

RSS EXAMINATION IN PUBLIC SOUTH EAST

STATEMENT BY CPRE SOUTH EAST: PARTICIPANT 7124

MATTER 2B – GREEN BELT AND STRATEGIC GAPS

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

1.1 Policy CC 10a confirms retention of existing Green Belts in the region, and their improvement through land use and rural urban fringe management initiatives. CPRE believes this policy can be consistent with the spatial strategy focus on urban areas and regional hubs, provided the location of the hubs and the extent of the urban development respects the permanence of Green Belt. If the development of hubs and urban areas encroaches into Green Belt the strategies are clearly inconsistent.

1.2 Green Belts have a very strong track record of helping to maintain successful settlements and protect them from the self destruction of sprawl. Green Belts are also part of Green Infrastructure that can now be recognised to be a vital part of any town. Green Belts can provide the access to the countryside around towns, and be a valuable part of healthier living and better quality of life. The Green Belt should therefore be an asset in an urban development plan both by focussing development on the core of the town and by providing Green Infrastructure especially where there are active access-friendly land management initiatives in place.

1.3 Policy CC 10b sets out guidance to local authorities enabling them to define strategic gaps ‘where there is a need to prevent’ coalescence between settlements of over 10,000 people. In a few cases such gaps are reinforced by natural topography: for example the 2.5 mile gap between Maidstone and the Medway towns, is also the escarpment of the North Downs. The spatial characteristics of the South East are a wide spread of medium to large sized settlements across the region; fewer metropolitan cities than other regions; fewer natural topographical barriers, but very great pressures for development. In this situation a framework of strategic gaps is vital to ensure settlements do not merge by default and lose their focus and character. It is also important to consider strategic gaps at the Regional level, since they are vital part of planning the overall pattern of settlements to help ensure infrastructure, economic growth, environmental quality, and quality of life can be optimised.

1.4 CPRE believes CC10b is supportive of the focus on urban areas and regional hubs, provided the strategic gaps are identified and respected.

2B.2 Is there a case for a strategic review of the Green Belt?

2.1 Green Belts are a proven planning policy mechanism. A key part of their effectiveness is that they have permanence: they set a framework which is clear for all. The concept of Green Belts has worked successfully for 50 years to help manage many

waves of growth, always helping to maintain the coherence and character of settlements. The current world scale success of London is at least in part because of the existence of the Metropolitan Green Belt. This also allows access to residence in highly desirable adjacent areas. The Metropolitan Green Belt has also protected market towns around London, which have maintained their character, and some have become significant economic hubs themselves and drivers of the economy in the South East. This is a virtuous circle of good spatial planning, civic identity and good places to live and work. To work properly, Green Belt must be able to work with other policies of urban renewal. Green Belt is not designated for its landscape value, but its essence is to retain its overall integrity.

2.2 When, from time to time, there are proposals to ‘review’ a specific Green Belt, or to permit development within them, this undermines their principal purpose which is to contain sprawl which would otherwise develop around strong cities, such as Oxford. We therefore support the Assembly’s view that there is no case for a strategic review of the Green Belts within the region.

2.3 Green Belts are also in place to maintain character and identity. The Oxford Green Belt was put in place to maintain the historic character and setting of the City of Oxford; it has stood the test of time. The academic, research and economic vibrancy of Oxford is proof that the established fact of the Oxford Green Belt has not limited this success. While some may regard the City of Oxford as ‘overheated’, others would describe that as ‘very successful and aspirational’. The character and setting of Oxford reinforced as it is by the Green Belt, is part of that success. The value and importance of the Green Belt to spatial planning is even more important just because it is *not* always reinforced by other natural topographical barriers. In this case the Green Belt constraints for Oxford will help the direction of effort and economic growth to other towns such as Didcot and Bicester creating stronger multi settlement growth. The alternative of urban sprawl around Oxford could destroy both the character and the economic attractiveness of the city. It is no accident that the sub-regional strategy for Central Oxfordshire has a specific policy CO3 to maintain the Green Belt around Oxford.

2.4 Should there be more Green Belts? CPRE does not believe there is a case for new Green Belts to be established in this Plan. An important part of the overall spatial strategy is to try to spread economic growth more evenly across the South East, in particular to reduce the east – west disparities. However there may be a case for reviewing this in the future if the economic growth in fact becomes more concentrated and ‘heated’ in some areas. A Green Belt could help to manage the growth, and maintain the character and success of strong urban environments and their rural access.

2.5 It is also often asserted that Green Belts are a ‘waste of land: lying semi derelict, an unused resource (‘so why not build on them: much better use of the land?’). It is very important to distinguish between the strategic spatial strategy *need* for Green Belts- to protect and enhance the character and identity of settlements- and the effective land *management* of Green Belts: these are two very different topics and should not be confused. The argument is put forward where there is ‘scrubbing up’ of pasture no longer grazed by animals, or where equestrian establishments or market gardens fall

into disrepair. Green Belts are in fact subject to just the same land management economic pressures as other rural areas of the South East. They also have the pressures of being close to settlements and therefore the litter and vandalism of the rural urban fringe is more evident.

2.6 We are at a 'tipping point' where this proximity to settlements is becoming more of a beneficial resource than a problem. The new agendas of access to the countryside, interest in local food, farmers' markets, greatly increased interest in health through walking and cycling for leisure are making the Green Belt an integral and important part of the 'offering' of successful urban settlements. In many places this is reinforced by the now active management plans of adjacent AONBs.

2.7 Green Belts can facilitate very high quality Green Infrastructure, contributing directly to a 'healthy region'. Much work has been done already which is directly relevant to the better management of Green Belts: the *Countryside In an Around Towns* national policy is included as BE4. The London Fringe sub region sets out the importance of Green Belt management in LF10, and notes the initiative of the Green Arc: this is an important inter-regional Green Infrastructure project with London Region.

2.8 Green Belts should be maintained as an axiomatic part of the spatial strategy because they protect successful urban settlements from self destructive sprawl, and they can encourage the development of other successful settlements. The criticism of them as 'wasted land' is wrong. Now is not the time for a strategic review of green belts. It is rather the time to apply them as an asset for town character and setting design and green infrastructure. This better management of Green Belts is a significant issue.

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

3.1 There are many substantial settlements in the South East and many examples where the settlements have become continuous urban development. The Medway towns are a notable example. The proposals in this RSS for hubs would create more urban 'twins' The proposal for a Tonbridge – Tunbridge Wells hub straddling the A21 needs fuller discussion to avoid both towns losing more than they gain economically. Other towns such as Reigate and Redhill risk coalescing by default. In some sub-regions, such as South Hampshire there is a clear proposal to designate strategic gaps to protect the separate identity of settlements.

3.2 Along the Sussex Coast Strategic gaps are also a key issue, but not one that has been highlighted in the present sub-regional strategy. In the Western Corridor and Blackwater Valley it is recognised that the spatial strategy has a multi-centred approach (2.4.1) and that 'gaps and green wedges' to maintain the identity of settlements are essential parts of the good development in the sub-region. In the London Fringe, the close proximity of towns designated as Hubs makes it imperative to give stronger weight to establishing strategic gaps.

3.3 CPRE is concerned that not enough attention may be given to identifying strategic gaps in the context of so much continuing development in settlements that are less than 5 miles apart. The corollary of this is that the consequences and risks of settlements coalescing into two centre hubs as proposed for example for Tunbridge Wells - Tonbridge, needs very careful consideration to ensure both can continue to be successful settlements. We would strongly urge all councils to identify strategic gaps or local gaps, where appropriate in their sub regions and rest of county areas. In this context, the nature and character of a hub that will remove a strategic gap should have particular attention in an LDF to ensure that settlement culture is not eroded in pursuit of greater economic growth and housing development.

3.4 In conclusion, yes we do believe that strategic gaps should be identified and we believe that the policy should be more widely applied than is likely in the policy as drafted. We also think that there should be a clear rationale wherever there is a case being presented that would result in coalescence two or more towns. This could happen in the case of certain regional hubs over time. In particular, the character and identity impacts of the proposals should be considered, and if possible, assessed against the Integrated Regional Framework criteria.

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