

Examples of Strategic/Green Gaps in recent Neighbourhood Plans - Summary

Proposals/Issues	Results/Inspector Comment (rejected / accepted)
Oakley and Deane (Basingstoke)	
Green Gap to provide physical and visual separation for Newfound and Oakley from Basingstoke	No Borough wide Strategic Gaps Policy. Proposals jump the gun and are not based on robust analysis Policy deleted
Titchfield (Fareham)	
The Adopted Local Plan, August 2011, Policy CS22 identifies land around the village between Fareham/Stubbington and the Western Wards as the Meon Gap – a Strategic Gap. Importantly, all of this land is treated as countryside. This means that proposals for development will not be permitted, either individually or jointly, if they would significantly affect the integrity of the gap.	This policy (which was accepted) refers to and repeats an existing Fareham Local Plan Policy Policy Accepted
East Hagbourne (S Oxon)	
<p>The Plan proposes four proposed local green gaps In many respects this aspect is at the heart of the Plan. The neighbourhood area has the potential to act as a green environment within the context of the future expansion of Didcot as a Garden Town.</p> <p>The policy approach towards local green gaps draws on detailed evidence from the East Hagbourne Village Character and Landscape Assessment (Appendix 2 of the Plan) and the East Hagbourne Green Buffer Assessment (Appendix 10 of the Plan). Both of the documents are well-researched and professionally prepared. The Character and Landscape Assessment provides an integrated character assessment of the natural and historic environment of the parish. It identifies the features that make the area distinctive and the types of landscape which provide a sense of space. It subdivides the various landscapes into local areas of distinct character.</p>	<p><i>As the Plan explains the various local green gap policies are intended to prevent coalescence between the communities of East Hagbourne, Coscote and Didcot. They are also intended to preserve the distinctive individual characters and settings of the various communities. The Plan also comments that the local green gap policies do not seek to prevent development or open land uses that would otherwise be suited to a countryside location. Their primary purpose is to ensure that any development proposals do not result in the integrity of the gaps being undermined.</i></p> <p><i>I am satisfied that the potential coalescence of East Hagbourne and Didcot would not represent sustainable development and that the designation of local green gaps has an important role to play in this matter.</i></p>

Proposals/Issues

Results/Inspector Comment (rejected / accepted)

Sonning Common (S Oxon)

Policy DS1 seeks to designate a “green gap.” This is a new designation and whilst the Basic Conditions Statement suggests that the Policy is in general conformity with Core Strategy Policies CSEN1 and CSR1, neither of these District-wide policies seeks to designate a green gap, nor anything similar. Policy CSEN1 is a District-wide landscape character policy and Policy CSR1 is concerned with housing in villages. There is no substantive evidence to demonstrate that the creation of a new green gap Policy is in general conformity with the Core Strategy.

The Policy states that any development within the green gap should maintain the separation of villages and complement the landscape characteristics of the gaps. Such an approach appears contradictory. The very nature of the land in the green gaps is that it is green, open and largely undeveloped. It is therefore unclear how development, which by its very nature, tends to be urbanising, will complement existing landscape character. The Neighbourhood Plan provides no details in this regard.

Further to the above, it is also unclear how development would maintain the separation of villages, when, by its very nature, it would be likely to reduce separation. Again, neither the Policy, nor the supporting text, provides clarity in this regard. I also note that the “green gap” itself is not the result of a detailed landscape character analysis, but simply designates land in the countryside up to the Neighbourhood Area boundary.

Policy DS1 fails to meet the basic conditions

Proposals/Issues

Results/Inspector Comment (rejected / accepted)

Cradley (Herts)

This policy seeks to establish that development other than for specified purposes will not be supported in a defined strategic green gap between east and west Cradley.

I conclude the strategic green gap identified in Neighbourhood Plan Policy CSNDP8 is a valued landscape in the context of paragraph 109 of the Framework, the protection of which has regard for national policy. 126. A policy defining an area where no development is to be supported would seek to establish a regime that is more restrictive than even that applying in designated Green Belt or designated Local Green Space. Such an approach would not have sufficient regard for national policy for it to be appropriate. The Policy however does not seek to restrict all forms of development but identifies development for **public open space, and that reasonably required for agriculture and forestry purposes, or to mitigate flood risk**, as exceptions to the approach of not supporting development. In this respect, the policy seeks to shape and direct sustainable development to ensure that local people get the right type of development for their community as described in paragraph 16 of the Framework.

127. **The resistance of coalescence of settlements can be a legitimate objective of land use policy.** Subject to the modification recommended, this policy meets the basic conditions.

Recommended modification 11: In Policy CSNDP 8: delete “Proposals Map” and insert “Cradley village Policies Map” after “in it” insert “that will visually diminish the openness of the gap when viewed from publicly accessible locations”

Proposals/Issues

Results/Inspector Comment (rejected / accepted)

Bray (Windsor)

72 The majority of the Neighbourhood Area is protected by Green Belt and the Neighbourhood Plan is supportive of national Green Belt policy. However, it seeks, in addition, to establish a “Green Gap.” This would effectively overlay existing Green Belt.

73 Policy BNP-GG1 is confusing in the above regard. For example, it seeks to impose a policy to protect against coalescence, when this is already a Green Belt purpose. However, whereas Green Belt policy, as set out in Chapter 9 of the National Planning Policy Framework (the Framework), “Protecting Green Belt land,” establishes a detailed approach to preventing urban sprawl whilst keeping land permanently open, it is not clear exactly how Policy BNP-GG1 would ensure that development protects “the distinct and separate identities of existing settlements,” or how it might work alongside existing policies to achieve this.

74 Further to the above, no detail is provided to set out in what way development might “protect the landscape and environmental qualities” of the proposed Green Gap. Furthermore, the supporting text only briefly refers to very general elements of the local landscape, based on a study dating from 2004 and provides little substantive evidence relating to “environmental qualities.”

75 ...There is a lack of precision in respect of the precise area the proposed Green Gap would cover.

Notwithstanding all of the above and taking into account all of the information submitted by Bray Parish Council, I am especially mindful that the character of the local landscape and the features within it are extremely important to the local community.

I recommend:

- *Delete wording of Policy BNP-GG1 and replace with “Development within the Neighbourhood Area must respect local character. The improvement of landscape quality and the retention and/or restoration of boundary features such as hedgerows will be supported.”*
- *Delete supporting text and replace with “The Neighbourhood Area’s landscape has an important bearing of the quality of the environment. The Parish Council is keen to ensure that new development respects landscape quality and where possible, takes opportunities to improve landscape quality in those areas where it may have become degraded.*

Review of Policy 1: Local Gaps & Regulation 14 Pre-Submission Representations Hassocks Neighbourhood Plan
<https://www.midsussex.gov.uk/media/4243/hassocks-np-review-of-policy-1.pdf> (May 19)

Green Belt: “The Government attaches great importance to Green Belts. The National Planning Policy Framework establishes national Green Belt policy in Chapter 9, “Protecting Green Belt.” This sets out, in Paragraph 80, the five purposes of Green Belt, which are: ***to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns;*** and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

NPPF Feb 19

One of the core principles in the National Planning Policy Framework (NPPF) is that planning should recognise the intrinsic character and beauty of the countryside.

Paragraph 170 states planning policies and decisions should contribute to, and enhance the natural and local environment by:

Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; Minimising impacts on, and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

National Planning Policy Guidance (NPPG) advises

Local Plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes, but also the wider countryside. In addition, the NPPG advises, where appropriate,

- Landscape Character Assessments should be prepared to complement Natural England’s National Character Area profiles.
- Landscape Character Assessment is a tool to help understand the character and local distinctiveness of the landscape, and identify the features that give it a sense of place. It can help to inform, plan, and manage change, and may be undertaken at a scale appropriate to Local and Neighbourhood Plan-Making.

West Sussex District Plan notes that Local Gaps can be identified in Neighbourhood Plans or a Site Allocations Development Plan Document produced by the District Council, where there is robust evidence that development within the gap would individually or cumulatively result in coalescence and the loss of the separate identity and amenity of nearby settlements. It notes that evidence must demonstrate that existing local and national policies cannot provide the necessary protection. This provides context for the following Neighbourhood Plans:

Thakeham PC (Horsham) (p7)

Whether the inclusion of four 'green gaps' in Policy 1 is adequately justified and whether the areas (marked A-D) on the Policies Map sufficiently clearly defined.

Policy states that 'proposals must not undermine the visual and physical integrity of the gaps between the built-up areas of ...' and then names the adjacent parishes. The text in paragraph 4.17 does little more to expand or justify this policy approach except that it clarifies that one of the areas is 'between the two halves of the village.' (of Thakeham). There is no robust evidence to support the policy which would impose a significant constraint on development, contrary to national policy. It is also not clear what account has been taken of (Horsham Dev Plan Framework) which provides a clear criteria-based policy for the consideration of development proposals which would lead to 'settlement coalescence'. Policy deleted

The made TNP, January 2017, includes Thakeham 1: A Spatial Plan for the Parish. The policy, amongst other matters, identifies a green gap between Thakeham village ('The Street') and the new development at Abingworth Nurseries. The Policy seeks to prevent development in the gap and states:

"Proposals must not undermine the visual and physical integrity of the gap between the built-up area of Thakeham ('The Street') and the new development at Abingworth Nurseries as identified on the Policies Map".

Hurstpierpoint and Sayers Common (p7)

Development will be permitted in the countryside provided that it does not individually or cumulatively result in coalescence and loss of separate identity of neighbouring settlements, and provided that it does not conflict with other Countryside policies in this Plan. Local Gaps between the following settlements define those areas covered by this policy:

Mid Sussex Local Plan Policy C3 identifies areas of countryside that are particularly vulnerable to development pressure, but which have an important function with regards protecting local character. Neighbourhood Plan Policy C3 permits development in the countryside, subject to it not resulting in coalescence or the loss of identity of neighbouring settlements. This approach is in general conformity with Mid Sussex Local Plan Policy C3. Further to testing and robust consultation, it reflects the local community's strong support for the vision for the Neighbourhood Area, which seeks to retain a "village feel" and sense of place. This has regard to the Framework, which gives communities direct power to develop a shared vision for their neighbourhood. The policy contributes to the achievement of sustainable development by protecting local character and supporting appropriate development. No modifications are proposed."

Dichling Westmeston and Streat (p8)	
<i>Development proposals for new development in the gap separating Ditchling and Hassocks/ Keymer and Burgess Hill, either individually or cumulatively, will only be supported where they conserve and where possible enhance the open landscape character of the gap, and do not reduce the physical gap between settlements. This will be informed by the South Downs Integrated Landscape Character Assessment and relevant local landscape character assessments."</i>	The policy and its supporting text are appropriate. An amendment to the last sentence of the policy is desirable in the interests of clarity. I Recommend: amend the final sentence of the policy to refer to the "South Downs Integrated Landscape Character Assessment and relevant local landscape character assessments"
Storrington Sullington and Washington (p10)	
SSWNP, included Policy 9: Green Gaps. The objective of the policy was to identify particular areas that, if developed, could lead to coalescence between settlement <i>"Development between Storrington and West Chiltington will be resisted in line with Policy 27 of the Horsham District Planning Framework which seeks to prevent the coalescence of rural settlements. "</i>	<i>...it is therefore considered that the Storrington, Sullington and Washington Neighbourhood Plan meets the Basic Conditions and should proceed to referendum within accepted timescales".</i>

Other useful phrases

Footpaths: "Support will be given to improvements to the local footpath network delivered in association with the development of this site"

Protection of views and vistas: "The character of the area seen in views of X from the public footpaths in the area shown on the plan below will be protected from development proposals that would harm it."

- Include a new plan beneath the Policy. This should identify the specific area protected. It is proposed that this should be in the form of a shaded area over an OS Base