

**Matter 2B / Government Office for the South East of
England (7447)**

Draft RSS for The South East of England -The South East Plan
Examination in Public - November 2006 to March 2007
Written Statement on behalf of HM Government - October 2006

1. National policy on Green Belt is set out in Planning Policy Guidance (PPG) 2 *Green Belt*. It has been augmented by:
 - PPG13 *Transport* Annex E regarding Park and Ride in the Green Belt;
 - Planning Policy Statement (PPS) 7 *Sustainable Development in Rural Areas* regarding the countryside around urban areas (para 26) and farm diversification (para 30 (iii));
 - PPS10 *Planning for Sustainable Waste Management* (para 3) regarding the locational needs of some types of waste management facilities (including minerals recycling facilities); and
 - The *Sustainable Communities Plan (2003)* (para 4.10) that states:

4.10 We will protect the countryside through a target for each region to maintain or increase the current area of land designated as green belt land in local plans. We will use green belt and countryside protection tools to maintain the openness of the countryside around areas of growth and prevent urban sprawl. Designated areas such as National Parks and Areas of Outstanding Natural Beauty will continue to enjoy the greatest level of protection afforded by the planning system.
2. National policy on land outside urban areas is contained, *inter alia*, in PPS 7 *Sustainable Development in Rural Areas*.
3. The fundamental policy aim remains to keep land around urban areas permanently open, to prevent urban sprawl and to protect the countryside from encroachment.

2B.1. Are policies CC10a and CC10b consistent with the emphasis of the spatial strategy on urban areas and regional Hubs?

1. Green Belts (addressed by Policy CC10a) are an important part of national policy and the Government continues to uphold the principles in PPG2 and more recently in the Sustainable Communities Strategy 2003. We would expect the spatial strategy to uphold Green Belt principles and we would ask the panel to consider whether or not it does.
2. Given Government support for Green Belts, and the fact countryside is protected under PPS7, we question whether there is a need for an

additional layer of structural protection in the form of Strategic Gaps. Such land might, in some circumstances, provide sustainable locations for urban expansion.

3. LPAs may include, as a plan objective, the maintenance of separate settlement identity for testing through Sustainability Appraisal (SA).
4. An appropriate application of Green Belt, Rural Areas and other national policy, augmented by and implemented via relevant regional and local policy, should provide and support the draft RSS's (South East Plan (SEP)) urban areas and regional hubs based strategy. It is clear from our responses to 2B.2 and 2B.3 that we have concerns that policies CC10a and CC10b do not fully provide and support the SEP strategy.

2B.2 *Is there a case for a strategic review of the Green Belt? If there is a case i) are there any particular locations in the Region that should be identified for review (for the purposes of additions to or deletions from the Green Belt), ii) what are the criteria for review that should be specified in the Plan?*

1. We would expect the SEP to carefully consider and address the need for strategic reviews of the Green Belt in the context of the need to take forward strategic planning in the South East over the plan period and beyond.
2. Green Belts are designated through the plan-making process, ensuring that proposals for new Green Belts are subject to public consultation and examination. Boundaries of Green Belts are set by planning authorities in development plans, once their general extent has been agreed in the regional spatial strategy. Once established, Green Belt boundaries should only be altered exceptionally, through the plan process, ensuring that local people have full opportunity to make representations or object to the proposed changes. But where Green Belt boundaries have been drawn too tightly, development may "leapfrog" the Green Belt into less sustainable locations. Where this occurs, the Government considers it sensible for planning authorities to consider further whether Green Belt boundaries need revision. In that case:
 - the Government would want to be satisfied that all opportunities for development within the urban area contained by the Green belt had been properly considered; and,
 - the need for boundary changes should be considered first in a review of the regional spatial strategy. Only when that need for change has been firmly established should detail changes be considered through the local plan process. This ensures that local people have a full

opportunity to make representations or object to the proposed changes.

3. For example, the Government is aware that the Oxfordshire Structure Plan Panel Report concluded that a review of the Oxford Green Belt should be carried out as part of the SEP's Central Oxfordshire sub regional planning. We are not aware of any evidence or change in circumstances that would invalidate their conclusions, recommendations or suggested basic methodology and we feel the SEP should incorporate these recommendations.
4. GOSE welcomes the draft SEP's acknowledgement that any cases for small scale review can be pursued through the Local Development Framework process. To prevent local Public Examinations having to revisit regional issues, the Panel may consider that Policy CC10a should read "where" rather than "if"; and make clear what "small- scale" and "local" mean in practice.
5. Any criteria within the SEP to guide green belt reviews should be consistent with PPG2 and the Sustainable Communities Plan.

2B.3 *Is it appropriate to encourage the identification of strategic gaps in certain circumstances? If yes, are the criteria defined in Policy CC10b appropriate and justified?*

6. As outlined in Government's representations on the draft RSS we have a number of concerns over the SEP's treatment of strategic and local gaps. PPS7 Sustainable Development in Rural Areas provides for the protection of rural areas, including country towns and villages and the wider largely undeveloped countryside up to the fringes of larger, urban areas. The new system requirement to proactively plan the future form and direction of development in all areas will also increase the protection afforded to unidentified land. Similarly, authorities may include as a plan objective, the maintenance of separate settlement identities for testing through Sustainability Appraisal. Therefore, the Panel may firstly wish to explore whether there is a continuing need for gaps per se.
7. If the Panel concludes that there is a continuing case, it may wish to explore the need for SEP guidance regarding testing the continuing relevance of existing individual gap policies. This is because in order to take account of up-to-date national policy and/or to establish individually and collectively sustainable communities, it may be necessary to remove or amend gaps, or safeguard new areas.
8. With regards to the creation of any new gaps, we would reiterate our concerns that the CC10b criteria appear rather blunt tools that fail to recognise the variety of existing settlement sizes, patterns and inter-relationships. For example, it may be appropriate, and not necessarily via a gap policy, to guide development such that a larger settlement does not expand and over-run a smaller neighbour. Equally we are

uncertain whether the policy is suggesting that if the distance between settlements exceeds five miles, gap policies are unnecessary, or the protected area between them may only be a maximum five miles wide.

9. Finally we are unclear whether any inferences should be taken from the draft SEP's inclusion of some named gaps. If the case is proven for the designation of strategic gaps, then the general location and extent of all of them should be made known. To do otherwise may result in a plan with insufficient clarity, transparency or consistency.
10. With regards to draft SEP paragraph 1.38 on local gaps serving landscape purposes, this is a further example of where we are unsure of the merits of the plan paraphrasing but not adding to national policy.