

GREEN BELT ASSESSMENT REVIEW: RA50 AND RA51

with landscape-scale consideration of RA49–RA52

Purposes A, B and D

Evidence Submission for Reassessment

17 August 2026

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Research status: ongoing. This submission records the evidence currently available and remains open to supplementation as further archaeological, documentary, landscape, GIS and other relevant evidence becomes available.

Purpose and status

This report challenges the July 2026 LUC/Rochford District Council Green Belt assessment of RA50 and RA51, with RA49 and RA52 used where necessary to understand the wider landscape and Green Belt relationships. Its purpose is to test whether the published ratings are robust and whether any higher contribution ratings are supported by the available evidence under Purposes A, B and D, and whether the consequential identification of RA50 and RA51 as potential grey belt is robust.

The review is an evidence submission about the Council's Green Belt evidence base. Professional documents are identified by their author and document title. Where a technical document independently records an existing physical fact, that fact is used for the proposition it supports.

The report advances the strongest evidence-based case while retaining qualifications only where necessary for factual accuracy. Where materially different parts of a parcel perform differently, subdivision and separate assessment is treated as the appropriate methodological response rather than automatic averaging to a lower rating.

Principal reassessment positions

Parcel / purpose	LUC July 2026	Position advanced in this review	Grey-belt relevance
RA50 A	Moderate	Strong for Brook-defined land where Eastwood Brook is confirmed as an existing containing feature; subdivision if necessary.	Strong would be directly consequential.
RA50 B	Weak/No	At least Moderate; eastern RA49-facing component to be tested for a stronger role.	Moderate alone is not exclusionary; Strong would be.

Parcel / purpose	LUC July 2026	Position advanced in this review	Grey-belt relevance
RA50 D	Weak/No	Strong positively advanced for the coherent Eastwood Brook historic-landscape component; subdivision if necessary.	Strong would be directly consequential.
RA51 A	Moderate	Strong is the principal reassessment position; subdivision is the fallback if the parcel is too heterogeneous.	Directly consequential.
RA51 B	Weak/No	At least Moderate; Strong remains open for a properly defined component if the evidence reaches that threshold.	Moderate alone is not exclusionary; Strong would be.
RA51 D	Weak/No	Strong for the coherent Lower Wyburns-Eastwood Brook historic-landscape component; subdivision if necessary.	Strong would be directly consequential.

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1. Executive summary

The principal conclusion of this review is that the potential-grey-belt findings for RA50 and RA51 should not be treated as robust until the Strong Purpose A and Purpose D cases identified in this review, and the appropriate assessment-area geometry, have been expressly determined.

For Purpose A, the key distinction is between existing containment and future containment. Eastwood Brook is independently identified in the Ardent Consulting Engineers Flood Risk Assessment and Drainage Strategy as an Environment Agency Main River. Its regulatory status is not itself a Green Belt score; its significance is its physical relationship with the present Rayleigh edge. [7]

Where Rayleigh is followed by intervening edge/open land and then Eastwood Brook before the more open Green Belt beyond, development up to the Brook and development which crosses it are analytically different. Once development passes beyond a Brook-defined existing containment line, the settlement edge is advanced through open Green Belt towards the A127. The strength of the A127 as a potential new boundary does not neutralise the prior breach question under LUC §3.57. [3]

For RA50, LUC itself describes the parcel as predominantly open and substantially free from urbanising development, yet also states that physical features in reasonable proximity are restricting and containing development and that their weakening or loss would adversely affect Purpose A. The principal reassessment case is therefore Strong for the Brook-defined land, with subdivision if the wider 22.42 ha parcel is too internally varied for one rating. [4]

RA51 presents an even stronger Purpose A case. Eastwood Brook and its vegetation are absent from LUC's published Purpose A reasoning, while a Planning Inspector in October 2025 found that land physically within RA51 strongly contributed to preventing the unrestricted sprawl of Rayleigh. RDC relied upon and reaffirmed that reasoning in July 2026, only days before LUC's report. Earlier 2020 evidence also rated Lower Wyburns Sites 68 and 69 Strong for checking sprawl while recognising that the A127 and Daws Heath Road could form stronger future boundaries. [15][16][17][18]

For Purpose B, the position advanced is at least Moderate for both RA50 and RA51. LUC's methodology distinguishes a "small" part of a gap, which still provides some degree of visual separation, from a "very small" part, which provides none. Both parcels contain substantial open and vegetated land, with stronger component-level contributions remaining capable of assessment where a granular review demonstrates the necessary function. [3][4]

For Purpose D, LUC accepts that RA50 and RA51 form part of historic Rayleigh's setting but nevertheless concludes that they contain none of the features contributing to that setting or special character. The assembled evidence now identifies Rayleigh-specific relationships including the Essex HER Deer Park evidence, historic routes, historic farmstead continuity, Eastwood Brook, historic boundaries, surviving earthworks and basin landforms, and documented medieval and post-medieval estate organisation across Rayleigh and Eastwood. [5][6][11][12][19][22]-[26]

The Purpose D case does not depend upon proving that EB01 is a medieval mill dam, EB02 or EB08 a mill pond, or any surviving boundary a medieval park pale. The evidence is stronger when expressed at the level it actually supports: a surviving, coherent historic landscape containing physical and experiential relationships with the historically documented rural hinterland of Rayleigh. Strong Purpose D should therefore be positively assessed for the coherent Eastwood Brook component of RA50 and for the coherent Lower Wyburns-Eastwood Brook component of RA51. If other parts of either parcel perform differently, subdivision is the response.

The consequential grey-belt point follows from the contribution assessment. A properly defined assessment area which strongly contributes to any of Purposes A, B or D does not satisfy the Green Belt contribution limb of the grey-belt definition. The assessment-area geometry and contribution ratings must therefore be settled before a parcel-wide grey-belt label is relied upon. [1][2][29]

Overall position: there is a substantial evidence-based basis for Strong Green Belt performance within RA50 and RA51, particularly under Purpose A, together with live Strong Purpose D cases for coherent historic-landscape components. Those questions should be determined before the affected land is treated as grey belt.

2. Scope, policy and methodology

2.1 Policy position and the July 2026 LUC assessment

The July 2026 LUC/Rochford District Council Green Belt Assessment was prepared against the National Planning Policy Framework published in December 2024 and the Green Belt Planning Practice Guidance updated in February 2025. Those were the national policy and guidance documents against which LUC expressly constructed its assessment methodology and parcel ratings. [1][2][3]

A new National Planning Policy Framework was published on 17 August 2026 and replaces the December 2024 Framework generally. Its Annex A contains specific plan-making transitional arrangements. Rochford's published programme still records the Regulation 18/Regulation 19 route. This review does not assume which Annex A category applies: RDC should confirm the transitional basis when responding. The substantive reassessment case does not depend on that answer because the February 2025 PPG and LUC's own July 2026 methodology already contain the relevant granularity and anti-averaging principles. [2][3][29][30]

The August 2026 Framework is nevertheless current national policy. Its Annex E is particularly important because it now states expressly that assessment areas should be small enough to enable variations in Green Belt contribution to be assessed, and that areas should be subdivided into smaller assessment units where necessary to facilitate identification of grey belt. Smaller areas around existing settlements are given as a specific example. [29]

That is not a new argument invented for RA50 or RA51. It reinforces the same anti-averaging principle already present in the February 2025 PPG and LUC's own July 2026 methodology. [2][3]

The current August 2026 grey-belt definition comprises previously developed land and/or other Green Belt land which does not strongly contribute to any of Purposes A, B or D. The former footnote-7 exclusion is no longer part of the definition itself. The July 2026 LUC assessment was prepared under the earlier definition and that historic policy position remains relevant to understanding its published proformas. [1][3][29]

2.2 Controlling assessment principles

Topic	LUC / national provision	Relevance to this review
Granularity / anti-averaging	LUC §§3.7-3.9, 3.17-3.18, 3.29-3.30; Aug 2026 NPPF Annex E	Materially different contributions should not be averaged within oversized assessment areas; areas should be subdivided where necessary.
Recognisable physical boundaries	LUC §§3.8-3.9, 3.47-3.51	Waterways, woodland, roads, topography and field boundaries may define assessment areas and restrict urbanising influence.

Topic	LUC / national provision	Relevance to this review
Existing versus future containment	LUC §§3.31 and 3.57	A feature capable of containing an enlarged settlement after development does not answer whether development first breaches a feature currently containing the existing built-up area.
Purpose B threshold	LUC §§3.60-3.75	A “small” part still provides some visual separation; a “very small” part provides none. The distinction must be applied functionally.
Purpose D	LUC §§3.90-3.105 / Appendix B	Visual, physical and experiential relationships, routes, parkland and linear historic landscapes can contribute to historic-town setting and special character.

2.3 Evidence discipline

Evidence is identified by what it actually establishes. An entire source is not treated as weak merely because one interpretation within it remains provisional.

- ⌚ Weight is proposition-specific. Ardent is relied upon for the recorded physical location and status of Eastwood Brook, not for a Green Belt rating; Tetra Tech for the HER and archaeological material it records; the Eastwood Brook assessment for observed physical features while date/function interpretations remain provisional; and the Inspector/RDC material for the spatial reasoning actually applied to land within RA51. No source is treated as globally high or low weight.

2.4 Factual, spatial and interpretative status

- ⌚ Established source fact - directly evidenced by an identified policy document, official record, professional technical report, archive record, historic map or recorded physical observation.
- ⌚ Derived spatial finding - obtained by cross-reading parcel mapping, coordinates, professional plans and other mapped sources. Where precision could affect the rating, RDC/LUC should verify the relationship through original GIS.
- ⌚ Site-derived reconstruction - a reconstructed route, boundary or landscape relationship supported by site knowledge and mapping but not survey-grade.
- ⌚ Provisional archaeological interpretation - an interpretation of date, function or relationship capable of testing through specialist investigation.

2.5 Method for dealing with uncertainty

1. Where exact location may materially affect a rating, the response is GIS verification, not an assumption against the stronger contribution.
2. Where materially different parts of a parcel appear to perform differently, the response is granular reassessment or subdivision, not automatic averaging to Moderate or Weak/No.
3. Where archaeological date or function is unresolved, that uncertainty does not remove separately evidenced historic routes, estate organisation, farmstead continuity, watercourses or physical/experiential relationships.
4. Where LUC's conclusion depends upon a factual premise challenged by identifiable evidence, the assessment should explain how that evidence was considered and why the published rating remains justified if retained.

2.6 Purpose D - two-stage reassessment

Stage 1 is adequacy of the evidence base: what Rayleigh-specific historic-environment evidence was considered before the categorical “no relevant features” premise was adopted? Stage 2 is classification: once the relevant evidence is assembled, does the land make little/no, some or considerable contribution to Rayleigh’s setting and special character?

Where a coherent historic-landscape component may make a considerable contribution, Strong should be expressly tested. If other areas perform differently, that is a granularity question, not a reason to suppress the stronger component.

2.7 Ongoing evidence

The Green Belt reassessment does not need every archaeological hypothesis to be resolved before the Council addresses the evidence already available. The current submission remains open to material new evidence during the Local Plan process, particularly under Purpose D.

3. LUC baseline and the grey-belt decision chain

3.1 Published LUC ratings

Parcel	Area	A	B	C	D	E	LUC grey belt
RA49	19.88 ha	Strong	Strong	Strong	Weak/No	Equal	No
RA50	22.42 ha	Moderate	Weak/No	Moderate	Weak/No	Equal	Yes
RA51	13.26 ha	Moderate	Weak/No	Moderate	Weak/No	Equal	Yes
RA52	5.11 ha	Moderate	Weak/No	Strong	Weak/No	Equal	Yes

These are the published starting scores. They are not adopted as correct merely because they appear in the July 2026 evidence base. [4]

3.2 Grey belt is consequential, not independent

define assessment area -> assess A/B/D contribution -> determine whether any contribution is Strong -> apply the consequential grey-belt contribution test

The reliability of the grey-belt outcome therefore depends upon both the rating and the assessment-area geometry. If either is materially wrong, the downstream result cannot safely be relied upon.

3.3 Consequence of a Strong A, B or D finding

A Strong contribution under any one of Purposes A, B or D is sufficient to prevent the relevant assessment area satisfying the contribution limb of the grey-belt definition. It is not necessary for every purpose to be Strong. [1][2][29]

This is why granularity comes before the grey-belt label. A Strong-performing component should not first be averaged with weaker-performing land and then called grey belt because the whole-parcel average fell to Moderate.

3.4 Purpose C and the meaning of “grey belt”

RA52 demonstrates that potential grey belt is not a general finding of weak Green Belt performance. LUC rates RA52 Strong for Purpose C but nevertheless identifies it as potential grey belt because Purpose C is not one of the A/B/D contribution purposes used for that element of the definition. [4]

3.5 RA49 and RA52 as substantive local controls

RA49 is a substantive Strong-performing comparator within the same wider Green Belt landscape; RA52 is a strongly wooded/open countryside parcel which helps demonstrate the wider physical structure. Neither should be dismissed as merely contextual. Their parcel-specific scores remain separate, but the reasoning applied to them is relevant to consistency testing.

3.6 Baseline conclusion

The RA50 and RA51 grey-belt outcomes should not be treated as settled while assessment-area geometry, Purpose A and Purpose D remain materially disputed. The correct order is to establish appropriate assessment areas, then contribution ratings, and only then consequential grey-belt status.

Parcel RA50

Parcel RA50

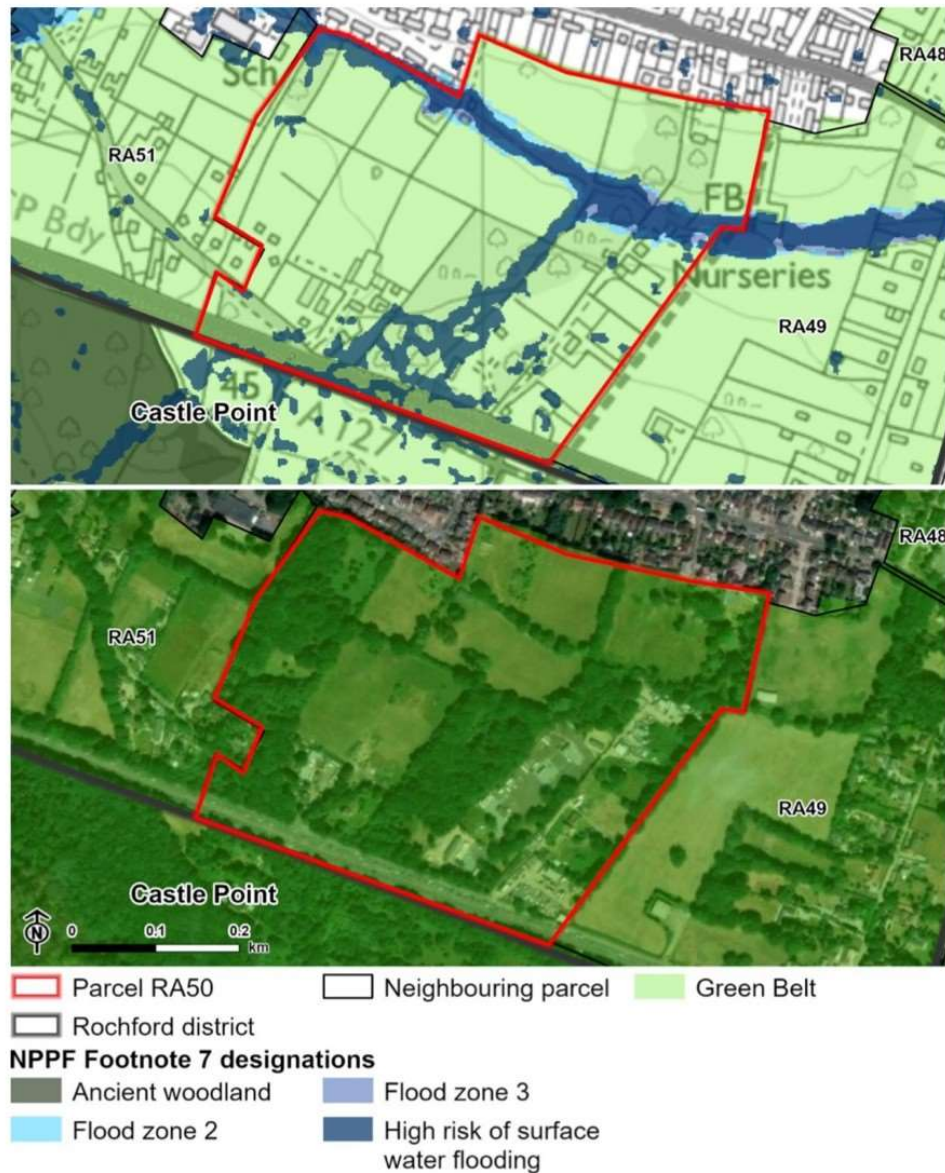


Figure 1. LUC published RA50 parcel map as supplied in the review material. It shows RA50 between the Rayleigh edge and the A127 within the wider south-east Rayleigh Green Belt. Source: LUC/RDC July 2026 parcel mapping.

[4]

4. Common RA49–RA52 physical and historic landscape

4.1 Why the landscape must be understood before parcel ratings are applied

RA49, RA50, RA51 and RA52 are modern assessment areas. Their boundaries are not evidence that the physical or historic landscape stops at those lines. Eastwood Brook, earthworks, basin landforms, historic routes, territorial/property boundaries, farmstead relationships, Deer Park evidence and estate organisation continue across or relate to more than one modern parcel. [5][6][19]

identify physical and historic relationships first -> establish which relationships survive within or through each assessment area -> then assess the contribution of the relevant land under the individual Green Belt purposes

This avoids both artificial fragmentation and inappropriate averaging.

4.2 Eastwood Brook as the physical spine of the landscape

The Ardent Consulting Engineers Flood Risk Assessment and Drainage Strategy identifies Eastwood Brook as an Environment Agency Main River. The preliminary Eastwood Brook historic-landscape assessment records alternating constrictions and broader basin-like landforms, associated earthworks, routes, boundaries and farmstead relationships. [6][7]

For Purpose A, the issue is the Brook's present spatial role in restricting or containing Rayleigh. For Purpose D, the Brook is a surviving physical axis around which historic movement, land division, farmstead organisation and the recorded earthworks are arranged.

4.3 Earthwork and basin sequence

EB01 is recorded at approximately TQ 81810 89652 as a deliberately constructed valley-crossing earthwork, approximately 90 m long, 15 m wide and 2.5-4 m high, occupying a natural constriction. Its construction as an earthwork is an observed physical proposition; date and original function remain separate questions. [6]

Immediately upstream, EB02 is a much broader basin-like landform of approximately eight acres. EB08 is recorded near the Daws Heath Road crossing as a separate upper basin/possible former pond of approximately 1.6 acres. The assessment also records EB03, EB04, EB05 and EB09 as further elements within the same valley. [6]

The current cross-reading places EB01 within RA50 and most of EB02 within RA51, with part of the relationship extending into RA50. Boundary-sensitive attributions should be confirmed using RDC/LUC GIS. The substantive point is that the modern RA50/RA51 line cuts across the surviving valley relationship rather than corresponding to a demonstrated historic or physical break.

4.4 Rayleigh Medieval Deer Park - two independent evidence strands

The Tetra Tech Archaeological Desk-Based Assessment, using Essex HER data, records Rayleigh Medieval Deer Park (HER 46858 / MEX1039678) and states that the recorded south-western boundary encompasses Lower Wyburns study-site land north of Daws Heath Road, with potential for park-management earthworks. [5]

Separately, the Eastwood Brook assessment considers Oliver Rackham's published reconstruction of the Deer Park, whose south-western boundary broadly corresponds with Historic Routeway A and the historic Thundersley boundary. That reconstruction is contextual and interpretative and must not be conflated with the HER polygon. [6]

The evidence therefore establishes a recorded Deer Park relationship with part of Lower Wyburns and a separate possible relationship between a reconstructed park edge and surviving

route/boundary features. Whether individual surviving earthworks represent medieval park management remains open to investigation.

4.5 Historic movement through the landscape

Historic Route A survives as a longstanding route/boundary alignment associated with the historic Thundersley boundary. Route B survives physically as a substantial hollow way with mature trees along parts of its course. Route C has the clearest secure mapped date: the 1798 mapping records a route connecting Daws Heath with Rayleigh, with surviving traces in the Tile Wood/Lower Wyburns landscape. [6][19]

Their importance does not depend on proving that all three routes are medieval or contemporary. LUC's Purpose D method expressly recognises historic routes, parkland and linear historic landscapes as potentially tangible physical or experiential links with historic towns. [3]

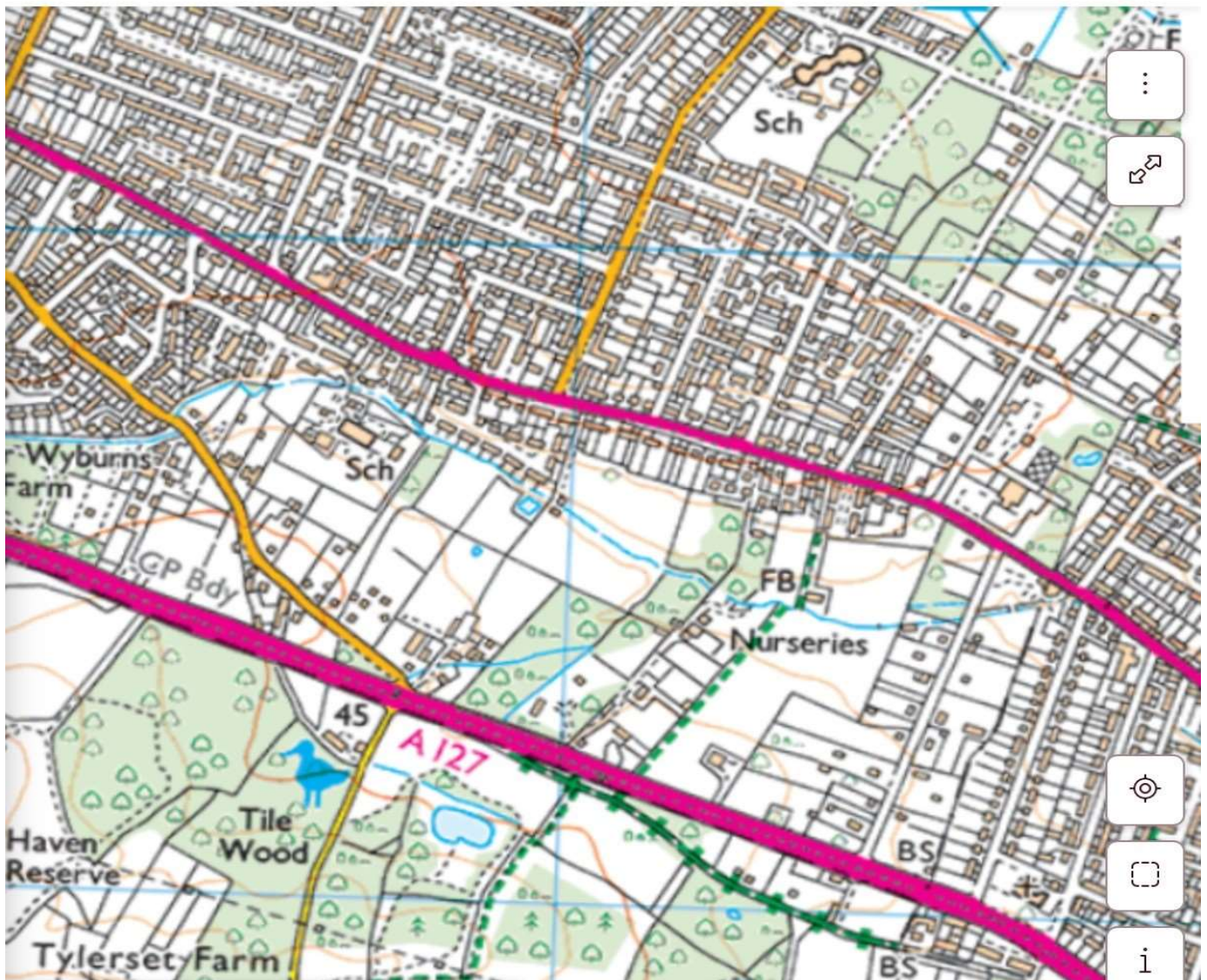


Figure 2. OS-based mapping supplied during the review, illustrating the relationship between Rayleigh's southern edge, Daws Heath Road, Eastwood Brook, the A127 and the wider Lower Wyburns/Tile Wood landscape. Used as spatial context; historic-route continuity remains source-specific. [19]

4.6 Farmsteads, lodges and surviving historic anchors

The wider landscape contains a network of surviving and historically recorded farmstead/lodge relationships. These include Whitehouse Farm, Lower Wyburns/Wyburns, Little Lodge, Eastwood Lodge, Limehouse Farm, Edwards Hall and Tylerset Farm. Several surviving listed buildings provide fixed historic anchors, including White House Farmhouse, Weir Farmhouse, Eastwood Lodge, Tylerset Farmhouse and Barnabys Hotel/The Chase. [6][13]

These buildings do not need to have formed one contemporary estate complex. Their relevance is that the present Green Belt retains tangible survivals of a long-lived rural, farmstead and estate landscape around historic Rayleigh.

4.7 Post-medieval estate organisation - Bury, Kingsman and Stonehewer

Archival evidence independently demonstrates successive phases of estate-scale organisation involving recurring Rayleigh and Eastwood properties through the Bury, Kingsman and later Stonehewer phases. The evidential point is successive organisation of the wider rural landscape, not an uninterrupted medieval-to-modern title chain. The documentary sequence and individual archive references are set out once, in Appendix B. [22]-[26]

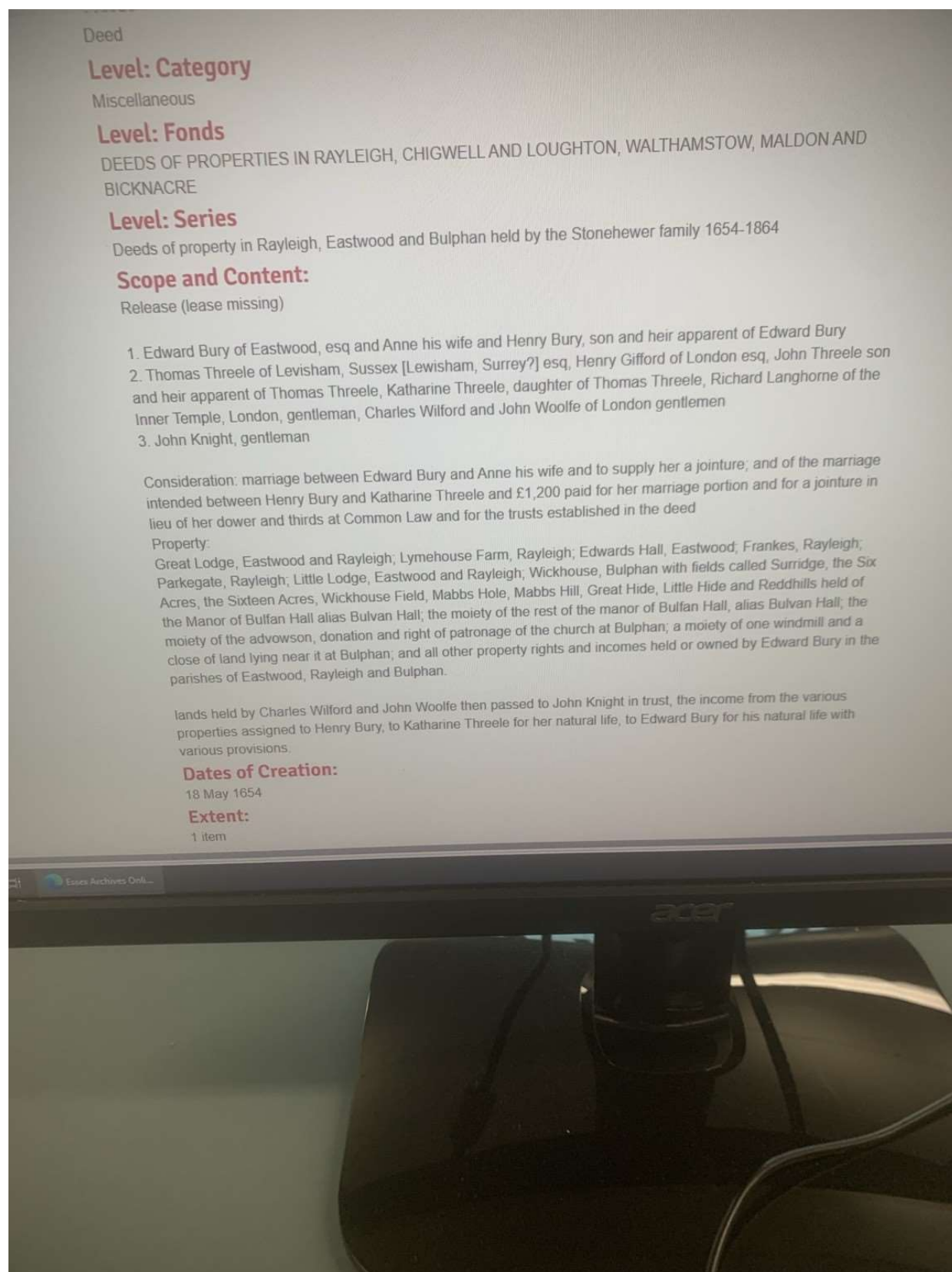


Figure 3. Essex Record Office catalogue extract supplied during the review: 1654 Bury-family release listing recurring Rayleigh/Eastwood properties including Great Lodge, Lymehouse Farm, Edwards Hall, Franks, Parkgate and Little Lodge. Reported source: ERO D/DU 1243/5. [22]

02:10

... 50

Kingsman, spinster late daughter of Jasper Kingsman

5. Richard Bacon of the Middle Temple, London, gentleman

Recites 2 bonds taken out by Henry Bury, one for £1000 to Elizabeth Kingsman and one for £1400 to Jasper Kingsman the elder; mortgage for £350 1 April 1675 from Henry Bury to Edward Bartlett of a moiety of the manor of Bulphan Hall, Little Lodge in Eastwood and Rayleigh, and a moiety of the advowson and right of patronage to the church of Bulphan and all his other estates (except the windmill and close of land which were sold to Bradford Bury); mortgage 2 January 1678 to Jasper Kingsman the elder for £2,060, making a total liability of £3462; mortgage of Lymehouse Farm in Rayleigh for £860, part of the sum of £3462, 4 December 1682 from 1 to 3

In consideration of £1,900 1 grants moiety of manor of Bulphan Hall, Wickhouse Farm, and various fields at Bulphan and advowson of Bulphan church to 2 for remainder of term and then to 3

Dates of Creation:

5 December 1682

Extent:

1 item

essexarchivesonline.co.uk

Figure 4. Essex Record Office catalogue extract supplied during the review: 1682 deed reciting Bury bonds/mortgages involving Jasper Kingsman and Lymehouse Farm. Reported source: ERO D/DU 1243/2. [23]

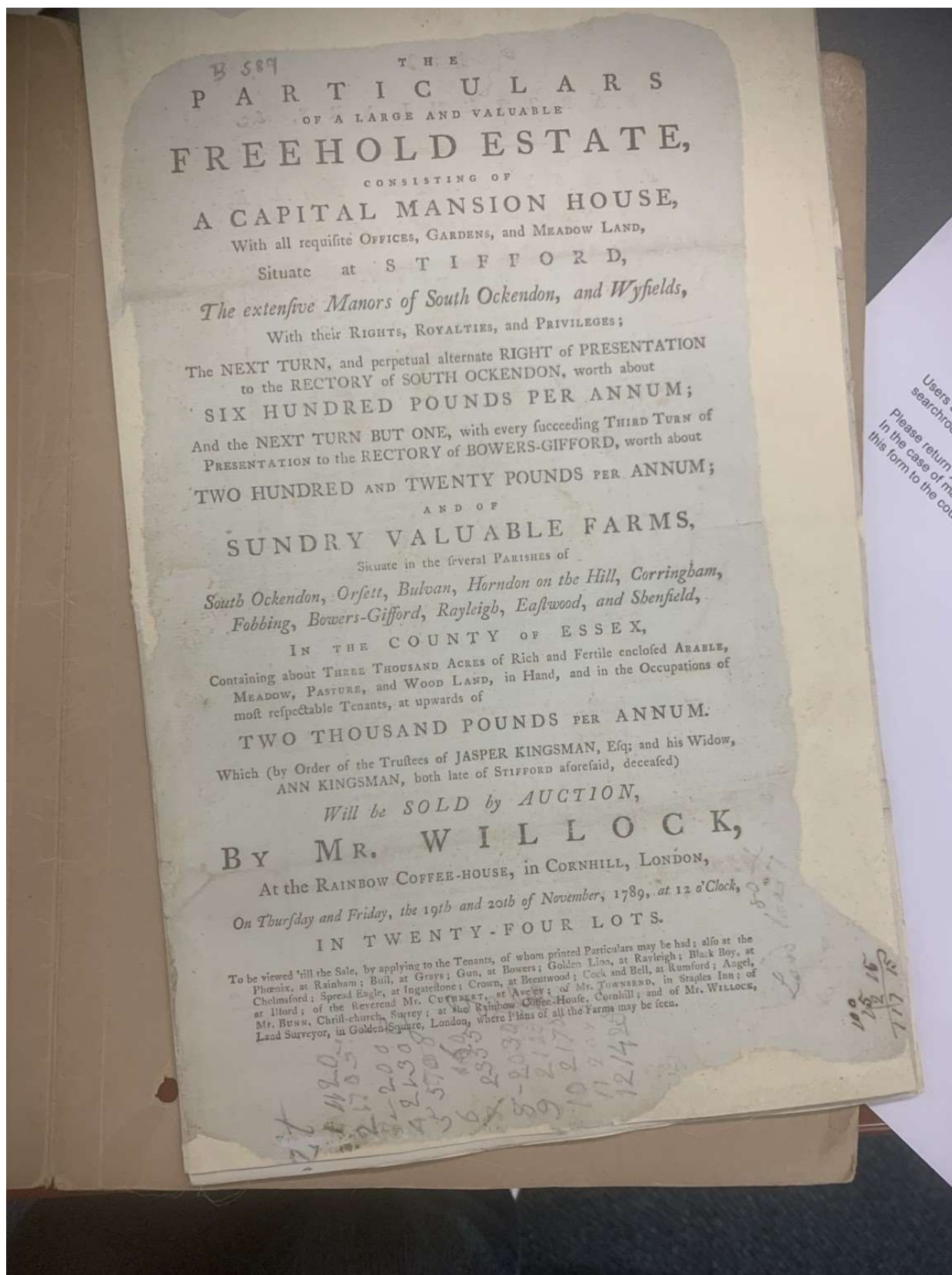


Figure 5. 1789 sale particulars supplied during the review, advertising the large freehold estate of the late Jasper Kingsman and his widow Ann, including farms in Rayleigh and Eastwood. [25]

23:20

4G 44

Landowner	William Scott Stonehewer
Occupier	John Samprell
Parish	Rayleigh
County	Essex
Original Date	16th Oct 1840
Plot	553
Reference	IR 29/12/275
Remarks	Code Descriptions ▼

Landowner » Tithe Records » Full

Close

thegenealogist.co.uk

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Figure 6. 1840 tithe-record extract supplied during the review identifying William Scott Stonehewer as a Rayleigh landowner. This evidences a later Stonehewer phase; it is not relied upon as proof of the exact conveyancing route from Kingsman. [26]

4.8 Medieval documentary context - park, fishery, water and mills

Medieval records show that Rayleigh's historic estate context included the honour/township, fair and market, Rayleigh Park, fishery, a recorded stank within the park, milling interests, and neighbouring

Eastwood and Thundersley manorial relationships. The 1419 dower assignment and 1431/32 material are particularly relevant. [12]

These records do not identify EB01 with a particular documented water-mill or EB02/EB08 with the recorded stank. That identification is unnecessary. The relevant point is that parkland, managed water/fishery, milling and productive rural land were genuine components of the historic Rayleigh estate landscape.

4.9 Rayleigh's special historic character includes its rural hinterland

The Essex County Council/Rochford District Council Rayleigh Historic Town Project identifies Rayleigh as an early Norman castle and medieval market town with strong documentary evidence and expressly identifies the relationship between Rayleigh and its rural hinterland as a matter meriting further research. [11]

This provides the Purpose D bridge: the relevant aspect of Rayleigh's historic character is not limited to direct views of the modern Conservation Area. It includes the historical relationship between the town and the park, estate, movement and productive rural landscape through which it functioned.

4.10 Direct difficulty with LUC's Purpose D factual premise

LUC says RA50, RA51 and RA52 form part of the setting of historic Rayleigh, yet assigns Weak/No because it says those parcels contain none of the features contributing to the town's setting or special character. [4]

Against LUC's own methodology, the evidence now includes an HER-recorded Deer Park relationship, historic routeways, historic farmstead continuity, Eastwood Brook and valley landforms, historic boundaries, surviving earthworks, medieval Rayleigh park/water/mill evidence, and post-medieval estate organisation. That does not predetermine whether the rating is Moderate or Strong, but it does mean the categorical "none of the features" premise requires substantive reconsideration.

4.11 Present-day survival, openness and the A127

The A127 is a conspicuous twentieth-century severance. It interrupts historic movement relationships but does not establish that those relationships never existed or necessarily remove the significance of the surviving landscape on the Rayleigh side. The relevant Purpose D question is the degree of present-day legibility.

Where open land preserves the spatial relationship between route, watercourse, historic boundary, farmstead, earthwork and recorded park/estate landscape, openness is part of the medium through which those historic relationships remain capable of being understood and experienced.

4.12 Consequence for parcel-specific reassessment

Section 4 does not impose one Purpose D rating across RA49–RA52. It establishes the evidence base from which RA50 and RA51 must be classified. The proper question is now not whether those parcels contain any relevant Rayleigh-specific feature, but how much the surviving landscape within, through and immediately connected with each assessment area contributes to preserving Rayleigh's historically documented relationship with its park, routes, estate organisation, productive rural landscape and wider hinterland.

5. RA50 - Purpose A: checking unrestricted sprawl

5.1 LUC's published position

LUC rates RA50 Moderate. It describes the 22.42 ha parcel as predominantly open and predominantly free from urbanising development, with tree cover, a small watercourse and hedgerows. Most importantly, the proforma states that the parcel contains physical features in reasonable proximity which are restricting and containing development and that their weakening or loss would adversely affect Purpose A. LUC then relies on the A127, tree cover and surrounding urban edges as a strong outer boundary and concludes that development would not create an incongruous pattern. [4]

That reasoning leaves a prior question unanswered: if physical features associated with RA50 are already restricting and containing development, which features are they, and would development weaken, negate or cross them before the A127 becomes the new outer edge?

5.2 Existing containment must be tested before future containment

LUC §3.31 assumes that suitable outer physical features would ordinarily be retained to form the boundary of an enlarged settlement after development. LUC §3.57 separately states that breaching a significant existing physical feature, or combination of features, currently serving to restrict and contain the existing large built-up area can itself create an incongruous pattern, expressly identifying a road, railway or river as examples. [3]

The RA50 assessment must therefore answer, in sequence: what presently restricts Rayleigh's outward expansion along the relevant interface; and only then, what could contain the enlarged settlement after development?

5.3 Eastwood Brook and the Rayleigh edge

The Ardent Consulting Engineers Flood Risk Assessment and Drainage Strategy identifies Eastwood Brook as an Environment Agency Main River. Main River status is not itself a Green Belt rating criterion; its relevance is that it independently confirms the established watercourse under consideration. [7]

Cross-reading the published parcel mapping and the assembled site evidence indicates that along a material section of RA50's northern relationship with Rayleigh the sequence is: existing Rayleigh residential development -> intervening edge/open land where present -> Eastwood Brook and associated vegetation -> open RA50 beyond -> A127 farther south.

The existence of a strip of land between the last houses and the Brook does not remove the Brook from the Purpose A analysis. LUC's own test refers to physical features in reasonable proximity. The important question is whether Eastwood Brook and its vegetated corridor form the first significant existing physical feature in reasonable proximity which currently restricts and contains the outward expansion of Rayleigh before the more open Green Belt beyond.

For spatial analysis, development up to such a feature and development extending across it are different. Once the Brook is crossed, the settlement edge is advanced beyond an existing containing feature into the open land beyond. That is the event which must be tested against §3.57.

5.4 The A127 does not answer the prior breach

The A127 is a strong and durable potential outer boundary. The error would be to treat that strength as though it resolves the contribution of all Green Belt land between Rayleigh and the road. If Eastwood Brook currently performs a material containment function, the A127 means only that another boundary would be available after the existing feature had first been crossed.

Existing containment cannot be retrospectively deprived of its Purpose A function because a stronger replacement boundary exists farther into the Green Belt.

5.5 Internal LUC comparators

Comparator	A rating	Functional position	Implication
RA45	Strong	Small watercourse and consistent tree line form an existing separator at the built-up-area edge.	Crossing the current separator is treated as a breach of features restricting/containing the urban area.
RA3	Strong	Existing woodland/landform separates the urban area; woodland/A127 also provide containment farther out.	Strong outer containment can coexist with Strong A where development first negates an existing separator.
RA49	Strong	A127 forms a southern outer boundary, while RA49 still performs Strong A in its existing spatial relationship.	Local confirmation that A127 containment does not automatically require Moderate A.
RA9	Moderate	Watercourse/tree line lies principally on the outer/countryside side of the land and can contain development within it.	Shows why a watercourse does not mechanically produce Strong; function and position are decisive.
RA44	Moderate	River Roach/tree cover/Grove Woods operate principally as outer containment.	Further outer-containment control.

5.6 Brook internality and granularity

The fact that Eastwood Brook subsequently continues within RA50 does not erase its edge function where it lies between Rayleigh and open land. A physical feature can perform different spatial functions along different sections. If RDC/LUC concludes that the Brook is an existing separator along one coherent section but has another relationship elsewhere, the correct response is subdivision and separate assessment, not a parcel-wide Moderate average. [2][3][29]

5.7 Conclusion - RA50 A

The principal reassessment case is Strong Purpose A for the land beyond Eastwood Brook where the Brook and associated vegetation are confirmed to form a significant existing physical feature restricting and containing the outward expansion of Rayleigh.

If the whole 22.42 ha parcel is too heterogeneous for one Strong score, the fallback is granular subdivision and separate rating of the Brook-defined land. Moderate should not be retained merely because the A127 could form a new outer boundary or because the Brook performs differently elsewhere within RA50.

6. RA50 - Purpose B: preventing neighbouring towns merging

6.1 LUC's published position

LUC rates RA50 Weak/No. It places RA50 on the periphery of the very fragile Rayleigh-Southend-on-Sea gap and also within the moderate Rayleigh-Hadleigh gap via Daws Heath, but categorises the parcel as forming a "very small" part of the gap and predicts a negligible effect upon visual separation. [4]

The description of the overall gap as very fragile and the classification of RA50 as a “very small part” are different judgements. The first describes the condition of the wider town gap; the second describes RA50’s functional contribution to that gap.

6.2 LUC’s own “small / very small” threshold

Under LUC’s methodology, a “small” part is an insubstantial part of the wider gap which nevertheless still provides some degree of visual separation. A “very small” part is land considered to provide no visual-separation contribution, generally because it is already developed, contained or significantly urbanised. Negligible effects are similarly associated principally with developed/contained/significantly urbanised land. [3]

RA50 does not readily fit that description. LUC itself records the parcel as approximately 22 ha, predominantly open, substantially free from significant urbanising development and physically connected with wider countryside. [4]

6.3 Very fragile Rayleigh-Southend-on-Sea gap

RA49 to the east is the Strong-performing core of the very fragile Rayleigh-Southend-on-Sea gap. The issue is not whether RA49 performs more strongly; it does. The question is whether urbanising eastern RA50 would materially increase urbanising influence upon, or reduce the effectiveness of, that already fragile core. LUC’s methodology expressly allows peripheral land in a fragile gap to be important where development would materially urbanise the core gap. [3][4]

6.4 Rayleigh-Hadleigh/Daws Heath gap

The existence of stronger separating land, the A127 and wooded/open land farther south may mean development would not destroy the overall Rayleigh-Hadleigh separation. That circumstance is capable of explaining a Moderate contribution; it does not automatically demonstrate no contribution. The threshold is whether RA50 presently provides at least some degree of separation.

6.5 Conclusion - RA50 B

Weak/No is not adequately demonstrated. The principal reassessment position is at least Moderate Purpose B. The eastern component adjoining RA49 should be tested separately for Strong if its urbanisation would materially weaken the already fragile Rayleigh-Southend-on-Sea gap.

7. RA50 - Purpose D: preserving the setting and special character of historic Rayleigh

7.1 LUC’s factual premise requires reconsideration

LUC rates RA50 Weak/No but expressly accepts that it forms part of the setting of historic Rayleigh and is predominantly open. The rating rests on the further proposition that RA50 contains none of the features contributing to Rayleigh’s setting or special character. [4]

The assembled evidence now identifies physical, historic and experiential relationships within and through RA50 which fall within the categories recognised by LUC’s Purpose D methodology. The categorical premise therefore requires substantive reconsideration before Weak/No can safely be maintained.

7.2 Purpose D does not require a direct Conservation Area view

LUC’s methodology recognises visual, physical and experiential relationships, including routes, parkland, historic activity, landscape features and linear historic landscapes. The RA50 case therefore does not depend upon an uninterrupted view to Rayleigh Mount or the present Conservation Area. [3]

7.3 Rayleigh-specific historic-character link

The Rayleigh Historic Town Project expressly identifies the relationship between Rayleigh and its rural hinterland as a matter meriting further research. That provides the town-specific bridge for assessing whether RA50's surviving landscape preserves part of the historical relationship between Rayleigh and its park, estate, movement and productive countryside. [11]

7.4 Coherent Eastwood Brook historic landscape within RA50

RA50 contains a substantial component of the Eastwood Brook historic landscape identified in the preliminary assessment: Eastwood Brook, valley form, substantial earthworks, basin relationships, routeways, boundaries and farmstead associations. The report assesses the corridor as possessing clear archaeological and historical interest at landscape scale, with group value and continuing legibility. [6]

7.5 EB01 as a substantial surviving feature

EB01 is a major constructed valley-crossing earthwork within RA50. Its precise date and function remain open, but the established fact is that a substantial historic-landscape earthwork survives in physical relationship with Eastwood Brook, the valley constriction and the wider basin/route/boundary landscape. [6]

7.6 Cross-parcel valley relationship

The modern RA50/RA51 boundary divides EB01 from much of the upstream EB02 basin relationship. Nothing in the available evidence shows that the parcel line corresponds to a historic or physical break. The contribution of EB01 should therefore be assessed as part of the coherent valley relationship rather than in isolation.

7.7 Historic movement, Deer Park and estate context

The wider landscape also has documented Rayleigh Deer Park/manorial relationships and successive medieval and post-medieval Rayleigh-Eastwood estate organisation, considered in Section 4 and Appendix B. These provide specific historic context for the surviving RA50 route, boundary, Brook and earthwork relationships. [5][6][12][22]-[26]

7.8 Openness performs a Purpose D function

RA50's open character assists the legibility of the spatial relationships between Brook, valley, route, boundary, earthwork and wider historic landscape. In this context, openness is not merely empty countryside around isolated features; it is part of the physical and experiential setting through which the historic relationship remains understandable.

7.9 Strong must be positively tested

The evidence is sufficient to require the coherent Eastwood Brook historic-landscape component to be tested against the Strong Purpose D criterion: whether the open Green Belt forming part of historic Rayleigh's setting makes a considerable contribution to the town's special character. The review should not impose Moderate as a ceiling before that judgement is made.

7.10 Conclusion - RA50 D

Strong Purpose D is positively advanced for the coherent Eastwood Brook historic-landscape component within RA50. If that contribution is not uniform across the 22.42 ha parcel, subdivision is the appropriate response.

8. RA51 - Purpose A: checking unrestricted sprawl

8.1 Principal reassessment position

Strong is the better-supported reassessment position for RA51 Purpose A. If RDC/LUC considers the whole 13.26 ha parcel too heterogeneous for one Strong score, the fallback is granular subdivision and separate assessment of the stronger open/current-edge components.

The position is cumulative: Eastwood Brook at the current Rayleigh edge; LUC §3.57; Strong comparator parcels; the 2025 Inspector decision on land within RA51; RDC's July 2026 reaffirmation; earlier Strong Site 68/69 findings; professional landscape evidence of the Rayleigh-to-countryside transition; and the marked internal heterogeneity of RA51. [3][4][7][8][15]-[21]

8.2 LUC's published position

LUC describes RA51 as generally open but containing school playing fields, allotments, scattered dwellings and other urbanising uses. It records some wider-countryside perception, describes separation from the urban area as relatively Moderate, and relies upon woodland to the east and west and the A road to the south as restricting and containing features. [4]

Parcel RA51

Parcel RA51

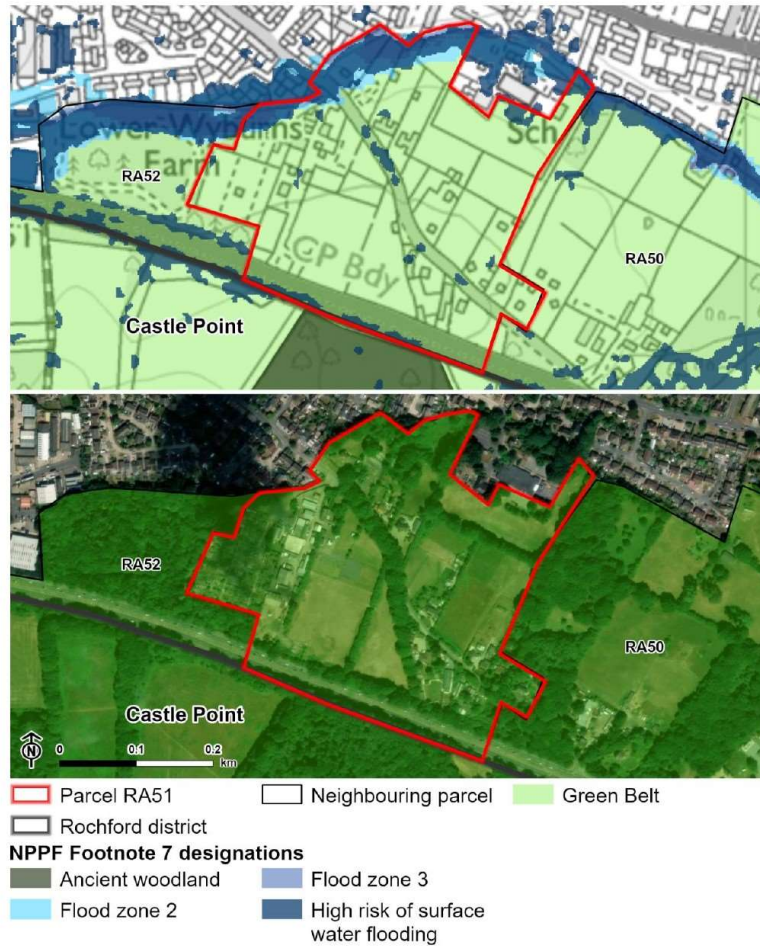


Figure 7. LUC published RA51 parcel map, providing the parcel-wide spatial context for the Purpose A reassessment, including the existing Rayleigh edge, the A127 and neighbouring RA50/RA52 relationships. Eastwood Brook and its precise relationship with the parcel and settlement edge are assessed separately using the technical evidence and GIS cross-reading. Source: LUC/RDC July 2026 parcel mapping. [4]

8.3 Eastwood Brook is absent from the published Purpose A reasoning

Eastwood Brook is independently recorded by the Ardent Flood Risk Assessment, the Bryant Landscape and Visual Appraisal and the SJA Trees material. The professional evidence places the Brook and substantial associated vegetation along the northern Lower Wyburns/RA51 edge with existing Rayleigh residential development, including Nevern Road/Nevern Close, immediately to the north. [7][8][20]

existing Rayleigh / Nevern Close -> Eastwood Brook + established vegetation -> Green Belt land within RA51

That sequence requires direct assessment under LUC §3.57. The A127 or woodland farther outward may contain an enlarged settlement, but they do not answer whether development first crosses a feature already restricting Rayleigh.

8.4 Eastern boundary relied upon by LUC

LUC's Moderate conclusion also relies upon "woodland to the east". The technical evidence requires a more precise description.

Local landowner evidence identifies the highlighted section

as including the edge of a residential garden, a more limited wooded component and substantial mature tree/shrub vegetation.

This does not prove that there is no woodland or that the eastern edge has no containing value. It requires RDC/LUC to verify the actual extent, depth, continuity and character of the feature before relying upon a generic "woodland" description to reduce Purpose A.

Parcel RA51 Description

Parcel Location, Land Uses and Boundaries

The parcel is located to the south-east of Rayleigh. Parcel size: 13ha.

Boundary separation between the urban area and the parcel is relatively moderate. It includes mature trees and residential garden fences.

There is no significant change in landform to create a sense of separation between the settlement and the parcel.

There is a moderate perception of urban development outside of the parcel.

Land is generally open but there are some evident urbanising land uses and activities in this parcel. This includes playing fields associated with Wyburns Primary School, allotments and scattered residential dwellings.

There is some perception of the wider countryside. Tree cover limits views but maintains a physical connection with the wider countryside.

Purpose A: Checking the unrestricted sprawl of large built-up areas:

Moderate contribution

Assessment Considerations	Assessment
Is the parcel adjacent or near to a large built-up area?	The parcel is near to a large built-up area. Rayleigh is a town and so is defined as a large built-up area.
What is the extent of urbanising development in the parcel?	There is some urbanising development in the parcel but also some notable areas of open land.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel.
Are there physical features in reasonable proximity that could restrict and contain development?	There are physical features in reasonable proximity that could restrict and contain development. The woodland to the east and west of the parcel and the A road to the south provides restricting and containing physical features.
Would development form an incongruous pattern in relation to the large built-up area?	Development of land in the parcel would not have an incongruous impact on the urban pattern. The parcel is subject to some urbanising influence and has features that would restrict and contain development,

Figure 8. LUC RA51 proforma extract. The published assessment records Moderate boundary separation and relies expressly on "the woodland to the east and west of the parcel" and the southern A-road as restricting and containing features. Source: LUC/RDC July 2026 RA51 proforma. [4]



Figure 9. Eastern RA51 boundary/interface context. The highlighted section is retained to show why the physical feature relied upon by LUC requires verification. Local site evidence identifies a garden-edge relationship, a limited wooded component and substantial mature tree/shrub vegetation.

8.5 Planning Inspector finding inside RA51

The appeal land adjacent to 256 Daws Heath Road lies east of 256 Daws Heath Road and within RA51. The Planning Inspector's decision of 30 October 2025 describes the local point at which Rayleigh gives way to ribbon-type development interspersed with woodland and verdant open areas, and finds that the appeal land's spatial openness strongly contributed to preventing the unrestricted sprawl of Rayleigh. [15]

The site's position between developed areas did not destroy the anti-sprawl role; the Inspector treated the remaining openness as important to restricting further outward spread. The finding was made notwithstanding screening from public views, demonstrating that spatial function and simple visibility are not the same question.

8.6 RDC reaffirmation in July 2026

RDC officers reconsidered the same Green Belt position in July 2026 and found no substantive new evidence justifying departure from the Inspector's reasoning. The application was refused on 22 July 2026; LUC's draft assessment is dated 31 July 2026. The RA51 proforma does not explain how its parcel-wide Moderate rating was reconciled with the almost contemporaneous Strong anti-sprawl reasoning on land physically within RA51. [16]

8.7 Earlier Strong Lower Wyburns evidence

The 2020 Rochford/Southend Green Belt study used a different methodology and does not mechanically determine the current score. Its site-specific spatial findings remain relevant corroboration. Site 68 and Site 69 were both assessed Strong for checking sprawl. Site 68 was described as open and was rated Strong even while the study said the A127 and Daws Heath Road would create stronger Green Belt boundaries after release. [17][18]

A stronger future boundary does not mean the land currently makes only a Moderate or Weak anti-sprawl contribution.

8.8 Professional landscape evidence of a settlement-to-countryside transition

The Bryant Landscape and Visual Appraisal describes Daws Heath Road transitioning from a suburban road to a tree-lined country lane and users travelling east as leaving Rayleigh. The wider landscape material also describes an urban-edge to semi-rural transition. [8][28]

8.9 Heterogeneity and granularity

RA51 combines school playing fields, allotments, dwellings, developed/hardstanding uses, tree belts, Eastwood Brook, open paddocks/fields and the Daws Heath Road settlement-transition landscape. The Ardent FRA describes the 3.6 ha southern parcel as predominantly greenfield, with western/northern developed uses and the remainder as paddocks and fields bounded by overgrown hedgerows and tree belts. [7]

If one portion performs only Moderately because of urbanising influence while another open/current-edge component continues to perform a Strong anti-sprawl role, LUC's anti-averaging methodology requires separate assessment. The stronger land should not be reduced to Moderate by the inclusion of unrelated lower-performing land.

8.10 Conclusion - RA51 A

Strong Purpose A is the principal reassessment position for RA51.

If RDC/LUC maintains Moderate for any relevant land, it should provide a reasoned reconciliation of Eastwood Brook, the actual eastern boundary, the 2025 Inspector decision, RDC's July 2026 reasoning, the earlier Strong Site 68/69 findings, the LUC comparator logic and its own granularity methodology. If the parcel is too mixed for one score, subdivision is the fallback - not acceptance of a parcel-wide Moderate average.

9. RA51 - Purpose B: preventing neighbouring towns merging

9.1 LUC's published position

LUC rates RA51 Weak/No within the moderate Rayleigh-Hadleigh gap. It records some urbanising development but notable areas of open land, then classifies the parcel as a "very small" part of the gap and predicts a negligible impact upon visual separation. [4]

9.2 Correct threshold

The fact that the overall gap is moderate and the A127/wooded Green Belt farther south would continue to preserve separation does not answer whether RA51 itself provides any degree of separation. Under LUC's methodology, a small part can still provide some visual separation and receive Moderate; a very small part provides none. [3]

9.3 Present physical depth of the gap

Current sequence: Rayleigh urban area -> open/vegetated and mixed Green Belt within RA51 -> A127 -> further wooded/open Green Belt -> Hadleigh/Thundersley side.

Urbanisation of RA51 would advance the Rayleigh edge materially towards the A127 and remove part of the existing depth of Green Belt separation. The wider gap may survive, but survival of the gap is not the Weak/No test. A minor reduction can still support Moderate.

9.4 Screening vegetation may itself perform the separation function

The Bryant Landscape and Visual Appraisal records strong woodland/tree cover and states that existing woodland and tree cover provides visual separation between the urban areas. Lack of direct visibility of the site from the A127 or Little Haven Nature Reserve does not therefore establish that RA51 contributes nothing; the screening vegetation may itself be part of the separation function. [8]

9.5 Granularity

Developed western components may perform differently from open paddocks, woodland, hedgerows and tree belts. If open and vegetated land provides meaningful separation while more developed land does not, the appropriate response is subdivision.

9.6 Conclusion - RA51 B

Weak/No is not the better-supported conclusion. Moderate is the minimum reassessment position advanced for RA51 Purpose B, with Strong left open for any appropriately defined component which is shown to form a substantial part of the operative gap or contain key separating features whose loss would significantly reduce visual separation.

10. RA51 - Purpose D: preserving the setting and special character of historic Rayleigh

10.1 LUC's Weak/No premise is directly challenged

LUC expressly states that RA51 forms part of the setting of historic Rayleigh and contains notable areas of open land, yet assigns Weak/No because it says RA51 contains none of the features contributing to the town's setting or special character. [4]

The Lower Wyburns component contains or participates in identifiable Rayleigh-specific physical, cartographic and historic relationships of the kinds LUC's own Purpose D method recognises.

10.2 Rayleigh's rural hinterland is part of the historic enquiry

The Rayleigh Historic Town Project expressly identifies the relationship between Rayleigh and its rural hinterland as an important historical research issue. The relevant Purpose D question is therefore whether the surviving RA51 landscape preserves a meaningful physical or experiential expression of that historic town-hinterland relationship. [11]

10.3 Essex HER Deer Park relationship within Lower Wyburns

The Tetra Tech Archaeological Desk-Based Assessment, using Essex HER data, states that the recorded south-western boundary of Rayleigh Medieval Deer Park encompasses Lower Wyburns study-site land north of Daws Heath Road and identifies potential for park-management earthworks. [5]

This is a direct recorded Rayleigh-specific historic-landscape relationship. It does not require a particular surviving bank to be proved medieval before it becomes relevant to Purpose D.

10.4 Historic Route C and territorial boundary relationships

The 1798 mapping records Historic Route C connecting Daws Heath with Rayleigh; surviving traces remain within the Lower Wyburns/Tile Wood landscape. The Eastwood Brook assessment also

records a substantial historic boundary relationship associated with the old Thundersley boundary. [6][19]

These features fit LUC's physical/experiential Purpose D categories directly. Their relevance does not depend upon proving a medieval date for every surviving route or boundary segment.

10.5 Lower Wyburns historic farmstead

Historic mapping demonstrates farmstead continuity at Lower Wyburns/Wyburns. The farmstead sits within the same landscape as the Brook, route and boundary relationships. Existing development within RA51 therefore cannot simply be counted as urbanising weakness without asking what that development is: a surviving historic rural farmstead may itself contribute to the historic landscape. [6][19]

10.6 Eastwood Brook and the basin landscape

The RA51 component includes Eastwood Brook, EB08 and most of the larger upstream EB02 basin relationship, with the principal EB01 earthwork immediately downstream across the RA50 line. [6]

The modern parcel boundary does not appear to represent a historic-landscape break. The appropriate question is what contribution the RA51 component makes to the legibility and preservation of the coherent historic landscape of which EB01 is another immediately adjoining element.

10.7 Purpose D is resilient to individual archaeological hypotheses

The Purpose D case does not require EB08 to be a medieval pond, EB02 a medieval reservoir, EB01 a medieval dam, or the historic boundary a proved park pale. The existing evidence is broader: RA51 contains a substantial component of a surviving historic landscape whose route, farmstead, Deer Park, boundary, watercourse and valley relationships have specific links with historic Rayleigh.

10.8 Openness and present-day legibility

Open land allows the relationship between route, boundary, farmstead, basin and watercourse to remain spatially legible. Urbanisation could therefore harm the historic-town relationship not only by destroying a specific archaeological feature, but by replacing the open landscape through which historically related features remain capable of being understood and experienced.

10.9 Strong should be positively applied to the coherent component

The evidence for a coherent Lower Wyburns-Eastwood Brook component includes accepted setting, substantial open land, the HER Deer Park relationship, Route C, historic boundary evidence, Lower Wyburns farmstead, Eastwood Brook, EB08 and most of EB02, physical continuation to EB01, historic documentary context and continuing legibility. Taken cumulatively, those strands support a positive Strong Purpose D case.

10.10 Heterogeneity is a parcel-definition issue

School playing fields, allotments, scattered dwellings and other modified land may not make the same Purpose D contribution. If RDC/LUC considers those parts lower-performing, the coherent historic-landscape component should be subdivided and rated separately rather than diluted within the whole 13.26 ha parcel.

10.11 Conclusion - RA51 D

Strong Purpose D is advanced for the coherent Lower Wyburns-Eastwood Brook historic-landscape component of RA51. If other parts of RA51 perform differently, subdivision is the appropriate

response; Weak/No should not be retained by averaging the coherent historic-landscape component with lower-performing land.

11. RA49 and RA52: supporting landscape, comparator and reassessment role

11.1 RA49 - adjoining Strong-performing comparator

LUC rates RA49 Strong under Purposes A, B and C and not grey belt. It therefore provides substantive local evidence against which the treatment of RA50 and RA51 can be tested. [4]

RA49's geography must be stated accurately. Its principal settlement-separation function is on the locally relevant Eastwood side of the Rayleigh-Southend-on-Sea gap, to its east. The A127 lies along its southern side towards the Hadleigh/Thundersley direction. The A127 is not the eastern separator between Rayleigh and Eastwood/Southend.

For Purpose A, RA49 is useful because LUC gives it Strong even though the A127 forms a clear southern outer boundary. That reinforces the proposition that effective future/outer containment by the A127 does not automatically require a Moderate Purpose A rating.

For Purpose B, RA49 identifies the Strong-performing core on the Eastwood side of the very fragile Rayleigh-Southend-on-Sea gap. Its existence does not mean adjoining RA50 provides no supporting separation function; LUC's peripheral-gap methodology requires that possibility to be examined functionally.

11.2 RA52 - strongly wooded/open countryside structure

RA52 is approximately 5 ha and LUC describes it as primarily wooded, strongly separated from the urban area, substantially free from urbanising development and physically connected with wider countryside. LUC rates it Strong Purpose C. [4]

RA52 therefore demonstrates the narrow technical nature of the grey-belt contribution test: potential grey belt is not a finding that land is low-value or weak Green Belt generally. The parcel also forms part of the wider woodland/containment structure relied upon in neighbouring assessments.

RA52's current A, B and D scores are not the principal rating challenge in this report, but they should not be used mechanically against RA50 or RA51. Its Purpose D position should remain capable of review if parcel-specific historic evidence emerges while the research is active.

11.3 Section conclusion

RA49 is an adjoining Strong-performing comparator and RA52 is a strongly wooded/open component of the wider Green Belt structure. Their different published ratings should inform the reassessment without being transferred mechanically to RA50 or RA51.

12. Consequential grey-belt conclusions

12.1 Contribution consequence

LUC's potential-grey-belt findings are downstream of parcel geometry and the A/B/D contribution ratings. Strong contribution under any one of A, B or D prevents the affected assessment area from satisfying the contribution limb. Where contributions differ materially within a parcel, geometry must be resolved first through appropriate subdivision rather than averaging. [2][3][4][29]

12.2 RA50 and RA51 - independent Strong routes

RA51 has a principal Strong Purpose A case and an independent Strong Purpose D case for the coherent Lower Wyburns-Eastwood Brook historic-landscape component. RA50 likewise has a Strong Purpose A case for Brook-defined land where Eastwood Brook is confirmed as an existing

containing feature and a Strong Purpose D case for the coherent Eastwood Brook historic-landscape component. Acceptance of any one of those Strong routes at the appropriate scale changes the grey-belt contribution outcome for the affected land.

12.3 Purpose B remains live

The review advances at least Moderate Purpose B for both parcels and keeps Strong open where a properly defined component meets the threshold. Moderate alone does not alter the grey-belt contribution limb, but Strong B would be independently consequential.

12.4 Conclusion

LUC's parcel-wide potential-grey-belt findings for RA50 and RA51 should not be relied upon as robust until the Strong Purpose A and Purpose D cases, together with the required assessment-area granularity, have been determined. Where reassessment identifies Strong A, B or D, the affected land does not satisfy the Green Belt contribution limb.

13. Requested actions from RDC/LUC

RDC/LUC is requested to undertake the following actions before the July 2026 contribution ratings and consequential grey-belt conclusions are relied upon in progressing the Local Plan.

13.1 Reassess geometry and GIS before the grey-belt conclusion

Treat the RA50 and RA51 A/B/D ratings and consequential grey-belt findings as disputed. Map and, where necessary, subdivide materially different open, developed, Brook-defined, paddock/field, historic-landscape and urban-edge components. Use the original RDC/LUC GIS to verify Eastwood Brook, the RA51 eastern boundary, EB01/EB02/EB08, Routes A/B/C, the HER Deer Park extent, Lower Wyburns and the RA49 east-versus-south geography.

13.2 RA50 - Purposes A and B

Purpose A: determine whether Eastwood Brook is a significant existing physical feature restricting and containing Rayleigh and, where it is, assess land beyond it against Strong under §3.57. Reconcile the result with RA45, RA3 and RA49, including the fact that RA49 is Strong A notwithstanding its A127 southern outer boundary. Purpose B: reassess the 'very small/negligible' finding against LUC's own threshold and RA50's relationship with Strong-B RA49 and the very fragile Rayleigh-Southend-on-Sea gap. The position advanced is at least Moderate, with the eastern component tested for Strong.

13.3 RA51 - Purposes A and B

Purpose A: reassess RA51 positively against Strong using Eastwood Brook/current-edge containment, the 2025 Inspector decision, RDC's July 2026 reasoning, earlier Strong Site 68/69 findings, the settlement-to-countryside transition, the actual eastern boundary and parcel heterogeneity. Purpose B: determine why urbanisation would have a negligible rather than minor effect on separation; the position advanced is at least Moderate, with stronger open/separating components subdivided where necessary.

13.4 Purpose D evidence and specialist review

Obtain or record advice from Essex County Council Place Services / the Essex HER team, or another suitably qualified historic-environment specialist, addressing Purpose D at historic-landscape scale.

13.5 Amend ratings, geometry and grey-belt conclusions

Where reassessment identifies Strong A, B or D, amend the relevant rating, parcel geometry and consequential grey-belt contribution finding. Correct any factual or mapping premise on which the existing rating depended.

13.6 Keep the evidence base open

Treat this as a current-stage evidence submission. Consider material new archaeological, documentary, GIS, historic-map and specialist evidence arising during the Local Plan process.

13.7 Reasoned response and requested outcome

If any challenged Moderate or Weak/No rating is retained, identify the evidence accepted or rejected, the weight given, the methodology and assessment geometry applied, and the comparator reasoning supporting that result. The requested outcome is reassessment at an appropriate scale, positive testing of the identified Strong A and D cases, correct Purpose B thresholds, subdivision where contributions differ, and revision of grey-belt findings wherever a Strong contribution is established.

14. Evidence status, verification and ongoing research

14.1 Present evidence is sufficient to require reassessment

The evidence already assembled includes LUC/RDC material, national policy and guidance, named professional technical reports, a recent Planning Inspector decision, RDC decision-making, Essex HER evidence, historic mapping, primary medieval documents, Essex Record Office material, surviving physical landscape features, LiDAR/topographical evidence and the Eastwood Brook preliminary historic-landscape assessment. That evidence already raises substantive A, B and D questions requiring reassessment.

Future research may strengthen, refine or alter individual propositions, particularly under Purpose D. It is not a prerequisite to the Council addressing the evidence presently available.

14.2 Evidence status is proposition-specific

- ⌚ Eastwood Brook exists and its course is independently recorded; its exact Green Belt containment function is a planning assessment question.
- ⌚ EB01 exists as a substantial constructed valley-crossing earthwork; its precise date and original function remain to be established.
- ⌚ EB02 and EB08 exist as basin-like landforms; whether they retained water historically, and in what period or for what purpose, remains capable of investigation.
- ⌚ Route C is securely mapped by 1798 as connecting Daws Heath and Rayleigh; a medieval origin is not required for that historic relationship to be relevant.
- ⌚ Lower Wyburns has historic farmstead continuity; the detailed chronology of surviving buildings is a separate question.
- ⌚ The Essex HER records a Rayleigh Medieval Deer Park relationship with Lower Wyburns land north of Daws Heath Road; whether individual surviving earthworks are park-management features is a separate archaeological question.
- ⌚ Primary documents establish Rayleigh park, fishery/water, milling and wider manorial/estate relationships; they do not identify a particular surviving Eastwood Brook feature without further evidence.

14.3 Spatial and archaeological verification

Boundary-sensitive relationships should be verified against original RDC/LUC GIS. The Eastwood Brook assessment is preliminary and non-intrusive: chronology and original function of individual earthworks/basins remain capable of professional testing, but that uncertainty does not remove the recorded physical features or the independently evidenced Deer Park, route, farmstead, boundary, Brook and documentary relationships. [5][6][11][12][19]

14.4 Active professional, local and documentary research

Important Purpose D strands - including the HER Deer Park relationship, Route C mapping, Lower Wyburns farmstead continuity, the Rayleigh Historic Town Project, medieval documents and the estate archive - do not depend upon future excavation of the Brook earthworks. A professional archaeologist is provisionally arranged to visit in September 2026; relevant landowner permission has been obtained, funding opportunities are being explored, local historians from Thundersley are engaging with the research, and further archive work remains active. The programme is investigative rather than directed to a predetermined result. [5][11][12][19][22]-[26]

14.5 Submission status and evidential caution

This is a current-stage Evidence Submission for Reassessment, not a closed historic-landscape record. Material new evidence should be incorporated during the Local Plan process. Proper caution means not assigning an unproved date or function; it does not mean resolving every uncertainty automatically in favour of the existing Moderate or Weak/No rating. Where location needs checking, verify it; where date/function is uncertain, investigate it; where parcel components differ, subdivide; where relevant evidence was omitted, reassess.

15. Overall conclusions

15.1 Why reassessment is required

This review concludes that the July 2026 LUC/RDC assessment does not presently provide a sufficiently robust basis for the Moderate and Weak/No ratings assigned to RA50 and RA51 under Purposes A, B and D, or for the consequential identification of the affected land as potential grey belt.

The issues are cumulative: parcel geometry and averaging; current versus future containment; omission or insufficient treatment of significant physical features; comparator consistency; unresolved conflict with recent Inspector/RDC reasoning; Purpose B threshold application; and Purpose D conclusions reached without addressing the full Rayleigh-specific historic-landscape evidence now assembled.

15.2 RA50

- ⌚ Purpose A - Strong for Brook-defined land where Eastwood Brook is confirmed as an existing containing feature; subdivision if the wider parcel performs differently.
- ⌚ Purpose B - at least Moderate; the eastern RA49-facing component should be tested for a stronger supporting role in the very fragile Rayleigh-Southend-on-Sea gap.
- ⌚ Purpose D - Strong should be positively assessed for the coherent Eastwood Brook historic-landscape component; subdivision if necessary.

15.3 RA51

- ⌚ Purpose A - Strong is the principal reassessment position, supported by Eastwood Brook/current-edge evidence, the 2025 Inspector decision inside RA51, RDC's July 2026 reasoning, earlier Strong Site 68/69 findings and granularity.

- ⌚ Purpose B - Moderate is the minimum reassessment position; Strong remains open for a properly defined component where the evidence meets the threshold.
- ⌚ Purpose D - Strong is advanced for the coherent Lower Wyburns-Eastwood Brook historic-landscape component; subdivision if modern or lower-performing land differs.

15.4 Supporting parcels and Purpose D scope

RA49 is a substantive Strong comparator: its locally relevant Eastwood-side Rayleigh-Southend-on-Sea separation function lies to the east, while the A127 is a separate southern boundary towards Hadleigh/Thundersley. RA52 remains a strongly wooded/open parcel with Strong Purpose C. Purpose D does not depend on proving EB01 to be a medieval mill dam, EB02/EB08 to be mill ponds or a surviving boundary to be a medieval park pale; the established historic routes, Deer Park evidence, farmstead continuity, Brook, documentary history, estate organisation and surviving physical/experiential landscape are sufficient to require reassessment.

15.5 Consequential grey-belt position and requested outcome

RA50 and RA51 each have multiple live Strong routes relevant to grey-belt identification. Where a properly defined assessment area is Strong under A, B or D, that land does not satisfy the contribution limb. The Council should therefore reassess the affected land using the complete evidence base and appropriately granular geometry, amend ratings and grey-belt findings where Strong is established, and provide a reasoned evidential response if any challenged lower rating is retained. This submission remains open to material archaeological, documentary, GIS and specialist evidence arising during the Local Plan process.

Overall, the July 2026 Moderate/Weak/No ratings and consequential potential-grey-belt findings for RA50 and RA51 should not be treated as robustly established unless and until the Strong Purpose A and Purpose D cases identified in this review have been expressly assessed at the correct spatial scale and reasoned conclusions reached.

Appendix A. Reassessment position matrix

This matrix summarises the positions reached in Sections 5-10. It should be read with the substantive reasoning. Where materially different parts of a LUC parcel perform differently, subdivision and separate rating is the requested response rather than averaging down.

Parcel / purpose	LUC	Reassessment position advanced	Required treatment	Grey-belt consequence
RA50 A	Moderate	Strong for Brook-defined land where Eastwood Brook currently restricts and contains Rayleigh; subdivide if needed.	GIS map current Rayleigh-Brook-RA50 relationship; apply \$3.57; subdivide if performance differs.	Strong area does not satisfy contribution limb.
RA50 B	Weak/No	At least Moderate; Strong left open for an eastern component if functional analysis supports it.	Reassess "very small/negligible"; assess relationship with RA49 and very fragile Rayleigh-Southend-on-Sea gap.	Moderate alone not exclusionary; Strong would be.
RA50 D	Weak/No	Strong positively advanced for coherent Eastwood Brook historic-landscape component.	Apply considerable-contribution test; specialist input/GIS; subdivide if needed.	Strong area does not satisfy contribution limb.
RA51 A	Moderate	Strong principal position; subdivision fallback.	Reconcile Eastwood Brook, Inspector/RDC, earlier Strong findings, eastern boundary and granularity.	Strong area does not satisfy contribution limb.
RA51 B	Weak/No	At least Moderate; Strong remains open for a properly defined substantial separating component.	Identify actual separation function; explain negligible vs minor; subdivide where needed.	Moderate alone not exclusionary; Strong would be.
RA51 D	Weak/No	Strong for coherent Lower Wyburns-Eastwood Brook historic-landscape component; subdivide if contribution varies.	Apply considerable-contribution test to Deer Park/route/farmstead/Brook/basin landscape; use specialist input/GIS and subdivide where needed.	Strong area does not satisfy contribution limb.

Supporting parcels

RA49 is already Strong A/B/C and provides an adjoining Strong-performing comparator. Its locally relevant Eastwood side of the Rayleigh-Southend-on-Sea gap lies to the east; the A127 lies along the southern side. RA52 is Strong C and remains a strongly wooded/open element of the wider Green Belt structure.

Appendix B. Historic manorial and estate evidence schedule

This schedule demonstrates the long-term documentary relationship between historic Rayleigh and its wider rural, park, manorial, agricultural and estate landscape. It is not used to claim an uninterrupted legal title from the medieval Deer Park to the present RA50/RA51 land.

Date / phase	Source	Documentary evidence	What it establishes	Purpose D relevance
1416 - Edward, Duke of York	Medieval inquisition material	Rayleigh as honour/vill with fair, market, park and mill; Thundersley manor/park; Eastwood manor.	Rayleigh's medieval historic character included a managed rural/manorial landscape extending beyond the settlement.	Supports rural hinterland, park, productive landscape and neighbouring manorial relationships as genuine aspects of historic character.
1419 - Philippa, Duchess of York	Dower assignment	Interests in Rayleigh honour/township/fair/market/park; fishery; Thundersley manor; Eastwood manor; profits from a Rayleigh water-mill.	Places parkland, fishery, milling, Rayleigh, Eastwood and Thundersley within one documented estate/dower context.	Directly relevant to the historic town-hinterland relationship.
1431/32 - Philippa, Duchess of York	Post-mortem material	Rayleigh Park, fishery and a stank within the park; Thundersley manor/park; Eastwood manor; Rayleigh water-mill and separate Eastwood mill.	Confirms continuing park, managed water/fishery, milling and neighbouring manorial context.	Shows that parkland, managed water and productive countryside were genuine Rayleigh landscape elements.
1654 - Bury phase	ERO D/DU 1243/5	Great Lodge, Lymehouse Farm, Edwards Hall, Frankes, Parkgate, Little Lodge and other property.	Substantial Bury estate/farm network across Rayleigh and Eastwood.	Post-medieval estate organisation of the same wider rural landscape.
1678-1682	ERO D/DU 1243/2	Bury bonds/liabilities and mortgages involving Jasper Kingsman, including Lymehouse Farm.	Direct documented Bury-Kingsman legal/financial relationship.	Supports succession/reorganisation of recurring property units.
1695 / later synthesis	Benton / Rochford Hundred history	Great Lodge/Edwards Hall, Little Lodge, Limehouse, Whitehouse, Mill House, Millstead.	Corroborates substantial Kingsman estate phase.	Recurring farms/lodges/mill-related names link archival record to the historic rural framework.
1754	ERO trust/deed material	Kingsman estate including Whitehouse/Edwards Hall, Mill House, Limehouse, Franks and Park Gate.	Continued Kingsman organisation of recurring Rayleigh holdings.	Long-term estate structure within Rayleigh's rural hinterland.
1789	Primary sale particulars	Sale of substantial freehold estate of late Jasper Kingsman and Ann Kingsman containing Rayleigh and Eastwood farms.	Major estate immediately before sale/reorganisation.	Provides documentary framework for later farm ownership and landscape subdivision.
1840 and later	Tithe + ERO Stonehewer material	William Scott Stonehewer as Rayleigh landowner; later deeds include White House Farm, Limehouse/Linehouse and Eastwood Great Lodge.	Later Stonehewer phase involving recurring properties.	Demonstrates further successive organisation of the same broad rural landscape.

The documentary sequence supports successive phases of organised landscape history: medieval Rayleigh park/manorial landscape -> Bury estate organisation -> documented Bury/Kingsman

relationships -> Kingsman estate organisation -> 1789 sale/reorganisation -> later Stonehewer landownership/deed history.

The material is not used to identify EB01 as the recorded medieval water-mill, EB02/EB08 as the recorded stank, or any surviving boundary as a specific medieval estate boundary. Those are separate archaeological/spatial questions and are unnecessary to the principal Purpose D proposition.

Appendix C. Source register

Professional documents are identified by author and title. Supporting reassessment papers are analytical aids; where possible the main report cites the underlying official, professional, cartographic or archival source directly.

[1] Ministry of Housing, Communities and Local Government, National Planning Policy Framework, December 2024, as amended February 2025. Framework against which the July 2026 LUC assessment was prepared and potentially relevant under the August 2026 transitional arrangements.

[2] Ministry of Housing, Communities and Local Government, Planning Practice Guidance: Green Belt, updated 27 February 2025, including the Green Belt assessment and grey-belt contribution criteria.

[3] LUC for Rochford District Council, Rochford Green Belt Assessment, Draft Report, 31 July 2026, especially §§3.7-3.9, 3.17-3.18, 3.29-3.31, 3.47-3.75 and Purpose D methodology / Appendix B.

[4] LUC for Rochford District Council, Rochford Green Belt Assessment - Parcel Maps / Proformas, July 2026, including RA3, RA9, RA44, RA45, RA49, RA50, RA51 and RA52.

[5] Tetra Tech, Archaeological Desk Based Assessment: Land at Lower Wyburns, Rayleigh, Planning Issue, April 2026, ref. 794-PLN-HER-02160, including Essex HER / Rayleigh Medieval Deer Park material.

[6] Graham Biner, Eastwood Brook Corridor: Preliminary Non-Intrusive Archaeological and Historic Landscape Assessment, Version 1.1, 4 August 2026.

[7] Ardent Consulting Engineers, Flood Risk Assessment and Drainage Strategy: Lower Wyburns, April 2026, ref. 2507440-ACE-XX-XX-RP-C-0501.

[8] Bryant Landscape Planning Ltd, Lower Wyburns Landscape and Visual Appraisal, April 2026, ref. 210-RE-01_v2.

[9] Acanthus RH Architects LLP, Design and Access Statement: Lower Wyburns, Essex - Part 1, April 2026.

[10] Historic England correspondence from Adam Single, Inspector of Ancient Monuments for Essex and Hertfordshire, 28 May 2026; treated as professional correspondence, not a formal determination.

[11] Essex County Council / Rochford District Council, Rayleigh: Historic Town Project Assessment (Medlycott, 1999).

[12] Mapping the Medieval Countryside / Electronic Inquisitions Post Mortem: Edward Duke of York (1416); Philippa Duchess of York dower assignment (1419); Philippa Duchess of York Essex inquisition (1431/32).

[13] Historic England, National Heritage List for England entries including White House Farmhouse, Weir Farmhouse, Eastwood Lodge, Tylersset Farmhouse and Barnabys Hotel/The Chase.

- [14]** Site-visit/local historical evidence, August 2026, used only where expressly identified as local testimony/context.
- [15]** Planning Inspectorate, appeals APP/B1550/C/23/3326097, /3326098 and /3326099, Land adjacent to 256 Daws Heath Road, decision dated 30 October 2025.
- [16]** Rochford District Council, officer report for application 25/00950/FUL, Kennels at 256 Daws Heath Road, July 2026, together with Notice of Decision dated 22 July 2026.
- [17]** Rochford District and Southend-on-Sea Borough Joint Green Belt Study, 2020, including Stage 1 Parcel 21 and Stage 2 Sites 68 and 69.
- [18]** Bryant Landscape Planning Ltd, Green Belt Assessment: Land at Lower Wyburns, Rayleigh, April 2026, ref. 210-RE-02_v2, including reproduction of 2020 Site 68/69 findings.
- [19]** Historic mapping used in the review, including the 1798 Hadleigh map, nineteenth-century tithe mapping and later Ordnance Survey mapping relevant to routes, boundaries and Lower Wyburns farmstead continuity.
- [20]** SJA Trees, Arboricultural Implications Report: Lower Wyburns, Daws Heath Road, Rayleigh, July 2026, ref. SJA air 25565-01e, with associated Tree Protection Plan / schedule.
- [21]** Icen Projects, Planning Statement: Lower Wyburns, Rayleigh, July 2026; used selectively for factual descriptions of site boundaries and existing conditions.
- [22]** Essex Record Office, D/DU 1243/5, release dated 18 May 1654.
- [23]** Essex Record Office, D/DU 1243/2, deed/mortgage dated 5 December 1682.
- [24]** Essex Record Office catalogue and associated 1754 trust/deed material concerning Jasper Kingsman's estates.
- [25]** Sale particulars, 19-20 November 1789, relating to the estate of the late Jasper Kingsman.
- [26]** Essex Record Office Stonehewer material including D/DB T738 and relevant deed series, together with Rayleigh tithe material identifying William Scott Stonehewer as a landowner in 1840.
- [27]** Robert Sier / Essex Mills historical research concerning the Rayleigh-Eastwood water-mill landscape, retained as secondary research context only.
- [28]** Dutch Landscape Architects, Landscape Strategy: Land at Lower Wyburns, Rayleigh, 14 April 2026, ref. 1099-DLA-ZZ-XX-RP-L-0001, rev. P05.
- [29]** Ministry of Housing, Communities and Local Government, National Planning Policy Framework, August 2026, published 17 August 2026, especially Annex A, Annex B and Annex E.
- [30]** Rochford District Council, Local Plan programme/evidence-base updates and timeline, July 2026, confirming progression from Regulation 18 towards Regulation 19 consultation in autumn 2026.

Supporting reassessment papers

- 🕒 RA51 Purpose A - Evidence Review / Strong Evidence Report, August 2026.
- 🕒 RA51 Purpose B - Evidence Review, August 2026.
- 🕒 RA51 Purpose D - Evidence for Reassessment, August 2026.
- 🕒 RA50 Green Belt Assessment Review: Purposes A, B and D, August 2026.
- 🕒 RA49–RA52 common-landscape working framework, August 2026.

These are analytical working papers rather than independent evidential sources. They should be retained with the evidence package as an audit trail, but this submission should rely upon underlying sources wherever possible.