

Matter 2/00682

Spatial Strategy, Vision and Objectives

- 1.1 The answer to the key issue is that the Spatial Strategy is not sufficiently clear, soundly based and appropriate to the Borough, nor is it consistent with National and Regional Policy.
- 1.2 The answers to questions **i** to **v** have been set out in Fairview's previous submission of the 23rd July 2007.
- vi. Were all reasonable options explored etc, including a review of the green belt?**
- 1.3 The council identify two major constraints to development in the Borough, flooding and green belt notation. They have failed to adopt appropriate procedures on the flooding issue, contrary to National Policy and have refused to contemplate any review of the green belt.
- 1.4 In not attempting an objective review of the green belt, they have failed to properly identify all options to accommodate development needs. The Government's recent approach to green belt is as follows:
- i) Paragraph 68 of PPG3 asked Local Authorities to look at green belt boundaries where adjustment might provide more sustainable options for development.
 - ii) PPS3 states much the same thing in paragraph 37 (first bullet point) where, in identifying suitable sites for housing, Local Planning Authorities are asked, amongst other things, to review policy constraints.
 - iii) In her Proposed Modifications to the Draft SE RSS, the Secretary of State has amended Policy LF1 (London Fringe) by stating that housing needs should be met within urban areas but where this is not possible by urban extensions, involving selective or small scale reviews of the green belt.
- 1.5 In answer to question 6, there are areas in the Borough where the green belt has become fragmented and it is these areas that lend themselves to re-evaluation of whether such land genuinely performs a green belt function. In the circumstances where the wrong approach has been taken to flooding, (see previous

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representations, 23rd July 2007 paras 2.26 to 2.36), the strategy of not reviewing the other single major constraint to development, i.e. green belt, is inappropriate.

1.6 When producing the new LDF, it is reasonable to expect a root and branch policy approach to the Core Strategy.

vii. **Should the DPD include a policy for allowing for small scale reviews of the green belt?**

1.7 No. A characteristic of green belts is their permanence. Following a review of the green belt in the context of this Core Strategy, subsequent reviews would be inappropriate. Mechanisms exist, i.e. safeguarded land (PPG2 Annex B Safeguarded Land), where land can be kept free from development until required to meet long term needs. Such an approach might well be appropriate in respect of fragmented green belt and the Core Strategy should not be adopted until a review of the green belt has been carried out.