted Local Plan classification of settlements within Thurrock.

Table 14 Stage 2 Built up area (BUA) size classification

Population range (usual resident population)	BUA size classification	Approximate settlement type
0 – 4,999	Minor	hamlet or village
5,000 – 19,999	Small	larger village /small town
20,000 –74,999	Medium (for the purpose of this study some are deemed Large)	medium towns
75,000 –199,999	Large	large towns /smaller cities
200,000+	Major	cities

The PPG, updated in 2025, provides guidance for the interpretation of Green Belt policy, which has used the term ‘large built-up area’ for many years but had never previously provided any specificity on what could or could not be considered a large built-up area. On this basis, it is difficult to justify what might or might not be a large built-up area subsequent to the PPG update on the basis of pre-2025 precedents and/or definitions in case law and appeals. While one potential solution could be to assume everywhere defined as a ‘town’ for purpose (b) is also a ‘large built-up area’ for purpose (a), this would however overlook the fact that the Government specifically chose to retain here the term ‘large-built up area’ (rather than ‘town’). On this basis, this study has assumed that not all settlements identified as towns will necessarily be equivalent to large built-up areas.

The defined large built up areas for Thurrock for the purpose (a) assessment comprises Thurrock urban core, comprising Grays and merged with Purfleet-on-Thames and Tilbury; alongside the medium sized towns of South Ockendon and Stanford-le-Hope/Corringham (combined) (using the ONS classification in Table 14, above) on the basis that these towns have a range of services and facilities to meet both the needs of their residents but also serve residents from neighbouring smaller towns and villages. Coryton/London Gateway is also included on the basis that while it has a low resident population, it is considered to be an area which is predominantly built up and has an important role as a major employment hub in Thurrock. This definition has been informed by local knowledge of Thurrock Planning Officers, alongside the adopted and emerging settlement hierarchy for Thurrock, the Stage 1 Green Belt Assessment and approaches taken by neighbouring authorities including Basildon. It should be noted that South Ockendon was not considered a large built-up area at Stage 1, and Chadwell St Mary is no longer considered part of Thurrock urban areas for purpose (a) at Stage 2.

Table 15 Purpose (a) Large Built-up Areas

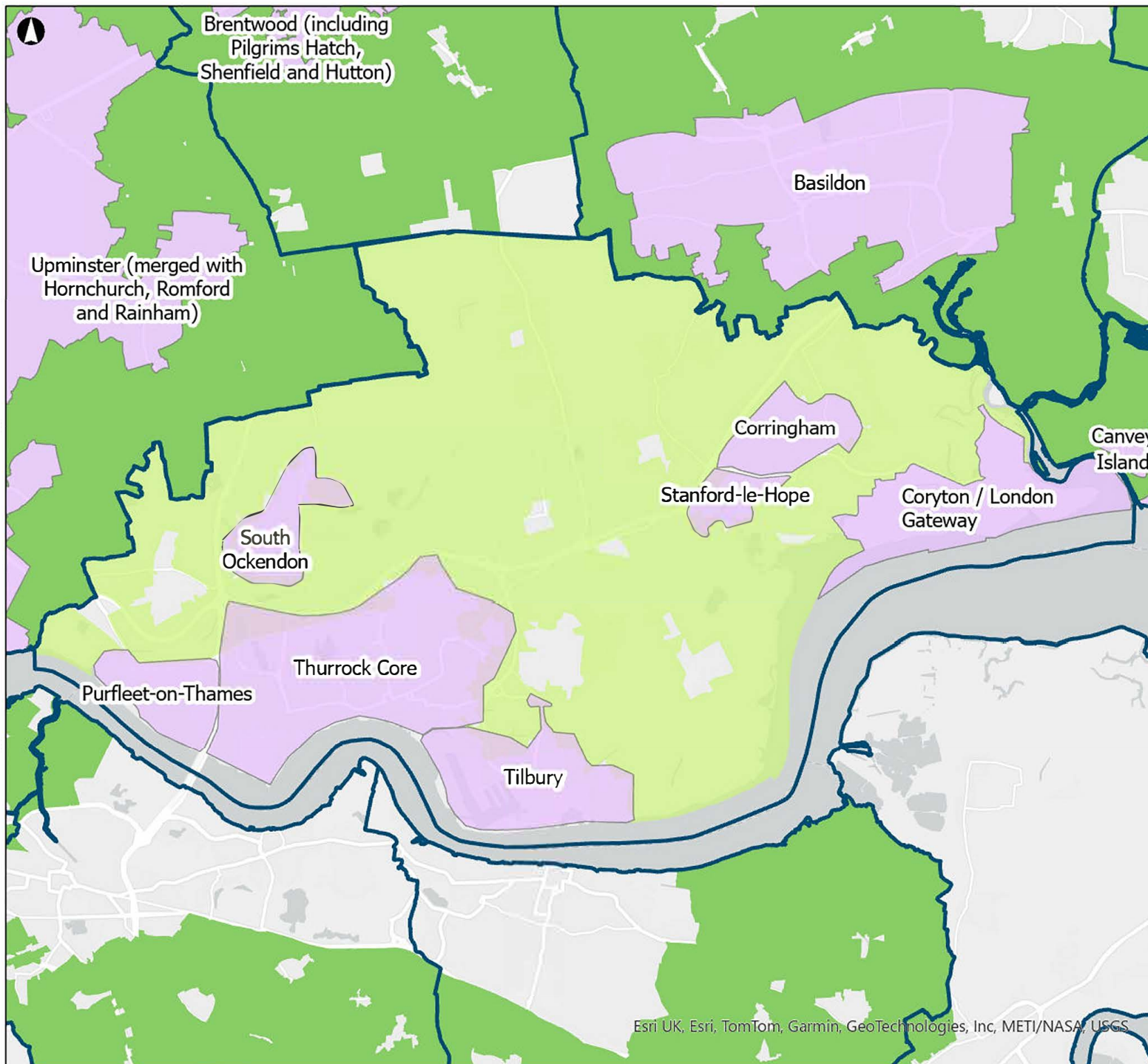
Thurrock	Neighbouring Local Authorities
Thurrock Urban Core, comprising Grays, Purfleet-on-Thames and Tilbury Stanford-le-Hope merged with Corringham Coryton/London Gateway South Ockendon	Basildon – Basildon ⁴⁵ Brentwood – Brentwood merged with Pilgrims Hatch, Shenfield, and Hutton Havering – Upminster merged with Hornchurch, Romford and Rainham Castle Point – Canvey Island

⁴⁵ The following towns were treated as large built-up areas in the Basildon Green Belt (2023) but have been excluded here based on the methodology set out above: Billericay and Wickford, Bowers Gifford, Crays Hill, Ramsden Bellhouse, Noak Hill

Although ‘sprawl’ is a multi-faceted concept and thus has a variety of different definitions, this GBA has adopted a simple definition, considering sprawl as the outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way.

Green Belt should function to protect open land at the edge of large built-up areas. The extent to which an assessment area prevents sprawl is dependent on:

- Whether it is adjacent or near to the built-up area. Consideration should be given to whether it is physically, visually or functionally linked to a large built-up area.
- If it was to be developed, the extent to which it would result in an incongruous pattern of development (such as an extended ‘finger’ of development into the Green Belt).
- Presence of physical feature(s) in reasonable proximity that could restrict and contain development. Consideration should be given to whether there are prominent man-made or natural physical features (i.e. Motorway, A-road, railway line, major river or significant topographical feature) that might restrict the scale of outward growth of the settlement and regularise potential development form.
- Degree of openness, i.e., the extent to which an assessment area already contains built development. If the assessment area is fully developed, it does not meet the basic aim of Green Belt (NPPF paragraph 142).
- Whether the assessment area is subject to other urbanising influences, existing development such as residential or commercial development, however not including development that falls within one of the exception categories in paragraph 154 NPPF (2024) (i.e. it is not deemed to be inappropriate development in the Green Belt, for example buildings for agriculture and forestry).
- Its relationship with the respective built-up area(s), in particular the degree / nature of containment by built form. Sub-areas that are almost entirely surrounded by built development as part of a single built up area (enclosed) do not prevent sprawl; rather potential development could be classified as infill. Whereas assessment areas between two built up areas (contiguous) or on the edge of a built-up area (connected) have a role in preventing sprawl. This is depicted in Figure 8 overleaf.



- Large Built-up Areas considered for Purpose (A) Assessment
- Thurrock Green Belt
- Neighbouring Green Belt
- Local Authority Boundaries

Coordinate System: British National Grid

Metres
2500

--	13/02/2026	SP	NS	AR	--
Rev	Date	By	Chkd	Appd	Authd

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Thurrock Council

Project Name

Green Belt Assessment (Stage 2, 2025)

Drawing Title

Figure 8: Large Built-up Areas Considered

Scale at A4

1:120,000

Role

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Suitability

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Project Number

312159-01

Rev

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Drawing Number

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Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

Figure 9 Illustration of connected, contiguous and enclosed

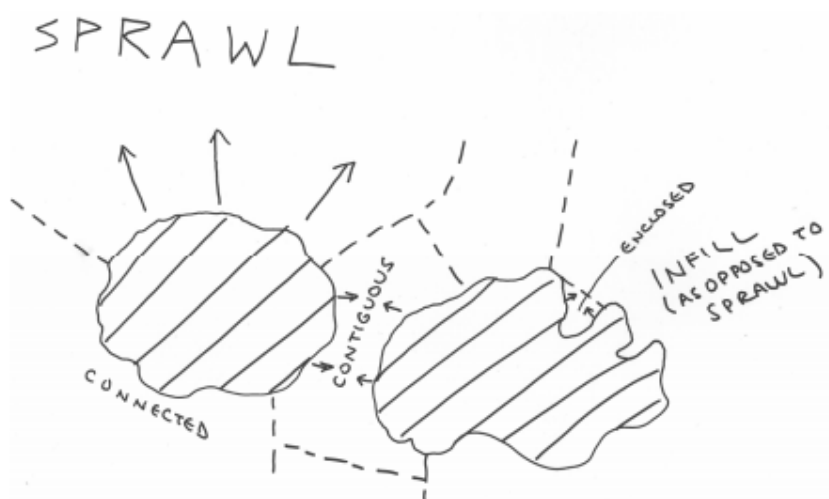


Table 16 Purpose (a) assessment criteria

Criterion	Score	Description
Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another defensible boundary	5	Assessment area is contiguous with two or more large built-up areas. The assessment area is likely to be free of existing development and / or other urbanising influences. OR Assessment area is connected to a large built-up area. The assessment area is likely to be free of existing development and / or other urbanising influences. There are no prominent physical features along the edge of the existing settlement and in reasonable proximity to the outer edge of the assessment area to prevent a disproportionate / incongruous pattern of development.
	4	Assessment area is connected to a large built-up area. The assessment area is likely to be free of existing development and / or other urbanising influences. There are no prominent physical features in reasonable proximity to the outer edge of the assessment area to prevent a disproportionate / incongruous pattern of development, however the inner edge of the existing settlement comprises a prominent physical feature.
	3	Assessment area is partially enclosed or connected to a large built-up area. The assessment area is likely to contain some existing development and / or other urbanising influences. There are prominent physical features in reasonable proximity to the outer edge of the assessment area to prevent a disproportionate / incongruous pattern of development. However, the inner edge of the existing settlement does not comprise a prominent physical feature.
	2	Assessment area is partially enclosed or connected to a large built-up area. The assessment area is likely to contain some existing development and / or other urbanising influences. There are prominent physical features in reasonable proximity to the outer edge of the assessment area and along the edge of the existing settlement to prevent a disproportionate / incongruous pattern of development.
	1	Assessment area is fully enclosed by a large built-up area. The assessment area may contain some existing development and / or other urbanising influences.
	0	Assessment area is not at the edge of a large built-up area, in physical or perceptual terms, and does not meet purpose (a). OR Assessment area contains significant existing development.

6.4.2 Purpose (b)

Purpose (b): To prevent neighbouring towns merging into one another

Purpose (b) considers the role that the Green Belt plays in preventing neighbouring towns from merging into one another. The assessment considered gaps between towns in the Borough, and towns in surrounding local authorities.

National policy provides some guidance over what might constitute ‘towns’ by stating that *‘This purpose relates to the merging of towns, not villages’* ⁴⁶.

As such, a definition of towns and villages for the purposes of this assessment was necessary. Based on emerging appeal decisions set out within Appendix A.2, this definition accounts for a number of relevant factors, including: the adopted and emerging settlement hierarchies for TC, the adopted Local Plan for TC, neighbouring adopted settlement hierarchies and/or references to settlements within adopted Local Plans, a ‘sense check’ against ONS built up area data (2021); and professional judgement and local knowledge of Thurrock. In all cases, settlements categorised as villages within settlement hierarchies and/or Local Plans reviewed have not been included as towns for purpose (b). Note that East Tilbury merged with Linford was not defined as a town at Stage 1, while it is for Stage 2.

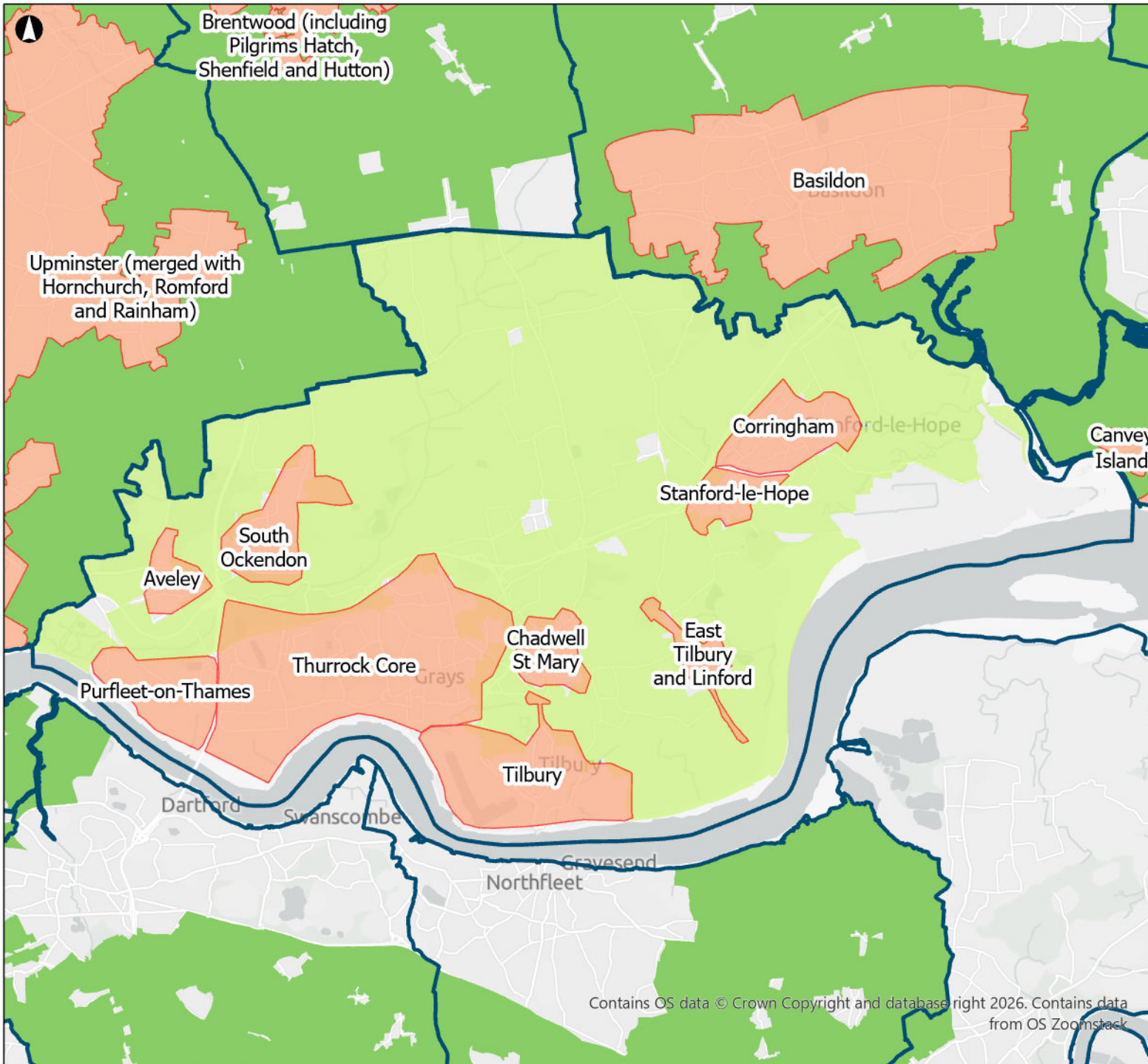
Only neighbouring towns within close proximity of Thurrock’s boundary and which could form a gap with Thurrock towns were included in the assessment, as listed in Table 17 and illustrated in Figure 7. Proximity to the Thurrock boundary is not based on a prescribed distance rather based on local context and professional judgement.

Table 17 Purpose (b) Towns

Thurrock	Neighbouring Local Authorities	
Thurrock Urban Core inclusive of Grays, merged with Purfleet-on-Thames and Tilbury Aveley South Ockendon Chadwell St Mary Stanford-le-Hope merged with Corringham East Tilbury and Linford	Basildon	Basildon ⁴⁷
	Brentwood	Brentwood merged with Pilgrims Hatch, Shenfield, and Hutton
	Havering	Upminster, merged with Hornchurch, Romford and Rainham
	Castle Point	Canvey Island

⁴⁶ National Planning Practice Guidance (PPG) (2025). Green Belt. Paragraph: 005 Reference ID: 64-005-20250225.

⁴⁷ The following towns were used in the Basildon Green Belt (2023) but have been excluded here based on the methodology set out above: Billericay and Wickford



- Towns considered for Purpose (B) Assessment
- Thurrock Green Belt
- Neighbouring Green Belt
- Local Authority Boundaries

Coordinate System: British National Grid

Metres
200

--	13/02/2026	SP	NS	AR	--
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Rev	Date	By	Chkd	Appd	Authd
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Thurrock Council

Project Name

Green Belt Assessment (Stage 2, 2025)

Drawing Title

Figure 10: Towns Considered

Scale at A4

1:120,000

Role

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Suitability

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Project Number

312159-01

Rev

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Drawing Number

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The purpose (b) criterion considers the extent to which assessment areas protect a gap and prevent towns from merging through sprawl or ribbon development. The extent to which an assessment area prevents towns merging is dependent on:

- Its relationship with towns and whether it lies within a gap between neighbouring towns.
- Degree to which development of an assessment area would reduce the perceived or physical distance between towns.
- Presence of physical feature(s) in reasonable proximity that would visually or physically prevent the coalescence of neighbouring towns. Consideration should be given to whether there are prominent man-made or natural physical features (i.e. motorway, A-road, railway line, major river or significant topographical feature) that will influence the degree to which visual separation will be maintained.
- Degree of openness, i.e., the extent to which an assessment area already contains built development or is subject to other urbanising influences. If the assessment area is fully developed, it does not meet the basic aim of Green Belt (NPPF paragraph 142).

Table 18 Purpose (b) assessment criteria

Criterion	Score	Description
Restricts development that would result in merging of or significant erosion of the gap between neighbouring towns.	5	Assessment area forms a substantial part of a gap, where development would significantly visually or physically reduce the perceived or physical distance between towns.
	3	Assessment area forms a small part of a gap, where there is scope for some development without visually or physically reducing the perceived or physical distance between towns.
	1	Assessment area forms a very small part of a gap where development would not visually or physically reduce the perceived or physical distance between towns.
	0	Assessment area does not form part of a gap between towns.

6.4.3 Purpose (c)

Purpose (c): To assist in safeguarding the countryside from encroachment

The approach to purpose (c) considered the extent to which Green Belt has maintained the openness and character of the countryside and conversely resisted urbanising influences (thus broadly reflecting the term ‘encroachment’). It should be noted that assessment of purpose (c) does not form part of the grey belt assessment.

The interpretation of purpose (c) for this study has considered openness (in terms of extent of existing built development which may encroach on the sense of spatial and visual openness due to urbanising influences) and the degree to which the Green Belt can be characterised as countryside. The score attributed to each assessment area is based on a qualitative assessment of character from site visits, including the

sense of openness within the assessment area and with the neighbouring Green Belt and the extent of urbanising influences within and around the assessment areas.

To aid in this assessment, the percentage of built form within the assessment area was calculated. The percentage of built form was calculated using GIS tools based on the land area of manmade (constructed) features as classified by the Ordnance Survey MasterMap data. This data includes buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures but excludes roads and railway lines.

The term ‘countryside’ typically refers to land beyond a defined settlement boundary and which does not comprise built development (other than rural uses such as buildings for agriculture and forestry). For purpose (c), the assessment considered the degree to which an assessment area can be characterised as having a rural (as opposed to urban) character. When drawing conclusions on the character of assessment areas, the following were considered:

- Land uses and the level of land management within the assessment area, including the presence of any urban managed uses, such as golf courses. Where development is not considered inappropriate in the Green Belt by national policy, the extent to which it reduces openness was considered.
- Whether there were any urban influences in addition to those identified in the OS MasterMap defined built form, such as other areas of paving and urban or suburban-style gardens.
- Morphology – the shape, scale, distribution and regularity of any built form and the pattern of development within the assessment area. Typically, a more dispersed built form contributed to a more rural character while a denser built-up area contributed to a more urban character.
- Sense of openness and containment from neighbouring urbanising influences, including whether the assessment area has long views to the wider Green Belt, or is visually enclosed.
- Topography of the assessment area and its influence on visual perceptions.

The following categorisation of assessment area character were used:

- ‘Strongly rural character’ - land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.
- ‘Largely rural character’ - land largely characterised by rural land uses and landscapes but with limited and dispersed built development and man-made structures, such as detached residential buildings and gardens.
- ‘Moderately rural character’ - land characterised by rural land uses and landscapes but with isolated pockets of built development and man-made structures or other urban land uses.
- ‘Limited rural character’ – land with some characteristics of rural land uses and landscapes regularly interspersed with built development or other urban land
- ‘Largely urban character’ - land dominated by built development or other urban land uses with limited or dispersed pockets of land characterised by rural land uses and landscapes.

- ‘Strongly urban character’ - land that is dominated by built development or other urban land uses. The land does not have any characteristics of rural land uses or landscapes.

Table 19 Purpose (c) assessment criteria

Criterion	Score	Description
Protects the openness of the countryside and is least covered by development.	5	Assessment area possesses a strongly rural character.
	4	Assessment area possesses a largely rural character.
	3	Assessment area possesses a moderately rural character.
	2	Assessment area possesses a limited rural character.
	1	Assessment area possesses a largely urban character.
	0	Assessment area possesses a strongly urban character.

6.4.4 Purpose (d)

Purpose (d): To preserve the setting and special character of historic towns

Purpose (d) considers the extent to which an assessment area protects land in the immediate and wider context of a historic town.

National policy provides some guidance over what might constitute ‘historic towns’ by stating that ‘*this purpose relates to historic towns, not villages*’ (Green Belt PPG, paragraph 005). Historic towns have therefore been identified from the list of places which are considered towns for purpose (b) and which have a historic significance.

In alignment with the Thurrock Stage 1 Green Belt Assessment (2019), purpose (d) is not considered to be relevant to the Green Belt in the Borough, as it “*does not possess truly historic towns (although there are smaller village settlements of historic interest, notably East Tilbury)*”. The Stage 1 assessment further states that there are no towns in the Borough which may be regarded as having a particularly ‘special’ historic character or where such character is particularly derived from or complemented by to its landscape setting (para 3.6.8). Whilst the Borough contains several Conservation Areas, the assessment notes that the majority of these are part of smaller settlements. It is considered that the relationship between such areas and their surroundings which contributes to their local character and setting is not relevant to the strategic nature of the Stage 1 GBA (para 3.6.8). This approach and conclusion that there are no towns of historic significance meeting the purpose (d) requirements has been reviewed as part of the Stage 2 methodology, alongside the definition of towns under purpose (b). All relevant information in relation to Conservation Areas and Heritage Assessments which may support the inclusion of settlement under purpose (d) has been reviewed to confirm that this conclusion remains fit-for-purpose for this Stage 2 Green Belt Assessment. Settlements considered villages have been discounted as per PPG (2025) (this includes Orsett and Baker Street, Fobbing, Bulphan, Horndon on the Hill, North Stifford and East and West Tilbury).

For those towns identified under Purpose (b), a brief summary of the information and conclusion for each is outlined in Table 20 below.

Table 20 Consideration of historic towns

Town	Summary of local evidence	Conclusion in relation to purpose (d) assessment
Purfleet-on-Thames	Purfleet-on-Thames Conservation Area was designated in 1985. The Purfleet Character Appraisal ⁴⁸ defines the areas of special interest within Purfleet, which is located to the west of the towns built up area and adjoins the northern bank of the River Thames. The areas of special interest within this include significant areas of open space (none of which is designated Green Belt), various listed buildings and a highway of historic significance. There are also two scheduled ancient monuments, neither of which (the Dovecote ⁴⁹ and Purfleet Magazine ⁵⁰) are located in proximity of the Green Belt – the Purfleet Magazine is separated by the Mardyke and has limited visual connection with it.	Due to a combination of modern development (including residential and industrial land uses) and topography, the historic ‘core’ of Purfleet is disconnected from the Green Belt and therefore does not form the setting or context of it and Purfleet is not considered a historic town for Purpose (d).
Stanford-le-Hope merged with Corringham	Only Corringham has a Conservation Area within it, which was designated in 1973 and extended in 1986. The Corringham Conservation Area Character Appraisal ⁵¹ covers an area of land along the southern boundary of the settlement below Cobblers Mede Lake, encompassing Church Road and part of the B1420 Road. Most of the area falls within the current Green Belt Designation.	Stanford-le-Hope has no Conservation Area. While the Conservation Area Character Appraisal for Corringham acknowledges that due to topography there are wide reaching views to the south over agricultural land (some of which is Green Belt) and that these contribute to the areas significance, given the very limited extent of the Conservation Area in the context of Corringham, it is not considered a historic town under purpose (d).
East Tilbury and Linford	Only East Tilbury has a Conservation Area within it, which covers Bata Village, a small settlement south of Linford within the existing built-up area of East Tilbury. The Conservation Area was first designated in 1993 and recognises the former company village built around the Bata shoe factory in the 1930s. The East Tilbury (Bata Village) Character Appraisal ⁵² outlines the special interest of the area, which is largely based on the Bata Village development, comprising a distinct street layout, factory site and modernist houses. There are also a number of non-designated heritage assets across East Tilbury outside of the Conservation Area. Land to the south of the conservation area adjoins the Green Belt and is recognised as providing a historic and visual connection with the Conservation Area, as it provides a functional and aesthetic role in establishing a self-contained village, particularly given the flat topography. East Tilbury also has	Although it is recognised in the character appraisal, given the size of Bata Village, and the fact it is largely surrounded by modern development as well as having flat topography, there is limited visual connection between the Green Belt and the Conservation Area today. For the purpose of this assessment, as East Tilbury is combined with Linford (which does not have any Conservation Areas). Given the fact the ‘historic core’ of East Tilbury has limited connection to the Green Belt, East Tilbury and Linford are not considered a historic town for purpose (d).

⁴⁸ Purfleet Conservation Area Character Appraisal (2007) Thurrock Council.

⁴⁹ Assessment of Settings, Thurrock Scheduled Ancient Monuments (2023). Dovecote at High House, Purfleet (SM1017234)

⁵⁰ Assessment of Settings, Thurrock Scheduled Ancient Monuments (2023). Purfleet Magazine (SM1005561)

⁵¹ Corringham Conservation Area Character Appraisal and Management Plan (2023). Essex County Council.

⁵² East Tilbury (Bata Village) Character Appraisal and Management Plan (2023). Essex County Council.

Town	Summary of local evidence	Conclusion in relation to purpose (d) assessment
	three scheduled ancient monuments, the East Tilbury Battery ⁵³ , the Coalhouse Fort Battery and Artillery Defences ⁵⁴ and the Second World War anti-aircraft battery at Bowaters Farm ⁵⁵ , all of which are on land within the Green Belt designation.	
Tilbury	While Tilbury does not contain any Conservation Areas, the Tilbury Fort is located within it. The fort was originally constructed in the 17 th century, with earlier phases of fortification dating back to 1539. While the fort is of historic significance, it is not adjacent to or visible from the Green Belt.	The presence of a scheduled ancient monument within or adjoining a town under purpose (b) does not result in the entire settlement gaining historic significance. Therefore, Tilbury is not considered as a historic town under purpose (d).
Aveley	Aveley does not contain any conservation areas, and only has one scheduled ancient monument, the Site of Moated Manor House East of St Michael's Church ⁵⁶ . The monument is located to the east of the church, and the historic settlement of Aveley is located to the immediate north and west, focused on the junction of the High Street and Ship Lane. The monument is located near the edge of the Green Belt, which is located to the south and east. Belhus Park Conservation Area ⁵⁷ is located to the north of Aveley but is entirely within the existing Green Belt designation.	Given the limited extent of the 'historic core' of Aveley and the fact that there is no conservation area within it, Aveley is not considered as a historic town under purpose (d).
South Ockendon	South Ockendon does not contain any conservation areas, and only has one scheduled ancient monument, the Gatehouse and Moat of South Ockendon Old Hall ⁵⁸ .	The monument is located entirely within the Green Belt and is not connected with the settlement itself. Therefore, South Ockendon is not considered a historic town under purpose (d).
Chadwell St Mary	There are no conservation areas or scheduled ancient monument with Chadwell St Mary.	While there are some listed structures, this does not qualify the settlement as a historic town under purpose (d). Therefore, Chadwell St Mary is not considered a historic town under purpose (d).

⁵³ Assessment of Settings, Thurrock Scheduled Ancient Monuments (2023). East Tilbury Battery (SM1013880)

⁵⁴ Assessment of Settings, Thurrock Scheduled Ancient Monuments (2023). Coalhouse Fort Battery and Artillery Defences (SM1013943)

⁵⁵ Assessment of Settings, Thurrock Scheduled Ancient Monuments (2023). Second World War Anti-Aircraft Battery at Bowaters Farm (SM1002156)

⁵⁶ Assessment of Settings, Thurrock Scheduled Ancient Monuments (2023). Site of Moated manor House East of St Michael's Church, Aveley (SM1005562)

⁵⁷ Belhus Park Conservation Area and Management Plan (2022) Essex County Council.

⁵⁸ Assessment of Settings, Thurrock Scheduled Ancient Monuments (2023). Gatehouse and Moat of South Ockendon Old Hall (SM1002155)

6.4.5 Purpose (e)

Purpose (e): *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Purpose (e) focuses on assisting urban regeneration through the recycling of derelict and other urban land. Assessment of areas against purpose (e) is unlikely to lead to a differentiation between areas as it is difficult to attribute regeneration and brownfield land development to a particular area of Green Belt. Rather, it is the designation of all areas collectively as Green Belt which encourages the recycling of derelict and other urban land. As such, it is not possible to differentiate the assessment of purpose (e) by individual assessment sub-areas. Nevertheless, it is important to consider purpose (e) in respect of the Green Belt to inform the later ‘fundamentally undermine’ test required by NPPF paragraph 146. In consideration of this, an appropriate and proportionate methodology for assessing the performance of the Green Belt against this purpose has therefore been considered for the Green Belt in Thurrock as a whole.

Reviewing the percentage of new dwellings on Green Belt land in Thurrock is directly relevant to how the Green Belt is performing on Purpose (e). This is a national dataset published by MHCLG and therefore is consistent across each local authority area⁵⁹. It covers a period between 2014 and 2022 and takes a three-year average to minimise outlier figures⁶⁰. The data is presented in Table 21 below.

Table 21 Percentage of new dwellings on Green Belt land, Thurrock, 2014-2022

Year	Thurrock	East of England Authorities Average	England Green Belt Authorities Average
% of total new dwellings on Green Belt land			
2014	Not available	Not available	3.2
2015	29	Not available	2.9
2016	26	Not available	2.3
2017	27	Not available	2.6
2018	28	Not available	2.8
2019	25	5	2.5
2020	18	6	2.8
2021	8	7	2.3
2022	14	7	2.5

Source: MHCLG (2014-2022)

To note, the above data does not distinguish between new dwellings on brownfield or greenfield land within the Green Belt and the MCHLG data does not provide this detail at a local authority level.

The information above indicates that there are consistently and significantly higher levels of residential development on Green Belt land in TC compared to both the England Green Belt authorities of 2-3% and East of England Green Belt authorities’ average of 5-7%.

⁵⁹ MHCLG (2022) [Land Use Change Statistics](#)

⁶⁰ Consistent data for years outside this range does not appear to be available. While it could be collated for more recent years from the AMRs across the five authorities there could be inconsistencies and, most importantly, the England Green Belt authorities’ average figure would not be available as a benchmark.

This pattern is likely attributed to the spatial coverage of Green Belt land within Thurrock when compared to the East of England extent, which as of 31 March 2024 was 71.2% compared to 12.2%⁶¹. It is also likely to stem in part from not having had an up-to-date Local Plan in place over this period (since 2015), with speculative housing development benefitting as a result from the so-called ‘tilted balance’ in national policy in favour of development during this time (it was introduced in 2012 as part of the NPPF and continues to apply) due to the challenges around demonstrating a 5-year housing land supply.

More recently (since 2020), the percentage of new dwellings on Green Belt land in Thurrock has fallen from the average of 27% over the preceding years (2015-2019). This pattern is likely to be partially linked to the Thurrock housing completions data trends, which whilst do not specify the location of development (i.e. within or outside the Green Belt) indicate a slowdown in average completions since 2020 (328), when compared to the average of 568 for preceding years (2014-2019)⁶².

At a national level, a slowdown in housing completions during this period (2020-2022) may be linked to the impact of disruptions caused by the Covid-19 pandemic on construction and supply chain issues; economic uncertainty relating to interest rates and market volatility, and planning system challenges including delays in approvals, changes in policy and uncertainty around planning system reforms (i.e. since the introduction of the Planning for the Future White Paper 2020⁶³).

It is clear, therefore, that a number of contextual factors impacted on the performance of Purpose (e) to a greater extent, in many cases, than national Green Belt policy. Such factors include other national planning policy (the ‘tilted balance’), sustained high levels of demand for housing and other development across Thurrock, Greater London and the rest of East of England, alongside spatial and other authority-specific factors.

The simplest and most likely explanation for the England average diverging so significantly from the TC average is that housing demand on most Green Belt land in England is significantly lower, in relative terms, than in TC. For this reason, the entire Thurrock Green Belt (all parcels) has been assigned a score of 1 (weak performance) against Purpose (e). This is because the evidence indicates that, relative to Green Belt authorities elsewhere in England, the Thurrock Green Belt is playing a much more limited role in encouraging the recycling of derelict and other urban land.

While this assessment has been made on the basis of past performance rather than future projections, as the former is considered more robust, it is important to note that it is a snapshot in time and might change in future particularly in consideration of emerging Local Plans coming forward within Thurrock and neighbouring local planning authorities.

⁶¹ Ministry of Housing, Communities and Local Government (2024). Local authority green belt statistics for England: 2023 to 2024.

⁶² [Thurrock Council \(2023\). Planning policy monitoring – Housing completions.](#)

⁶³ [Ministry of Housing, Communities and Local Government \(2020\). Planning for the Future White Paper.](#)

6.5 Step 2b: Provisional Grey Belt identification

The NPPF makes clear that the grey belt comprises any Green Belt land that is judged not to strongly contribute to any one of purposes (a), (b), or (d) and that is not restricted by the application of policies relating to NPPF footnote 7 constraints. The NPPF also makes clear that grey belt can include both previously developed land⁶⁴ (itself defined in the NPPF) and other Green Belt land, but for the purposes of this assessment stage, no distinction need be made between these two types of grey belt.

Filter results from NPPF purposes assessment

The results of the Stage 2 GBA purposes assessment were filtered to isolate sub-areas which do not contribute strongly to any one of purposes (a), (b), or (d).

Undertake NPPF footnote 7 sift

As defined in the NPPF (2024), grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. In reaching this judgement, the PPG (2025) states that authorities should consider where areas of grey belt would be *covered by* or *affect* other designations in footnote 7. For the purposes of grey belt identification, Footnote 7 constraints are listed in Table 22.

Since Step 1 (Definition of assessment areas) of the Stage 2 GBA involved a filtering process to remove areas or sites which were entirely or largely covered by major policy constraints (which were considered to effectively rule out development of the land) some of the footnote 7 constraints were already excluded in drawing the sub-areas. These major constraints are also noted in Table 22.

As part of Step 2b, a further sift was undertaken to acknowledge areas subject to footnote 7 constraints not already excluded through the Step 1 major constraints sift. These constraints are acknowledged in the relevant proforma for each sub-area.

This Footnote 7 sift is only a first step. It is for the Council to review subsequently whether or not the application of policies relating to Footnote 7 would provide a strong reason for refusing or restricting development, at the site allocation and/or application determination stage, later on in the plan making and/or development management process. This entails site-level assessment of whether the release of any specific site for development would affect these designations.

Table 22 NPPF Footnote 7 Constraints

Footnote 7 constraints	Stage 2 definition of assessment areas – major constraint filter
Habitat sites (and those sites listed in paragraph 194) and/or designated as Sites of Specific Scientific Interest (1)	Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), Ramsar sites
Land designated as Local Green Space, a National Landscape, a National Park (or within the Broads Authority); or defined as Heritage Coast (2) (3)	N/A
Irreplaceable habitats (4)	Ancient Woodland
Designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75) (5)	Scheduled Monuments and Registered Parks and Gardens
Areas at risk of flooding or coastal change (3)	Flood Zone 3b

Notes:

(1) Thurrock does not contain any Special Areas of Conservation (SAC).

(2) There are no Local Green Spaces designated within the Core Strategy (2015). Thurrock does not contain a National Park or National Landscape.

⁶⁴ Note that previously developed land in the Green Belt may not necessarily be identifiable as grey belt in cases where Footnote 7 applies to it.

(3) Thurrock does not have a heritage coastline.

(4) The only irreplaceable habitats in Thurrock are Ancient Woodland, as there are no Mediterranean saltmarsh scrubs or Spartina saltmarsh swards, and veteran trees are not considered a major constraint filter or the purpose of identifying provisional grey belt.

(5) Footnote 75 states “Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets”.

Identify provisional grey belt

Sub-areas that did not contribute strongly to the purpose (a), (b) or (d) and are not entirely covered by Footnote 7 constraints were identified as *provisional* grey belt. The identification can only be provisional until the Council undertakes further review against Footnote 7 at the site allocation and/or application determination stage, which will confirm or rescind the provisional grey belt status.

6.6 Step 2c: Assessment of impacts on the wider Green Belt

This final step of assessment comprised an appraisal of the sub-area’s role and importance in terms of the function of the wider Green Belt. In this context, the term ‘wider Green Belt’ refers to the land designated as Green Belt immediately surrounding the sub-area, which may or may not include other sub-areas.

In cases where this step logically would include other sub-areas, for example where there were one or more sub-areas immediately adjacent to the sub-area being assessed, the sub-area could be assessed as part of a cluster or clusters of sub-areas in combination.

The qualitative assessments considered the following:

- Would the potential release of a sub-area impact on the assessment of the wider Green Belt? And if so, to what extent?
- Would the potential release of a sub-area harm the long-term protection or integrity of the surrounding Green Belt? For example, by creating ‘islands’ or ‘holes’ in the Green Belt.

For each sub-area, an overall conclusion was made on the level of contribution to the wider strategic Green Belt – important or less important. This was judged qualitatively, based on a composite judgement of the factors described above.

6.7 Step 3: Categorisation and Recommendations

Step 3 brought together the assessment of the sub-areas against the NPPF purposes (step 2a) and assessment of the impacts on the wider strategic Green Belt (step 2c), categorising each sub-area as to whether or not it should be considered further, as shown in Table 23.

The process of categorisation recognises the potential for sub-areas to meet one or more of the Green Belt purposes strongly but where it is unlikely that there would be harm to the function or integrity of the surrounding Green Belt if the sub-area were removed from the Green Belt. Conversely, it also reflects the possibility for sub-areas which meet the purpose assessment criteria weakly to be nevertheless important in terms of protecting the integrity of the surrounding Green Belt. Specifically, sub-areas may at this point be either:

- Recommended for retention in isolation– if removed from the Green Belt, harm to the wider Green Belt is likely to result; a select few cases were noted where release in combination with neighbouring sub-areas could have lesser impact;
- Recommended for release in isolation – if removed from the Green Belt, harm to the wider Green Belt is unlikely to result.

Table 23 Sub-area Categorisation / Recommendations

Meets purpose assessment criteria	Contribution to wider strategic green belt	Recommendation (may apply to clusters of sub-areas as well as to individual sub-areas)
Strongly	Important	Not recommended for further consideration

	Less important	Recommended for further consideration
Moderately	Important	Not recommended for further consideration
	Less important	Recommended for further consideration
Weakly	Important	Not recommended for further consideration
	Less important	Recommended for further consideration

6.8 Step 4: Boundary review

Within the sub-area pro forma it was recorded whether the existing inner and outer Green Belt boundaries met the NPPF paragraph 149 (f) requirement for being readily recognisable and likely to be permanent (with reference to the examples of specific boundary features in Table 24 below). This part of the pro forma also considered where it might be necessary to strengthen currently weak boundaries or to provide new boundaries if the sub-area were to be released.

This requirement is noted for information only at assessment stage. The final decision on whether to strengthen existing boundaries or create new boundaries, including how this might be achieved, will be for the Council to determine based on any new Green Belt boundaries proposed.

Boundary Classification	Features
Meets NPPF definition (i.e. readily recognisable and likely to be permanent)	- Motorways - A & B roads - Adopted highway - Railway lines - Canals - Rivers and waterbodies - Reservoir - Natural 'buffer' features such as ridgelines - Existing development with strongly established regular or consistent boundaries - Well-established woodland edges
Does not meet NPPF definition (i.e. readily recognisable but not necessarily permanent)	- Unclassified public and private roads - Smaller water features, including streams and other watercourses - Treelines and hedgerows

7. Summary and Findings

7.1 Introduction

This section summarises the key findings from the assessment of the 145 sub-areas against the NPPF purposes, consideration of the role of the sub-areas as part of the wider strategic Green Belt, provisional grey belt status, consideration of boundaries and categorisation and recommendations for each sub-area. The detailed proformas setting out the assessment for each sub-area can be found in Appendix A.5.

7.2 Purpose (a)

To check the unrestricted sprawl of large built-up areas.

The findings of the purpose (a) assessment are presented in Table 25 and Figure 11. The summary of scores is presented below:

Purpose A Score	No. of sub-areas
0	94
1	11
2	18
3	15
4	4
5	3
Total	145

The large number of sub-areas who received a score of 0 is due to their distance from a large built-up area identified in this study.

7.3 Purpose (b)

To prevent neighbouring towns from merging.

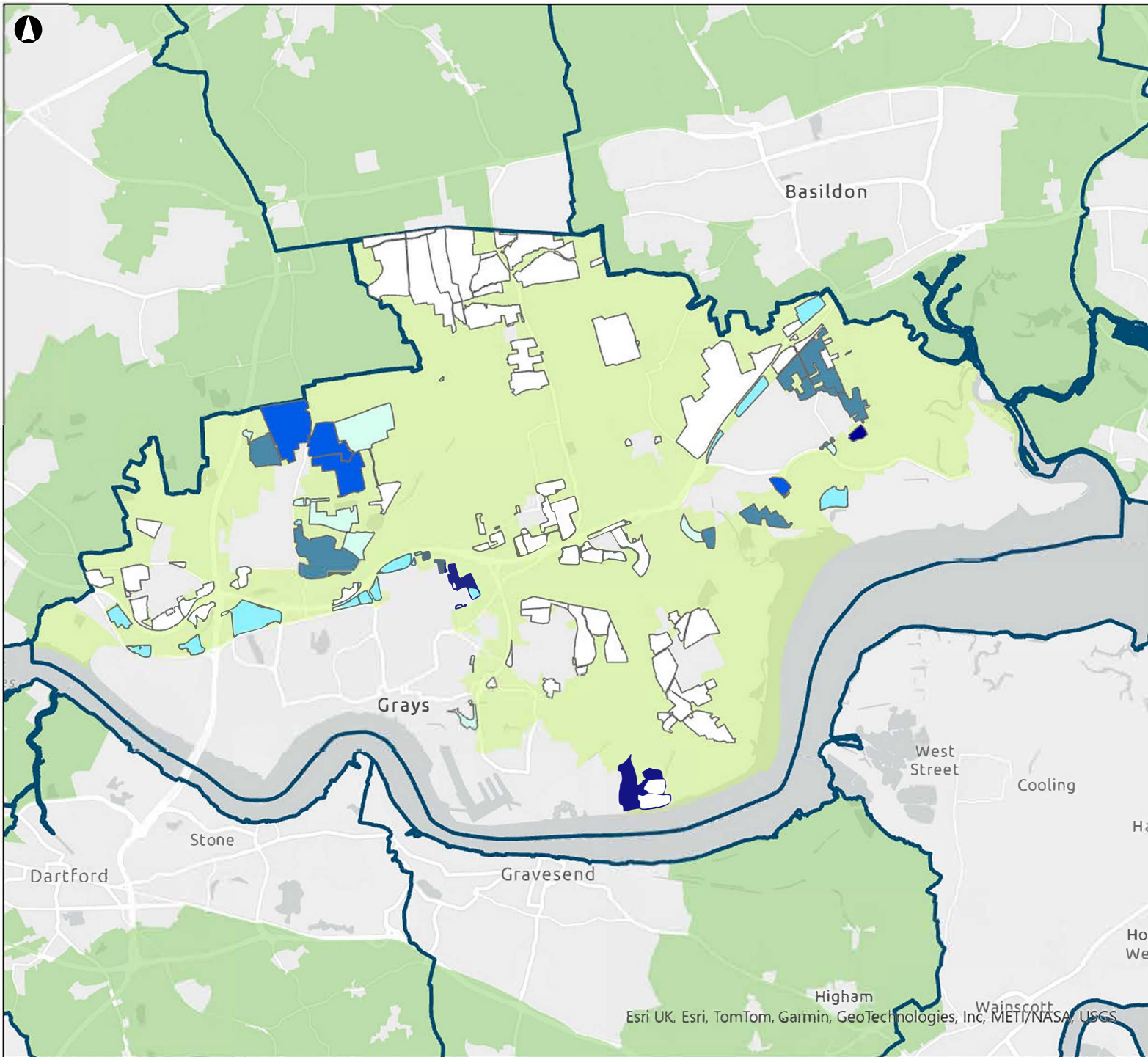
The findings of the purpose (b) assessment are presented in Table 26 and Figure 12. The summary of scores is presented below:

Purpose B Score	No. of sub-areas
0	54
1	77
3	13
5	1
Total	145

The overwhelming majority of sub-areas scored either a 0 or 1 for purpose (b). This is because they either did not sit within a gap between two towns or served as a small part of the gap only.

Table 25 Purpose (a) scores

Purpose (a) Score	Number of sub-areas	Sub-areas				
5	3	CS-18	TC-10	TL-06		
4	4	CS-23	OK-03	OK-04	OK-05	
3	15	CS-06	CS-07	CS-08	CS-09	CS-15
		CS-17	CS-21	CS-22	CS-25	CS-26
		OK-01	OK-10	TC-07	TC-08	TC-09
2	18	AV-11	CS-02	CS-03	CS-11	LG-01
		OK-11	PF-01	PF-02	PF-03	TC-01
		TC-02	TC-03	TC-04	TC-05	TC-06
		TC-11	TC-12	TC-14		
1	11	CS-19	CS-20	CS-27	OK-02	OK-06
		OK-09	OK-12	OK-13	OK-14	TC-13
		TL-01				
0	94	AV-01	AV-02	AV-03	AV-04	AV-05
		AV-06	AV-07	AV-08	AV-09	AV-10
		AV-12	BA-01	BA-02	BA-03	BA-04
		BP-01	BP-02	BP-03	BP-04	BP-05
		BP-06	BP-07	BP-08	BP-09	BP-10
		BP-11	BP-12	BP-13	BP-14	BP-15
		BP-16	BP-17	BP-18	BP-19	BP-20
		BP-21	BP-22	BP-23	BP-24	CH-01
		CH-02	CH-03	CH-04	CH-05	CH-06
		CH-07	CH-08	CH-09	CS-01	CS-04
		CS-05	CS-10	CS-12	CS-13	CS-14
		CS-16	CS-24	CS-28	ET-01	ET-02
		ET-03	ET-04	ET-05	ET-06	ET-07
		ET-08	ET-09	ET-10	ET-11	HO-01
		HO-02	NS-01	NS-02	OK-07	OK-15
		OK-16	OR-01	OR-02	OR-03	OR-04
		OR-05	OR-06	OR-07	SO-01	SO-02
		SO-03	SO-04	SO-05	SO-06	SO-07
		SO-08	TL-04	TL-07	TL-08	



- Thurrock Green Belt
- Neighbouring Green Belt
- Local Authority Boundaries

Purpose A Score

- 0
- 1
- 2
- 3
- 4
- 5

Coordinate System: British National Grid

Metres
300

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Figure 11: Sub-areas with Purpose (A) Score

Scale at A4

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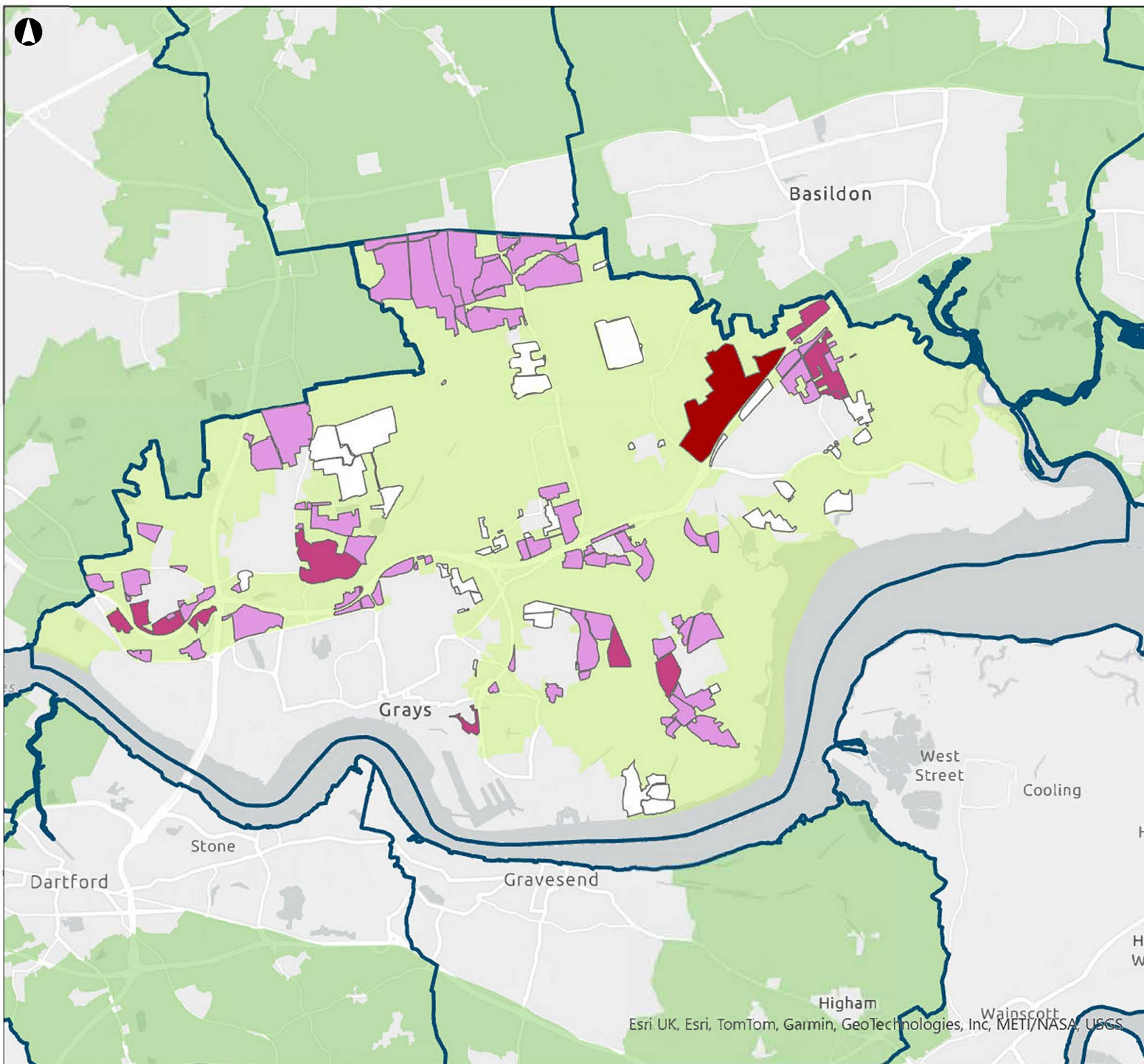
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Table 26 Purpose (b) scores

Purpose (b) Score	Number of sub-areas	Sub-areas				
5	1	CS-01				
3	13	AV-05	AV-06	AV-08	AV-11	CH-07
		CS-07	CS-09	CS-11	CS-28	ET-10
		NS-02	OK-10	TL-01		
1	77	AV-01	AV-02	AV-03	AV-04	AV-07
		AV-09	AV-10	AV-12	BP-03	BP-04
		BP-05	BP-06	BP-07	BP-08	BP-09
		BP-10	BP-11	BP-12	BP-13	BP-14
		BP-15	BP-16	BP-17	CH-03	CH-05
		CH-06	CH-08	CH-09	CS-04	CS-05
		CS-06	CS-08	CS-10	CS-12	CS-14
		CS-26	CS-27	ET-01	ET-02	ET-03
		ET-05	ET-06	ET-07	ET-08	ET-09
		ET-11	NS-01	OK-01	OK-02	OK-03
		OK-09	OK-11	OK-12	OK-13	OK-14
		OK-16	OR-02	OR-03	OR-04	OR-05
		PF-01	PF-02	PF-03	SO-01	SO-02
		SO-05	SO-06	SO-07	SO-08	TC-01
		TC-02	TC-03	TC-04	TC-05	TC-06
		TC-07	TL-04			
0	54	BA-01	BA-02	BA-03	BA-04	BP-01
		BP-02	BP-18	BP-19	BP-20	BP-21
		BP-22	BP-23	BP-24	CH-01	CH-02
		CH-04	CS-02	CS-03	CS-13	CS-15
		CS-16	CS-17	CS-18	CS-19	CS-20
		CS-21	CS-22	CS-23	CS-24	CS-25
		ET-04	HO-01	HO-02	LG-01	OK-04
		OK-05	OK-06	OK-07	OK-15	OR-01
		OR-06	OR-07	SO-03	SO-04	TC-08
		TC-09	TC-10	TC-11	TC-12	TC-13
		TC-14	TL-06	TL-07	TL-08	



- Thurrock Green Belt
- Neighbouring Green Belt
- Local Authority Boundaries

Purpose B Score

- 0
- 1
- 3
- 5

Coordinate System: British National Grid

Metres
300

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Figure 12: Sub-areas with Purpose (B) Score

Scale at A4

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7.4 Purpose (c)

To assist in safeguarding the countryside from encroachment.

The findings of the purpose (c) assessment are presented in Table 27 and Figure 13. The summary of scores is presented below:

Purpose C Score	No. of sub-areas
0	1
1	8
2	12
3	50
4	56
5	18
Total	145

Most of the subareas (106 out of 145) scored either a 3 or 4 for purpose (c). This is because many of these sub-areas consisted of open fields or grassy areas but experienced some urbanising influences, either from nearby residential development, commercial development, industry or transport links. The one sub-area that scored a 0 for purpose (c), CS-13, was completely developed at the time of site visits.

7.5 Purpose (d)

To preserve the setting and special character of historic towns

A purpose (d) assessment was not undertaken as there were no historic towns identified in proximity to these sub-areas in Thurrock.

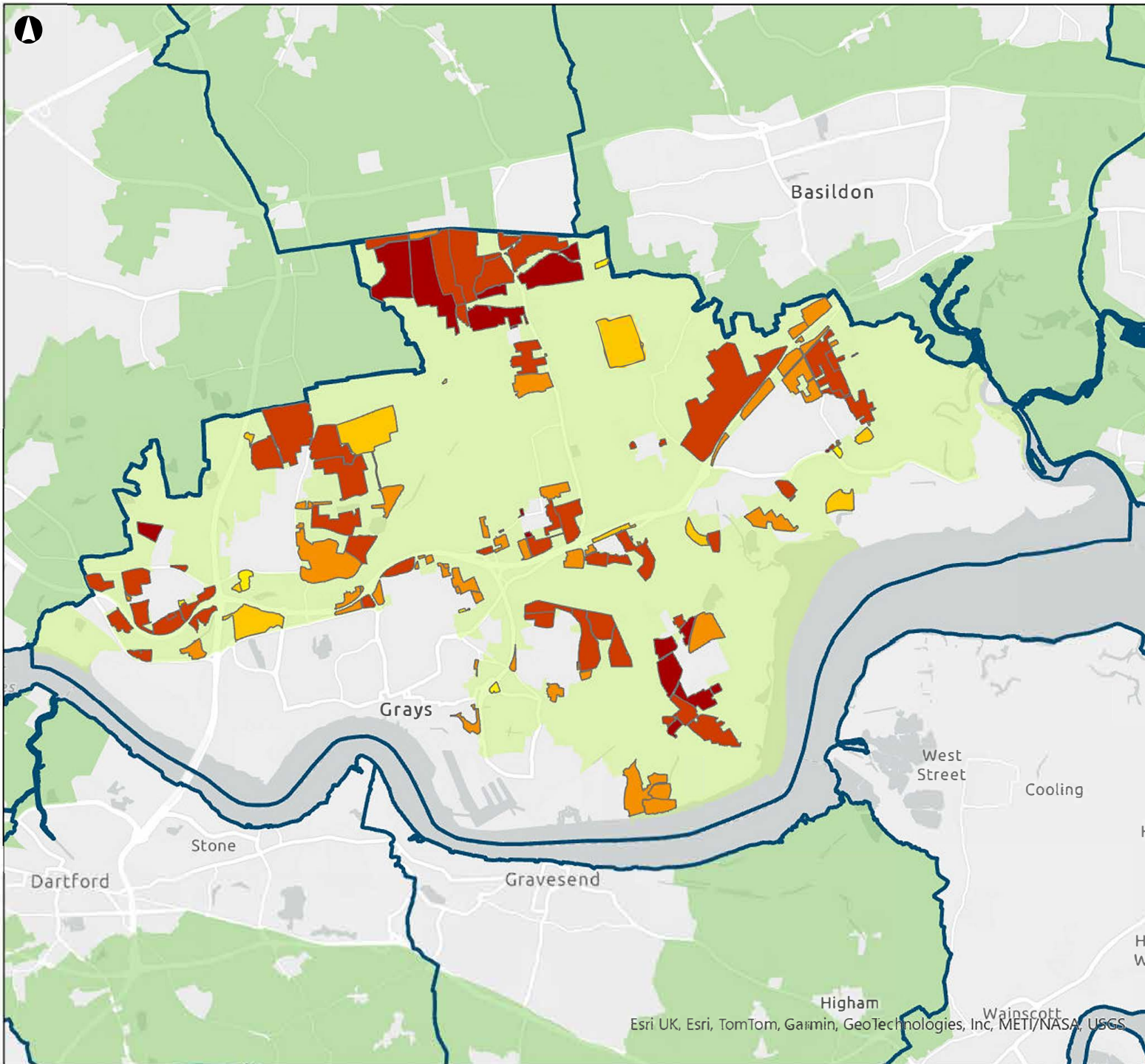
7.6 Purpose (e)

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

As set out in section 6.4.5, purpose (e) was assessed at the whole Borough level due to the inability to differentiate how an individual assessment area contributes to this purpose. On the basis of the analysis presented in the methodology, the whole district was assigned a score of '1' or 'weak' performance against this purpose. This value was assumed for all constituent sub-areas within the Borough.

Table 27 Purpose (c) scores

Purpose (c) Score	Number of sub-areas	Sub-areas				
5	18	AV-01	BP-01	BP-02	BP-03	BP-05
		BP-06	BP-13	BP-16	BP-17	CS-22
		ET-02	ET-04	ET-05	ET-07	ET-10
		ET-11	OR-01	OR-06		
4	56	AV-02	AV-03	AV-05	AV-06	AV-07
		AV-08	AV-10	AV-11	AV-12	BA-02
		BA-04	BP-04	BP-07	BP-09	BP-10
		BP-11	BP-12	BP-14	BP-15	BP-19
		CH-01	CH-02	CH-03	CH-06	CH-07
		CS-01	CS-07	CS-09	CS-14	CS-15
		CS-16	CS-21	CS-23	CS-24	CS-26
		ET-01	ET-06	ET-08	ET-09	HO-01
		HO-02	OK-01	OK-03	OK-04	OK-05
		OK-09	OK-14	OR-03	OR-04	OR-07
		PF-01	SO-02	SO-05	SO-06	TC-02
		TC-04				
3	50	AV-09	BA-01	BA-03	BP-08	BP-21
		CH-04	CH-05	CH-08	CH-09	CS-02
		CS-03	CS-04	CS-05	CS-06	CS-08
		CS-10	CS-11	CS-12	CS-19	CS-25
		CS-28	ET-03	NS-01	NS-02	OK-07
		OK-10	OK-11	OK-12	OK-13	OR-02
		OR-05	PF-02	SO-04	SO-07	SO-08
		TC-01	TC-03	TC-05	TC-06	TC-07
		TC-08	TC-09	TC-10	TC-11	TC-12
		TC-14	TL-01	TL-06	TL-07	TL-08
2	12	BP-22	BP-23	CS-17	CS-18	CS-27
		LG-01	OK-02	OK-06	OK-16	PF-03
		SO-01	SO-03			
1	8	AV-04	BP-18	BP-20	BP-24	CS-20
		OK-15	TC-13	TL-04		
0	1	CS-13				



Thurrock Green Belt
Neighbouring Green Belt
Local Authority Boundaries

Purpose C Score

0
1
2
3
4
5

Coordinate System: British National Grid

Metres
300

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Figure 13: Sub-areas with Purpose (C) Score

Scale at A4

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7.7 Overall NPPF Performance

The overall NPPF performance findings are presented in Table 30 and Figure 16. Based on the previous purpose a-c assessments, each sub-area is assessed to perform either strongly, moderately or weakly against the NPPF purposes overall. As all NPPF purposes are given equal weight, the strongest purpose score for each sub-area dictates its overall performance.

Of the 145 sub-areas, 79 performed strongly, 48 performed moderately, 17 performed weakly, and 1 did not meet the purposes at all.

7.8 Provisional Grey Belt identification

For the purposes of plan-making, grey belt is identified as any land that is not judged to strongly contribute to any one of purposes (a), (b), or (d) and that is not restricted by the application of policies in NPPF footnote 7. As set out in section 6.5, within a GBA it is only possible to provisionally identify grey belt based on the purpose scores, while final confirmation of grey belt status will be achieved through wider plan-making or through development management processes when NPPF footnote 7 can be taken fully into account. This section provides an overview of the provisional grey belt identification exercise undertaken for TC.

7.8.1 Grey belt scores and findings

The results of the Stage 2 GBA purposes assessment were filtered to isolate parcels which do not contribute strongly to any one of purposes (a), (b), or (d). The score values from the Stage 2 GBA were matched to the PPG's *weak*, *moderate* and *strong* contribution scale. Thus, parcels identified within the Stage 2 GBA as not having a relatively significant or significant impact were identified as provisional grey belt.

Provisional grey belt findings are presented in Tables 28 and 29 and illustrated spatially in Figure 15. Based on the purpose assessments, each sub-area has been identified as a 'yes' or a 'no' for provisional grey belt, judged by whether a sub-area scores 'strongly' against purposes (a), (b) or (d).

Of the 145 sub-areas assessed, 137 are provisionally identified as grey belt. This number is relatively high due to the simple formulation of provisional grey belt as set out by the PPG. In the case of TC, only purpose (a) and (b) scores were considered as a purpose (d) assessment was not made, due to no historic towns identified for this study. As a result, most of the sub-areas assessed did not have strong contributions for purpose (a) or (b). This is related to a variety of factors, such as the presence of existing development or strong boundary features near the sub-area which reduced their ability to contribute towards these purposes. Detailed descriptions of scores can be found in Appendix A.5.

Table 28 Summary of Grey Belt analysis in Stage 2

Status (provisional)	Number of Stage 2 Green Belt sub-areas	% of Green Belt sub-areas	% of assessed Green Belt Area	Area of assessed Green Belt (Ha)
Grey belt	137	94%	81%	2,193.45
Non-grey belt	8	6%	19%	506.18
Total	145	100%	100%	2,699.63

Provisional grey belt parcels are scattered throughout the borough with no clear concentration (Figure 15). Notable locations that included sub-areas **not** identified as provisional grey belt are Corringham, South Ockendon and Tilbury.

7.8.2 Next steps

As previously mentioned, purpose scores only form part of the determination of grey belt status. Thus, the Council should review whether the application of policies relating to NPPF footnote 7 would provide a strong reason for refusing or restricting development, once more detail is known for parcels or sites either through plan-making or the development management process. In reaching this judgement, the PPG states

that authorities should consider both where areas of grey belt would be covered by or affect designations in NPPF footnote 7.

Since the Stage 2 GBA involved a filtering process to remove assessment areas which were entirely or largely covered by major policy constraints (which were considered to effectively rule out development of the land) some of the footnote 7 constraints have already been partially taken into consideration. The following constraints were considered:

- Scheduled Monuments;
- Registered Parks and Gardens;
- Sites of Special Scientific Interest;
- Local Nature Reserves;
- Ancient Woodland;
- Common land; and
- Flood Zone 3b.

The analysis contained within the GBA forms only part of the footnote 7 judgement. Therefore, the Council should review whether the application of the full range of designations relating to footnote 7 would provide a strong reason for refusing or restricting development.

Once this final exercise has been completed, the Council will be able to confirm grey belt status of parcels, or sites within parcels. Confirmation of grey belt status will not necessarily equate to land being allocated for development or released from the Green Belt. As part of the plan-making process the Council will need to consider the balance of wider planning factors, including whether the release of Green Belt sites (including but not limited to grey belt land) would contribute to a sustainable pattern of development and apply the ‘fundamentally undermine test’ for any proposed Green Belt release, in line with national policy and guidance (NPPF 2024, paragraph 146). This test determines which areas of the Thurrock Green Belt are of ‘fundamental importance’ and perform a strategically important role against the Green Belt purposes across the plan area and are therefore considered the most sensitive to change.

It should be noted that for the purposes of decision-making, if a site is judged to be grey belt and its release would pass the fundamentally undermine test, then it will still be necessary to consider whether development would not be inappropriate in the Green Belt, in line with the NPPF (paragraph 155), as illustrated in Figure 2 of the NPPF (Figure 14).

This includes the following:

- The site is in a sustainable location
- The site is grey belt
- Development of the site would not fundamentally undermine the purposes of the remaining Green Belt
- There is demonstrable unmet need for the development proposed
- The site provides Golden Rules where applicable.

Figure 14 When development in the Green Belt is 'not inappropriate' (NPPF paragraph 155)

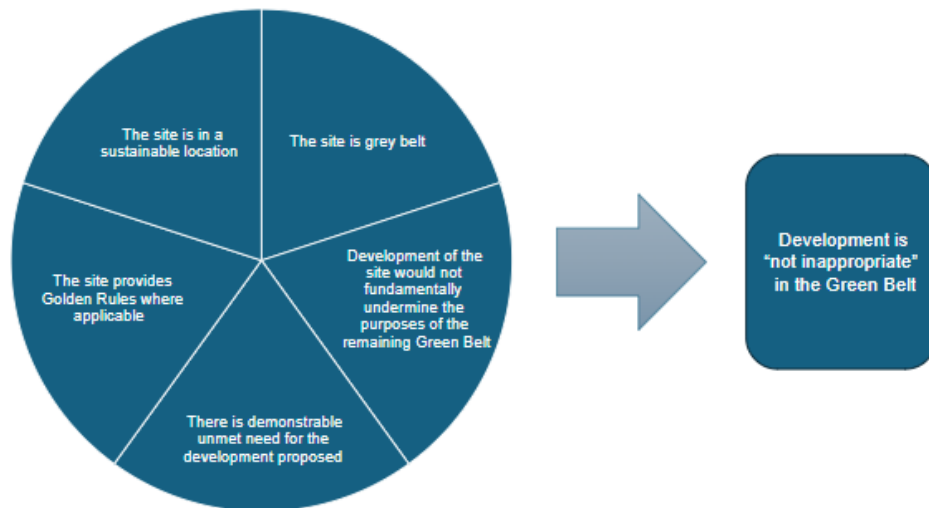
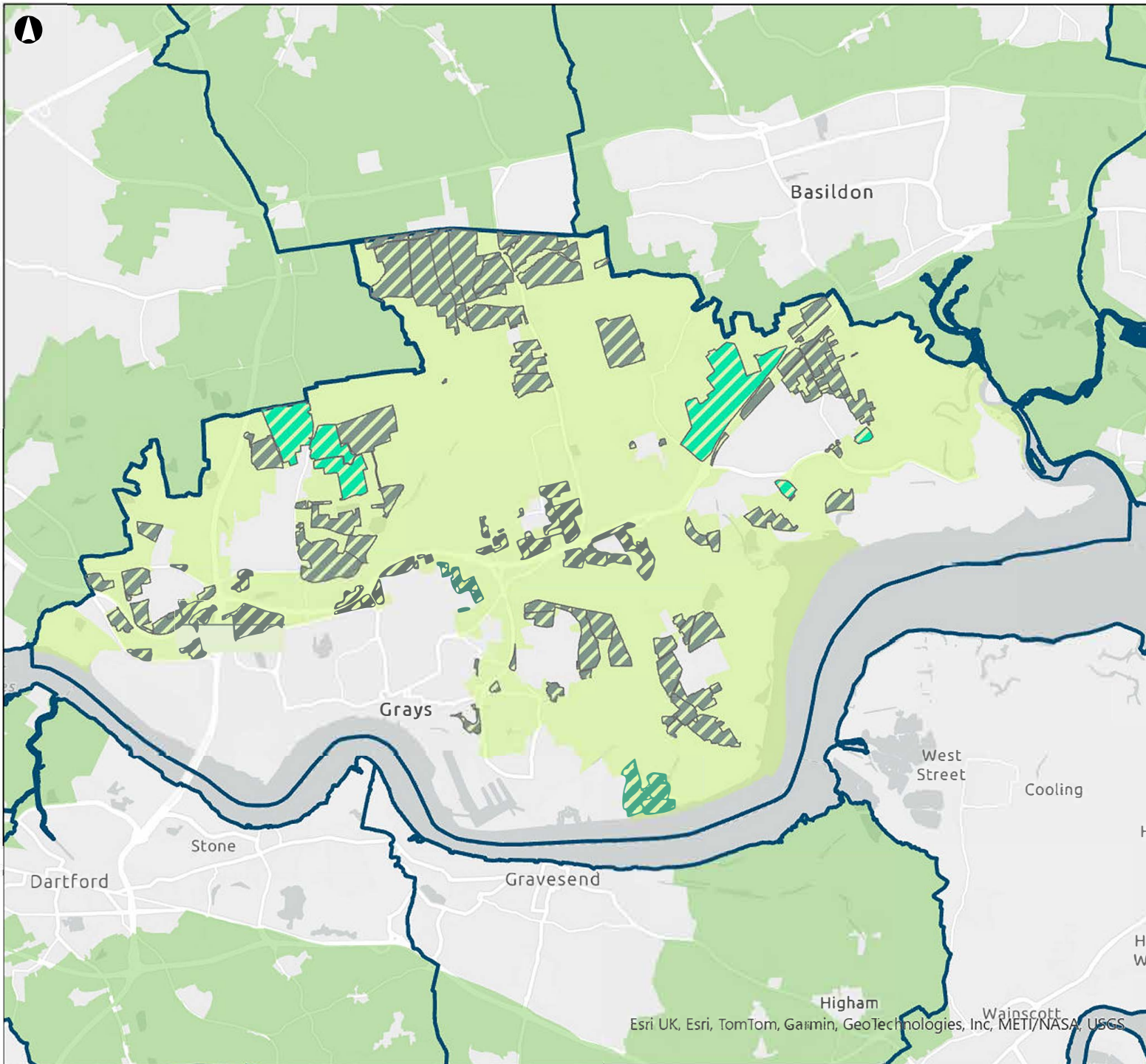


Table 29 Grey Belt Scores

Grey Belt Status	Number of sub-areas	Sub-areas				
Provisional Grey Belt	137	AV-01	AV-02	AV-03	AV-04	AV-05
		AV-06	AV-07	AV-08	AV-09	AV-10
		AV-11	AV-12	BA-01	BA-02	BA-03
		BA-04	BP-01	BP-02	BP-03	BP-04
		BP-05	BP-06	BP-07	BP-08	BP-09
		BP-10	BP-11	BP-12	BP-13	BP-14
		BP-15	BP-16	BP-17	BP-18	BP-19
		BP-20	BP-21	BP-22	BP-23	BP-24
		CH-01	CH-02	CH-03	CH-04	CH-05
		CH-06	CH-07	CH-08	CH-09	CS-02
		CS-03	CS-04	CS-05	CS-06	CS-07
		CS-08	CS-09	CS-10	CS-11	CS-12
		CS-13	CS-14	CS-15	CS-16	CS-17
		CS-19	CS-20	CS-21	CS-22	CS-24
		CS-25	CS-26	CS-27	CS-28	ET-01
		ET-02	ET-03	ET-04	ET-05	ET-06
		ET-07	ET-08	ET-09	ET-10	ET-11
		HO-01	HO-02	LG-01	NS-01	NS-02
		OK-01	OK-02	OK-06	OK-07	OK-09
		OK-10	OK-11	OK-12	OK-13	OK-14
		OK-15	OK-16	OR-01	OR-02	OR-03
		OR-04	OR-05	OR-06	OR-07	PF-01
		PF-02	PF-03	SO-01	SO-02	SO-03
		SO-04	SO-05	SO-06	SO-07	SO-08
		TC-01	TC-02	TC-03	TC-04	TC-05
		TC-06	TC-07	TC-08	TC-09	TC-11
		TC-12	TC-13	TC-14	TL-01	TL-04
		TL-07	TL-08			
Not Grey Belt	8	CS-01	CS-18	CS-23	OK-03	OK-04
		OK-05	TC-10	TL-06		



- Thurrock Green Belt
- Neighbouring Green Belt
- Local Authority Boundaries
- Provisional Grey Belt**
- No
- Yes

Coordinate System: British National Grid

Metres
300

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Figure 15: Provisional Grey Belt

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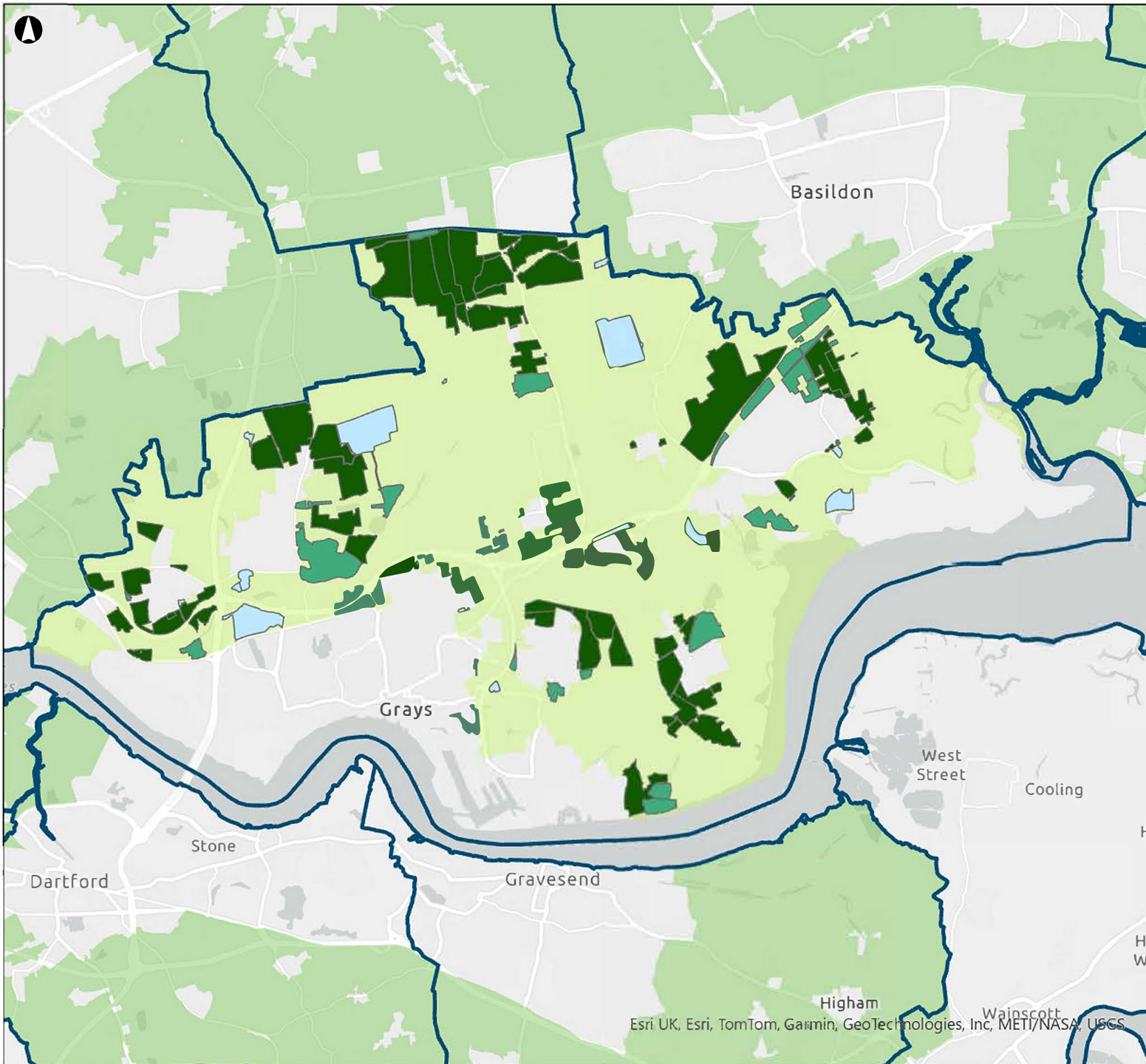
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Table 30 Overall NPPF Scores

NPPF Score	Number of sub-areas	Sub-areas				
Strongly	79	AV-01	AV-02	AV-03	AV-05	AV-06
		AV-07	AV-08	AV-10	AV-11	AV-12
		BA-02	BA-04	BP-01	BP-02	BP-03
		BP-04	BP-05	BP-06	BP-07	BP-09
		BP-10	BP-11	BP-12	BP-13	BP-14
		BP-15	BP-16	BP-17	BP-19	CH-01
		CH-02	CH-03	CH-06	CH-07	CS-01
		CS-07	CS-09	CS-14	CS-15	CS-16
		CS-18	CS-21	CS-22	CS-23	CS-24
		CS-26	ET-01	ET-02	ET-04	ET-05
		ET-06	ET-07	ET-08	ET-09	ET-10
		ET-11	HO-01	HO-02	OK-01	OK-03
		OK-04	OK-05	OK-09	OK-14	OK-15
		OR-01	OR-03	OR-04	OR-06	OR-07
		PF-01	SO-02	SO-05	SO-06	TC-02
		TC-04	TC-10	TC-12	TL-06	
Moderately	48	AV-09	BA-01	BA-03	BP-08	BP-21
		CH-04	CH-05	CH-08	CH-09	CS-02
		CS-03	CS-04	CS-05	CS-06	CS-08
		CS-10	CS-11	CS-12	CS-17	CS-19
		CS-25	CS-28	ET-03	NS-01	NS-02
		OK-07	OK-10	OK-11	OK-12	OK-13
		OR-02	OR-05	PF-02	SO-04	SO-07
		SO-08	TC-01	TC-03	TC-05	TC-06
		TC-07	TC-08	TC-09	TC-11	TC-14
		TL-01	TL-07	TL-08		
Weakly	17	AV-04	BP-18	BP-20	BP-22	BP-23
		BP-24	CS-20	CS-27	LG-01	OK-02
		OK-06	OK-16	PF-03	SO-01	SO-03
		TC-13	TL-04			
Does not meet	1	CS-13				



- Thurrock Green Belt
 - Neighbouring Green Belt
 - Local Authority Boundaries
- Overall NPPF Performance**
- Strong
 - Moderate
 - Weak

Coordinate System: British National Grid

Metres
300

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Project Name

Green Belt Assessment (Stage 2, 2025)

Drawing Title

Figure 16: Overall NPPF Performance

Scale at A4

1:120,000

Role

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Suitability

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Project Number

312159-01

Drawing Number

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Rev

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Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

7.9 Strategic Green Belt Assessment

Reflecting the granular focus of the Stage 2 Green Belt Assessment, additional qualitative assessment was undertaken to identify the role played by sub-areas as part of the wider Green Belt, and the likely impacts of their release on the performance of the wider Green Belt. A summary of the strategic assessment findings is provided in Table 31 and Figure 17.

7.10 Categorisation and Recommendations

Each sub-area was categorised as to whether the sub-area should be considered further by the Council. A summary of the categorisation, together with a summary of all elements of the assessment, is provided in Table 32.

The overall recommendations of the Stage 2 GBA are thus:

- 88 sub-areas are recommended for further consideration – if removed from the Green Belt, these areas are judged to be unlikely to result in harm to the wider Green Belt.

Each recommended sub-area has been assigned a unique reference number. In some cases, wider Green Belt land has been included as part of the recommended area to avoid leaving behind ‘slivers’ or islands of Green Belt, which would otherwise risk the integrity of the remaining Green Belt. The extent and location of the wider Green Belt land included for this reason is, like the rest of the report, solely a recommendation. As such, when considering them for release, the Council may consider in some cases that minor alterations may be justified in order to achieve a more robust boundary.

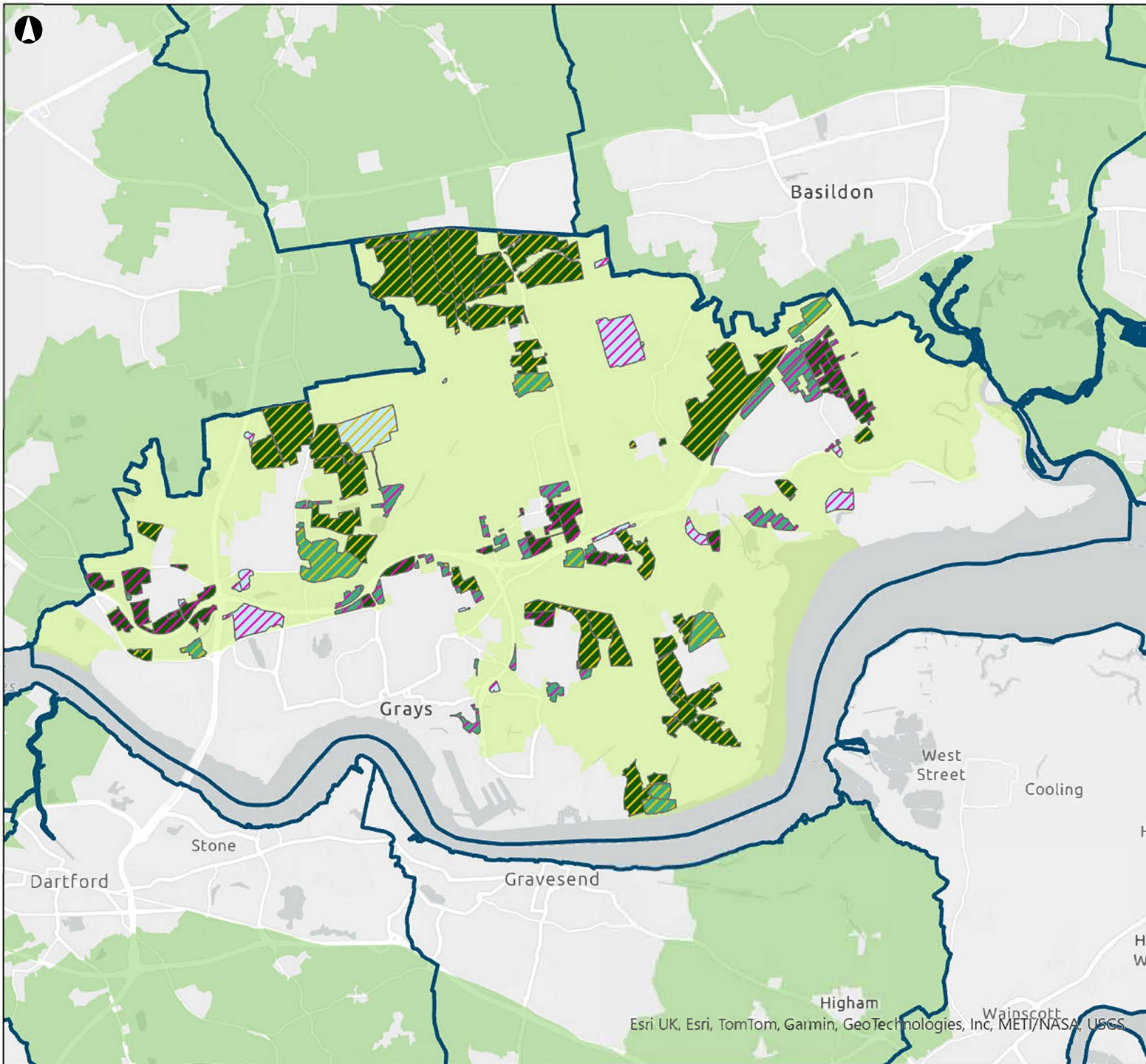
Note: Permissions, allocations and strategic decisions made after the assessment fall outside the scope of the report.

7.11 Boundary Considerations

The analysis of sub-area boundaries considered, in line with NPPF requirements, the strength of the boundaries if a sub-area were removed (wholly, or partially, depending on assessment recommendations) from the Green Belt. Where boundary weakness was identified, mitigation may be required, for example through strengthening existing partial boundary features or the creation of a new boundary feature. The boundary consideration for each sub-area can be found in the assessment pro forma in the Annex Report. This analysis was for information only and did not affect recommendations. Any future boundary refinements will be undertaken by Council as part of the Local Plan process.

Table 31 Strategic Assessment

Strategic Assessment	Number of sub-areas	Sub-areas				
Important role	57	AV-01	BP-03	BP-04	BP-05	BP-06
		BP-07	BP-08	BP-09	BP-10	BP-11
		BP-12	BP-13	BP-14	BP-15	BP-16
		BP-17	BP-19	BP-21	CH-02	CH-03
		CH-06	CH-07	CS-01	CS-11	CS-18
		CS-23	CS-24	CS-28	ET-01	ET-02
		ET-03	ET-04	ET-05	ET-06	ET-07
		ET-08	ET-09	ET-10	ET-11	HO-01
		OK-01	OK-03	OK-04	OK-05	OK-06
		OK-09	OK-10	OK-14	PF-01	PF-02
		SO-02	SO-08	TC-09	TC-10	TL-06
		TL-07	TL-08			
Less important role	88	AV-02	AV-03	AV-04	AV-05	AV-06
		AV-07	AV-08	AV-09	AV-10	AV-11
		AV-12	BA-01	BA-02	BA-03	BA-04
		BP-01	BP-02	BP-18	BP-20	BP-22
		BP-23	BP-24	CH-01	CH-04	CH-05
		CH-08	CH-09	CS-02	CS-03	CS-04
		CS-05	CS-06	CS-07	CS-08	CS-09
		CS-10	CS-12	CS-13	CS-14	CS-15
		CS-16	CS-17	CS-19	CS-20	CS-21
		CS-22	CS-25	CS-26	CS-27	HO-02
		LG-01	NS-01	NS-02	OK-02	OK-07
		OK-11	OK-12	OK-13	OK-15	OK-16
		OR-01	OR-02	OR-03	OR-04	OR-05
		OR-06	OR-07	PF-03	SO-01	SO-03
		SO-04	SO-05	SO-06	SO-07	TC-01
		TC-02	TC-03	TC-04	TC-05	TC-06
		TC-07	TC-08	TC-11	TC-12	TC-13
		TC-14	TL-01	TL-04		



- Thurrock Green Belt
- Neighbouring Green Belt
- Local Authority Boundaries
- Overall NPPF Performance
 - Strong
 - Moderate
 - Weak
- Strategic Role
 - Important
 - Less important

Coordinate System: British National Grid

Metres
300

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Project Name

Green Belt Assessment (Stage 2, 2025)

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Figure 17: Strategic Assessment

Scale at A4

1:120,000

Role

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Suitability

--

Project Number

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Table 32 Summary of findings

Sub-area	Area (ha.)	Purpose (a)	Purpose (b)	Purpose (c)	Purpose (d)	Purpose (e)	Overall NPPF Purpose Performance	Provisional Grey Belt	Strategic Role v2	Recommendation
AV-01	14.3	0	1	5	0	1	Strong	Yes	Important	Not recommended
AV-02	2.8	0	1	4	0	1	Strong	Yes	Less important	Recommended
AV-03	16.6	0	1	4	0	1	Strong	Yes	Less important	Recommended
AV-04	1.2	0	1	1	0	1	Weak	Yes	Less important	Recommended
AV-05	12.6	0	3	4	0	1	Strong	Yes	Less important	Recommended
AV-06	20.4	0	3	4	0	1	Strong	Yes	Less important	Recommended
AV-07	2.0	0	1	4	0	1	Strong	Yes	Less important	Recommended
AV-08	18.3	0	3	4	0	1	Strong	Yes	Less important	Recommended
AV-09	1.1	0	1	3	0	1	Moderate	Yes	Less important	Recommended
AV-10	25.9	0	1	4	0	1	Strong	Yes	Less important	Recommended
AV-11	14.5	2	3	4	0	1	Strong	Yes	Less important	Recommended
AV-12	14.6	0	1	4	0	1	Strong	Yes	Less important	Recommended

BA-01	5.1	0	0	3	0	1	Moderate	Yes	Less important	Recommended
BA-02	0.4	0	0	4	0	1	Strong	Yes	Less important	Recommended
BA-03	7.2	0	0	3	0	1	Moderate	Yes	Less important	Recommended
BA-04	3.8	0	0	4	0	1	Strong	Yes	Less important	Recommended
BP-01	0.7	0	0	5	0	1	Strong	Yes	Less important	Recommended
BP-02	0.7	0	0	5	0	1	Strong	Yes	Less important	Recommended
BP-03	49.1	0	1	5	0	1	Strong	Yes	Important	Not recommended
BP-04	8.5	0	1	4	0	1	Strong	Yes	Important	Not recommended
BP-05	99.2	0	1	5	0	1	Strong	Yes	Important	Not recommended
BP-06	82.6	0	1	5	0	1	Strong	Yes	Important	Not recommended
BP-07	13.7	0	1	4	0	1	Strong	Yes	Important	Not recommended
BP-08	7.1	0	1	3	0	1	Moderate	Yes	Important	Not recommended
BP-09	56.9	0	1	4	0	1	Strong	Yes	Important	Not recommended
BP-10	78.4	0	1	4	0	1	Strong	Yes	Important	Not recommended
BP-11	3.7	0	1	4	0	1	Strong	Yes	Important	Not recommended

BP-12	39.9	0	1	4	0	1	Strong	Yes	Important	Not recommended
BP-13	11.1	0	1	5	0	1	Strong	Yes	Important	Not recommended
BP-14	10.3	0	1	4	0	1	Strong	Yes	Important	Not recommended
BP-15	47.5	0	1	4	0	1	Strong	Yes	Important	Not recommended
BP-16	66.1	0	1	5	0	1	Strong	Yes	Important	Not recommended
BP-17	9.8	0	1	5	0	1	Strong	Yes	Important	Not recommended
BP-18	3.7	0	0	1	0	1	Weak	Yes	Less important	Recommended
BP-19	33.4	0	0	4	0	1	Strong	Yes	Important	Not recommended
BP-20	0.2	0	0	1	0	1	Weak	Yes	Less important	Recommended
BP-21	31.3	0	0	3	0	1	Moderate	Yes	Important	Not recommended
BP-22	80.3	0	0	2	0	1	Weak	Yes	Less important	Recommended
BP-23	0.5	0	0	2	0	1	Weak	Yes	Less important	Recommended
BP-24	0.5	0	0	1	0	1	Weak	Yes	Less important	Recommended
CH-01	15.7	0	0	4	0	1	Strong	Yes	Less important	Recommended
CH-02	17.1	0	0	4	0	1	Strong	Yes	Important	Not recommended

CH-03	42.1	0	1	4	0	1	Strong	Yes	Important	Not recommended
CH-04	0.6	0	0	3	0	1	Moderate	Yes	Less important	Recommended
CH-05	3.8	0	1	3	0	1	Moderate	Yes	Less important	Recommended
CH-06	26.8	0	1	4	0	1	Strong	Yes	Important	Not recommended
CH-07	25.3	0	3	4	0	1	Strong	Yes	Important	Not recommended
CH-08	9.8	0	1	3	0	1	Moderate	Yes	Less important	Recommended
CH-09	3.4	0	1	3	0	1	Moderate	Yes	Less important	Recommended
CS-01	221.5	0	5	4	0	1	Strong	No	Important	Not recommended
CS-02	5.1	2	0	3	0	1	Moderate	Yes	Less important	Recommended
CS-03	19.4	2	0	3	0	1	Moderate	Yes	Less important	Recommended
CS-04	15.7	0	1	3	0	1	Moderate	Yes	Less important	Recommended
CS-05	7.5	0	1	3	0	1	Moderate	Yes	Less important	Recommended
CS-06	23.3	3	1	3	0	1	Moderate	Yes	Less important	Recommended
CS-07	53.1	3	3	4	0	1	Strong	Yes	Less important	Recommended
CS-08	11.9	3	1	3	0	1	Moderate	Yes	Less important	Recommended

CS-09	5.5	3	3	4	0	1	Strong	Yes	Less important	Recommended
CS-10	1.2	0	1	3	0	1	Moderate	Yes	Less important	Recommended
CS-11	21.2	2	3	3	0	1	Moderate	Yes	Important	Not recommended
CS-12	1.7	0	1	3	0	1	Moderate	Yes	Less important	Recommended
CS-13	0.4	0	0	0	0	1	Weak	Yes	Less important	Recommended
CS-14	8.4	0	1	4	0	1	Strong	Yes	Less important	Recommended
CS-15	24.0	3	0	4	0	1	Strong	Yes	Less important	Recommended
CS-16	0.4	0	0	4	0	1	Strong	Yes	Less important	Recommended
CS-17	0.3	3	0	2	0	1	Moderate	Yes	Less important	Recommended
CS-18	8.1	5	0	2	0	1	Strong	No	Important	Not recommended
CS-19	0.6	1	0	3	0	1	Moderate	Yes	Less important	Recommended
CS-20	3.2	1	0	1	0	1	Weak	Yes	Less important	Recommended
CS-21	0.9	3	0	4	0	1	Strong	Yes	Less important	Recommended
CS-22	0.5	3	0	5	0	1	Strong	Yes	Less important	Recommended
CS-23	10.5	4	0	4	0	1	Strong	No	Important	Not recommended

CS-24	0.5	0	0	4	0	1	Strong	Yes	Important	Not recommended
CS-25	28.4	3	0	3	0	1	Moderate	Yes	Less important	Recommended
CS-26	9.5	3	1	4	0	1	Strong	Yes	Less important	Recommended
CS-27	12.0	1	1	2	0	1	Weak	Yes	Less important	Recommended
CS-28	7.8	0	3	3	0	1	Moderate	Yes	Important	Not recommended
xET-01	4.5	0	1	4	0	1	Strong	Yes	Important	Not recommended
ET-02	9.4	0	1	5	0	1	Strong	Yes	Important	Not recommended
ET-03	36.8	0	1	3	0	1	Moderate	Yes	Important	Not recommended
ET-04	3.5	0	0	5	0	1	Strong	Yes	Important	Not recommended
ET-05	24.6	0	1	5	0	1	Strong	Yes	Important	Not recommended
ET-06	20.0	0	1	4	0	1	Strong	Yes	Important	Not recommended
ET-07	6.6	0	1	5	0	1	Strong	Yes	Important	Not recommended
ET-08	4.0	0	1	4	0	1	Strong	Yes	Important	Not recommended
ET-09	40.2	0	1	4	0	1	Strong	Yes	Important	Not recommended
ET-10	31.5	0	3	5	0	1	Strong	Yes	Important	Not recommended

ET-11	14.8	0	1	5	0	1	Strong	Yes	Important	Not recommended
HO-01	1.6	0	0	4	0	1	Strong	Yes	Important	Not recommended
HO-02	1.7	0	0	4	0	1	Strong	Yes	Less important	Recommended
LG-01	22.3	2	0	2	0	1	Weak	Yes	Less important	Recommended
NS-01	9.5	0	1	3	0	1	Moderate	Yes	Less important	Recommended
NS-02	0.7	0	3	3	0	1	Moderate	Yes	Less important	Recommended
OK-01	35.1	3	1	4	0	1	Strong	Yes	Important	Not recommended
OK-02	3.1	1	1	2	0	1	Weak	Yes	Less important	Recommended
OK-03	94.1	4	1	4	0	1	Strong	No	Important	Not recommended
OK-04	48.8	4	0	4	0	1	Strong	No	Important	Not recommended
OK-05	59.0	4	0	4	0	1	Strong	No	Important	Not recommended
OK-06	85.1	1	0	2	0	1	Weak	Yes	Important	Not recommended
OK-07	21.5	0	0	3	0	1	Moderate	Yes	Less important	Recommended
OK-09	25.2	1	1	4	0	1	Strong	Yes	Important	Not recommended
OK-10	92.9	3	3	3	0	1	Moderate	Yes	Important	Not recommended

OK-11	1.3	2	1	3	0	1	Moderate	Yes	Less important	Recommended
OK-12	4.5	1	1	3	0	1	Moderate	Yes	Less important	Recommended
OK-13	2.2	1	1	3	0	1	Moderate	Yes	Less important	Recommended
OK-14	38.9	1	1	4	0	1	Strong	Yes	Important	Not recommended
OK-15	9.4	0	0	1	0	1	Weak	Yes	Less important	Recommended
OK-16	2.5	0	1	2	0	1	Weak	Yes	Less important	Recommended
OR-01	1.0	0	0	5	0	1	Strong	Yes	Less important	Recommended
OR-02	14.8	0	1	3	0	1	Moderate	Yes	Less important	Recommended
OR-03	32.6	0	1	4	0	1	Strong	Yes	Less important	Recommended
OR-04	15.5	0	1	4	0	1	Strong	Yes	Less important	Recommended
OR-05	7.7	0	1	3	0	1	Moderate	Yes	Less important	Recommended
OR-06	1.5	0	0	5	0	1	Strong	Yes	Less important	Recommended
OR-07	13.6	0	0	4	0	1	Strong	Yes	Less important	Recommended
PF-01	8.8	2	1	4	0	1	Strong	Yes	Important	Not recommended
PF-02	12.4	2	1	3	0	1	Moderate	Yes	Important	Not recommended

PF-03	53.2	2	1	2	0	1	Weak	Yes	Less important	Recommended
SO-01	8.3	0	1	2	0	1	Weak	Yes	Less important	Recommended
SO-02	29.9	0	1	4	0	1	Strong	Yes	Important	Not recommended
SO-03	0.3	0	0	2	0	1	Weak	Yes	Less important	Recommended
SO-04	0.5	0	0	3	0	1	Moderate	Yes	Less important	Recommended
SO-05	8.7	0	1	4	0	1	Strong	Yes	Less important	Recommended
SO-06	11.7	0	1	4	0	1	Strong	Yes	Less important	Recommended
SO-07	3.1	0	1	3	0	1	Moderate	Yes	Less important	Recommended
SO-08	14.7	0	1	3	0	1	Moderate	Yes	Important	Not recommended
TC-01	6.7	2	1	3	0	1	Moderate	Yes	Less important	Recommended
TC-02	6.1	2	1	4	0	1	Strong	Yes	Less important	Recommended
TC-03	7.4	2	1	3	0	1	Moderate	Yes	Less important	Recommended
TC-04	14.7	2	1	4	0	1	Strong	Yes	Less important	Recommended
TC-05	1.0	2	1	3	0	1	Moderate	Yes	Less important	Recommended
TC-06	0.8	2	1	3	0	1	Moderate	Yes	Less important	Recommended

TC-07	2.4	3	1	3	0	1	Moderate	Yes	Less important	Recommended
TC-08	3.9	3	0	3	0	1	Moderate	Yes	Less important	Recommended
TC-09	0.9	3	0	3	0	1	Moderate	Yes	Important	Not recommended
TC-10	16.3	5	0	3	0	1	Strong	No	Important	Not recommended
TC-11	1.3	2	0	3	0	1	Moderate	Yes	Less important	Recommended
TC-12	4.2	2	0	3	0	1	Moderate	Yes	Less important	Recommended
TC-13	1.1	1	0	1	0	1	Weak	Yes	Less important	Recommended
TC-14	1.6	2	0	3	0	1	Moderate	Yes	Less important	Recommended
TL-01	11.4	1	3	3	0	1	Moderate	Yes	Less important	Recommended
TL-04	3.3	0	1	1	0	1	Weak	Yes	Less important	Recommended
TL-06	47.9	5	0	3	0	1	Strong	No	Important	Not recommended
TL-07	13.0	0	0	3	0	1	Moderate	Yes	Important	Not recommended
TL-08	19.0	0	0	3	0	1	Moderate	Yes	Important	Not recommended

7.12 Final Conclusions

7.12.1 Green Belt Assessment

This study has examined the performance of the Green Belt within Thurrock Council against the Green Belt purposes, as set out in the NPPF (2024). A total of 149 sub-areas were identified for this assessment.

The sub-areas were defined using a four-stage process, as detailed in the Methodology Report, with the area of search including all submitted sites which had been promoted to the Council through their Call for Sites process. This was to ensure the assessment was proportionate and assessed all available locations for growth. Four sub-areas were excluded due to extensive Footnote 7 constraints, resulting in 145 going forward to the site visit step.

Critically, the assessment also considered the role and importance of sub-areas in terms of the function of the wider Green Belt. For example, it considered whether the release of sub-areas might result in ‘holes’ in the Green Belt, which do not comprise existing inset areas or potential extensions of inset areas. Consideration was also given to potential impacts upon the relative strength of the Green Belt boundary and whether new boundaries would be defined ‘clearly, using physical features that are readily recognisable and likely to be permanent’ (in line with Paragraph 149 (f) of the NPPF).

Of the 145 sub-areas assessed, 57 are recommended for retention in the Green Belt. For sites retained in the Green Belt, national Green Belt policy should continue to apply.

The remaining 88 sub-areas are recommended for further consideration (Figure 18).

The Stage 2 sub-areas recommended for further consideration cover a total of 816 hectares of Green Belt land. This represents 7% of the total designated Green Belt land in Thurrock.

7.12.2 Grey Belt Assessment

Taking the results of the purposes assessment, a total of 137 sub-areas which do not contribute strongly to any one of purposes (a), (b), or (d) have been identified as provisional grey belt. As defined in the NPPF, grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. As set out in the methodology section, the analysis contained within the GBA only forms part of the evidence for the footnote 7 judgement. Therefore, the Council should review whether the application of policies relating to footnote 7 would provide a strong reason for refusing or restricting development in any of these locations, once more detail is known for sites and broad areas for growth later in the plan making or decision-making processes. Once this final exercise has been completed, the Council will be able to confirm grey belt status.

7.12.3 Potential amendments to the Green Belt

NPPF 2024 paragraph 148 introduces a sequential approach to the release of Green Belt land: *“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”* When applying this approach through proposed release of Green Belt, consideration still needs to be given to promoting sustainable patterns of development. The NPPF further states that it is necessary to consider whether *“the site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework”* (NPPF 2024, paragraph 148). Paragraphs 110 and 115 focus on sustainable development locations and sustainable transport solutions.

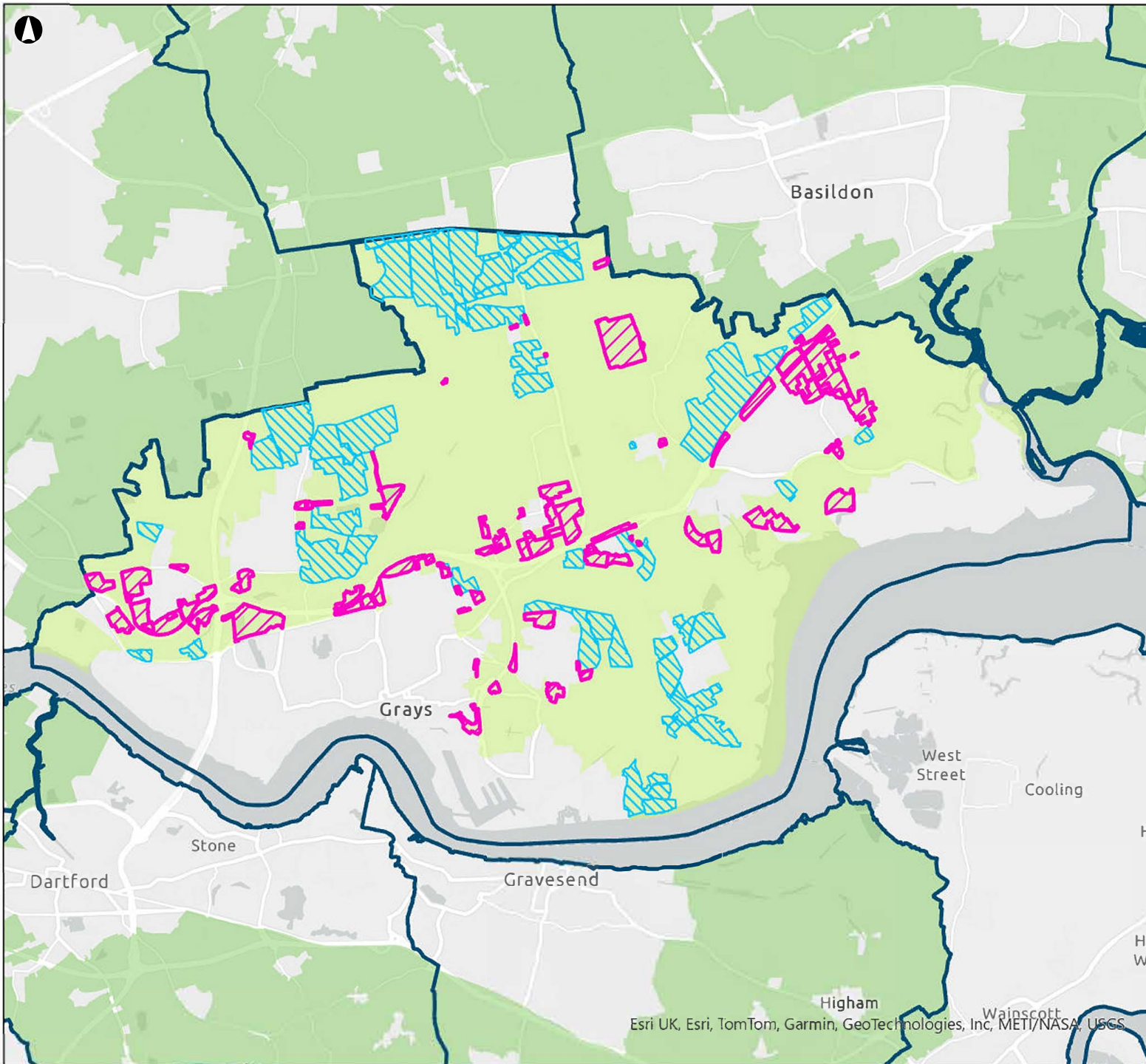
In this Green Belt assessment, once the methodology excluded sub-areas which are wholly or predominantly affected by major constraints, all recommendations were made based on the performance of sub-areas against NPPF purposes, and their performance in the context of the wider Green Belt. Suitability in terms of sustainability, deliverability, infrastructure and wider site-specific or strategic planning considerations has not been taken into account in the recommendations. Rather, it falls to TC to further assess the sustainability and deliverability of areas of land assessed through the Stage 2 GBA as part of the wider plan-making process. Should further work demonstrate that sites are not sustainable or deliverable, the Council may decide that the sub-areas should be retained within the Green Belt.

As noted previously, the relative strength of boundaries was not a determining factor in the final recommendations given it may be possible in certain circumstances to strengthen currently weak boundaries or to provide new boundaries where gaps exist (e.g. through site allocations policies). While this assessment notes where this might be required, the decision on the necessity to strengthen existing, or create new boundaries, will be for the Council to take, taking into account how such mitigation might be secured.

The Council will also need to carefully consider whether, in accordance with the NPPF, there are any exceptional circumstances that justify Green Belt boundaries being altered through the Local Plan review. At that time, the Council will need to consider the intended permanence of the Green Belt boundary in the long term, to ensure any proposed boundaries are capable of enduring beyond the Plan period. Furthermore, as part of the exceptional circumstances case, the NPPF 2024 requires a test of: *“whether the release of Green Belt land would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.”* (paragraph 146). The accompanying PPG explains that *“in reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way”*.

Therefore, once the combination of potential Green Belt sites for release is known, the assessment of fundamentally important areas can be reviewed to support the Council in conducting this ‘fundamentally undermine’ test when reviewing their Green Belt boundaries.

It is also noted that the Lower Thames Crossing (LTC) proposed route passes through areas of the Green Belt in Thurrock and was assessed at a high level for potential impacts on the Green Belt in the Stage 1 GBA. As the LTC is consented but not yet constructed as of February 2026, it has only been referenced in the boundary descriptions of relevant sub-areas and has not been assessed as to its impact on each sub-area as it would be inappropriate to assess a sub-areas contribution based on future development. Once the LTC is in construction, it may be appropriate to re-assess the Green Belt boundaries accordingly to propose alterations/mitigations that ensure the boundary is suitable for the long-term.



- Thurrock Green Belt
 - Neighbouring Green Belt
 - Local Authority Boundaries
- Recommendation**
- Not recommended
 - Recommended

Coordinate System: British National Grid

Metres
300

..	13/02/2026	SP	NS	AR	..
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Thurrock Council

Project Name

Green Belt Assessment (Stage 2, 2025)

Drawing Title

Figure 18: Recommendations

Scale at A4

1:120,000

Role

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Suitability

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Project Number

312159-01

Drawing Number

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Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

A.1 Stage 1 review questions and link to policy changes

No.	Topic	Question	Link to new national Green Belt policy (2024 NPPF) and guidance (2025 PPG)	Relevant section where this review question / topic is explored
1	Geographic Scope	Does the assessment consider all of the Green Belt within the plan area?	The updated PPG stipulates that the assessment of the whole of the Green Belt within an authority's Plan area should be considered in the first instance ⁶⁵ .	See 4.2.1.1
2		Are assessment areas sufficiently granular to enable assessment of their variable contribution to Green Belt purposes?	The PPG states that assessments should be sufficiently granular to enable assessment of the variable contribution of the Green Belt to the NPPF purposes ⁶⁶ . Therefore, a small number of large assessment areas would not be appropriate in most circumstances. The PPG sets out that assessment areas should respond to local circumstances ⁶⁷ . The assessment of smaller areas may be appropriate in certain places, such as around existing settlements or public transport hubs or corridors.	See 4.2.1.2
3	Green Belt Purposes	Does the assessment consider all five purposes of the Green Belt?	The five main purposes of Green Belt have been retained within the NPPF December 2024 and PPG and continue to form the basis of Green Belt assessments⁶⁸. Given the new need for grey belt to be identified and its definition within the 2024 NPPF, Green Belt Reviews must include performance assessment (scores or qualitative ratings) for Green Belt purposes (a), (b) and (d). The 2024 NPPF (paragraph 146) also includes the requirement to identify whether Green Belt release will fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan as part of the development of the exceptional circumstances case. It is therefore necessary for the assessment of performance within Green Belt assessments to cover all of the five purposes (a-e).	See 4.2.2.1

⁶⁵ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 004 Reference ID: 64-004-20250225

⁶⁶ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 004 Reference ID: 64-004-20250225

⁶⁷ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 004 Reference ID: 64-004-20250225

⁶⁸ National Planning Policy Framework (NPPF) 2024, para 143

No.	Topic	Question	Link to new national Green Belt policy (2024 NPPF) and guidance (2025 PPG)	Relevant section where this review question / topic is explored
4		How does the assessment deal with assessment of overall contribution to Green Belt purposes?	See comments above regarding the requirement to understand whether Green Belt release will fundamentally undermine the Green Belt purposes (taken together). PPG also sets out that to reach this judgement, relevant authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a ‘meaningful way’ ⁶⁹ .	See 4.2.2.2
5		Are the definitions of large built-up area clear and consistent in consideration of the new PPG?	The updated PPG clarifies that purpose (a) relates to the sprawl of large built-up areas, where villages should not be considered large built-up areas ⁷⁰ . There is no definition within the 2024 NPPF or PPG of a large built-up area.	See 4.2.3.1
6		Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose (a)?	The updated PPG includes a series of illustrative features considered to inform contribution assessment for Purpose (a). For strong contribution, PPG illustrates that assessment areas are “ <i>likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development.</i> ” It goes on to state that stronger areas are likely to be “ <i>adjacent or near to a large built-up area</i> ”, and if developed would “ <i>result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt</i> ” ⁷¹ .	See 4.2.3.2
7		Are the definitions of towns consistent in consideration of the new PPG?	PPG clarifies that purpose (b) relates to the merging of towns, not villages ⁷² .	See 4.2.4.1
8		Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose (b)?	The updated PPG includes a series of illustrative features considered to inform contribution assessment for Purpose (b). For strong contribution, PPG illustrates that assessment areas are likely to be “ <i>free of existing development</i> ” and form a “ <i>substantial part of a gap between towns</i> ”, the “ <i>development of which would be</i>	See 4.2.4.2

⁶⁹National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph 008 Reference ID: 64-008-20250225

⁷⁰ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 005 Reference ID: 64-005-20250225

⁷¹ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 005 Reference ID: 64-005-20250225

⁷² National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 005 Reference ID: 64-005-20250225

No.	Topic	Question	Link to new national Green Belt policy (2024 NPPF) and guidance (2025 PPG)	Relevant section where this review question / topic is explored
			<i>likely to result in the loss of visual separation of towns”⁷³</i> . It is implied that the term ‘substantial’ in respect of a gap between towns is relative to the context within which the Green Belt is located.	
9		Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose (c)?	The 2024 NPPF and updated PPG do not amend or introduce new requirements specifically for purpose (c). The PPG states that openness consists of both visual and spatial aspects, and that the degree of activity on a site can also impact overall openness ⁷⁴ . For completeness, a short description of how the existing Green Belt assessment work assessed this purpose is provided in Section 4.	See 4.2.5.1
10		What does the assessment consider as ‘historic towns’?	Updated PPG does not provide clear definitions on what constitutes a ‘historic town’ but does clarify that this purpose relates to historic towns, not villages ⁷⁵ . It sets out that where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. However, assessment of contribution to purpose (d) facilitates grey belt assessment ⁷⁶ . Planning Advisory Service (PAS) advice is that in practice, purpose (d) is likely to relate to very few settlements given that <i>‘in most towns there already are more recent developments between the historic core, and the countryside between the edge of the town’⁷⁷</i> .	See 4.2.6.1
11		Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose (d)?	Updated PPG provides illustrative features for various levels of contribution to purpose (d), where strong contribution is considered to be <i>“free of existing development”</i> and form part of the setting of the historic town(s), make considerable contribution to the special character of historic town(s), which could be due to being located within, adjacent to or of significant visual important to the historic aspects of the town ⁷⁸ .	See 4.2.6.2

⁷³ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 005 Reference ID: 64-005-20250225

⁷⁴ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 013 Reference ID: 64-013-20250225

⁷⁵ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 005 Reference ID: 64-005-20250225

⁷⁶ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 005 Reference ID: 64-005-20250225

⁷⁷ PAS/LGA (2015) Planning on the Doorstep: The Big Issues – Green Belt.

⁷⁸ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 005 Reference ID: 64-005-20250225

No.	Topic	Question	Link to new national Green Belt policy (2024 NPPF) and guidance (2025 PPG)	Relevant section where this review question / topic is explored
12		Do the strategic contribution assessment criteria align with the new PPG for making judgments against purpose (e)?	The 2024 NPPF and updated PPG do not amend or introduce new requirements for purpose (e). Nevertheless, it is now considered important to retain purpose (e) as an overarching assessment to inform the later ‘fundamentally undermine’ test set out in paragraph 146 of the 2024 NPPF.	See 4.2.7.1
13	Amendments to Green Belt	Does the strategic / Stage 1 assessment make recommendations for amendments to the Green Belt?	The review of Green Belt boundaries for reasons of authorities being unable to meet their identified need for homes now constitutes grounds for Exceptional Circumstances to release Green Belt land (NPPF 2024, para 146). The new requirement to consider Green Belt land to meet housing and other requirements is mitigated at a high-level by an additional test introduced in paragraph 146, in which LPAs will have to demonstrate in any Exceptional Circumstances case. The test stipulates that Green Belt boundaries should not be altered where that would “<i>fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan</i>” (NPPF 2024, paragraph 146). NPPF 2024 paragraph 148 introduces a sequential approach to the release of Green Belt land: “<i>Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.</i>”	See 4.2.8.1
14	Grey belt identification	How does the assessment deal with NPPF Footnote 7 constraints?	The PPG now states that when making judgements as to whether land is grey belt, their contribution to purposes (a), (b) and (d) needs to be considered⁷⁹. Footnote 7 identifies a number of constraints which may preclude land from being considered as grey belt. The PPG provides further guidance on how footnote 7 should be applied when identifying land as grey belt, including that authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7. The PPG states that grey belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. In reaching this judgement, authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7⁸⁰. Where this is the case, it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals.	See 4.2.9.1

⁷⁹ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 005 Reference ID: 64-005-20250225

⁸⁰ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 006 Reference ID: 64-006-20250225

No.	Topic	Question	Link to new national Green Belt policy (2024 NPPF) and guidance (2025 PPG)	Relevant section where this review question / topic is explored
15		Is the approach taken to the assessments against the purposes of the Green Belt suitable for them to be used for conducting Grey Belt identification?	The updated NPPF and PPG set out that grey belt is a sub-set of Green Belt. PPG sets out that in assessing their Green Belt, it will in most cases be necessary for authorities to divide their Green Belt into separate assessment areas for the purpose of identifying grey belt⁸¹. PPG also implies that grey belt identification follows evaluation of the contribution to purposes (a), (b) and (d), and whether the footnote 7 areas would provide a ‘strong reason for refusing or restricting development of the assessment area’, prior to identifying if the proposed release or development of the assessment area(s) would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt⁸².	See 4.2.9.2

⁸¹[National Planning Practice Guidance \(PPG\) \(2025\). Green Belt Paragraph: 004 Reference ID: 64-004-20250225](#)

⁸² [National Planning Practice Guidance \(PPG\) \(2025\). Green Belt Paragraph: 003 Reference ID: 64-003-20250225](#)

A.2 Appeals

It is useful and necessary to examine case law as it provides guidance on the interpretation of key terms/concepts within the NPPF, hence increasing the robustness of the study as a whole. It is important to consider the impact of these judgements on Green Belt Assessment methodologies and approaches since Inspectors may consider this at Independent Examination as was the case in North Hertfordshire, where the council was asked to review Green Belt outcomes with respect to recent judgements.

A.2.1 Spatial and visual openness

Paragraph 142 of the NPPF states that one of the fundamental characteristics of the Green Belt is its openness. The PPG states that openness consists of both visual and spatial aspects, and that the degree of activity on a site can also impact overall openness. There have been various appeals that have highlighted the important considerations surrounding the interpretation of ‘openness of the Green Belt’ and are therefore relevant to the assessment of the land against Green Belt purposes.

The Turner judgement (2016)⁸³ highlighted important considerations on openness. It states that the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Greenness is also a visual quality, and the preservation of the visual openness should also be considered.

‘There is an important visual dimension to checking “the unrestricted sprawl of large built up areas” and the merging of neighbouring towns, as indeed the name “Green Belt” itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside, and “safeguarding the countryside from encroachment” includes preservation of that quality of openness. The preservation of “the setting ... of historic towns” obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields.’

Appeal cases in Three Rivers⁸⁴ and Cheshire West and Chester⁸⁵ further highlight the need to carefully consider ‘openness’. In the former case, the Inspector concluded the proposal for three dwellings should be allowed as it constituted limited infill development in a village and formed appropriate Green Belt development, therefore the impact of the proposal on openness did not need to be assessed. However, that being said, the Inspector concluded that, regardless, any possible impact on openness would be offset by the removal of an existing structure with a similar footprint to the proposed development.

‘I therefore conclude that the proposal would constitute limited infill within a village and would therefore not be inappropriate development within the Green Belt. Accordingly, there is no need to examine if very special circumstances exist to outweigh any harm arising from inappropriateness. ...

In view of my finding that the proposal is not inappropriate development, the impact on openness does not fall to be formally considered, but the impact of proposal on the openness of the Green Belt would be offset to a large degree by the removal of the barn that has a similar footprint to the proposed houses.’

A case in Cheshire West and Chester concerned plans for a new home to be developed on previously developed land designated as Green Belt. The site concerned was a builder’s yard on the edge of a washed over village. The Inspector concluded that it could not be considered infill development, given that it was widely spaced from neighbouring houses and had frontages onto different roads. Further the development

⁸³ Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin)

⁸⁴ Planning Inspectorate (2018) Appeal Ref: APP / P1940/W/17/3183388 – Clovercourt Ltd v Three Rivers District Council

⁸⁵ The Planning Inspectorate (2018) Appeal Ref: APP/ A0665/ W/ 17/ 3190601 – Clegg v Cheshire

would urbanise the site and its surroundings, thereby diminishing the openness of Green Belt. The appeal was accordingly dismissed as follows.

'Indeed, in line with the 2016 Turner v Secretary of State and East Dorset Council judgement the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Such an approach would be far too simplistic and ignore the wider aspects of openness which goes beyond the physical effect of buildings or structures. Factors relevant include how built up the Green Belt is now and how built up would it be after development has taken place. Consequently, although it may be accepted that the proposal to redevelop a brownfield site may result in a reduced volume and footprint compared to the buildings and structures currently in place, there are wider factors that must be taken into account in defining the effect of the proposal on openness.'

In assessing the matter of openness there are a number of ways of determining whether there would be encroachment into the Green Belt. The effect of development as encroachment on the countryside may be in the form of loss of openness or intrusion. The Framework identifies that openness is an essential characteristic of the Green Belt.'

The Secretary of State⁸⁶ approved plans to build a replacement secondary school and new homes on land designated as Green Belt east of Guildford, after ruling that 'very special circumstances' had been demonstrated. He agreed with the Inspector that the scheme represented a significant development in the Green Belt which would, inevitably and significantly reduce its openness and would erode the open context of the village. Noting the substantial harm to the Green Belt, however, he ruled that the provision of new housing and a new school carried greater weight.

The Inspector's note⁸⁷ for this appeal highlighted some key considerations in relation to Green Belt, which are relevant to this assessment:

- The two essential attributes of the Green Belt are its permanence and openness, in line with NPPF (paragraph 142);
- The key element to assess is the effect that a development has on the openness of the Green Belt;
- The 'concept of 'openness' is generally considered to be land being free from built development.'; and
- Although openness should be assessed on an individual site/area basis, the cumulative impact on the Green Belt of development on adjacent sites/areas should be considered.

The Supreme Court in R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] UKSC 3⁸⁸ has provided important clarity as to the interpretation of the openness of the Green Belt and the relationship between 'openness' and 'visual impact' within the planning judgement of the decision maker. The judgment highlighted the important distinction in planning decisions between planning judgement and legal interpretation of planning policy. While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, will not be a strict nor mandatory determinative factor.

On the interpretation of 'openness' and the issue of 'visual impact' it was noted that:

'The concept of "openness" in para 90 of the NPPF [now para 142] seems to me a good example of such a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: "to prevent urban sprawl by keeping land permanently open ...". Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As PPG2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development.'

⁸⁶ Ministry of Housing, Communities and Local Government, Secretary of State (2018) Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd and The Howard Partnership Trust

⁸⁷ The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

⁸⁸ <https://www.supremecourt.uk/cases/uksc-2018-0077.html>

Importantly, the Supreme Court reinforced the importance of planning judgement within the role of the decision maker by stating:

‘[Openness] is a matter not of legal principle but of planning judgement for the planning authority or the inspector.’

In appeal decision APP/M3645/W/24/3354630 (14th March 2025)⁸⁹ the appellant’s site was in use as a storage yard for construction materials, equipment and machinery and the inspector adjudged that the intensity of activity and use meant that the site’s existing state made a limited contribution to Green Belt openness. In addition, the inspector noted that hedgerows around the site formed a defensible boundary which screened views of the storage yard, resulting in negligible impacts on visual openness.

In contrast, appeal APP/C4615/W/24/3345744 (2nd April 2025)⁹⁰ was dismissed by the inspector as it was adjudged that existing mature planting around the site perimeter was insufficient to screen the proposed development from adjacent rights of way, and that the proposed battery storage system would therefore be visually intrusive in its rural location.

A further lesson from the judgement of Baroness Taylor in appeal APP/P1940/W/24/3346061 (12th May 2025),⁹¹ within Three Rivers District, is the confirmation that substantial weight does not have to be given to any harm to the Green Belt deriving from harm to its openness where a proposed development is not inappropriate in the Green Belt (in this case a large data centre deemed to be on grey belt). The ruling also confirms that country parks (one element of the development proposal) preserve openness providing there is not significant built development on them.

A.2.2 Definition of sustainable locations

Paragraph 155 of the NPPF sets out four criteria that, if all met, would make any development appropriate in the Green Belt. Criterion (c) of paragraph 155 is that the development would be in a sustainable location, with reference to paragraphs 110 and 115. These paragraphs have a focus on access to sustainable transport and active travel modes; paragraph 110 states that “development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes”. Paragraph 115 requires that in assessing development sites it should be ensured that sustainable transport modes are prioritised, and that safe and suitable access to the site is available for all users.

In C Hall’s judgement in appeal APP/T2215/W/24/3354290 (26th February 2025)⁹², the inspector determined that one of the core principles of the Framework is to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling”, and that the nine dwellings proposed on the appellant’s site at Newington Farm would be highly reliant on private cars due to limited access to local services and facilities by other transport modes. The inspector therefore dismissed the appeal, judging that the site was not in a sustainable location and did not satisfy the criteria in paragraph 155(c).

This point of view was also advanced by A Knight in their judgement in appeal APP/B1930/W/24/3342701 (3rd February 2025)⁹³. In this case the site was determined to be in a sustainable location, satisfying paragraph 155 criterion (c), due to suitable access to public transport as the site had good pedestrian connections to local bus networks.

The judgement of A Wright in appeal APP/B1930/W/24/3349988 (19th March 2025)⁹⁴ builds on this principle. The appellant’s site was within 650m of the nearest bus stop, and the inspector determined that local facilities and services could be accessed within acceptable, comfortable or realistic walking distances as

⁸⁹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354630&CoID=0>

⁹⁰ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3345744&CoID=0>

⁹¹ https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf

⁹² <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0>

⁹³ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3342701&CoID=0>

⁹⁴ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3349988&CoID=0>

outlined in the Manual for Streets and other guidance. However, the inspector judged that the rural, unlit nature of the route and distances to bus stops and services did not satisfactorily meet the criteria of being accessible to all, or at all times (as outlined in NPPF paragraph 115), therefore making the site not sustainable under paragraph 155 criterion (c).

The judgement of Baroness Taylor in appeal APP/P1940/W/24/3346061 (12th May 2025),⁹⁵ within Three Rivers District, builds on this principle. Baroness Taylor took in to account the definition of the nearby settlement, Abbots Langley, in the Core Strategy Spatial Strategy, as one of six key centres in the District. The fact that the Spatial Strategy describes these centres as the most sustainable locations in the District constituted a reason to describe the site as sustainable. Additionally, Baroness Taylor noted that the Council had already considered and stated the site as appropriate for housing and that were housing to be delivered here it would be seen as sustainably located on the edge of a growth settlement, further influencing the judgement that the proposed development was in a sustainable location.

A.2.3 Grey Belt in unsustainable locations

In the Newington Farm decision APP/T2215/W/24/3354290 (26th Feb 2025)⁹⁶ noted above, the appeal was dismissed due to the site being in an unsustainable location. This decision was made despite the site being identified as grey belt land. The inspector adjudged that the site did not contribute to purpose (a), (b) or (d), and additionally that as it was contained within the boundary of an existing farm which included existing buildings and hardstanding, it made a limited contribution to openness. As such it did not fundamentally undermine the performance of the wider Green Belt. Being in an unsustainable location due to distance from local services and public transport options however made development inappropriate.

Similarly, Inspector D Lewis judged in appeal decision APP/Z0116/W/24/3342877 (26th Mar 2025)⁹⁷ that a site proposed for development was not in a sustainable location and moreover its location could not be made sustainable. Although the site was agreed by all parties to be grey belt land, not performing strongly against any of the purposes (a), (b), or (d), the unsustainability of the location was determined to render the proposal inappropriate development within the Green Belt, and the appeal was dismissed.

A.2.4 Definition of towns and sprawl

NPPF paragraphs 143(b) and (d) state that the purposes of the Green Belt are to prevent neighbouring towns merging into one another, and to preserve the setting of historic towns. There is no definition given in the NPPF as to what constitutes a ‘town’, but some recent appeal decisions provide some guidance.

In appeal APP/D3640/W/24/3347530 (12th March 2025)⁹⁸, an inspector ruled that the settlements of Bagshot and Windlesham did not constitute towns, being instead “villages of varying scales”, and that the appellant’s site which fell in between the two settlements therefore did not play a role with respect to paragraph 143(b). Both Bagshot and Windlesham had been defined as towns in the LPA’s GBA, but the inspector ruled that this carried less weight than the council’s Core Strategy, in which the settlement hierarchy defined Bagshot as a large village and Windlesham as a smaller village. The inspector also opined that even if both settlements were considered towns, that the parcel of land in their view would not materially erode the gap between them if released for development. Given that the site did not play a role with regards to paragraph 143(b), the inspector determined that it constituted grey belt land.

The judgement in appeal APP/H2265/W/24/3347410 (13th February 2025)⁹⁹ also provides guidance on the interpretation of Green Belt purposes with regard to preventing urban sprawl and the merging of neighbouring towns. The appellant’s site was argued by the council to play a role in preventing urban sprawl

⁹⁵ https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf

⁹⁶ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0>

⁹⁷ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3342877&CoID=0>

⁹⁸ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3347530&CoID=0>

⁹⁹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0>

as the proposals would contribute to ribbon development along the A20, however the inspector judged that paragraph 143(a) refers only to the unrestricted sprawl of large built-up areas. The nearest settlement (Wrotham) was judged to be a village and therefore not of relevance to this purpose, so the inspector determined that although the site would contribute to ribbon development, this did not amount to the unrestricted sprawl of a large built-up area. The same appeal judgement also stated that London is the most relevant large built-up area in this case with respect to paragraph 143(a), and that the site in question therefore did not perform strongly against this purpose.

In appeal APP/G5180/W/24/3354266 (31st March 2025)¹⁰⁰, the inspector judged that the neighbouring settlements of Chislehurst, Bickley and Petts Wood had the character of local centres rather than distinct towns as they have significantly merged. As such the appellant's site had an essentially suburban setting and could not be considered to play a role with regards to preventing neighbouring towns from merging. Given this context, the inspector additionally judged that the site could not play a role in preserving the setting or special of historic towns and the site did not fulfil the purposes set out in paragraphs 143(b) or (d).

In appeal APP/M1520/W/24/3351658 (15th April 2025) the Inspector acknowledged that the settlement of Daws Heath in Essex had been classed as a town in the latest GBA and a village in other development plan documents. The Inspector deemed Daws Heath to be a village for the purposes of judging an appeal site close to the settlement on the basis stated that as services and facilities are limited and Daws Heath is not of a large scale, it must be considered a village. The Inspector reiterated that the appeal site could not, therefore, contribute to purposes (a) or (b) given this relates to large built-up areas and towns rather than villages.

A.2.5 Scale, granularity and proportionality of assessment parcels

In determining a series of six appeals – APP/H1515/W/24/3341474-79 (16th Jan 2025)¹⁰¹ – Inspector T Gilbert-Wooldridge noted that all parties to the appeals agreed that the six parcels of land in question would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area. The reasoning behind this was that the parcels were small in size compared to the ‘considerable extent’ of the Green Belt across the borough (Brentwood). The inspector adjudged that the sites’ scale caused them to make no more than a limited contribution to checking the unrestricted sprawl of large built-up areas.

Additionally, the inspector stated the following: “Looking at parcels is helpful in a strategic sense to inform plan making and future development growth. However, for decision making, it seems more relevant to look at a site-specific level for determining grey belt land, otherwise the scale could be too large and skewed by land some distance from the actual site”. This aligns with the text of the Green Belt PPG, which indicates that, when identifying grey belt land, using a small number of large parcels will generally not be an appropriate approach and assessment areas should be sufficiently granular to enable their varied contributions to the Green Belt purposes to be functionally determined.

In the Wrotham appeal covered above – APP/H2265/W/24/3347410 (13th Feb 2025)¹⁰² – the inspector noted that the proposal would represent an irreversible encroachment of built form into open and undeveloped countryside. However, it was adjudged that the site's area would be small in relation to the totality of the Green Belt within the borough, and that it would therefore not fundamentally undermine the purposes of the Green Belt across the local authority area. As in the Brentwood example, the local authority in this instance (Tonbridge & Malling) was covered by over 70% Green Belt by total area, resulting in the impact of the release of a small land parcel being judged to be proportionally much less significant.

A.2.6 Footnote 7 land

A further lesson to be drawn from the Wrotham appeal – APP/H2265/W/24/3347410 (13th Feb 2025)¹⁰³ – is that the presence of a footnote 7 designation on a site does not automatically mean a proposal will be

¹⁰⁰ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354266&CoID=0>

¹⁰¹ <https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=60702043>

¹⁰² <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0>

¹⁰³ *ibid.*

refused. The site in question was within the Kent Downs National Landscape, but the inspector adjudged that the proposal would only have a “limited and localised” impact on the protected landscape, therefore not providing the ‘strong reason’ for refusal required by paragraph 006 of the Green Belt PPG.

A.3 Review of Green Belt Assessments elsewhere

In the absence of full guidance to carry out GBA, it is helpful to consider experience elsewhere to identify potential good practice. It should be noted that the timescales for undertaking all of the studies reviewed pre-date the (latest) NPPF, and some of the studies had not been subject to Independent Examination. In identifying good practice from the approaches adopted by other authorities, these factors were taken into account to ensure the methodology adopted is sound and reflects the latest requirements of the 2024 NPPF.

A review of Green Belt evidence bases in the following authorities was undertaken to inform this study:

Neighbouring authorities

- London Borough of Havering
- Brentwood Borough Council
- Basildon Borough Council
- Castle Point Borough Council

Authorities elsewhere

- London Borough of Bexley
- London Borough of Bromley
- Gravesham Borough Council
- Tandridge District Council
- Dartford Borough Council
- Tonbridge and Malling Borough Council
- Tunbridge Wells Borough Council
- Wealden District Council
- Authorities elsewhere
- Aylesbury Vale District Council
- Central Bedfordshire
- Dacorum Borough Council
- Chiltern District Council and South Bucks District Council
- Hertsmere Borough Council
- North Hertfordshire District Council
- Royal Borough of Windsor and Maidenhead
- Runnymede Borough Council
- Spelthorne Borough council
- Three Rivers Borough Council and Watford Borough Council
- Wycombe District Council
- Welwyn Hatfield Borough Council

A.4 Proformas