

COUNCILLORS' BRIEFING NOTE

RA50 AND RA51

Green Belt Assessment and Potential Grey Belt
Summary of Evidence Submission for Reassessment
17 August 2026
Wyburns Area Residents

Briefing status: this note is a concise summary of the accompanying RA50 and RA51 Evidence Submission for Reassessment. It does not replace the full report, which contains the detailed evidence, source references, maps, comparator analysis and qualifications.

1. Purpose of this briefing

This note summarises the principal findings of the accompanying evidence submission concerning Green Belt parcels RA50 and RA51 to the south-east of Rayleigh.

The July 2026 LUC/Rochford District Council Green Belt Assessment identifies both RA50 and RA51 as potential grey belt. The evidence now assembled raises substantial questions about whether those conclusions are sufficiently robust and whether the parcels have been assessed at the correct spatial scale.

The request is not that councillors simply substitute one opinion for another. It is that the Council requires the disputed findings to be properly reassessed before they are relied upon in progressing the Local Plan.

2. Why this matters

Under the Green Belt grey-belt test, land which **strongly contributes to Purpose A, B or D** does not satisfy the Green Belt contribution limb of the grey-belt definition.

The sequence therefore matters: first define the correct assessment area -> then assess its Green Belt contribution -> only then determine whether it is grey belt.

If land making a Strong contribution has been combined with weaker or more developed land and averaged down to Moderate or Weak/No, the resulting grey-belt conclusion may be unreliable.

This is particularly important for RA50 and RA51 because both contain materially different types of land and Green Belt relationships.

3. RA51 - the clearest Purpose A concern

LUC rates RA51 Moderate for Purpose A - checking the unrestricted sprawl of large built-up areas. There is a substantial case that this should be reassessed as Strong, or that Strong-performing parts of RA51 should be separately assessed.

Eastwood Brook is an Environment Agency Main River and, together with its established vegetation, forms part of the physical relationship between the existing southern edge of Rayleigh and the open Green Belt beyond. LUC's published RA51 Purpose A reasoning does not expressly assess the Brook in this role.

This matters because LUC's own methodology states that breaching a significant existing physical feature which currently restricts and contains a built-up area can create an incongruous pattern of development. A river is expressly recognised as the type of feature capable of performing that function.

The fact that the A127 could form a strong boundary after development does not answer the separate question of whether development would first cross an existing feature currently containing Rayleigh.

There is also unusually strong local evidence. In October 2025 a Planning Inspector concluded that land physically within RA51 strongly contributed to preventing the unrestricted sprawl of Rayleigh. Rochford District Council relied upon and reaffirmed that reasoning in July 2026, only days before the LUC assessment was published.

Earlier 2020 Green Belt work also assessed Lower Wyburns Sites 68 and 69 as making a Strong contribution to checking sprawl.

The Council should therefore explain why the 2026 RA51 assessment reaches a materially different conclusion.

4. RA50 - Purpose A also requires reassessment

LUC rates RA50 Moderate for Purpose A.

RA50 is predominantly open and LUC itself recognises physical features capable of restricting and containing development. The evidence submission asks the Council to determine specifically where Eastwood Brook presently performs a settlement-containment function.

Where land lies beyond a Brook-defined existing containment feature, there is a serious case for Strong Purpose A. If other parts of the 22.42-hectare parcel perform differently, the appropriate response is subdivision rather than averaging the whole parcel down.

This is consistent with LUC's treatment of other Rayleigh parcels where development beyond an existing watercourse, woodland or other physical separator has been rated Strong even though a road or other feature could contain development farther out.

5. Purpose B - preventing neighbouring towns merging

LUC gives both RA50 and RA51 a Weak/No contribution.

The submitted evidence considers at least Moderate to be the appropriate position requiring assessment.

LUC's own methodology distinguishes land forming a 'small' part of a gap, which can still provide some degree of visual separation, from a 'very small' part which effectively provides none.

RA50 and RA51 contain substantial open and vegetated land and sit within the wider Rayleigh-Southend-on-Sea separation landscape. RA49 immediately to the east is already rated Strong Purpose B.

The Council is therefore asked to explain why development of RA50 and RA51 would have a negligible rather than at least some effect on separation and to assess stronger components separately where appropriate.

6. Purpose D - historic Rayleigh

LUC accepts that RA50 and RA51 form part of the setting of historic Rayleigh but gives both parcels Weak/No Purpose D contribution on the basis that they contain none of the features contributing to its setting or special character.

That factual premise now requires reconsideration.

Evidence assembled for the submission identifies a much wider historic landscape including Eastwood Brook, the Essex Historic Environment Record evidence for Rayleigh Medieval Deer Park, historic routes and boundaries, long-standing farmstead relationships, surviving earthworks and basin landforms, and documentary evidence for medieval and later park, water, fishery, milling and estate organisation around Rayleigh and Eastwood.

The argument does not depend upon proving that any particular surviving earthwork is a medieval mill dam, that a basin is definitely a medieval mill pond, or that a surviving boundary is definitely the medieval park pale.

Those archaeological interpretations remain open to professional investigation.

The more important point is that there is already sufficient evidence of surviving historic-landscape relationships to challenge the categorical finding that the parcels contain none of the features contributing to historic Rayleigh.

The submission therefore asks for the Strong Purpose D criterion to be expressly assessed for the coherent Eastwood Brook historic-landscape component of RA50 and the coherent Lower Wyburns-Eastwood Brook component of RA51, with subdivision where other land performs differently.

7. Parcel size and averaging

One of the most important issues is the way the assessment areas have been drawn.

RA50 covers approximately 22.42 hectares and RA51 approximately 13.26 hectares. They contain open fields and paddocks, woodland and tree belts, the Brook corridor, historic-landscape features, school/allotment land, scattered dwellings and more developed or urban-influenced areas.

LUC's own methodology is intended to prevent materially different Green Belt contributions being averaged together.

Annex E of the August 2026 National Planning Policy Framework reinforces this principle, subject to applicable plan-making transitional arrangements, by stating that assessment areas should be small enough to reveal variations in contribution and be subdivided where necessary.

The Council should therefore establish whether RA50 and RA51 are genuinely homogeneous enough to justify a single rating for each purpose.

8. What councillors are being asked to support

1. Treat the existing RA50 and RA51 Purpose A, B and D ratings, and the resulting potential-grey-belt findings, as formally disputed pending reassessment.
2. Require RDC/LUC to use the Council's original GIS to verify Eastwood Brook, parcel boundaries and other boundary-sensitive relationships and to subdivide parcels where materially different Green Belt contributions occur.
3. Require RA51 Purpose A to be expressly reassessed against Strong, taking account of Eastwood Brook, the 2025 Planning Inspector's finding, RDC's July 2026 position, the previous Strong Sites 68/69 findings and LUC's own comparator parcels.
4. Require RA50 Purpose A to be reassessed specifically against the distinction between existing containment by Eastwood Brook and future containment by the A127.
5. Reassess the Weak/No Purpose B findings for both parcels against LUC's own gap and visual-separation methodology.
6. Obtain advice from Essex County Council Place Services, the Essex Historic Environment Record team or another suitably qualified historic-environment specialist before relying upon the existing Purpose D conclusion that there are no relevant historic-Rayleigh features.
7. Where reassessment identifies Strong Purpose A, B or D for a whole parcel or an appropriately defined part of one, amend the Green Belt rating and consequential grey-belt conclusion accordingly.

9. Conclusion

The evidence does not support treating the July 2026 potential-grey-belt findings for RA50 and RA51 as settled.

RA51 has a particularly substantial Strong Purpose A case. RA50 has a serious Strong Purpose A case for Brook-defined land. Both parcels also contain coherent historic-landscape components for which Strong Purpose D should be expressly tested.

The central request to councillors is therefore straightforward:

Do not allow RA50 or RA51 to be relied upon as established grey-belt land until the Council has reassessed the disputed Green Belt contributions at the correct spatial scale, considered the submitted evidence base and given a reasoned response to the identified inconsistencies.

The accompanying full Evidence Submission for Reassessment provides the detailed evidence, source references, maps, comparisons and qualifications supporting this briefing.