

M25 (Northeast) Residents Association
Green Belt Addendum – NPPF & PPG Grey Belt Assessment

1. This addendum supplements our Green Belt policy objection to the Moto MSA sites. Following the updated Planning Policy Guidance (PPG) issued in February 2025, it assesses why these sites do not qualify as Grey Belt and remain inappropriate development requiring very special circumstances.

NPPF 155 – Criteria for Inappropriate Development

2. The National Planning Policy Framework (NPPF) Paragraph 155 sets four criteria (a–d) that must all be met for Grey Belt classification. This relies on the definition of Grey Belt¹ which states that it is land that *‘does not strongly contribute to any of the purposes a) b) or d) in paragraph 143 of the NPPF’*. Conclusions on 155 a) therefore rely on an assessment of the three criteria in paragraph 143 before returning to consider whether there is any effect on the rest of the Green Belt. The decision then moves on to consider 155 b c and d all of which need to be satisfied.

NPPF 143 a) to check the unrestricted sprawl of large built-up areas

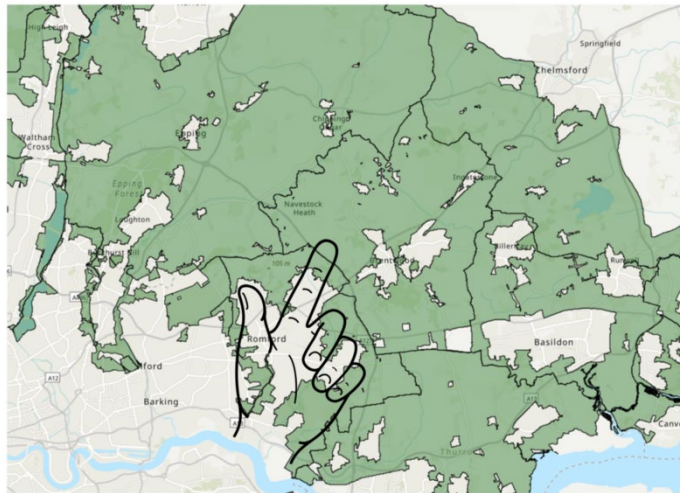
3. The PPG defines a "strong contribution" to preventing sprawl as areas free of existing development and lacking physical containment.
4. The Moto sites:
 - Are undeveloped and lack physical boundaries to restrict sprawl.
 - Are only 1,300m from London’s urban edge, creating a "finger" of development, the very pattern the Green Belt was designed to prevent.
 - Extend development towards Brentwood, potentially encouraging further expansion.



5. The application sites are very near the edge of London being 1,300m from the urban edge defined in the LB Havering Local Plan as shown above. This is ‘near to’ whether considered at the scale of the MGB relative to London, or, on the more local level.

¹ in the glossary of the NPPF

6. The PPG cites development that would cause an incongruous pattern of development 'such as an extended 'finger' of development into the Green Belt' as an indication of a strong contribution to restricting the sprawl of large built-up areas.



7. As shown above, at a strategic level, Havering as a whole grew out along a north-easterly axis into the Essex countryside and at the more local level, below, Harlod Hill is the north eastern tip of an urban finger of development up to the edge of the Green Belt.



8. The MSA's link up with existing pockets of development within the Green Belt extending the finger of sprawl out from Harold Hill to the motorway, where it leapfrogs the M25 via the second MSA, and beckons further fingers of development out from Kelvedon/Pilgrims Hatch and through South Weald. This would be the urban fingers of sprawl along local roads that the MGB was imposed to prevent.
9. The MSA's are clearly within an area that the PPG defines as making a strong contribution to the Green Belt purpose 143 a) and as the requirement is to avoid a strong contribution to any of the three purposes a failure here is sufficient to exclude the site from the Green Belt definition on its own.

NPPF 143 b) to prevent neighbouring towns merging into one another;

10. The PPG states that areas preventing towns from merging should be free of development and form a critical part of the gap between towns.
11. The Moto sites:
 - Cover 44 hectares, drastically altering open countryside.
 - Would urbanise the visual gap between Harold Hill (London) and Brentwood, reducing clear separation.
 - Would change the M25 corridor from open countryside into an urban motorway experience, as admitted in Moto's Environmental Statement.
12. The MSA's are very large developments changing the use and character of 44 ha's of open countryside and developing 2 million square feet of urban footprint. As such they form a substantial part of the narrow strategic gap between Harold Hill and Brentwood.
13. The sites are located on the two roads Horsmanside and Coxtie Green Road that run from Harold Hill to Kelvedon/Pilgrims Hatch. These are the roads on which the visual separation of the two urban areas is seen. The gap is experienced because you travel through countryside with a rural character that contrasts with the urban edge of the two main towns. You know when you leave and you know when you arrive. Both MSA's would be seen as urban developments in this gap resulting in the loss of a visual gap as described in the PPG. Similarly, the rural gap between towns formed by the MGB is experienced on the M25 which is seen to be passing through open countryside between towns on it arc through the area. As the developer's ES admits the MSA's would appear as a part of an urban motorway and would therefore result in a loss of visual separation provide by the countryside on these sites.
14. The MSA's are therefore in an area that makes a strong contribution to preventing neighbouring towns from merging and they do not meet the Grey Belt definition. As the requirement is to avoid a strong contribution to any of the three purposes a failure here is sufficient to exclude the sites from Grey Belt characteristics on its own.

NPPF 143 d) to preserve the setting and special character of historic towns;

15. Brentwood has historic significance dating back to the 12th–14th centuries, but since the sites already fail criteria 143(a) and (b), further assessment under this criterion is unnecessary.

NPPF 155a) Effect on remaining Green Belt

16. Since the sites are not Grey Belt, this test does not apply. However, their failure under 143(a) and (b) confirms that development here undermines the strategic Green Belt gap.

NPPF 155 b) There is a demonstrable unmet need for the type of development proposed;

17. The Very Special Circumstances test remains the applicable standard, as these sites are not Grey Belt.

NPPF 155 c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework;

18. The sites rely heavily on car travel to work, contradicting NPPF Paragraphs 110 & 115, which prioritise sustainable transport.

NPPF 155 d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.

19. The 'Golden Rules' do not apply to commercial development.

Conclusion

20. The Moto MSA sites do not meet Grey Belt criteria and remain inappropriate development requiring Very Special Circumstances. Brentwood Borough Council should reject any Grey Belt claims and assess the application under standard Green Belt policy.

