

## EXAMINATION OF THE HERTSMERE REVISED CORE STRATEGY DEVELOPEMNT PLAN DOCUMENT

ADDITIONAL STATEMENT – APRIL 2012

MATTER 2 - Distribution of Housing and Approach to the Green Belt

ISSUE 2.7 – Strategic Gaps

RACHEL CHARITABLE TRUST Ref. 4549

1. This additional statement has been primarily prepared in response to the publication of the National Planning Policy Framework (NPPF) on the 27th March 2012.
2. It considers if the nature of National Green Belt Policy has changed or evolved since the submission of the original representations made in January 2012. The basis of those representations was that the proposals for a “Strategic Gap” in paragraph 5.8, Policy CS12 and notated on the Key Diagram of the Core Strategy was not consistent with National Green Belt policy as expressed, at that time, in PPG2.
3. The National Policy for Green Belt is now contained with section 9 of the NPPF, paragraphs 79 – 92 inc.
4. Paragraph 79 immediately confirms that the Government attaches great importance to Green Belts.
5. The fundamental purpose of the Green Belt is then confirmed as being to prevent urban sprawl by keeping land permanently open. Green Belts are then described (para. 80) as having five purposes, namely:
  - to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and

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- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
6. These purposes are identical to those previously contained in the now replaced PPG2.
  7. The NPPF also reconfirms that inappropriate development is by definition harmful to the Green Belt (para. 87) and should not be approved except in very special circumstances.
  8. New buildings are also inappropriate in the Green Belt (para. 89) except in a limited range of circumstances. Included as an exception is:
    - limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
  9. It is considered that the NPPF approach to control of development in the Green Belt is unambiguous and clearly sets out a range of policies to underpin the great importance the Government attaches to the maintenance of the Green Belt.
  10. This approach broadly mirrors the previous approach contained in PPG2 and indeed several areas of policy (and wording) is drawn directly from the previous document.
  11. As a consequence of this, the basis of the original objection to the proposed Strategic Gap – inconsistency with National Policy - remains.
  12. The primary role of the Strategic Gap (Core Strategy para. 5.8) appears to be first, the maintenance of settlement patterns and the gap between towns and second, to control the scale of any (as yet undefined) development proposals on previously developed sites.
  13. The first of these elements is specifically addressed by bullet points one and two of para. 80 of the NPPF (para. 5 above). The second is directly addressed by the last bullet point of para. 89 of the NPPF (para. 8 above).

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14. The Core Strategy Green Belt policy (CS12) by simply aligning itself with the NPPF Green Belt policy approach has no additional need to designate or identify any Strategic Gaps as the Council's stated purpose for these Gaps is already addressed by the National Green Belt policy approach.
15. This would also avoid the clear impression of a "two tier" Green Belt policy in the Borough with other areas of Green Belt being regarded as less important leading to the potential unintended consequence of additional pressure for inappropriate development within these areas.
16. If however it is the intention of the Council that a greater control over development is envisaged in these Strategic Gaps than that afforded by "normal" Green Belt policy (which would confirm a two tier policy) then that approach will not be consistent with National Policy. It would not be appropriate, for example, for the Council to regard any of the categories of development listed in para. 89 of the NPPF as inappropriate in a Strategic Gap. National Policy does not support any tiered approach to the control of development in the Green Belt but sets out clearly in a single tier of policy what is and is not acceptable.

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Planning Works Ref.8255/36

Gary Thomas  
Planning Works Ltd  
71 The Ridgeway  
Stanley Hill  
Amersham  
Bucks  
HP7 9HJ

01494 725944

[garythomas@planning-works.co.uk](mailto:garythomas@planning-works.co.uk)