

# Strategic gap and green wedge policies in structure plans: main report

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## Summary

The research comprises a systematic analysis of a sample of restraint policies playing a similar role to Green Belts, as determined at structure plan level. The report discusses the purpose and use of strategic gaps, green wedges and rural buffers and makes suggestion for clarification of their role in planning guidance.

## Order

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*The findings and recommendations in this report are those of the consultant authors and do not necessarily represent the views or proposed policies of Communities and Local Government.*

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## Executive Summary

### *Introduction*

1. Local designations such as strategic gaps, rural buffers and green wedges were first referred to in planning guidance in PPG7 *The Countryside* (Revised) in 1997. The guidance states that in reviewing development plans local authorities should re-assess the function and justification of such policies, at the same time recognising that they can contribute to urban form and the shaping of urban areas. The House of Commons Environment Select Committee report on *Housing* recommended that the Government should support local planning authorities who wish to maintain their own local designations. In its response the Government stated its willingness to consider whether local designations which perform the same function as green belts and have the same objectives and purposes, should formally enjoy the same status.

2. The aims of the study were to:

- assess how far local authorities are using local designations such as strategic gaps, rural buffers and green wedges in their development plans, the scale and extent of these areas, and their location relative to urban areas;
- assess the justifications for including land in such designations;
- establish the objectives for land use within such areas, and to what extent these fulfil current green Belt purposes as set out in PPG2;
- establish what procedures exist for the definition and alteration of the boundaries of such designates areas; and
- establish what development control policies operate within such areas, and review any published development control evidence.

3. The analysis involved interviews with nine County planning authorities, selected from a wider list of authorities believed to be operating strategic gap and green wedge policies and available to the project team. A *Preliminary Survey* was produced by the Planning Policies Research Group at Oxford Brookes University in May 1999, based on correspondence and telephone survey methods.

### *Scale and Extent of Strategic Gap and Green Wedge Policies*

4. The survey of structure plan authorities, carried out by Oxford Brookes, in early 1999, revealed that 17 Counties had some form of strategic gap, green wedge or similar policy giving higher levels of protection than normal countryside policy. The more detailed analysis of Plans in the nine areas suggests that strategic gaps and green wedge policies have the following attributes:

- they are smaller in extent than most Green Belts, most often covering under five per cent

of a county area;

- they tend to be in the south and south east of the country, the largest areas being just beyond the outer edge of the Metropolitan Green Belt, in areas such as Crawley-Gatwick-Horsham and the Medway Towns;
- in seven of the nine cases County Councils had sought Green Belt as a first option, but had been rejected by the Secretary of State;
- decisions by the Secretary of State have sought to clearly differentiate between strategic gap and green wedge policies and Green Belt policy;
- where attempts have been made to re-formulate strategic gaps into continuous belts around towns, as in the Hampshire Structure Plan, these have been resisted by Examination in Public panels; and
- district and county councils have given strong support to strategic gap and green wedge policies, often seeking to extend them, and to adopt stronger development control policies within them.

### *Strategic Gap and Green Wedge Purposes*

5. Each strategic restraint designation has a different basic rationale, and a number overlap to some extent with Green belt purposes. Also there are links to the positive management and enhancement of the environment of the urban fringe covered by such designation.

6. The basic purposes of the designations are as follows:

- for *strategic gaps*; they are to protect the setting and separate identity of settlements, and to avoid coalescence; retain the existing settlement pattern by maintaining the openness of the land; and retain the physical and psychological benefits of having open land near to where people live;
- for *rural buffers*; to avoid coalescence with settlements (including villages) near a town until the long-term direction of growth is decided; and
- for *green wedges*; to protect strategic open land helping to shape urban growth as it progresses; to preserve and enhance links between urban areas and the countryside; and to facilitate the positive management of land.

### *Overlap with Green Belt Purposes*

7. The main overlap between strategic gap and green wedge and Green Belt purposes is in the area of preventing the coalescence of settlements. Most of the strategic gap and green wedge policies also have the purpose of avoiding coalescence between large built-up areas and villages. This purpose does not however overlap with those of Green Belts. Strategic gap and green wedge policies do not have the purposes of assisting urban regeneration or checking unrestricted sprawl. The restraint policies for Norwich and Lincoln have the purpose of

protecting the historic settings of the two cities. But the areas covered by the policy relate to the quality of the natural resources (for example landscape and wildlife areas) and not just the position of the land. The protection of important open land, in the form of green wedges, is an aim common to four of the counties studied. This does not overlap with Green Belt purposes.

### *Strategic-Local Distinction*

**8.** There was some confusion over the status of the three types of designation in Regional Planning Guidance (RPG). The Swindon Rural Buffer is mentioned in RPG, but green wedges in Leicestershire are not. The question of how far the three types of designation can restrain regionally-derived patterns of growth, an issue which has arisen in the South East Region, has yet to be clarified.

### *Positive Urban Fringe Policies*

**9.** All of the Counties studied had pursued positive measures to improve the environment of their urban fringe areas, and such initiatives were often keyed to the particular designations studied. These included strategic gap management frameworks, countryside management projects and river corridor enhancement studies. There was general acceptance of the view that environmental improvement measures were a necessary complement to restraint.

### *Permanence and the Definition of Boundaries*

**10.** There is no national guidance on the permanence of strategic gaps and green wedges in structure plans. In some Counties the position is clear; but confusion has arisen especially in Counties where the policy has been widely deployed. The main findings in respect of permanence and the drawing of boundaries are that:

- strategic gaps in Hampshire, West Sussex and Kent have the same duration as other policies in the Structure Plan, they are not long term as defined for Green Belt policy in PPG2;
- the rural buffers and green wedges studied also had the same duration as the relevant structure plan;
- in the cases of Hampshire and West Sussex local opinion would prefer to regard strategic gaps as having the same level of permanence as Green Belts;
- in defining strategic gaps and other restraint designations it is important to include only land that is strictly necessary to fulfil the purposes of the policy;
- factors such as openness, topography, the nature of urban edges and vegetation should be taken into account in defining strategic gaps; and
- clearly identifiable and logical features on the ground should be used to produce defensible boundaries.

### *Development Control Principles and Practice*

11. Development control in Green Belts is based on a number of clear principles. There is a presumption against inappropriate development in the area. Very special circumstances need to be demonstrated by applicants who wish to secure permission for uses other than those in a strictly limited list contained in the guidance. The overall aim of the policy is to keep land permanently open.

12. The main findings in relation to development control principles were:

- the strategic gap and green wedge policies constituted an additional presumption against development, over and above the strict controls normally available to local authorities for the countryside;
- the main principle deployed was to retain the openness of the areas designated; this was followed by a concern to retain the settings of urban areas;
- in some counties development control provisions in strategic gaps were equally or more stringent than for Green Belts, for example making no provision for the redevelopment of existing major sites; it was argued these policies were necessary because of the limited extent of gaps and the immediate danger of coalescence in many areas;
- Government Offices and EIP Panels have proposed less absolutist prescriptions for new development by introducing the idea that new development should not *significantly* diminish the extent of a gap, thus allowing for small-scale changes;
- development control in the rural buffer around Swindon was designed to resist major development; smaller-scale change was allowed for in policy and development control policies are similar to those in the remainder of the countryside;
- the policy for the control of environmental assets of the Norwich Policy Area was the same as for Green Belts proper; however Green Belt status had been rejected in the Norwich area in 1993.

13. For the monitoring of development control, the main findings are that:

- the monitoring and analysis of development control outcomes was at best selectively done and, at worst, was non-existent;
- despite this, all of the authorities interviewed claimed their strategic gap and green wedge policies had been successfully used in development control, and had generally been supported at appeal;
- where monitoring was reasonably comprehensive (in West Sussex) local plans had already, or were proposing, a reduction in the area of strategic gaps in the County; and
- current pressures in West Sussex related to existing businesses seeking expansion space adjacent to current sites.

## *The Way Forward*

**14.** From the central Government point of view there are problems with how far such policies are needed and what form they might take. There is no agreement on what a strategic gap or rural buffer zone is, and PPG7 is not enlightening on this aspect. In terms of the future:

- *strategic gaps*, in that they deliver important outcomes, and are strictly limited in size, could be a useful feature of planning at County level. It should be made clear that land within them could be considered on an equal basis with non-designated land when Structure Plans are reviewed;
- *rural buffers*, in that they are an interim policy for towns which are exceptionally fast growing, are probably only likely to be used sparingly; but
- there is a potential for *green wedges*, delivering a wide variety of desirable outcomes, to become a successful future model for the urban fringe.

## *Removal from Structure Plans*

**15.** It appears that the removal of these forms of designation from Structure Plans is not feasible given their level of local public support. Central Government would need to give very strong additional re-assurances to local authorities if reliance were to be placed on normal countryside policies alone.

## *Green Belt Status*

**16.** There would be significant problems in giving strategic gaps and green wedges the status of Green Belts. Strategic gaps as Green Belts would reduce peripheral land development options on the edges of large settlements, often in sustainable locations. Problems over the interpretation of permanence, and the possible need for safeguarded land would also occur. If *green wedges* were given Green Belt status then the area covered by a strong presumption against development would be more closely drawn into cities and large towns. It would therefore be important to retain parts of urban peripheries free of the policy, as demonstrated in the Leicestershire and Norwich examples.

## *New Restraint Policies*

**17.** In this scenario structure plans and UDP Part I plans would be permitted to designate rural buffers, strategic gaps, or green wedge policies. For rural buffers and strategic gaps the emphasis would be on avoiding coalescence and retaining the separate identity of settlements. Rural buffers (more extensive than strategic gaps) could be appropriate in areas with rapid physical growth, with strategic gaps being used in more limited areas where coalescence was likely. Rural buffers and strategic gaps would help tackle issues of the orderly development of urban areas. Green wedges would follow the Leicestershire model, identifying areas of land that would help shape the form and direction of development. They would have a theme of linking town and country, and protecting high quality landscapes and access to the countryside for leisure.



### *Implications for Green Belt Policy*

**18.** A clear impression from the study was how far local planners operating strategic gap, rural buffer and green wedge policies considered them an improvement on Green Belt. They were capable of delivering wider objectives, while giving more flexibility to respond to newly-emphasised priorities of sustainable development. This brings forward the question of how far the existing purposes and long-term rigidities of Green Belt policy are appropriate in current circumstances.

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## 1. Aims And Policy Background

### *Aims of the Study*

**1.1** Local planning authorities have, for many years, operated a range of policies designed to restrain development. In addition to Green Belt policy, local planning authorities have used policies, approved in structure plans, to protect strategic gaps, green wedges and rural buffers. The aims of this study are to:

- assess how far local authorities are using local designations such as strategic gaps, green wedges and rural buffers in their development plans; the scale and extent of these areas; and their location relative to urban areas;
- assess the justifications for including land in such designations;
- establish the objectives for land use within such areas; and to what extent these fulfill current Green Belt policy purposes as set out in PPG2;
- establish what procedures exist for the definition and alteration of the boundaries of such designated areas; and
- establish what development control policies operate within such areas, and review any published development control evidence.

### *Policy Background*

**1.2** Strategic gaps and green wedges were first referred to in policy guidance in PPG7 *The Countryside* in 1997 ([see endnote 1](#)). It was made clear that strategic gaps and green wedges are local countryside designations which perform a lesser degree of restraint than Green Belts. They should only be maintained or extended where there is good reason to believe that normal planning policies cannot provide the necessary protection. The guidance on PPG7 emphasises that local authorities should rigorously consider the function and justification of existing local designations. It states strategic gaps and green wedges should be soundly based on a formal assessment of their contribution to urban form and urban areas ([see endnote 2](#)).

**1.3** In its inquiry into *Housing* in 1998, the House of Commons Environment Committee received evidence on strategic gaps and green wedges. They concluded that Government should support local authorities who wish to maintain their own designations which play a similar role to Green Belts such as Rural Buffer Zones and Strategic Gaps ([see endnote 3](#)). In its response, published in October 1998, the Government stated:

Following its Planning Comprehensive Spending Review, the Government is giving careful consideration to the role of local planning designations. The Government is willing to consider whether local designations which perform the same function as Green Belts, and have the same objectives and purposes, should formally enjoy the same status. In the meantime, it remains the Government's view that local designations, such as Rural Buffer Zones and Strategic Gaps, carry less weight

than sites formally designated in accordance with PPG2, and the policies operating within them should therefore not be as restrictive as provided for in PPG2 ([see endnote 4](#)).

**1.4** In recent draft advice on Regional Planning Guidance the Government has re-affirmed the regional and sub-regional role of Green Belt policy, but makes no reference to strategic gap and green wedge policies ([see endnote 5](#)). Guidance on development plans suggests that structure plans can indicate broad areas of restraint on development and these can form part of the strategic framework for local plans and development control. This guidance includes Green Belts as a subject for inclusion in structure plans but, again, does not refer to strategic gaps or green wedges ([see endnote 6](#)).

#### *Evidence from Previous Research*

**1.5** Research for the Rural Development Commission on *Rural Development and Land Use Planning Policies* revealed 29 strategic gap and green wedge policies in a sample of 30 rural area local plans from across the country. The number of such policies is believed to have grown over recent years. It was noted that these policies adopt parts, or all, of the rationale for Green Belts proper, and also use similarly restrictive provisions for development control. A number of the policies found sought to protect the setting of historic towns or cities such as Salisbury, deploying Green Belt-style development controls to this end ([see endnote 7](#)). The planners interviewed considered strategic gap and green wedge policies to be as restrictive as Green Belts, but thought this necessary to help shape development and define the edges of large towns and historic cities ([see endnote 8](#)).

**1.6** A *Preliminary Survey of Structure Plan Authorities*, carried out in 1999 by the Planning Policies Research group at Oxford Brookes University, revealed that 17 Counties had some form of strategic gap, green wedge or similar policy in their structure plans. These were intended to give higher levels of protection than normal countryside policy (see Table 1.1). In some cases, such as Hampshire and West Sussex, the policies were long standing and indicated on structure plan key diagrams, but in others written statements in the plan were not accompanied by indication of the broad areas where they would apply ([see endnote 9](#)).

**Table 1.1:** Counties with Strategic Restraint Policies, including Strategic Gaps and Green Wedges, in Structure Plans:

Bedfordshire	Norfolk
Berkshire	Nottinghamshire
Cornwall	Staffordshire
Cumbria	Suffolk
Gloucestershire	Surrey
Hampshire	Warwickshire
Kent	West Sussex
Leicestershire	Wiltshire
Lincolnshire	

Source: Steenberg, C. (1999) *Preliminary Survey of Structure Plan Authorities*, Oxford Brookes University

1.7 There is a growing volume of opinion to suggest that Green Belt policies, conceived as permanent restrictions on development over broad areas around cities, may not accord well with sustainable development priorities (see endnote 10). The Draft PPG3 *Housing* suggests that planned extensions to existing urban areas are likely to prove the next sustainable option for new housing after building on appropriate sites within the urban areas (see endnote 11). The presence of Green Belt may preclude the identification of the most sustainable sites, in particular those with good access to a variety of transport modes. In this situation green wedges have been suggested as a better way forward. The recent *Strategic Sustainability Appraisal of the Nottingham-Derby Green Belt* discusses the relevance of green wedges to regional planning. They are seen as having considerable potential in that they stress the roles of strategic restraint policies in structuring urban growth, rather than the preventative role of policy (see endnote 12). When discussion about introducing Green Belts into Wales arose in the early 1990s, much of the advice received stressed that the policy should take the form of wedges, structuring development, rather than broad encircling areas of land operating as stoppers or diverters of development (see endnote 13). These themes are reflected in more recent discussion in the context of allowing for economic development in Wales (see endnote 14).

1.8 It is therefore important, given the emerging sustainability agenda, to assess the benefits of forms of restraint other than Green Belt, which operate in a strategic context. This study is designed to produce a body of evidence of their use at local authority level from which to draw conclusions.

## Endnotes

1. This phrase, used throughout the study, is also intended to cover also rural buffer zone policies.
2. DOE (1997) *The Countryside: Environmental Quality and Economic and Social Development*, PPG 7, London, HMSO, para. 4.16
3. HM Government (1998) *Housing*, Tenth Report of Environment, Transport and Regional Affairs Committee, Vol. 1, 495-1, para.264
4. HM Government (1998) *The Governments Response to the Environment, Transport and Regional Affairs Committee, Housing*, Cm 4080, para. 95.
5. DETR (1999) Revision of Planning Policy Guidance Note 11; *Regional Planning*, Public Consultation Draft, London, DETR.
6. DETR (1999) PPG 12; *Development Plans*, London, DETR, paras 3.8 and 3.10.
7. Elson, M.J., Steenberg, C. and L. Downing (1998) *Rural Development and Land Use Planning Policies*, Salisbury, RDC, paras 5.15-5.16.
8. Ibid., para. 5.25.
9. Steenberg, C. (1999) *Strategic Gap And Green Wedge Policies In Structure Plans, Preliminary Findings of a Survey of Structure Plan Authorities*. Unpublished Report, Planning Policies Research Group, Oxford Brookes University.
10. See, for example, Elson, M.J. Green Belts the Need for Re-Appraisal, *Town & Country Planning*, 68,5 156-8.
11. DETR (1999) Public Consultation Draft, PPG3 *Housing*, London, DETR.
12. Baker Associates (1999) *Strategic Sustainability Assessment of the Nottingham-Derby Green Belt in the East Midlands Region*, Bristol, Baker Associates, paras 4.25-4.30.
13. See, for example, Elson, M. J. (1992) Green Belts for Wales, *The Planner*, 78,9, pp10-11.
14. Tewdwr-Jones, M (1997) Green Belts or Green Wedges for Wales? A Flexible Approach to

Planning in the Urban Periphery, *Regional Studies*, 31, 1, pp73-77.

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## 2. Strategic Gap And Green Wedge Policies The Current Position

### *Introduction*

**2.1** Strategic policies for the restraint of development outside towns and cities, currently take a variety of forms. Normal countryside policies, following PPG7 *The Countryside*, suggest that development will be firmly controlled, and any change limited to that for agriculture, forestry and related activities ([see endnote 1](#)). Where an additional layer of protection against unnecessary development is needed, restraint has taken one of three forms:

- the designation of Green Belts, operating in accord with the principles in PPG2;
- strategic gap and green wedge policies, put forward by strategic authorities and, from time to time, approved by DETR; and
- AONB and local landscape designations, the former determined by the Countryside Agency, and the latter by local planning authorities, which elevate the importance of landscape conservation in any decisions made.

This chapter assesses the second of these three categories strategic gaps and green wedges.

**2.2** The *Preliminary Survey* was limited to an assessment of policies in structure plans. The majority of these are in the southern part of England. No Metropolitan District or Unitary Development Plan policies were studied as it was established that most such areas already operated Green Belt policy restraints ([see endnote 2](#)). The nine examples studies here, selected from the seventeen identified in the *Preliminary Survey*, take two basic forms:

- county-wide patterns of strategic gaps or green wedges; and
- strategic restraint policies related to one town, city or group of settlements in a county ([see endnote 3](#)).

The relevant Counties in the first category are West Sussex, Hampshire and Leicestershire. In the second, the Counties are Kent, Wiltshire, Norfolk, Lincolnshire, Suffolk and Gloucestershire. In each case the account discusses the number and extent of strategic gaps and green wedges, their purposes, and any key Examination in Public (EIP) rulings which have affected the status of such policies. Comments are also made on the level of support for such policies given by relevant District Councils.

### County-Wide Approaches

#### *West Sussex*

**2.3** The approved West Sussex Structure Plan (1993) shows 21 strategic gaps on its key diagram. They cover some 20,285 hectares, just under 10 per cent of the County area. The

strategic gaps are in three broad areas. They were first introduced in 1966 on the coast, and they have been retained in subsequent structure plans. The main coastal gaps separate Chichester, Bognor Regis, Selsey, Littlehampton, Worthing, Lancing and Shoreham. The 1980 Structure Plan introduced large strategic gaps separating Horsham, Crawley and East Grinstead, bordering the Metropolitan Green Belt and the Surrey County boundary in the vicinity of Gatwick Airport. Strategic Gaps also separate Haywards Heath, Burgess Hill and Hassocks, located in the London-Brighton corridor (see [Figure 2.1](#)).

**2.4** There has been a gradual growth in the number of strategic gaps in the County, from 16 in the 1980 Structure Plan, to 22 proposed in the 1996 Third Review Structure Plan. There are also 17 local gaps listed in the 1996 Plan.

**2.5** The purposes of the strategic gaps are to prevent the coalescence of settlements, to retain amenity and the separate identity of settlements, and to protect the undeveloped coastline. The County Council see strategic gaps as protecting the settings of towns and the existing settlement structure of the County. In the *West Sussex Environmental Capacity Study*, carried out in 1996, strategic gaps are seen as part of countryside capital which should be conserved through planning. The gaps are acknowledged to be a County counterpart to the Metropolitan Green Belt, the latter operating in a Regional context ([see endnote 4](#)). Successive Structure Plan approvals by the Secretary of State have stressed that the boundaries of strategic gaps and built-up areas should not necessarily be co-incidental, and that the purpose of the gaps is to prevent coalescence, not to impose a presumption against development. The EIP Panel commented on the Third Review of the Structure Plan (1997) that strategic gap policies should allow for development in gaps which may become necessary when all other options have been exhausted ([see endnote 5](#)). In this way they were seeking to make a clear distinction between strategic gap policies and Green Belt policy.

**Figure 2.1:** Strategic Gaps in the Crawley - Haywards Heath area of West Sussex

**2.6** Strategic gaps have a high level of local political support in West Sussex. They are seen as one of a number of key milestones for County policy, and one to which considerable attention is given in monitoring. District Councils strongly support the policy, and have added local gaps in their local plans. The result is that some towns are surrounded by a patchwork of strategic gaps and local gaps, forming a continuous belt (for example around Horsham).

### *Hampshire*

**2.7** The 1994 Hampshire Structure Plan identifies some 45 strategic gaps in the County. These comprise 13,700 hectares, 3.6 per cent of the area of the County. The gaps are clustered in two areas; along the coast separating Portsmouth, Southampton and Fareham; and in North East Hampshire separating towns in the Blackwater Valley area (see [Figures 2.2](#) and [2.3](#)). The pattern is as inherited from the South Hampshire Structure Plan of 1990 (eight gaps), the Mid Hampshire Structure Plan of 1990 (eight gaps) and the North East Hampshire Structure Plan of 1989 (15 gaps).

**2.8** In approving the 1994 Structure Plan the Secretary of State (SoS) was keen to clarify which of the proposed gaps in the plan were of clear strategic importance. Accordingly the 45 gaps were divided into two categories. The first 18 gaps identified were to cover circumstances where it was considered there was a risk of coalescence between *substantial settlements*. The

remaining 27 gaps were to be re-examined by the County at the next review of the Plan, in order to decide whether they were of strategic or local importance.

### **Figure 2.2:** Strategic Gaps in South Hampshire

**2.9** Following a detailed technical study by the County the Structure Plan Review of 1996 proposed three types of strategic gap:

- three (larger) gaps, to avoid the coalescence of major urban areas in the Meon and Southampton areas, and in North East Hampshire (these formed `collars around the relevant urban areas);
- a strategic gap in the Blackwater Valley, linking with a similar designation in Surrey; and
- seven gaps linking undeveloped coast to the open countryside beyond the South Hampshire urban areas.

If implemented, this proposal would have reduced the number of strategic gaps from 45 to 11 ([see endnote 6](#)).

**2.10** However, the EIP Panel, reporting in 1997, considered the proposed South Hampshire and North East Hampshire strategic gaps to be extensive enough to be termed quasi-Green Belts, rather than having the more limited extent and purposes of strategic gaps. They made similar comments in respect of the proposed Blackwater Valley strategic gap. The Panel proposed that eight strategic gaps should be included in the Plan, in locations where a real threat of coalescence between substantial settlements could occur during the Plan period ([see endnote 7](#)).

### **Figure 2.3:** Strategic Gaps in North East Hampshire

**2.11** In their latest proposed modifications (1999) the Hampshire, Portsmouth and Southampton authorities see the strategic gap issue as one of the most difficult facing the authorities. All of the gaps have strong public support, yet the authorities are aware of the need to include only gaps serving a clear strategic purpose. They have proposed, as a compromise, that four strategic gaps should be approved in:

- in the Fareham-Whiteley area of the Meon Valley;
- in the Fleet, Aldershot, Yateley area in North East Hampshire;
- in the Aldershot, Farnborough-Surrey boundary area (the Blackwater Gap), and
- between Southampton and Eastleigh ([see endnote 8](#)).

**2.12** With the removal of strategic gaps around Winchester, the County have proposed a new Structure Plan policy to protect the setting of the City. This would operate in addition to normal



countryside policies.

**2.13** The Districts have been strongly in favour of strategic gap policies, and are unwilling to see any of the existing gaps lost. This has resulted in the suggested compromise of strategic and local gaps being put forward in the current Structure Plan, despite the wish of the Panel to remove reference to local gaps from the Plan. Where Districts have defined local gaps these have also, on occasion, included green wedges, green corridors and greenways. Strategic gaps have presented some dilemmas to the new Unitary Authorities in South Hampshire where large sites offering potential economic benefits have been the subject of planning applications.

### *Leicestershire*

**2.14** Eleven green wedges, within and on the edges of Leicester, and three on the edges of Loughborough, were first approved in the 1987 Leicestershire Structure Plan. These continued established policies for protecting structurally important areas of open land which influence the form and direction of development in Leicester and Loughborough. In Leicester the green wedges penetrate the urban area, separating neighbourhoods. The wedges in the south of the City are narrower than those in the north. Around a quarter of the City boundary, on the north western edge, has a peripheral pattern of restraint separating Leicester from dormitory villages such as Groby, Anstey and Birstall ([Figure 2.4](#)).

### **Figure 2.4:** Green Wedges in and around Leicester

**2.15** In 1994 further green wedges were approved in the Coalville and Hinckley-Earl Shilton area. Some additions were also made to the green wedges around Leicester at this time. The 2000 Deposit Structure Plan proposes no further strategic changes to the green wedges. There is also an enabling policy in the Structure Plan, allowing for local gaps to be defined by District Councils.

**2.16** The aims of the green wedges include positive environmental aspirations as well as restraint. The latter purposes are the prevention of coalescence and the protection of structurally important areas of open land; and the former relate to preserving landscape and wildlife links between town and country, providing recreational facilities and promoting positive land management ([see endnote 9](#)).

**2.17** A distinction between green wedges and Green Belt policy was made at the EIP discussions into the 1987 Deposit Structure Plan. The Panel concluded there were no special circumstances to justify a Green Belt around Leicester. They also noted that green wedges do not constitute a Green Belt in the accepted sense, in that they do not seek to restrict the total amount of development, but rather to ensure that as urban development extends, open land is incorporated within it. Green wedges are seen by the County Council as a dynamic tool for shaping urban development and improving the quality of life of residents.

**2.18** There has been no conflict with the Districts and Leicester City Council over the principle of green wedge policy. Some Districts have sought to create additional green wedges, but the County has not supported them where they feel they do not fulfil the criteria in the Structure Plan. Housebuilders have challenged green wedge policies at local plan inquiries, notably those within the Blaby Local Plan area in an economically buoyant part of the southern edge of

the City.

## Individual Settlements

### *Kent*

**2.19** In Kent, the County Council have created a strategic gap to separate Maidstone and the Medway Gap area from the Medway Towns of Rochester, Chatham and Gillingham and from each other. The gap, some seven and a half miles wide on an east-west axis, and an average of three to four miles wide north-south, was adapted in the 1996 Kent Structure Plan. (see [Figure 2.5](#)) (see [endnote 10](#)). The three local authorities in the gap, (Tonbridge and Malling, Maidstone and Medway), have sought to extend the gap in various ways, for example to recognise the separation between Gillingham and Chatham. The County have however resisted this on the basis that the proposal was not strategic. Most prominently the County Council objected to a proposal in the Tonbridge and Malling Deposit Draft Local Plan (1996) which sought to extend the Strategic Gap by a significant amount from the south east to the south west side of the Medway Gap settlements. Housebuilders have objected to the policy being included and extended in local plans, contending there is insufficient land for future new housing in the Maidstone area.

**2.20** The strategic gap is an anti-coalescence policy, seen as necessary due to new employment and housing pressures in this part of Kent, and the closeness of the settlements in this part of the County. Much of the strategic gap is also covered by AONB and Special Landscape Area policies.

### **Figure 2.5:** Medway Towns Strategic Gap: Kent

### *Wiltshire*

**2.21** The relevant strategic restraint policy in Wiltshire is a *rural buffer*, which is located on the western and southern edges of Swindon, with a small area north of the Town. This policy was approved in a Structure Plan alteration in 1990. The rural buffer is approximately four miles wide west of Swindon and one mile wide to the south. Its purpose is to avoid coalescence of the fast growing urban area of Swindon with rural service centres such as Wootton Bassett and Cricklade, and a number of villages around the town.

**2.22** The EIP into the 1993 Structure Plan Alteration had considered and rejected the use of Green Belt and strategic gap policies for the area. These were seen as inappropriate when the aim of the restraint policy was to maintain the separate identity of towns and villages and to protect the open countryside around Swindon, pending decisions on the long term future of the town. This is thus a one off policy which, as the Structure Plan approval letter states creates a special presumption against development tending to lead to the coalescence of settlements.

### **Figure 2.6:** The Swindon Rural Buffer

**2.23** Following the EIP into the Draft Structure Plan of 1996, Swindon Borough and Wiltshire County Councils have carried out a study into the possible direction of future growth around Swindon. Growth is proposed south of the town, setting back part of the existing rural buffer to allow for this. However local authority modifications to the Structure Plan propose extensions

of the buffer to the east of Swindon, so that it would encircle the town. This is being considered at the current EIP into the proposed amendments to the Structure Plan.

**2.24** There is strong support from North Wiltshire District for the rural buffer. The residents of village and market towns around Swindon see the policy as the main way of retaining the identity of such settlements. The largest number of representations on any topic on the Structure Plan was on the rural buffer. A local Green Belt Protection Committee appeared at the EIP in November 1999 to argue in favour of a strengthened restraint policy around Swindon.

### *Lincolnshire*

**2.25** The cornerstone of policies to protect the historic and natural environment of the City of Lincoln is a series of green wedges approved in the 1998 Lincoln Local Plan. These safeguard the line and character of important views into and out of the City and help maintain Lincoln's character as an urban area entwined with its rural setting. The green wedges, together with Areas of Great Landscape Value north and south of the City, and a Special Protection Zone in North Kesteven defined in the adopted West Lindsey and North Kesteven Local Plan, help to prevent coalescence of Lincoln and neighbouring settlements (see [Figure 2.7](#)).

**2.26** The Deposit Draft of the Lincolnshire Structure Plan Review (1996) discussed a set of policy options for the continued protection of the unique setting and special character of Lincoln. Those considered most closely were:

- a continuation of existing countryside policies;
- the definition and management of structurally important areas of open land (termed green wedges by the County Council), and
- the designation of a Green Belt to provide long term protection for an area encircling the City.

Little additional land was required for new housing allocations within the Structure Plan period up to 2011 and there were few pressures for inappropriate development around Lincoln. The two Districts, West Lindsey and North Kesteven, in which any Green Belt or green wedges would be located, were in favour of green wedges.

### **Figure 2.7:** Green Wedges and other protected areas in and around Lincoln

**2.27** The EIP Panel did not recommend approval of Green Belt, because existing policies were regarded as adequate to control development. No examples of a failure of the existing policy framework were cited by interests favouring Green Belt designation, and no major changes in circumstances sufficient to otherwise justify designation were established. Para 2.14 of PPG 2 suggests Green Belts are a policy which should be introduced as an exceptional measure. No exceptional circumstances were considered to be present in this case ([see endnote 12 & 13](#)).

**2.28** The Structure Plan policy for Development Around Lincoln's Urban Fringes, endorsed by

the EIP Panel, states that land should be identified to:

- protect the historic setting of the City from inappropriate development;
- protect structurally important areas of open land; and
- ensure that open areas of land extend outwards from Lincoln to preserve links with the open countryside.

**2.29** The area of land covered by the policy is not indicated on the Structure Plan key diagram. Detailed interpretation of the policy is left to the Districts who, it is suggested, may more clearly identify areas for special protection in their proposals maps. Strong District support for the policy suggests that this process is assured. Arising from an EIP Panel recommendation, work has now commenced on an Alteration to the Structure Plan for the Lincoln Policy Area. Among other matters, this will extend the green wedge concept beyond the City boundary and will involve delineation in the Key Diagram.

### *Norfolk*

**2.30** In *Norfolk*, the County Council operates a policy to protect the environmental assets of the Norwich Policy area. The areas covered by the policy include: river valleys, areas of important landscape character, areas of woodland, and the landscape setting of the Southern Bypass of the City. The area covered is largely to the south of the City. These areas are to be identified in local plans (see [Figure 2.8](#)). The policy was approved in 1993, and has been rolled forward in the Structure Plan adopted in October 1999. The EIP Panel recommended no amendments to the policy in 1998.

**2.31** The environmental assets policy was introduced following a proposal by the County Council in 1989 for a Green Belt around Norwich. This was rejected following the EIP in 1992, and the strengthened environmental protection policy was introduced. The policy combines environmental and restraint aspects, and is justified in order to:

- protect the historic setting of Norwich;
- safeguard the surrounding countryside and its particular features and green wedges, and
- prevent settlements merging, restricting ribbon development and urban sprawl.

**2.32** The EIP Panel concluded that Green Belt policy was not appropriate in 1992 for a number of reasons;

- the rate of growth of the City was not seen as exceptional;
- there was no evidence that existing planning policies could not control development pressures; and
- plans for the long term direction of growth around Norwich had not been put forward by

the Authority.

The Secretary of State agreed with these points and turned down the proposal ([see endnote 14](#)).

### **Figure 2.8:** Protection of Environmental Assets around Norwich

**2.33** Although the area covered by the policy is defined by a range of environmental assets such as river valleys and areas of attractive landscape development control policies in the area are the same as for Green Belts in PPG2. They were also updated to reflect the revision of the guidance in 1995.

**2.34** The policy is supported by Norwich City and South Norfolk Districts. Broadland District Council however objected to the policy at the 1998 EIP on the basis that it attempts to apply Government guidance on Green Belts to areas of environmental protection.

#### *Suffolk*

**2.35** The 1995 Structure Plan contains a special policy to protect part of the urban fringe of Ipswich. It states that in order to maintain the countryside around the City, and retain the separate identity of nearby villages, care will be taken to maintain the open character of land separating the villages of Kesgrave, Rushmere St Andrew and Foxhill (on the north eastern edge of Ipswich) from each other, and from Ipswich and Woodbridge. This succeeded a similar policy in the 1979 Suffolk Structure Plan, which also referred to named villages on the western edge of Ipswich. This special policy is not shown as an area on the key diagram of either plan.

**2.36** In the 1999 Draft Structure Plan this policy has been widened to cover urban fringe areas throughout the County ([see endnote 15](#)). Whilst development requirements will be met, the separate identity of towns and villages will be maintained by the use of strategic gaps. Where necessary strategic gaps will be identified in local plans. Waveney Borough Council have identified strategic gaps north and south of Lowestoft in their Local Plan.

#### *Gloucestershire*

**2.37** The Second Review of the Gloucestershire Structure Plan (1997) included a policy for designating a strategic gap on the southern edge of Gloucester. This was to prevent urban sprawl and the coalescence of the Gloucester urban area with villages in the locality. The proposed policy indicates that development should be opposed where it would visually or physically diminish the amount of open and undeveloped land within the strategic gap. However the EIP Panel proposed (1999) that no evidence had been produced to indicate that normal countryside policies were inadequate to protect the countryside from urban sprawl. Using advice in PPG7 *The Countryside* (para 4.16) they recommended rejection of the policy. This has been accepted by the County Council.

#### *Main Findings*

**2.38** This analysis suggests that strategic restraint policies, in the sample of structure plans

studied, have the following attributes:

- they are smaller in extent than most Green Belts, normally covering under five per cent of a county area;
- they tend to be in the south and south east of the country, the largest areas are just beyond the outer edge of the Metropolitan Green Belt, in areas such as Crawley-Gatwick-Horsham and the Medway Towns;
- in seven out of nine cases county councils had sought Green Belt as a first option but had been rejected by the Secretary of State;
- decisions by the Secretary of State have sought generally to differentiate between strategic gap and green wedge policies and Green Belt policy;
- where attempts have been made to re-formulate strategic gaps into continuous belts around towns, as in the Hampshire Structure Plan, this has been resisted; and
- districts and city councils have given strong support to strategic gap and green wedge policies; in some cases seeking their extension, and the adoption of stronger development control policies within them ([see endnote 16](#)).

## Endnotes

1. DoE (1997) *The Countryside Environmental Quality and Economic and Social Development*, PPG7 Revised, London, HMSO.
2. A number of Metropolitan and Unitary authorities may have green wedge policies that are relevant.
3. Steenberg, C. (1999) *Strategic Gap and Green Wedge Policies in Structure Plans Preliminary Findings of Survey of Structure Plan Authorities*, Planning Policies Research Group, Oxford Brookes University, 7pp.
4. West Sussex County Council (1996) *Environmental Capacity in West Sussex*, Chichester, WSCC, para 2.13.1-2.13.6.
5. West Sussex County Council (1999) *Mind the Gap, County Milestones and Strategic Planning Monitoring Statement*, Chichester, WSCC, pp 5-6. Any development would be such as to not compromise the fundamental integrity of a gap.
6. Hampshire County Council (1996) *Hampshire County Structure Plan (Review) 1996-2011*, Winchester, HCC, pg 30, para 170.
7. Hampshire County Council (1997) *Hampshire County Structure Plan 1996-2011 (Review)*, Report of the Panel, Winchester, HCC, p 83, para 8.25.
8. Hampshire County Council (1999) *Hampshire County Structure Plan 1996-2011 (Review)*, Proposed Modifications, p 96, para 265.
9. Leicestershire County Council (2000) *Leicestershire, Leicester and Rutland Structure Plan 1996-2016*, Deposit Draft, paras 2.50-2.51.
10. Kent County Council (1996) *Kent Structure Plan 1996*, Maidstone, KCC, para 3.106, policy MK5.
11. Wiltshire County Council and Swindon Borough Council (1998) *Wiltshire Structure Plan 2011: Swindon Development Appraisal Study*, Swindon, WCC and SBC.
12. Lincolnshire County Council (1996) *Lincolnshire Structure Plan*, Lincoln, LCC, p107.

13. Lincolnshire County Council (1999) *Lincolnshire Structure Plan, EIP Panel Report*, Lincoln, LCC, paras 4.1-4.14.
14. Department of the Environment and Transport (1993) *Norfolk Structure Plan: Norwich Area Alterations*, paras 3.1-3.11.
15. Suffolk County Council (1999) *Suffolk County Structure Plan Review*, Deposit Draft, Ipswich, Suffolk, para 5.13.
16. Gloucestershire County Council (1997) *Gloucestershire Structure Plan: Second Review, Deposit Draft*, Gloucester, GCC, policy SG1.

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### 3. The Purposes Of Strategic Gap And Green Wedge Policies

#### *Introduction*

**3.1** This chapter assesses the purposes of local restraint policy designations in terms of:

- the basic reasons why strategic gap and green wedge policies have been introduced into policy;
- how far the expressed purposes of strategic gaps and green wedges overlap with PPG2 purposes;
- the extent of links to positive measures to enhance and manage the environment of the urban fringe.

**3.2** The nine case study examples fall into three categories. Whilst there is some overlap, the three basic categories are as follows:

- strategic gaps; Hampshire; West Sussex and Kent;
- rural buffers; Wiltshire, Suffolk and Gloucestershire; and
- green wedges; Leicestershire, Norfolk and Lincolnshire.

The situations where strategic gaps, green wedges and rural buffers have been considered appropriate vary considerably. They will therefore be treated in turn.

#### **Basic Rationales**

##### *Strategic Gaps*

**3.3** Strategic gaps have been most comprehensively used in West Sussex and Hampshire. In both Counties they have a lengthy pedigree and a high level of local political support. The essence of this support appears to reside in three basic arguments. These are:

- the need to protect the setting and separate identify of settlements, by avoiding their coalescence;
- the need to retain the openness of the land by resisting greenfield growth, and thus conserving the existing character of an area in terms of its current mix of urban and rural development; and
- the need to provide real access and recreational benefits to urban dwellers, and the perceived (psychological) as well as real benefits of having open countryside near to where people live.



**3.4** The retention of the separate identity of individual settlements is extremely important to people living in the urban fringe and in urban areas. Successful strategic gap policies can help safeguard local distinctiveness. A recent MORI poll conducted in West Sussex found strategic gaps to be one of the most popular features of the County's planning policy. Successive structure plans in West Sussex have used the same preamble to explain the basic reasons for strategic gap policy:

the settings of towns and villages are as important as the buildings and spaces which comprise their urban environment and, if the individual character of a place is to be retained, its setting must be given close attention. A clear visual break when passing from place to place gives a recognisable structure to a group of settlements, establishing in the travellers mind that they are arriving to somewhere else ([see endnote 1](#))

Separate identity is seen to be enhanced if there is an absence of urban activity within a defined strategic gap. Development and road traffic movement are seen as reducing the perception of a gap. For these reasons very strong development control policies in such areas are seen as desirable.

**3.5** The second rationale suggests that retaining openness through the use of strategic gaps can effectively retain the coherence of the settlement structure, (as argued in Hampshire), and the valued ambience created by the existing urban and rural structure, (as argued in West Sussex). In Hampshire, strategic gaps are seen as most important in areas of the County where the relationship between urban settlements, and the open or largely undeveloped countryside between them, is under such pressure that the coherence of the settlement structure is in danger of being lost. This may be where large urban areas are tending to coalesce, or where there is a danger of urban sprawl. Hampshire County Council argue as follows:

the balance between the built-up areas and the open or largely undeveloped areas around and between them is important. This relates to the danger of coalescence and the need for identifying and protecting the gaps between the settlements involved ([see endnote 2](#)).

**3.6** In West Sussex, the argument is made that the openness of a strategic gap is itself an environmental resource. As the study *Environmental Capacity in West Sussex* argues:

both urban open spaces and strategic gaps have boundaries which are artificial, and are usually defined in part or wholly by surrounding urban development. Yet, no one would think of arguing that urban greenspace was not an environmental resource. The message is simple: the openness of the land is the essence of its value as a resource ([see endnote 3](#)).

Losing strategic gaps, it is argued, would mean an end to the existing urban structure of West Sussex ([see endnote 4](#)). The County Council describe the image which it is considered important to retain as one of medium-sized and small towns and villages, set in good quality

English lowland between Areas of Outstanding Natural Beauty.

**3.7** The third argument covers the benefits for sustainable development and the psychological attributes of strategic gaps. Protecting undeveloped land close to where people live, it is argued, retains the opportunity for local people to find the recreational, scenic or amenity resources they require without having to travel long distances. In addition, Hampshire County Council suggest that having undeveloped land and countryside near residential areas confers psychological benefits which contribute to general quality for life and well-being of local residents just by being there ([see endnote 5](#)).

#### *Rural Buffers*

**3.8** Strategic gaps tend to be limited in extent, most often comprising narrow strips of land designed to avoid coalescence and retain the existing settlement pattern. Where restraint is seen as necessary over a wider geographical area, the policy can take the form of a rural buffer, as in the area around Swindon, Wiltshire or around part of Ipswich in Suffolk. The choice between rural buffer and strategic gap policies was appraised in the recent *Swindon Development Appraisal Study* of 1998. In Swindon's case the need was for a policy to avoid the coalescence of the town with around a dozen small towns and villages within three or four miles of the urban area. To give certainty to the year 2011 it was felt that all settlements around Swindon should be accorded equal protection ([see endnote 6](#)). Strategic gaps were rejected because they are normally used to separate *substantial* urban areas only. The policy for restraint north and east of Ipswich also has similar purposes to the Swindon policy, and could also be termed a rural buffer (paras 2.35-2.36).

#### *Green Wedges*

**3.9** The emphasis in the most prominent example here (Leicestershire) is on protecting structurally important areas of open land as development extends. Thus green wedges help shape urban growth. This approach is argued as more sustainable in that it retains the peripheral development option for future housing. This is particularly important given the formalisation of the sequential approach proposed in the draft PPG3 *Housing* ([see endnote 7](#)).

**3.10** Three other arguments have been put forward to support green wedge policies in the Leicestershire case;

- (unlike strategic gaps) they penetrate urban areas, and help preserve and promote landscape and wildlife corridors between the countryside and urban areas;
- they provide space for appropriate recreational facilities within easy reach of urban residents, at the same time reducing potential journey times to such facilities which might otherwise be located in less accessible locations; and
- they facilitate the positive management of land so that the wedges are enhanced as an important contributor to the quality of life of nearby urban residents.

The creation of green networks linking urban open space and the countryside, and the

retention and enhancement of access to nearby open land, are key themes of the policy.

**3.11** The City of Norwich is a free-standing cathedral City in a rural setting with a large medieval core. The quality of the City and the environment it provides are significantly enhanced by its natural setting and, in particular, a number of river valleys crossing the area. The construction of a new Southern By-Pass in the early 1990s focused pressures on the particularly attractive southern approaches to the City.

**3.12** In order to protect these attributes restraint policy around Norwich is based on identifying an area co-incident with high quality environmental assets. The main assets identified are river valleys, areas of important landscape or nature conservation character, areas of woodland which help define a clear edge to the built up area, and other areas contributing to the landscape setting of the City ([see endnote 8](#)). In addition, open land which acts as green wedges within the built-up area of the City is included. A *Green Plan for Norwich*, first published in 1986, put forward policies to protect river corridors and wooded ridges within the built up area, as well as to improve access to major open areas by the creation of a Green Links network. These ideas were subsequently incorporated in local plans for the Norwich area ([see endnote 9](#)).

**3.13** The green wedges policy around Lincoln is modelled on that for Norwich. The basic purpose of the green wedges is to manage structurally important open land areas in and around Lincoln, and prevent inappropriate development that would affect the historic setting of Lincoln. In their appraisal of the policy the County Council saw green wedges as retaining the possibility for some future development in appropriate locations on the edge of the City. At the same time as allowing appropriate development, green wedges incorporated into the growing urban area could be maintained, enabling optimum use of transport infrastructure. It was argued that green wedges would not have some of the adverse consequences of Green Belts such as:

- additional pressures in urban green space and open space; and
- the deflection of development beyond a fixed area of restraint to less sustainable locations ([see endnote 10](#)).

Accordingly the Lincoln, West Lindsey and North Kesteven Local Plans identify green wedges, Areas of Great Landscape Value and the Skellingthorpe Protection Zone on the northern and southern fringes of the City, where the additional policy of restraint would apply.

#### *Green Belt and Other Strategic Restraint Policy Purposes*

**3.14** An analysis of how far strategic gap and green wedge policies overlap with Green Belt policy has been conducted. The purposes are categorised according to those listed in the relevant structure plan policies. The results are shown in [Table 3.1](#). There are five main points to be made here.

**3.15** Firstly, the main overlap in purposes between strategic gap and green wedges and Green Belt is in the area of preventing the coalescence of settlements. In Hampshire, Kent and West Sussex the strategic gap policies act to separate substantial settlements. In this respect they

are the same as Green Belts which can be designated, as stated in PPG2, to prevent *towns* from merging. There is thus no difference *in terms of functions* between for example Green Belts separating settlements in the Fylde, Lancashire or Swadlincote and Burton-on-Trent and many of the strategic gaps in Hampshire and West Sussex.

**3.16** Secondly, virtually all of the strategic gap and green wedge policies also have the purpose of avoiding coalescence between large built-up areas and nearby villages. Avoiding coalescence with villages is not, however, a purpose which overlaps with those of Green Belts. Where proposals for Green Belts to perform this purpose have been suggested in the past they have been turned down by Government. In some of the larger strategic gaps in West Sussex, avoiding coalescence *between villages* is also a purpose of the policy, and similar reasoning occurs in the cases of the Swindon rural buffer and the restraint area near Ipswich. This is also not a purpose of Green Belt policy.

**Table 3.1:** Comparison of Green Belt and Other Strategic Restraint Policy Purposes

**3.17** Thirdly, the strategic gap and green wedge policies found do not have the purposes of assisting urban regeneration or checking unrestricted sprawl. Also wording relating to safeguarding the countryside was only included in the proposal for the Gloucester strategic gap, a policy which was not accepted by the Government Office for the South West.

**3.18** Fourthly, two of the restraint policies, those for Norwich and Lincoln, have the purpose of protecting the setting and historic character of the two cities. In this sense *the purpose* does overlap with that for Green Belts. However, beyond that, the policies differ radically from Green Belts in terms of their use of green wedges penetrating into cities, and the definition of the restraint area based on the intrinsic value of local environmental assets, not merely on the position of the land in respect to urban areas.

**3.19** Fifthly, the protection of important open land, usually in the form of green wedges, is an aim common to four of the counties studied. This encompassed the protection of land to retain important views into and out of cities, and of open land providing links between urban areas and the countryside. This purpose does not overlap with Green Belt purposes.

*The Strategic Local Distinction*

**3.20** Green Belts are a nationally-accepted policy designation, with the same criteria being applied to their definition, use and re-adjustment across the country. The justification, form and general location of Green Belts is a topic for treatment within Regional Planning Guidance, as acknowledged in the Draft PPG11 *Regional Planning* of 1999 ([see endnote 11](#)). By contrast strategic gaps and green wedges are seen as *local designations* in PPG7 *The Countryside*, and therefore should not be dealt with in regional guidance.

**3.21** Our interviews, and other material, suggest that this distinction has not been as clear cut in the past as the guidance now suggests. Regional Planning Guidance for the South West (RPG10) acknowledges the rural buffer around parts of Swindon and advises that this should continue to be protected against inappropriate development. There is also reference to the rural buffer in the emerging spatial strategy for the South West ([see endnote 12](#)). Where RPG has not referred to the possibility of a Green Belt around a particularly city, this has been a major factor in the rejection of county-promoted proposals. In making recommendations about

the need for a Green Belt around Lincoln, the EIP Panel noted there is no reference to a Green Belt for Lincoln in either RPG 8 or the emerging *Regional Guidance for Spatial Development of the East Midlands*. Similarly, Regional Guidance in the East Midlands does not refer to Leicestershire's green wedge policy.

**3.22** *The Sustainable Development Strategy for the South East*, submitted by SERPLAN, suggested that Green Belts and strategic gaps should have the same status in implementing policies for urban containment in the Region ([see endnote 13](#)). The EIP Panel Report, however, seeks to make a distinction between Green Belts and strategic gaps. It recommends that strategic gaps should not have a role in shaping regionally-determined patterns of development. It states strategic gaps and other county designations are of local significance only and should not pre-empt the spatial consideration of regional policy in RPG. ([see endnote 14](#)) The suggested spatial strategy for the Region includes a major APLE (Area of Planned Expansion) in a location partly covered by a strategic gap near Crawley in West Sussex ([see endnote 15](#)). It also suggests there could be amendments to strategic gaps near Southampton and Portsmouth in Hampshire.

**3.23** West Sussex County Council regard their strategic gaps as protecting the character of the County, which they see as a resource of regional significance. They are therefore opposed to the approach taken by the Regional EIP Panel.

#### *Positive Urban Fringe Policies*

**3.24** The Governments strategy for sustainable development *A Better Quality of Life* supports initiatives to create improved open space and wildlife habitats in and around towns. The creation of new woodlands, improved countryside access, informal recreation and land reclamation are all important objectives for the countryside around towns. The urban fringe will be an important area bridging between the forthcoming Urban and Rural White Papers ([see endnote 16](#)). All of the counties studied were pursuing positive policies to enhance urban fringe areas. For example, the Great Western Community Forest area is closely co-incident with the area of the Swindon rural buffer, and both Swindon and Lincoln are experimental areas for the Countryside Agency-supported Greenways project. This study was restricted to interviews with policy staff at County level. The detail collected on positive urban fringe measures was, of necessity, limited.

**3.25** In Hampshire the main involvement of the County has been joint work with Districts along the M27 corridor. Supplementary Planning Guidance has been produced for strategic gaps. Examples include the *Eastleigh Southampton Strategic Gap: A Planning and Management Framework for North Stoneham* and the *South West Fareham Countryside Strategy* ([see endnote 17](#)). The South West Fareham strategy includes measures to conserve and enhance the historic pattern of the undeveloped landscape, to integrate urban edges with their countryside setting, and to improve public access in the area. In addition, a number of countryside management projects cover strategic gaps. These have been seen as important by Inspectors at local plan inquiries. The County has a separate budget for environmental improvements to strategic gaps.

**3.26** The main vehicle for environmental improvement in the Leicester urban fringe is the *Leicester Urban Fringe Countryside Management Project*. Funded by the Countryside Agency

and seven local authorities, including the City and County Councils, the project aims to:

- manage existing countryside resources;
- enhance the attractiveness of the urban fringe;
- improve accessibility to and within the project area;
- improve peoples awareness of the urban fringe countryside; and
- encourage community action.

Over the 1998-9 period the project has carried out a household survey of residents near to a green wedge, and has progressed management plans for the Anstey Lane and Scapcroft green wedges ([see endnote 18](#)). The National Forest area abuts the urban fringe of Leicester to the north west where it links with the Anstey green wedge. Access and recreation links between the two areas are being promoted.

**3.27** In Norwich attention focuses around river valley and river corridor enhancement. In 1986 Norwich City Council adopted a *Green Plan* which involved creation of a Green Links network. This helped link residential areas to open spaces and river corridors. Following this, two projects the *Wensum Valley Project (1998)* and an *Urban Fringe Project (1990)* were established. Resources from a successful Single Regeneration Budget Challenge Fund bid have been used to assist the Green Links scheme and to provide other greening and access initiatives. The *River Corridor Enhancement Study (1997)* covers an area similar to that defined in the Structure Plan as the special area of restraint around Norwich. It comprises an action plan, Supplementary Planning Guidance, and design guidelines for individual schemes. Among ten opportunities for enhancement, the following are prominent:

- creation of new wildlife habitat and wildlife corridors;
- completion of river and valley walks;
- creation of green links between residential areas and schools and riverside walks; and
- creation of cycleways and linkages to the National Cycling Network ([see endnote 19](#)).

**3.28** West Sussex County Council would like to set up partnerships with Districts to set in place *Strategic Gap Improvement Plans*. These would promote higher quality landscapes and recreation provision than currently exist. The County are investigating the feasibility of using section 106 planning obligations to retain the openness of strategic gap land as compensation, or trade-offs in association with nearby development ([see endnote 20](#)). Land in strategic gaps would be donated or covenanted to local authorities by developers. This land would be managed and improved for public benefit (recreation, nature conservation, access). This process, it is suggested, would make it easier to persuade local people of the need and merit of releasing land for development if they could see benefits in exchange. These suggestions

remain at the feasibility stage.

### *Main Findings*

**3.29** Each strategic restraint designation has a different basic rationale, and a number overlap to some extent with Green Belt purposes. Also there are links to the positive management and enhancement of the environment of the urban fringe covered by such designations.

**3.30** The basic purposes of the designations are as follows:

- for *strategic gaps*; they are to protect the setting and separate identity of settlements, and to avoid coalescence; retain the existing settlement pattern by maintaining the openness of the land; and retain the physical and psychological benefits of having open land near to where people live;
- for *rural buffers*; they are to avoid coalescence with settlements (including villages) near a town until the long-term direction of growth is decided; and
- for *green wedges*; they are to protect strategic open land helping to shape urban growth as it progresses; to preserve and enhance links between urban areas and the countryside; and to facilitate the positive management of land.

**3.31** The main overlap between strategic gap and green wedge and Green Belt purposes is in the area of preventing the coalescence of settlements. Most of the strategic gap and green wedge policies also have the purpose of avoiding coalescence between large built-up areas and villages. The purpose does not however overlap with those of Green Belts. Strategic gap and green wedge policies do not have the purposes of assisting urban regeneration or checking unrestricted sprawl. The restraint policies for Norwich and Lincoln have the purpose of protecting the historic settings of the two cities. But the areas covered by the policy relate to the quality of the natural resources and not just the position of the land. The protection of important open land, in the form of green wedges, is an aim common to four of the counties studied. This does not overlap with Green Belt purposes.

**3.32** There was some confusion over the status of the three types of designation in Regional Planning Guidance; some were referred to, and some were not. The question of how far the three types of designation can restrain regionally -derived patterns of growth has yet to be clarified.

**3.33** All of the Counties studied had pursued positive measures to improve the environment of their urban fringe areas, and such initiatives were often keyed to the particular designations studied. These included strategic gap management frameworks, countryside management projects and river corridor enhancement studies. There was general acceptance of the view that environmental improvement measures were a necessary complement to restraint. This study is, of course, unable to demonstrate that positive policies to enhance the environment are *more* effective in areas covered by green wedge as opposed those covered by to Green Belt policies.

### **Endnotes**

1. West Sussex County Council (1998) *West Sussex Structure Plan 1998: Not Formally Adopted*, Chichester, WSCC, para. 7.19.
2. Hampshire County Council (1996) *Strategic Gaps*, Winchester, HCC, para 3.2.
3. West Sussex County Council (1996) *Environmental Capacity Study*, Chichester, WSCC, para 2.13.4.
4. Ibid, para 2.13.5.
5. Hampshire County Council (1996) op. cit., para 1.2.
6. Wiltshire County Council and Swindon Borough Council (1998) *Wiltshire Structure Plan 2011: Swindon Development Appraisal Study*, Swindon, WCC and SBC, sections 6.7, 6.8 and 6.9.
7. DETR (1999) *Housing*, Consultation Draft of Revised PPG 3, London, DETR.
8. Norfolk County Council (1993) *Norfolk Structure Plan*, Norwich, NCC, para 20.5.
9. Norwich City Council (1997) *A River Corridor Enhancement Strategy for Norwich*, Consultation Document, Norwich, NCC, p 2.
10. Lincolnshire County Council (1997) *Lincolnshire Structure Plan Consultation Draft, Analysis of Response and Recommendations for Change, Protection of Urban Fringe Locations*, Lincoln, LCC, pp. 113-115.
11. DETR (1999) *Regional Planning*, Consultation Draft of PPG 11, London, DETR, paras 8.5-8.6. This is also referred to in para 2.2 of PPG 2 *Green Belts* (1995).
12. The Draft Revised Regional Strategy for the South West suggests that the future form and function of the rural buffer could be reviewed to act as green wedges or fingers that would provide accessible breathing space for residents (para 4.1.28).
13. SERPLAN (1998) *A Sustainable Development Strategy for the South East*, SERP 500, London, SERPLAN, policy CD7.
14. DETR (1999) *Regional Planning Guidance for the South East of England*, Public Examination, Report of the Panel, para 6.26.
15. Ibid, This states in the context of the Crawley/Gatwick APLE there is a substantial area of land covered by a strategic gap designation which appears to us to have little strategic importance it tails out into open countryside which is pleasant but comparatively ordinary, and it is questionable what the gap it is seeking to protect. It rather looks to us like a second class Green Belt (para 12.117).
16. H M Government (1999) *A Better Quality of Life: A Strategy for Sustainable Development for the United Kingdom*, London, SO, pp 61-64.
17. Hampshire County Council, Test Valley Borough Council and Eastleigh Borough Council (1994) *Eastleigh-Southampton Strategic Gap: A Planning and Management Framework for North Stoneham*, Winchester, HCC; Hampshire County Council and Fareham Borough Council (1995) *South West Fareham Countryside Strategy*, Winchester, HCC.
18. Leicestershire County Council (1999) *The Leicester Urban Fringe: Countryside Management Project*, Annual Report 1998-9, Leicester, LUCMP.
19. Norfolk County Council (1994) *Wensum Valley Strategy*, NCC, Joint Advisory Panel; Norwich City Council (1997) *A River Corridor Enhancement Study for Norwich*, Consultation Paper, Norwich, NCC.
20. See Elson, M. J., N. Mendham and S. Walker (1999) *Countryside Benefits from Developers Contributions, A Report to the Countryside Agency*, Oxford, School of Planning, Oxford Brookes University.



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## 4. Permanence And The Definition Of Boundaries

### *Introduction*

**4.1** This chapter assesses the permanence of strategic gap and green wedge policies, and the definition of boundaries of such restraint areas, and how these issues have been handled. In describing permanence a contrast between Green Belt, and strategic gap and green wedge policies can be made. Planning guidance in PPG2 *Green Belts* states the essential characteristic of Green Belts is their permanence. Their protection must be maintained as far as can be seen ahead ([see endnote 1](#)). In practical terms an approved Green Belt in a development plan is required to be long term, that is related to a time scale which is longer than that adopted for other aspects of a structure plan ([see endnote 2](#)). No time period is normally given to long-term. Green Belts should also normally endure beyond the planning horizon of RPG ([see endnote 3](#)).

### *Permanence*

**4.2** There is no national guidance on the permanence of strategic gaps and green wedges in structure plans. In some Counties the position is clear. But confusion has arisen, especially in the Counties where the policy has been widely deployed.

**4.3** In its submitted Structure Plan of 1966 Hampshire County Council intended that strategic gaps would have a degree of permanence similar to Green Belts ([see endnote 4](#)). Boundaries should only be altered in exceptional circumstances, such as an overriding need for a particular development. The EIP Panel however saw no case to accord strategic gaps the permanence of Green Belts. They noted with the probability of growth in South Hampshire continuing in the next Plan period, we think it unwise to close any option for the future direction of any urban expansion at this stage ([see endnote 5](#)). In their latest set of proposed amendments the Hampshire authorities suggest strategic gaps should continue to be seen as long-term ([see endnote 6](#)). The Inspector at the Fareham Local Plan Inquiry (LPI) however has interpreted long-term in the context of strategic gaps to be a period at least as long as the development plan ([see endnote 7](#)).

**4.4** It is worth noting here that changes have been made to strategic gaps in Hampshire as the Structure Plan has been reviewed. For example, the need to meet strategic housing requirements has led to the deletion of one strategic gap and the substantial alteration of another, both near Basingstoke, in 1994. Also a number of changes have been agreed to strategic gaps in the M27 Corridor through the local plan process. This suggests we have moved to a position where strategic gaps in Hampshire have *de facto* the same duration as the remainder of the policies in the structure plan.

**4.5** In West Sussex strategic gaps, as approved in the 1993 Structure Plan, are described as long-term. In terms of status, the 1988 SoS Letter of Approval stated that strategic gaps should not impose a presumption against development, and the 1997 Panel saw the use of strategic gap land as the last stage in a sequential process of searching for new development locations. It stated that the policy should allow for *possible* development in gaps which might become necessary once all other options had been exhausted. However it was also stated that any approved development should not compromise the fundamental integrity of a gap ([see endnote](#)

8). The submitted Structure Plan of 1998, equates long-term with the duration of the Plan, and the planners interviewed accepted that this was now the position.

4.6 The Maidstone Gap policy, approved in the Kent SP of 1996, does not refer to long-term protection of the area. The policy states only that separation between the relevant Medway towns will be maintained. This is quite clearly different to the wording used for Green Belts ([see endnote 9](#)).

4.7 In the case of the Swindon rural buffer, the *Swindon Development Appraisal Study* notes the rural buffer in policy terms, is a step below Green Belt policy. It is a temporary measure of protection from major development which can be revised with each subsequent structure plan review ([see endnote 10](#)). It is therefore not a long-term designation in the same way that Green Belt is. The primary function of the buffer is the prevention of coalescence. However, if the best location for future development, say in terms of reducing the need for travel, lies within the buffer then, it is suggested, the land should be released. The current proposal in the Wiltshire Structure Plan appears to conform with these principles, proposing a southern development area on the edge of Swindon, on land previously defined as rural buffer. A proposal for strategic gap policies around Swindon was rejected by the SoS in 1990. The rural buffer has wider functions, to keep the defined area clear of major development, pending future reviews of the Structure Plan and appraisals of Swindon's development needs ([see endnote 11](#)). The designation functions to secure an orderly release of land for development, and its duration is the same as the period of the structure plan.

4.8 In the context of green wedges in Leicestershire, there is no statement in the Structure Plan on their level of permanence. Local planners see green wedges as a designation which has the same duration as the Structure Plan, and can be re-assessed when the Plan is reviewed. In the Leicestershire case successive Structure Plans have altered the areas covered by existing green wedges to some extent, but these changes have not compromised the integrity of the policy. It should be noted that green wedges in Leicestershire cover far less land than is covered by strategic gaps in Hampshire or West Sussex.

4.9 The policy for the protection of the environmental assets of the Norwich Policy Area does not have the same permanence as Green Belt. The original Letter of Approval for the policy by the SoS in 1993, considered that giving the environmental assets policy a permanence similar to that of Green Belt policy would be undesirable. It would, they stated, in effect freeze the City's pattern of development before medium-term development needs had been taken into account ([see endnote 12](#)). The policy thus has the same duration as other policies in the Plan.

#### *Boundary Definition*

4.10 Linked to questions of permanence are those of boundary definition. Most structure plans list the purposes of their strategic gaps and green wedges, stating that appropriate boundaries will be defined in local plans. Questions surrounding the criteria to be used in defining strategic gaps have received most comment at EIPs and by Inspectors at Local Plan Inquiries. Most DETR interventions have been to seek to limit the extent of strategic gap restraints as compared to those suggested by local authorities.

4.11 In Hampshire, successive EIP Panels have sought to limit strategic gaps to the essential minimum of land. The Hampshire County Council had proposed, in its 1996 Structure Plan,

that strategic gaps should:

- separate large urban areas;
- be of a size which enables them to be a counterweight to the large urban areas they separate; and
- have sufficient width to enable them over a large part of their area to have a predominantly rural and/or open appearance and land use ([see endnote 13](#)).

**4.12** The Panel argued that the strategic gaps should be only the essential minimum to avoid coalescence. They should be focused on the narrow points of gaps between settlements where the threat of coalescence is real and undesirable. The Hampshire proposals were seen as too much about the absolute protection of broad areas of countryside and coast. The counterweight argument was seen as having little meaning and the Panel suggested avoiding coalescence should be the sole purpose of strategic gaps.

**4.13** The proposed green collar around Southampton (see para 2.9) was seen as too extensive, being drawn both tightly up to the current boundary of the urban area, with parts of its outer edge extending into open countryside free from development. The proposal would, it was argued, be an irreversible restraint on the sustainable development of Southampton. It is now proposed that more limited, discrete gaps, forming narrow areas between *substantial settlements* only, should be defined as strategic gaps ([see endnote 14](#)).

**4.14** A large number of criteria have been suggested as relevant to determining the location of strategic gaps. The SoS Letter of Approval to the Structure Plan 1993 suggested two criteria:

- the nature of the developed areas on either side of the gap; and
- the visual perception of the gap, allowing for local topography.

**4.15** The Inspector at the Inquiry into the Eastleigh LP ([see endnote 15](#)) in 1998 was unable to define a standard formula for delineating strategic gaps. He considered the following factors most useful:

- distance;
- topography;
- landscape character/type;
- vegetation;
- existing uses and density of buildings;
- nature of urban edges;

- inter-visibility (the ability to see one edge from another);
- intra-visibility (the ability to see both edges from a single point);
- the sense of leaving a place.

He suggested that, as with Green Belts, detailed boundaries on the ground should be logical, reasonable and defensible and readily identifiable through existing durable features of the landscape.

**4.16** In West Sussex criteria for the definition of strategic gap boundaries have been loosened. The 1980 Structure Plan stated that strategic gap boundaries should not normally differ significantly from the boundary of the developed area except to recognise any outstanding allocations for development. By April 1988 the SoS had confirmed that for West Sussex the boundaries of strategic gaps and built up areas should *not necessarily* be coincidental, and that the purpose of gaps was to prevent coalescence, not to impose a presumption against development. The 1998 Plan acknowledges that there may be land between settlements listed which is not within the relevant strategic gap ([see endnote 16](#)).

**4.17** In Kent, Structure Plan policy suggests the detailed criteria for definition of the Medway Towns strategic gap will be listed in local plans. The Tonbridge and Malling LP put forward the following three criteria at the LPI into their Plan in 1998. These were accepted by the County. These are;

- the location of land in relation to adjoining settlements;
- the openness of the land; and
- the visibility of the land from public vantage points.

### *Main Findings*

**4.18** The main findings in respect of permanence and the drawing of boundaries are;

- strategic gaps in Hampshire, West Sussex and Kent have the same duration as other policies in the structure plan; they are not long term as defined for Green Belt policy in PPG 2;
- the rural buffers and green wedges studied also had the same duration as the relevant structure plan;
- in the cases of Hampshire and West Sussex, local opinion would prefer to regard strategic gaps as having the same level of permanence as Green Belts;
- in defining strategic gaps and other restraint designations it is important to only include land that is strictly necessary to fulfil the purposes of the policy;

- factors such as openness, topography, intervisibility, the nature of urban edges and vegetation cover should be taken into account in defining boundaries; and
- clearly identifiable and logical features on the ground should be used to produce defensible boundaries

## Endnotes

1. DOE (DETR) (1995) *Green Belts*, PPG2, London, HMSO, para
2. Ibid., para 2.12.
3. DETR (1999) *Planning Policy Guidance Note 11: Regional Planning*, Public Consultation Draft, London, DETRA, para 8.6.
4. Hampshire County Council (1997) *Hampshire County Structure Plan 1996-2011 (Review), Report of the Panel*, para 8.6.
5. Ibid., para 8.9
6. Hampshire County Council (1999) *Hampshire County Structure Plan 1996-2011 (Review), Proposed Modifications*, p.49.
7. Fareham Borough Council (1998), *Fareham Borough Local Plan Review Inquiry*, para 3.45.
8. West Sussex County Council (1999) *Mind the Gap, Technical Report*, paras 1.16 and 1.18, and Appendix F.
9. Kent County Council (1996).
10. Wiltshire County Council and Swindon Borough Council (1998) *Wiltshire Structure Plan 2011 - Swindon Development Appraisal Study*, para 6.9.3.
11. Ibid., para 6.9.5.
12. DOE (1993) *Norfolk Structure Plan: Norwich Area Alterations*, para 3.6.
13. Hampshire County Council (1996) *Hampshire County Structure Plan (Review) 1996-2011*, para 164.
14. Hampshire County Council (1997) op. cit., paras 8.9-8.15.
15. Eastleigh BC (1998) *Eastleigh Local Plan, Inspectors Report*, paras 2.2.1.2-2.2.1.3.
16. West Sussex County Council (1999) op.cit., paras 1.13-1.17.

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## 5. Development Control Principles And Practice

### *Introduction*

**5.1** This chapter investigates what are considered as appropriate land uses in strategic gaps and green wedges. These are compared to the development control policies for Green Belt outlined in PPG2. The level of detail listed in structure plan policies, as guidance to districts, is also discussed.

### *Development Control in Green Belts*

**5.2** Development control in Green Belts is based on a number of clear principles. There is a *presumption against* inappropriate development in a Green Belt area. Very special circumstances need to be demonstrated by an applicant who wishes to secure permission for uses other than those in a strictly limited list contained in the guidance. The overall aim of the policy is to keep land permanently open. New buildings will usually be inappropriate unless for:

- agriculture and forestry;
- essential facilities for outdoor sport and outdoor recreation;
- limited changes for existing dwellings;
- limited infilling in existing villages and limited affordable housing; and
- limited infilling and redevelopment of major existing developed sites.

The re-use of buildings will also, in certain circumstances, be allowed. Mineral extraction need not be inappropriate development in Green Belts, although great care should be taken to ensure that high environmental standards are maintained ([see endnote 1](#)).

### *Development Control in Strategic Gaps and Green Wedges*

**5.3** The principle of retaining openness is common to strategic gap, green wedge and Green Belt policies. In Hampshire, the Structure Plan Review states that within strategic gaps permission will not be given for development which visually or physically diminishes the amount of open and undeveloped land ([see endnote 2](#)). The County Council sees a need for the degree of constraint to be higher than in the general countryside, because of the importance given to retaining these gaps. They consider there are developments which would be allowed in the countryside, perhaps even in Green Belts, such as large institutional uses, which would not be allowed in a strategic gap. This is because the gaps are usually so narrow and limited in extent that any development would affect their openness, and could be seen as contributing to visual or physical coalescence ([see endnote 3](#)). The EIP Panel investigating the Hampshire plan are seeking to qualify this policy, suggesting that any approved development should not *significantly* diminish the extent of a strategic gap ([see endnote 4](#)).

**5.4** The proposed Hampshire formulation is similar to that already operating in Kent. The

Tonbridge and Malling LP policy for the Medway Gap states that development will not be permitted which *significantly* extends the built confines of existing rural settlements or urban areas. This, the LPI Inspector suggests, allows for some possible small-scale development on the fringes of the strategic gap which would not unreasonably compromise its main purpose ([see endnote 5](#)).

**5.5** The West Sussex SP of 1993 contained a policy for strategic gaps which is more restrictive than for Green Belts. It established a compelling circumstances test for any development sought within a strategic gap. Uses which could, exceptionally, be regarded as compelling included development essential for:

- agriculture or forestry;
- roads;
- opportunities to meet a demand for quiet informal recreation; and
- mineral extraction and waste disposal ([see endnote 6](#)).

**5.6** The EIP Panel into the 1996 Structure Plan, where the written statement contained essentially the same policy, recommended removal of the compelling circumstances test. This was on the basis that it incorrectly indicated the degree of protection which ought to be afforded to strategic gaps ([see endnote 7](#)). The proposed criteria now suggests that proposals would be subject to the most rigorous examination. Development will only be permitted if it will not compromise individually or cumulatively the objectives and fundamental integrity of the gap. Permission may, however, be granted to meet other requirements of the Development Plan ([see endnote 8](#)).

**5.7** Development control principles in green wedges of a strategic nature in Leicestershire are:

- to retain the open and undeveloped character of the wedge;
- to retain and create green networks between the countryside and open spaces in the urban areas; and
- to retain and enhance public access, especially for recreation.

**5.8** The detailed listing of uses seen as acceptable in Leicestershire is given in [Table 5.1](#). These were informed by Green Belt development control policy elsewhere, allowing for agriculture, forestry and outdoor recreation. In terms of recreation, for example, the plan suggest that outdoor recreational uses such as sports pitches and golf courses are acceptable, but any associated development, essential for operational requirements, should be small in scale and sited so as to retain the open and undeveloped nature of the green wedge. It is suggested that more formal outdoor recreational facilities should be located adjacent to the built up areas, to minimise the need to travel and to lessen the impact on the openness of the wedge. The Plan also discusses park and ride facilities. These, it is suggested, should only be located in a green wedge in exceptional circumstances, and if there is no other suitable site

available outside the green wedge. It is proposed that local plans should elaborate on what types of development would permanently damage the open and undeveloped character of green wedges ([see endnote 9](#)). This reverses the logic for specifying development control policies in Green Belts, where only the not unacceptable (ie generally acceptable) uses are listed.

**Table 5.1:** Development Control in Green Wedges in Leicestershire

Only the following uses will be acceptable...provided the development associated with these uses does not permanently damage the open and undeveloped character of the Green Wedge:

- a. agriculture
- a. outdoor recreation
- b. forestry
- c. footpaths, bridleways and cycleways
- d. mineral uses

In addition the following land uses will only be acceptable if appropriate measures are taken to minimise severance and adverse effects on the amenity of the Green Wedge:

- f. road proposals in the development plan
- f. dedicated public transport routes (in exceptional circumstances where there is no alternative route)
- g. park and ride facilities (if no other suitable site outside a Green Wedge is available)

Provision will be made in Green Wedges for the retention and creation of green networks between urban open spaces and the countryside, and the retention and enhancement of public access, especially for recreation.

Source: Leicestershire, Leicester and Rutland Structure Plan 1991-2011, policy 6.

**5.9** One of the principles of current Green Belt development control policy generally is that it is clearly distinguishable from policies for other parts of the countryside. The policy introduces a presumption against development, and a set of extra firm development control provisions which apply in Green Belts and nowhere else. In the case of Norwich, the policy to protect the environmental assets of the City was first proposed as Green Belt. Although Green Belt status was rejected, the development control guidelines of PPG2 were still followed. The Draft Structure Plan Review, submitted in 1998, proposed continuation of this policy, revised to accord with the up-dated PPG2 of 1995.

**5.10** At the recent (1998) Structure Plan EIP, Norfolk County Council suggested that there was a softening of attitude by the Government to the use of national criteria for local designations. This was, they considered, reflected in the Governments response to the Select Committee



report on *Housing*, where it was suggested this might be an issue considered in a future review of PPG 2 ([see endnote 10](#)). The Panel also noted the Governments view that strategic gap and similar policies should, for the time being, carry less weight than Green Belt policy.

**5.11** The Panel felt the proposed policy for environmental assets around Norwich was as restrictive as PPG2. They recommended no change be made however, arguing that:

the matter is not clear cut ... the overriding consideration ... is to maintain continuity between the approved Structure Plan (of 1993) and the present Draft Plan and on balance we have concluded that the policy should stand. Bearing in mind that the policy seems to have worked, it has wide support, the Governments statement is not entirely clear and that tougher policies are already coming forward in the South Norfolk Local Plan, we do not feel it appropriate to change the policy at this time ([see endnote 11](#)).

**5.12** The Swindon rural buffer is also a hybrid policy. The SoS letter of approval for the buffer in 1990 makes the following points;

- the key diagram would show a broad area where there would be a *special presumption against development* likely to lead to the coalescence of settlements;
- the buffer should be designed to operate without the need for precise boundaries to be defined in local plans; and
- the buffer should prevent development which might cumulatively lead to coalescence.

**5.13** The buffer would protect against major development, but would allow for some small-scale development in defined circumstances. The approved policy for the rural buffer suggests that approval will not normally be given for new buildings other than for agriculture, forestry, mineral extraction or other uses appropriate to a rural area. Development in towns and villages and the conversion of buildings within the rural buffer would also be subject to the other policies of the Plan ([see endnote 12](#)). Government Office views on the draft policy in the Proposed Modifications to *Wiltshire 2011* is that references to development control should be removed from the policy; the Explanatory Memorandum in future should refer to limiting development to that appropriate to a rural area.

### *Monitoring*

**5.14** Local authorities were asked how, and in what ways, they monitored the outcomes of strategic gap and green wedge policies. All of the authorities interviewed claimed the policies had been successful in keeping areas open, although virtually no systematically analysed data were available to show this (see [Table 5.2](#)). One-off exercises to inform individual discussion topics at EIPs were the norm. Lincolnshire County Council claimed there were too few development pressures to make monitoring worthwhile around the City. In Swindon, although a monitoring system had been set up, staffing changes had led to a cessation of work on its operation.

**Table 5.2:** The Monitoring Situation in the Case Study Areas

<b>County</b>	<b>Status</b>
West Sussex	milestones monitoring report in 1999; detailed development control analysis for 1994-5.
Hampshire	no formal monitoring; some evidence to LPIs.
Leicestershire	no formal monitoring
Kent	no formal monitoring; analysis in small part of Medway Gap for year 1986-7.
Wiltshire	monitoring scheme drawn up, but not implemented.
Lincolnshire	no formal monitoring
Norfolk	no formal monitoring
Suffolk	no formal monitoring
Source: local authority interviews	

**5.15** West Sussex County Council had the only systematic monitoring information, mainly because maintaining strategic gaps is seen as a key county milestone. A study of land presently and previously designated as strategic gap, and now no longer designated in plans, shows that 217 hectares, just under one per cent of the total land in strategic gaps, had been lost since their inception in plans. The largest areas deleted are around Crawley, with a small area near Chichester ([see endnote 13](#)). The study *Environmental Capacity in West Sussex* analysed the rate of land lost between settlements from 1946 to date. The results showed a reduction in land loss corresponding with the introduction of gaps as policy designations in 1980. Losses since that time have been noted in Selsey, in the Littlehampton area, and on the west side of Worthing, a number associated with road improvements ([see endnote 14](#)).

**5.16** The results of a detailed study of applications submitted in strategic gaps in West Sussex in 1994 and 1995 is shown in Table 5.3. This shows that just under one half of applications were permitted. One third of applications refused were taken to appeal. However only one out of the 21 appeals was upheld. The majority of applications permitted related to agriculture and forestry, and transport and utilities. Most of the development permitted resulted in either no additional floorspace or a very small land take of less than 100 sq. m. Some 28 applications were for residential development by infilling or for single plots. The majority of the schemes (of one or two units) were permitted. The main schemes to challenge strategic gap policy recently have been for the expansion of existing employment sites in Littlehampton and Shoreham. The County Council objected in both cases. However the relevant Districts approved the schemes, on the basis that there were no realistic alternative sites, and there was a need to retain and increase jobs in the two areas. A proposal for a Heritage Museum in a strategic gap near Shoreham was refused on appeal in 1998 ([see endnote 15](#)).

**Table 5.3:** Planning Decisions in Strategic Gaps in West Sussex: 1994-5

<b>Status</b>	<b>Number of applications</b>	<b>per cent</b>

permitted	103	48.8
refused	66	31.3
refused and taken to appeal	21	10.0
temporary permission	13	6.2
withdrawn	8	3.7
total	211	100.0
	number of appeals	
dismissed	18	
upheld	1	
withdrawn	2	

Source: WSCC (1999) *Mind the Gap*, p13.

**5.17** In Kent, the County Council carried out an appraisal of refusals of major development proposals adjacent to the M20 near Maidstone, within part of the strategic gap. These covered the period 1986-1997. The proposals included a petrol station, non-food retail use, a retail warehouse park, a large hotel and residential uses. Some seven of the 13 schemes went to appeal, and all of the appeals were dismissed. There was strong support from Inspectors for the strategic gap in the appeal decisions. If approved, these schemes would have virtually eroded part of the gap between the north western edge of Maidstone and Ditton.

**5.18** The policy to protect the environmental assets of Norwich was introduced in response, particularly, to increased development pressures resulting from the completion of the Southern By-Pass. At the time the policy was introduced, in the early 1990s, there was considerable pressure for major retail uses around the main junctions. An appeal by Tesco, at the junction of the A11 and the By-Pass, was turned down in 1993 as was a housing scheme in open countryside. A number of smaller-scale proposals, including extensions to a car park, a store on land in the Yare Valley, and a small meeting hall near a railway line, were upheld at appeal in the 1993-4 period. Overall the County Council considers that appeal decisions demonstrate that the policy in the 1993 Structure Plan has proved successful in preventing developments in areas where it is considered it would cause damage to the historic setting of Norwich ([see endnote 16](#)). The County has resisted the inclusion of truck stops, park and ride facilities and long stay car parking as appropriate uses in the policy area.

### *Main Findings*

**5.19** The main findings in relation to development control policies are that:

- the strategic gap and green wedge policies contained an additional presumption against development, over and above the strict controls normally applied by local authorities in the countryside;
- the main principle deployed was that of the retention of openness in the areas concerned;

this was followed by a concern to retain the integrity of such areas;

- in some counties development control policies in strategic gaps were equally or more stringent than for Green Belts; it was argued these were necessary because of the limited extent of gaps, and the immediate danger of coalescence in many areas;
- Government Offices and EIP Panels have proposed less absolutist prescriptions for new development than local authorities; for example, by introducing the idea that new development should not *significantly* diminish the extent of a gap, thus allowing for small-scale change;
- the policy for the control of the environmental assets of the Norwich policy area was the same as for Green Belts; however Green Belt status had been rejected in the Norwich area in 1993;
- the rural buffer around Swindon is designed to resist major development; smaller-scale change is allowed for in the policy, and development control policies are similar to the remainder of the countryside.

**5.20** For development control and monitoring the main findings are that:

- monitoring and other analysis of development control outcomes was at best sketchily done and, at worst, was non-existent;
- all of the authorities interviewed claimed their strategic gap and green wedge policies had been successfully used in development control, and had been upheld by Inspectors at appeal;
- in West Sussex existing local plans were proposing approximately a one per cent reduction in the area of strategic gaps in the County; and important current pressures found related to existing businesses seeking expansion space adjacent to their current sites.

## Endnotes

1. DOE (DETR) Green Belts, PPG 2, London, HMSO, para 3.1-3.9.
2. Hampshire County Council (1996) Deposit Hampshire County Structure Plan 1996 - 2011, (Review), Winchester, HCC, p30, policy G3.
3. Hampshire County Council (1998) *Strategic Gaps*, Review of Hampshire County Structure Plan, p7.
4. Hampshire County Council (1997) *Hampshire County Structure Plan 1996 - 2011 Review*, Report of the Panel, p83, policy G1.
5. Tonbridge and Malling Borough Council (1998) *Tonbridge and Malling Local Plan*, Inspectors Report, paras 2.405 - 2.406.
6. West Sussex County Council (1999) *Mind the Gap*, Technical Report, Appendix F.
7. Ibid, p6, para 1.17.
8. Ibid, Appendix F.
9. Leicestershire County Council (1998) *Leicestershire Leicester and Rutland Structure Plan*,

Consultation Draft, paras 2.67, 2.70 and 2.76.

10. This appears an incorrect impression of the sentiments in the response.

11. Norfolk County Council (1999) *Norfolk Structure Plan Review 1993-2011, Examination in Public*, para 5.49.

12. Wiltshire County Council and Swindon Borough Council (1998) *Wiltshire Structure Plan 2011 - Swindon Development Appraisal Study*, Appendix 6.5.

13. West Sussex County Council (1999) op. cit; p10-11.

14. West Sussex County Council (1996) *Environmental Capacity in West Sussex*, p92.

15. West Sussex County Council (1999) op. cit., Appendix D.

16. Evidence to EIP on policy N6 of Norfolk Structure Plan by Norfolk County Council, paras 5.7-5.10.

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## 6. The Way Forward

### *The Broad Picture*

**6.1** Strategic gaps and green wedges are well embedded in planning practice at county level. Nearly one half of counties have policies giving an extra presumption against development in the countryside. Locationally the policies are found beyond Green Belts, in particular beyond the Metropolitan Green Belt and in parts of the Outer South East. The policies are extremely popular with local residents and environmental groups.

**6.2** District Councils in the case study areas have sought a greater number of strategic gaps than County authorities thought necessary. This has led to some Counties putting forward strategic gaps which are not truly strategic in their objectives. As a result there has been much technical discussion at EIPs on the valid purposes, extent and level of permanence of strategic gaps. In Leicestershire there have also been pressures from the Districts to define additional green wedges, and these have been resisted by the County. Around Swindon, North Wiltshire District are keen to instil the rural buffer with greater permanence than the other local authorities involved intend. Defining strategic gap and green wedge policies in structure plans has created as much local controversy and technical debate as in many Green Belt areas.

### *Implementing the National Guidance*

**6.3** The guidance in PPG 7 *The Countryside* suggests that strategic gaps and rural buffers should only be maintained if there is reason to believe that normal planning policies cannot provide the necessary protection. There has been a small amount of local-level policy analysis on this issue since the guidance was issued in January 1997. Lincolnshire County Council compared normal countryside policies, with green wedges and Green Belt as part of the consultation stage of their most recent Structure Plan. Swindon Borough Council also considered strategic gaps as an alternative to rural buffers in their recent study of development potential around the Town. However there has been little in-depth analysis which has *demonstrated* that normal countryside policies are inadequate in any of the study areas. A more important factor has been the backing for such policies at district council level. The support of West Lindsey and North Kesteven District Councils was seen as of major importance for the introduction of green wedge policies around Lincoln. Otherwise Panels have assessed the weight of opinion at EIPs before coming to judgements. This appears to have been the case around Norwich, where there was relatively little development control evidence confirming a problem. The main trigger appeared to be development pressures generated by the new Southern By-Pass.

**6.4** It is also clear that there is no agreement on how strategic gaps, green wedges or rural buffer zones should be defined. The guidance in PPG7 should be revised, or a new section should be introduced in PPG2, to clarify the purposes, extent and level of permanence of these policies. The process of negotiating around different strategic gap formulations has been time consuming and complex. In addition, there have been questions over the distinction between strategic gaps and local gaps, and how far the latter should be covered in structure plans. Confusion continues in some areas. A number of the stakeholders around Swindon consider the rural buffer to be a Green Belt, as evidenced by the existence of a Green Belt Protection

Committee in the area!

### *Overlap with Green Belts*

**6.5** The House of Commons Environment Committee have suggested that where the functions of strategic gaps and rural buffers overlap with those of Green Belt, consideration should be given to according them the same status. This study suggests that strategic gaps and green wedges do have one or two purposes in common with Green Belts, but that rural buffers do not. *Strategic gaps* share the purpose of avoiding coalescence, but do not share any other key attributes. As used to date strategic gaps do not have:

- the same level of presumption against development;
- the same level of permanence, not being long-term as defined in PPG2; and
- the need to demonstrate exceptional circumstances for the adjustment of boundaries.

**6.6** *Rural buffers* do not share any purposes with Green Belts as they are designed to maintain separation between a large town and surrounding villages. In addition they imply no strict presumption against development in the same way as Green Belts, or level of permanence beyond the period of the structure plan. *Green wedges* can be used to perform an anti-coalescence function, and may help protect the setting and character of historic towns, two Green Belt purposes. In this case also there is no additional presumption against development as in Green Belts, or level of permanence beyond the plan period.

**6.7** Strategic gaps, rural buffers and green wedges are thus more flexible than Green Belts, being open to possible adjustment at each review of the structure plan. They currently operate as a second order restraint, in contrast to Green Belts which are a first order restraint. In the context of searching for new land for development, second order restraint areas can be considered along with other possible locations (such as urban brownfield land or sites on the edges of urban areas and villages). In the case of land designated as Green Belt, only in exceptional circumstances can it be released for development.

### *The Three Models*

**6.8** Discussion and debate at local authority level concerning restraint policies has almost exclusively focused on the Green Belt model. However restraint policies can take many forms. A clear finding of this study is that there are *three models* emerging, each appropriate to different sets of circumstances. Their key attributes are as shown in Tables [6.1](#), [6.2](#) & [6.3](#).

**6.9** Taking the essential elements from structure plan submissions, EIPs and SoS Decision letters, the features of strategic gaps appear to be those listed in [Table 6.1](#). The key attributes are that strategic gaps would be strictly limited in scale, being only the minimum size needed for their separation role. They are useful where the authority wishes to avoid coalescence between substantial urban areas, but where a Green Belt cannot be justified. Side such a pattern would leave some alternatives for development on the peripheries of urban areas where coalescence is not a problem. Strategic gaps would have the same duration as other structure plan policies, and would have strict development control policies designed to retain

the openness of the land. Having a lower level of permanence than Green Belts, this type of policy could lead to the creation of hope value for landowners and speculative development pressures. There was little evidence from the interviews carried out during the study however that this had occurred within existing strategic gaps.

**Table 6.1:** Strategic Gaps - Essential Features

purposes	avoidance of coalescence and protection of the setting of urban areas
location	between <i>substantial</i> urban areas
size	generally up to two miles wide, no more land than is necessary for protection where there is a <i>real risk</i> of coalescence
permanence	same duration as the structure plan
development control	strict controls, allowing for area to be kept <i>predominantly</i> open, similar to Green Belt.

**6.10** Rural buffers, as in the model in [Table 6.2](#), would be more extensive than strategic gaps. They would also help protect the countryside, and restrict coalescence between an urban area and surrounding villages. They would have potential economic benefits in shaping orderly development, as long as it could be ensured that sufficient new land would be released at each structure plan review. The main concern is that once approved the designation would be regarded by local interests as a Green Belt proper, with boundaries only being alterable in exceptional circumstances.

**Table 6.2:** Rural Buffers - Essential Features

purposes	avoidance of coalescence and protection of the countryside
location	around major town/city with high propensity for growth, between the town/city and surrounding smaller settlements, including villages
size	up to five miles wide
permanence	can be revised at reviews of the structure plan
development control	restricts major development, allows for small-scale rural development, including farm diversification
other	could be abandoned or turned into Green Belt when long-term direction of the growth of the town/city decided.

**6.11** Green wedges have a mixture of purposes which include both the protection of important open land within the city fabric, and the protection of settlements on the urban periphery from coalescence. The green wedges found in this study were up to one mile wide within city areas, but their definition depended on factors such as topography, existing open land uses, and levels of recreational access. The benefits of green wedges as they are evolving in the case study areas are that they:

- retain good quality environmental assets;
- are likely to be more readily recognised and understood by the public; and
- allow some choice of peripheral development for local authorities in locations of generally lesser environmental quality.



The main problem is that, apart from the case of Leicestershire, the green wedge examples in this study have yet to be fully established and articulated. Also, the reasons for changes in the pattern of green wedges in Leicestershire over the last 15 years require more detailed investigation at City and District level to establish if there are significant definitional or other implementation problems.

**Table 6.3:** Green Wedges - Essential Features

purposes	protect important open land to help shape growth of town/city; protect good quality environmental assets, avoid coalescence
location	around town and city; penetrating into town/city
size	green wedges within urban areas may be up to one mile wide, peripheral restraint wedges generally up to four miles wide, but depends on pattern of environmental features
permanence	the duration of the structure plan
development control	Green Belt prescription, or similar

*The Way Ahead*

**6.12** Before coming to a view on the future of strategic gaps and green wedges, it will be necessary to assess how far they can deliver desirable planning outcomes. Some of the potential outcomes discussed in this study include:

- clear cut urban-rural boundaries;
- separate identity of settlements/local distinctiveness;
- a reduction in greenfield land-take;
- the retention and enhancement of biodiversity;
- quality of life improvements, including improvements in access to the countryside near towns; and
- the retention of flexibility for some selected peripheral development in accord with sustainable development principles.

However, many of these outcomes are deliverable also by other policies. How far strategic gap and green wedge policies can make a difference is a matter of judgement. Certainly there was a feeling locally among the authorities interviewed that strategic gaps and green wedges were of considerable additional value to normal countryside policies. However they add an element of complexity to the planning of countryside areas. The Government, in the Draft of PPG12, states that it is keen to avoid over elaboration in structure plans.

**6.13** The main alternatives discussed here are to:

- make it clear that strategic gaps, rural buffers and green wedges are not acceptable in structure plans;

- make such designations into Green Belts proper; or
- promote the best features chosen from among the three restraint models.

These possibilities are discussed, in turn, briefly below:

## Alternative Scenarios

### *Removal from Structure Plans*

**6.14** This does not appear feasible, given the strength of local support such designations have, unless stakeholders can be convinced that the benefits (listed in paragraph 6.12 above) can be delivered by other means. Strategic gap, rural buffer and green wedge policies add coherence to urban fringe policies generally. They are understood as no go areas by the development industry. The local authorities interviewed in this study clearly see the need for such localised restraint policies, due to the nature of development pressures at the edges of urban areas. If these policies were to be ruled out in planning guidance in a revised PPG2 or PPG7, local authorities would require greater assurances of Government (and particularly GO) support for countryside policies generally at the urban fringe. The status of policies in development plans, supported by Section 54A of the Act, is not yet regarded by the authorities studied as a sufficient substitute for local designations.

### *Green Belt Status*

**6.15** The implications of giving *strategic gaps* a status similar to Green Belts are perhaps the least consequential of the three models. This is because of their relatively limited extent. The drawbacks are nevertheless significant. They appear to fall into three areas; according strategic gaps the status of Green Belts would:

- reduce peripheral development options on the edges of large towns in locations favourable to sustainable development, and in relatively buoyant areas outside Green Belts;
- remove the urban growth management roles of strategic gaps, whereby they can be adjusted in certain circumstances as long as settlement separation is maintained; and
- create a new set of problems over the interpretation of permanence. For example:
  - o would such areas be subject to the same provisions for safeguarded land as outlined in paragraph 2.12 of PPG2?;
  - o would authorities be able to argue that where strategic gaps are not extensive, then no safeguarded land would be needed?

**6.16** It is already possible to use Green Belts in a limited way in strategic gap roles. The examples of Green Belt between Burton-on-Trent and Swadlincote, and between settlements on the Fylde, show that this is the case. It would be a question for local authorities to justify why they needed Green Belt status for their strategic gap policies under the criteria in para

2.14 of PPG2. The guidance states that the need for a Green Belt could *first* be demonstrated at structure plan level, although other evidence in this study has suggested that RPG is also of key importance here (see para 3.20-3.23).

**6.17** It would be possible to argue that *rural buffers* are an interim stage on the way to designating a Green Belt. They allow coalescence of settlements to be avoided and the protection of the countryside to be secured, while long-term options for the growth of a particular town are being assessed. If the long-term direction is agreed in policy, then it would be open for local planning authorities to argue that a Green Belt could be designated, as the appropriate level of permanence had been achieved. If development pressures eased, then it would be possible to argue, conversely, that the rural buffer should be replaced by strategic gaps, green wedges or normal countryside policies.

**6.18** If *green wedge* policies were to be accorded Green Belt status they would involve one basic change to the form of Green Belts. At present Green Belts are largely restraint policies which operate *around the periphery* of urban areas. This change would involve them also penetrating urban areas to separate neighbourhoods and retain urban open land, two purposes which have not traditionally been performed by Green Belt. In doing this the new Green Belts would be firmer shaping devices for urban areas, but there would remain a need to retain parts of urban peripheries free of the policy, as demonstrated in the Leicester and Norwich examples. Questions of how far green wedges are strategic in particular instances, what distance they should penetrate into urban areas, and the extent to which they should be seen as separating urban neighbourhoods, would also be important.

#### *New Local Restraint Policies*

**6.19** The third way forward would be to promote the best features of the local restraint policies discovered in this study. In this scenario it is suggested that structure plans and UDP Part Is could designate, in approved circumstances, the following types of local restraint policy:

- rural buffers and strategic gaps; and
- green wedges

**6.20** For rural buffers and strategic gaps the emphasis would be on avoiding coalescence between settlements (including villages and larger urban areas) and on retaining the separate identity of settlements. In their most extensive form these policies would comprise rural buffers, for example in areas with particularly rapid physical growth. In areas where the problems of physical growth are more limited, strategic gaps would be defined. In both instances these policies would have the same duration as other policies in the structure plan or UDP Part I plan. These designations would help tackle issues of the orderly development of urban areas and would be limited (second order) urban growth management tools.

**6.21** Green wedges would follow the Leicestershire model, allowing the identification of structurally important areas of open land which, by their protection, would also help shape the form and direction of development. The principle of identifying areas of land which encompass high quality natural resources (for example landscapes and wildlife areas), and areas suitable for countryside access, would be established in structure plans and UDP Part I plans. These

would be particularly appropriate to larger cities where links between urban areas and the surrounding countryside may be tenuous. In short they would be seen as designations linking town and country, with the restraint purposes of the designation being less prominent. The idea would be not to perpetuate static views of the urban fringe, but to help deliver sustainability gains both in the urban fabric and the urban fringe countryside.

### *Implications for Green Belt Policy*

**6.22** One impression standing out clearly from this study was how the local planners operating strategic gap, rural buffer and green wedge policies considered them an improvement on Green Belt. They were capable of delivering wider objectives, while giving more flexibility to respond to newly-emphasised priorities of sustainable development. This brings forward the questions of how far the existing purposes and long-term rigidities of Green Belt policy are appropriate in current circumstances. An analysis in particularly county areas could suggest that the purposes for which Green Belts were originally defined have in some cases evanesced, and that strategic gap or green wedge policies should be considered as appropriate in their place.

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