



### **Lead Authority: Monmouthshire County Council**

### **South East Wales Green Wedge Definition Criteria Method Statement**

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### Introduction

- **1.1** LUC has been commissioned by the ten South East Wales planning authorities <sup>1</sup> to develop a standardised methodology for the identification and justification of green wedges in future Local Development Plans (LDPs) in the region. Planning Policy Wales (PPW) <sup>2</sup> contains no specific assessment methodology for identifying, defining or reviewing green wedge designations in Wales.
- 1.2 This method statement has been prepared to outline the policy and geographical context for the green wedge designation, explore the established methodologies used by local authorities to date and propose a methodology that can be implemented on a consistent basis across South East Wales.

#### Consultation

- **1.3** Future Wales<sup>3</sup>: lays the framework for national, regional and local partners to work together in the coordinated delivery of national economic, housing, regeneration, environmental, flooding, energy, rural and transport policies. The definition of new green wedges, and refinement of existing ones, will play an important role in shaping growth and protecting the countryside in future LDPs.
- 1.4 Joint working on the definition of a new Green Belt in South East Wales through the South East SDP will influence the shape and extent of green wedges, given that green wedges can provide a buffer between settlement edges and statutory designations such as Green Belts. It is therefore important that the local authorities in South East Wales work together to develop a standardised approach to the identification and justification of green wedges in future LDPs.
- **1.5** This method statement provides an opportunity for national, regional and local partners to review and comment on a draft standardised methodology.

<sup>&</sup>lt;sup>1</sup> Blaenau Gwent County Borough Council, Bridgend County Borough Council, Caerphilly County Borough Council, Cardiff Council, Merthyr Tydfil County Borough Council, Monmouthshire County Council, Newport City Council, Rhondda Cynon Taf County Borough Council, Torfaen County Borough Council and Vale of Glamorgan Council

 $<sup>^{\</sup>rm 2}$  Planning Policy Wales – Edition 12, Welsh Government, February 2024

<sup>&</sup>lt;sup>3</sup> Future Wales: The National Plan 2040, Welsh Government, February 2021

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#### Report authors

**1.6** This method statement has been prepared by LUC. LUC has completed Green Belt and green wedge studies at a range of scales for over 50 local planning authorities in the past ten years, including in the neighbouring West of England.

#### **Method statement structure**

- **1.7** The remainder of this method statement is structured as follows:
  - Chapter 2 sets out the policy and geographical context and summarises the common structures and criteria in existing green wedge methodologies;
- Chapter 3 outlines a draft standardised methodology; and
- Chapter 4 summarises the next steps to be undertaken to refine the methodology.

#### Context

**2.1** National planning policy and guidance and associated case law and existing green wedge methodologies form the foundation of the proposed assessment methodology outlined in **Chapter 3**.

#### **National Planning Policy**

- **2.2** Paragraphs 3.64-3.78 of PPW (Edition 12) set out the details of Welsh Green Belt and green wedge Policy. The key difference between them is their relative permanence:
  - Green Belts are considered to be strategic having significance beyond a single local authority boundary and must therefore only be proposed as part of the preparation of a Joint LDP, an SDP, or in national policy, whereas green wedge polices can be defined locally through singular LDPs.
  - Green Belts are more permanent designations than green wedges and are therefore intended to be protected for longer than a single LDP period, whereas green wedge policies can be reviewed more regularly through the preparation of each new LDP.
- **2.3** PPW contains no specific assessment methodology for identifying, defining or reviewing green wedge designations.

## Justifying and shaping new Green Belts and green wedges

- **2.4** Paragraph 3.64 of PPW states that proposals for *green* wedges 'must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust.'
- **2.5** The case summary in the green box below highlights the importance of providing clear justification for each green wedge included in an LDP, something which must be a key priority in the definition of a new standardised methodology for identifying future green wedges in South East Wales.

Knight v Bridgend County Borough Council [2006] EWHC 596 (Admin)

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This case law provides some useful insight into the necessary justification needed to create a robust green wedge policy in the long term. The case considered the PPW policy in force at the time and concluded that green wedges should not be designated unless 'strictly necessary to fulfil the purposes of the policy'. The claimant sought to quash the relevant policies of the unitary development plan which designated an area of open land as green wedge, seeking to have it designated for housing instead.

The local authority rejected the inspector's recommendation that the land should be de-designated as green wedge, stating Welsh Development Agency v Carmarthenshire [1999] applied. It was held that the issue of whether the land should be included in the green wedge was one of pure value judgment and, consequently, provided the reasons for designation are adequate, then the designation is beyond challenge.

The local authority conceded that the reasons for the green wedge designation should be more clearly laid out in the UDP, which has since been amended.

#### Green Belt / green wedge purposes

- **2.6** Green wedges are described in PPW (at paragraph 3.68) as "local designations which essentially have the same purpose as Green Belts". The Green Belt purposes are as set out in paragraph 3.67 of PPW:
  - Prevent the coalescence of large towns and cities with other settlements;
  - Manage urban form through controlled expansion of urban areas;
  - Assist in safeguarding the countryside from encroachment;
  - 4. Protect the setting of an urban area; and
  - Assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- **2.7** Other beneficial effects of green wedges, such as their countryside, sport and recreation opportunities, are not material factors in determining whether land should be included within them (PPW paragraph 3.69).
- 2.8 Paragraph 3.68 of PPW also states that green wedges 'may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area'. This is not listed as a distinct purpose in the preceding paragraph of PPW, and the wording in paragraph 3.68 does not suggest that this is an additional purpose for green wedges. The word 'area' in paragraph 3.68 is taken to refer to the urban area rather than to a statutory designation, and the paragraph refers to the safeguarding of

important views, so this role as a buffer is taken to be an aspect of Purpose 4 – protecting the setting of an urban area. This reflects the important role that a statutory designation, such as a National Park, can play in the setting of a settlement. It could also apply to a Green Belt designation and the role that a green wedge could play in association with it.

- 2.9 In addition to being used in isolation, where development pressures are not considered to be widespread enough to warrant the protection of openness with a Green Belt designation, green wedges could, therefore, be used in conjunction with Green Belt. Future Wales outlines a blueprint for the designation of a new Green Belt in South East Wales in the forthcoming South East Wales Strategic Development Plan (SDP), and green wedges could potentially be used to protect land lying between settlements and land that is designated as Green Belt, where it is felt that a review of its protected status may be necessary at the next LDP review.
- **2.10** It may also be the case that existing and future strong candidates for green wedge designation will instead be designated as Green Belt in the forthcoming SDP. The findings of future work on the definition of the new South East Wales Green Belt should therefore be used to directly inform the future definition of green wedges.

#### Defining detailed Green Belt and green wedge boundaries

- **2.11** PPW states that green wedge boundaries should follow physical features and only include land which it is necessary to keep permanently open, being appropriate to the location, i.e. they don't necessarily need to extend in a continuous band around an urban area.
- **2.12** There is a general presumption against development that is inappropriate in relation to the purposes of green wedges. Inappropriate development is not permitted except in very exceptional circumstances. Development considered to be 'not inappropriate' in green wedges (detailed in PPW at paragraphs 3.75-3.77) includes:
  - justified rural enterprise needs;
- essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the green wedge and which do not conflict with the purpose of including land within it;
- limited extension, alteration or replacement of existing dwellings;
- small scale diversification within farm complexes where this is run as part of the farm business;
- the re-use of substantial permanent buildings that would be in keeping with its surroundings and not have a greater impact on the openness of the green wedge and their purposes;

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- mineral, renewable and low carbon energy generation. Engineering operations and local transport operations that maintain the designations' openness and do not conflict with the purposes of including land within them.
- **2.13** These details are helpful in defining the detailed boundaries of new or refined green wedges. It stands to reason that stronger physical features, such as railway lines, motorways, rivers, cliffs and dense woodlands should be used where possible, and inappropriate developments should be excluded where appropriate.

#### **Local policy**

**2.14 Table 2.1** summarises the adopted and emerging local green wedge policies of the local authorities in South East Wales.

Table 2.1: Summary of local green wedge policies

Local authority	Plan and policies
Blaenau Gwent County Borough Council	Adopted Local Development Plan 2006-2021: Policy ENV1 – Green Wedges states: 'Green Wedges have been identified at the following locations in order to prevent coalescence between settlements:
	1. Beaufort and Brynmawr
	2. Tredegar and Ebbw Vale'
	The supporting text states each of the green wedges has been identified following consideration of factors such as development pressure, urban form and the potential for eventual coalescence of settlements.
	An Environment Background Paper (2012) prepared in support of the Deposit LDF contained a desk-based study of the four green wedges in the adopted Unitary Development Plan.
Bridgend County Borough	Adopted Bridgend Local Development Plan 2006-2021: Policy ENV2 – Development in Green Wedges states:
Council	'Development which causes, or contributes to, the coalescence of settlements or reduces the openness of land between settlements will not be permitted.
	The following areas of land have been specifically designated as Green Wedges:
	ENV2(1) Coity and Bridgend
	ENV2(2) Tondu and Coytrahen
	ENV2(3) Coychurch and Pencoed
	ENV2(4) Bridgend and Laleston
	ENV2(5) Bridgend and Sarn
	ENV2(6) Kenfig Hill and Cefn Cribwr
	ENV2(7) Cwmfelin, Llangynwyd and Pontrhydycyff
	ENV2(8) Penyfai and Aberkenfig
	ENV2(9) Penyfai and Bridgend
	ENV2(10) Aberkenfig and Sarn
	ENV2(11) Bridgend and Ewenny
	ENV2(12) Kenfig and Mawdlam
	ENV2(13) Blackmill and Pantyrawel
	ENV2(14) Nantymoel and Ogmore Vale'
	The supporting text states 'The Council acknowledges that the rigorous application of settlement boundaries as limits to urban built development, as defined in Policy PLA1, will achieve most of the aims listed above. However, the Council considers that, due to the proximity of some neighbouring settlements and/or development pressure, some areas of countryside are more vulnerable than others in terms of coalescence with one another. Therefore, in the LDP the overriding purpose of the Green Wedge allocations is for their primary function, namely to prevent the coalescence of settlements.
	'Green Wedges' perform this function by maintaining an open area of countryside between settlements, and thereby afford a higher degree of protection for that land which lies beyond the designated settlement boundaries. The areas identified under Policy ENV2 are between settlement boundaries which are either already close enough where distance alone makes them vulnerable to coalescence, or are areas known to have been subject to past pressures for inappropriate development, which would reduce the openness between settlements to a point where they would be vulnerable to coalescence. Although the prevention of coalescence has

Local authority	Plan and policies
	been the primary purpose of designation, consideration of 'protecting the setting of an urban area', especially along highly visible and potentially easily developable road frontages has also been taken into account as part of the green wedge methodology.'
	The Council undertook a Green Wedge Review in 2021 to review the existing green wedge designations in the adopted Bridgend Local Development Plan 2006-2021 and consider the need for their continuation in the <b>emerging Replacement Local Development Plan 2018-2033</b> . No green wedges are included in the Bridgend County Borough Local Development Plan (2018-2033) Deposit Plan Consultation document suggesting that the review concluded that the previous green wedges should be removed.
Caerphilly County Borough	Caerphilly County Borough Local Development Plan up to 2021: Policy SI1 – Green Wedges states: 'Green Wedges are identified and will be protected at the following locations:
Council	SI1.1 Llechryd and Rhymney
	SI1.2 Fochriw and Pontlottyn
	SI1.3 Rhymney and Abertysswg
	SI1.4 Brithdir and Tirphil
	SI1.5 Argoed and Markham
	SI1.6 Aberbargoed, Cefn Fforest and Pengam
	SI1.7 Penpedairheol, Gilfach and Tir y Berth
	SI1.8 Blackwood, Cwm Gelli and Cefn Fforest
	SI1.9 Blackwood, Oakdale and Penmaen
	SI1.10 Croespenmaen and Treowen
	SI1.11 West of Nelson
	SI1.12 Gelligaer, Penybryn and Penpedairheol
	SI1.13 Pengam, Blackwood and Pontllanfraith
	SI1.14 Newbridge and Abercarn
	SI1.15 Cefn Hengoed, Hengoed, Ystrad Mynach and Fleur de Lys
	SI1.16 Maesycwmmer, Pontllanfraith and Fleur de Lys
	SI1.17 Maesycwmmer and Ystrad Mynach
	SI1.14 Newbridge and Abercarn
	SI1.18 Cwmcarn and Pontywaun
	SI1.19 Cwmfelinfach and Ynysddu
	SI1.20 Penyrheol, Hendredenny and Abertridwr
	SI1.21 Llanbradach and Pwll-y-Pant
	SI1.22 Bedwas and Caerphilly
	SI1.23 Machen, Graig-y-Rhacca and Waterloo
	SI1.24 Ty-Sign and Pontymister
	The supporting text to the policy states 'The need to define and maintain open spaces between and within urban areas and settlements to prevent coalescence is considered important for the County Borough to protect the integrity of both the built and natural environment. Within green wedges, it is intended to resist any development proposal that would not maintain this open character.'

Local authority	Plan and policies
	Appendix 3 of the Plan sets out detailed descriptions of each green wedge to inform planning decisions in these locations.
Cardiff Council	Cardiff Local Development Plan 2006-2026: Policy KP3 (A) – Green Wedge states: 'In order to strategically manage the urban form of Cardiff and to protect the setting of the urban area, a Green Wedge is proposed on land North of the M4 as shown on the Proposals Map. Within this area development which prejudices the open nature of this land will not be permitted. Positive biodiversity, landscape, climate change mitigation and informal recreational management and enhancement measures will be encouraged in this area to further enhance the long term role of the area as a key natural resource benefiting the city.'
	The supporting text to the policy also states: 'This land unquestionably forms a distinctive, prominent and well known green backdrop to the city forming a strategically important setting to the urban area. The land is also generally well contained by the strong physical boundary of the M4 Motorway to the south.'
Merthyr Tydfil County Borough Council	Merthyr Tydfil Replacement Local Development Plan 2016 – 2031: Paragraph 6.4.28 of the plan states 'The Plan does not include 'green wedge' designations (unlike the 2006-2021 LDP). Strong settlement boundaries are considered a sufficient mechanism to avoid urban coalescence.' Reference is made to the Green Wedge Review Background Paper (2018) for further information on this.
Monmouthshire County Council	Monmouthshire County Council Adopted Local Development Plan (2011-2021): Policy LC6 – Green wedges states 'In order to prevent the coalescence of the settlements listed below, the areas between them are identified as Green Wedges, as shown on the Proposals Map:
	a) Undy, Llanfihangel Rogiet and Rogiet;
	b) Rogiet and Caldicot;
	c) Portskewett and Sudbrook; and
	d) Shirenewton and Mynyddbach;
	e) Chepstow, Pwllmeyric and Mathern.'
	The supporting text to the policy states 'Exceptionally, development may be considered acceptable in a Green Wedge where the proposal complies with Policy E2 (Non-Allocated Employment Sites) or is necessary to implement a transport scheme identified in Strategic Policy S16.'
Newport City Council	Newport Local Development Plan 2011-2026: Policy SP7 – Green Wedges states: Green wedges have been identified in order to prevent coalescence between the following settlements:
	7) Newport and Cardiff;
	ii) Rogerstone and Risca;
	iii) Bettws, Malpas and Cwmbran;
	iv) Caerleon and Cwmbran.
	Within these areas development which prejudices the open nature of the land will not be permitted. An increase in size of a dwelling of more than 30% of the volume of the original size of the dwelling, or as existed in 1948, will not be approved.
	The supporting text to the policy states 'The prime purpose of Green Wedges is to prevent coalescence between urban areas. The designation is not made necessarily on the basis of the physical quality of the landscape, but rather to maintain their openness. The areas designated tend to have significant importance for their openness and for their role in maintaining the distinct identify of separate communities.'

Local authority	Plan and policies
Rhondda Cynon Taf County Borough	Rhondda Cynon Taf Local Development Plan up to 2021: Policy NSA 24 – Green Wedges states: 'Green Wedges have been identified in order to prevent coalescence between and within settlements at the following locations:
Council	1. Land north of Tonyrefail (Trane Farm, Cae'r-lan Farm) and Penrhiwfer (Mynydd y Gilfach) (part);
	2. Land between Penrhys (including Penrhys Cemetery) and Tylorstown;
	3. Land between Penrhys and Llwynypia;
	4. Land between Abernant (including Abernant Golf Course) and Cwmbach;
	5. Land between Fernhill and Mountain Ash, including Victoria Pleasure Park;
	6. Land north-east of Coed y Cwm and Grover's Field (Abercynon);
	7. Land between Penywaun and Cwmdare / Trecynon.
	Within these areas development that prejudices the open nature of the land will not be permitted.'
	Policy SSA 22 – Green Wedges states: 'Green Wedges have been identified in order to prevent coalescence between and within settlements at the following locations:
	1. Land north of Tonyrefail (Trane Farm, Cae'r-lan Farm) and Penrhiwfer (Mynydd y Gilfach) (part);
	2. Land between Gilfach Goch / Hendreforgan and Parc Eirin (Tonyrefail);
	3. Land between Parc Eirin (Tonyrefail) and Ty'n y Bryn / Gelli Seren (Tonyrefail);
	4. Land between Llanharan, Llanharry and Pontyclun;
	5. Land between Llantrisant and Beddau (Brynteg);
	6. Land between Beddau / Tyn-y-Nant and Llantwit Fardre (Crown Hill) / Church Village;
	7. Land between Efail Isaf and Llantwit Fardre;
	8. Land between Glyncoch and Ynysybwl.
	Within these areas development that would prejudice the open nature of the land, will not be permitted.'
	The supporting text to the policies states 'Although other policies in the plan are aimed at restricting development in the countryside, it is considered necessary to provide additional protection to areas of important and vulnerable open land by restricting development on the urban fringe and between settlements. Each of the Green Wedges has been identified following consideration of factors such as development pressure, urban form and the potential for eventual coalescence of settlements.
	In the Northern Strategy Area Green Wedges have been designated specifically to prevent coalescence between and within settlements and to protect vulnerable land and urban form.'
	Details of each of the designations are contained in a Green Wedge Topic Paper (2008).
Torfaen County Borough Council	Torfaen County Borough Council Local Development Plan (to 2021): Policy C1 – Green Wedges states: 'Green Wedges are identified at the following locations in order to prevent coalescence between settlements and to maintain the open character of these areas:
	C1/1 – Cwmbran and Newport;
	C1/2 – Ponthir and Caerleon; and
	C1/3 – Mamhilad and New Inn, Pontypool.

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#### Local authority Plan and policies Development within designated Green Wedges will only be permitted where the use is either conducive to or enhances the open character of the Green Wedge, respects its rural setting in terms of layout & design and minimises visual intrusion into the landscape.' The supporting text to the policy states: 'Green Wedges have been designated to prevent coalescence between settlements and to protect the open nature of land between settlements and urban areas. The spread of development into the countryside can result in the urbanisation of rural areas, incremental loss of important green space, coalescence of settlements and have a detrimental effect upon agriculture, the landscape and amenity value of land and the individual identity of settlements. Although other policies in the LDP restrict development in the countryside, it is necessary to provide additional protection to areas of important and vulnerable open land by restricting development on the urban fringe and between settlements. It is intended to resist any development proposal that would not maintain the open character of the Green Wedges.' Details of the Green Wedges are included in Appendix 5 of the Plan. Vale of Vale of Glamorgan Local Development Plan 2011- 2026: Policy MG18 – Green Wedges Glamorgan states 'Green wedges have been identified to prevent the coalescence of settlements and to Council retain the openness of land at the following locations: 1. Between Dinas Powys, Penarth and Llandough; 2. North West of Sully; 3. North of Wenvoe; 4. South of Bridgend; 5. Between Barry and Rhoose; 6. South Penarth to Sully; and 7. Between Rhoose and Aberthaw. Within these areas development which prejudices the open nature of the land will not be permitted.' The supporting text to the policy states: 'While other policies of the LDP seek to prevent inappropriate development within the open countryside it is considered that the areas defined by the green wedges are more vulnerable and susceptible to change and require additional protection. Therefore, within the areas defined by the green wedges there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.' Details of each of the designations are contained within the Green Wedge Background Paper (2011).

## Justifications for existing green wedges in South East Wales

- 2.15 As outlined above PPW and associated case law makes it clear that each green wedge has to have a clear justification. There must be a 'demonstrable need' to protect urban form beyond the definition of clear settlement boundaries which, in conjunction with associated countryside protection policies, serve to maintain openness and, therefore, contribute to all five of the Green Belt purposes. Other beneficial effects of green wedges, such as their countryside, sport and recreation opportunities, are not material factors in determining whether land should be included within them.
- **2.16** Whilst a general settlement boundary and countryside protection policy combination can protect land which contributes to the green wedge purposes, this is only achievable if there is a sufficient range of land available for development. If not, the countryside may become vulnerable to development pressure. Therefore, it is possible to justify the designation of green wedges where settlement boundaries are particularly vulnerable and susceptible to change because of the level of development pressure, and where land can be shown to contribute sufficiently to the green wedge purposes.
- 2.17 Each local authority has prepared standalone evidence to determine the need and provide the justification for the designation of green wedges in their plan areas. The latest green wedge papers and assessments prepared by each of the 10 South East Wales local authorities to inform local green wedge policy have been reviewed to determine their common features and assessment criteria including:
- Blaenau Gwent Deposit LDP Environment Background Paper (2012).
- 2. Bridgend LDP (2006-2021) Background Paper 4: Green Wedge Designation (2011).
- 3. Caerphilly LDP up to 2021 Appendix 3 and accompanying Green Wedge Study (2008).
- 4. Cardiff LDP (2006-2026) -
- Merthyr Tydfil Replacement LDP (2016-2031) Green Wedge Review Background Paper (2018).
- 6. Monmouthshire LDP (2011-2021) Green Wedge topic Paper (2012).
- 7. Newport LDP (2011-2026) -
- Rhondda Cynon Taf LDP up to 2021 Green Wedge Topic Paper (2008).
- 9. Torfaen LDP up to 2021 Appendix 5.
- **10.** Vale of Glamorgan LDP (2011-2026) Green Wedge Background Paper (2011).

**2.18** It should be noted that the above evidence base documents are all based on earlier iterations of national planning policy and guidance, which have since been updated by Future Wales and PPW (Edition 12), but there are no fundamental changes in PPW that would affect the definition and assessment of green wedges.

## Key points from review of green wedge assessments

**2.19** The review of existing green wedge assessments has been used to inform the definition of the draft assessment proforma in **Chapter 3**. The following key points are noted from the existing assessments:

#### **Relevant purposes**

- 2.20 A review of the text, appendices and topic papers supporting the local green wedge policies outlined above indicates that the most commonly used justification is the prevention of coalescence of neighbouring settlements (Purpose 1), in circumstances where gaps are narrow, there is evidence of development pressure, and other designations which preserve openness (such as leisure/amenity policies) do not apply. In such cases, it is suggested that reliance on settlement boundaries could potentially be insufficient.
- **2.21** The role of open land in providing a settlement setting (Purpose 4) is also sometimes the primary justification for green wedge designation, alongside demonstrable development pressure, but reference to the other green wedge purposes is less common.
- **2.22** Where land is more clearly distinct from urban areas, and development potential is considered to be lower, settlement boundaries are typically considered to be adequate.

#### Focus on the national purposes of green wedges

- 2.23 Some papers have provided local 'interpretations' of the national green wedge purposes, such as drawing on the secondary benefits of green wedges: opportunities for access to open countryside, outdoor sport and recreation, landscape and wildlife value, agriculture and forestry assets and green infrastructure. Edition 12 of PPW states the other beneficial effects of green wedges, such as their countryside, sport and recreation opportunities, are not material factors in determining whether land should be included within them.
- **2.24** The methodology set out in Chapter 3 is more strictly focused on the green wedge purposes as set out in PPW. Any other value that open land has such as biodiversity or recreational use should be recognised through other means.

#### **Interpretation of Purpose 1**

- **2.25** The PPW wording for Green Belt Purpose 1 specifically refers to preventing coalescence with a 'large town or city'. The other 'settlement' being protected could be any size, but the PPW wording suggests that coalescence of, say, two villages would not be a concern in terms of Purpose 1.
- **2.26** A review of green wedge assessments indicates that Purpose 1 has to date been widely applied in the context of gaps between settlements of any size. This does represent a potential point of challenge, but we are not aware of any such challenges to date. It is also noted that green wedges defined principally because of their role in separating settlements where neither is a 'large town' have been accepted as valid at Local Plan examination<sup>4</sup>.
- **2.27** The methodology set out in Chapter 3 suggests a stricter interpretation of Purpose 1, in line with PPW wording, but also suggests that Purpose 4, protecting the setting of an urban area, can potentially be served through the maintenance of gaps with smaller settlements.

#### **Assessment criteria**

- **2.28** The assessment criteria vary but reference is commonly made to the role of topography, development barriers/boundaries and transport (connecting) features.
- **2.29** The analysis is typically qualitative rather than quantitative i.e. there are no rating systems employed in the green wedge studies. Whilst it is inevitable that qualitative judgements will be required to some degree, the use of ratings for some elements of the assessment will help to achieve consistency across the South East Wales region.
- **2.30** The methodology set out in Chapter 3 combines these considerations into a rated analysis of the relationship between open land and the urban areas (the degree of 'distinction' between open land and the urban area).

<sup>&</sup>lt;sup>4</sup> For example, in the 'Report on the examination into the Caerphilly County Borough Local Development Plan up to 2021' (2010).

## Proposed Green Wedge Assessment Criteria and Guidance

- **3.1** Following the review of relevant national and local green wedge policy, and supporting justification in **Chapter 2**, this chapter outlines a proposed standardised approach for green wedge assessment.
- **3.2** There is no defined approach set out in Welsh or English National Planning Policy or guidance as to how Green Belt or green wedge assessments should be undertaken. The approach is based on LUC's extensive experience of undertaking Green Belt assessments for over 50 local authorities.

#### **General approach**

- **3.3** This assessment methodology has been prepared with the following priorities in mind:
  - Robustness basing assessment criteria on the latest relevant planning policy and associated case law.
  - Consistency making sure the assessment criteria are sufficiently clear and standalone to ensure all the judgements are consistently applied.
  - Transparency communicating assessment judgements clearly using maps and simple language so that both planning professionals and the general public understand the process, to save confusion and avoid unnecessary challenges.
- **3.4** The methodology is broken down into four stages, each of which has one or more steps. Working through the steps, the aim of the process is to identify areas that justify the protection provided by a green wedge designation. Some potential green wedge locations will be eliminated from consideration along the way, at Stages A, B or C, whilst others will require all four stages to be completed in order to determine whether a green wedge is needed and, if so, where its boundaries should be located.
- 3.5 The actions from each step will be either:
  - the exclusion of unsuitable locations for designation;
  - the recording of information to be used in a later step; or
  - the identification of an area suitable for green wedge designation.

- **3.6** Each step will produce appropriate and consistent wording to justify the exclusion or inclusion of a location.
- 3.7 The four stages of green wedge assessment are:
  - A Assessment of openness;
- B Assessment of development pressure;
- C Assessment of performance in relation to the green wedge purposes;
- D Conclusion on need and definition of boundaries.
- **3.8** The assessment stages and steps are also illustrated on Figure 3.1 below.

### Ways of applying the methodology

- **3.9** The methodology is intended for use by Local Planning Authorities. It provides a process that can be used to assess and refine existing or candidate green wedges, employing an assessment proforma to record and map relevant information.
- **3.10** It is also designed so that it could, in the first instance, be used to identify potential green wedges without any reference to existing or proposed ones. Considering **all** land in the ten districts as potential green wedge and then working through a step-by-step process of excluding unsuitable areas, until only the strongest candidates remain. It could also be used as a consistency check to help determine whether some existing green wedges should be amended, and whether some new ones should be created.

#### Relationship with Green Belt assessment

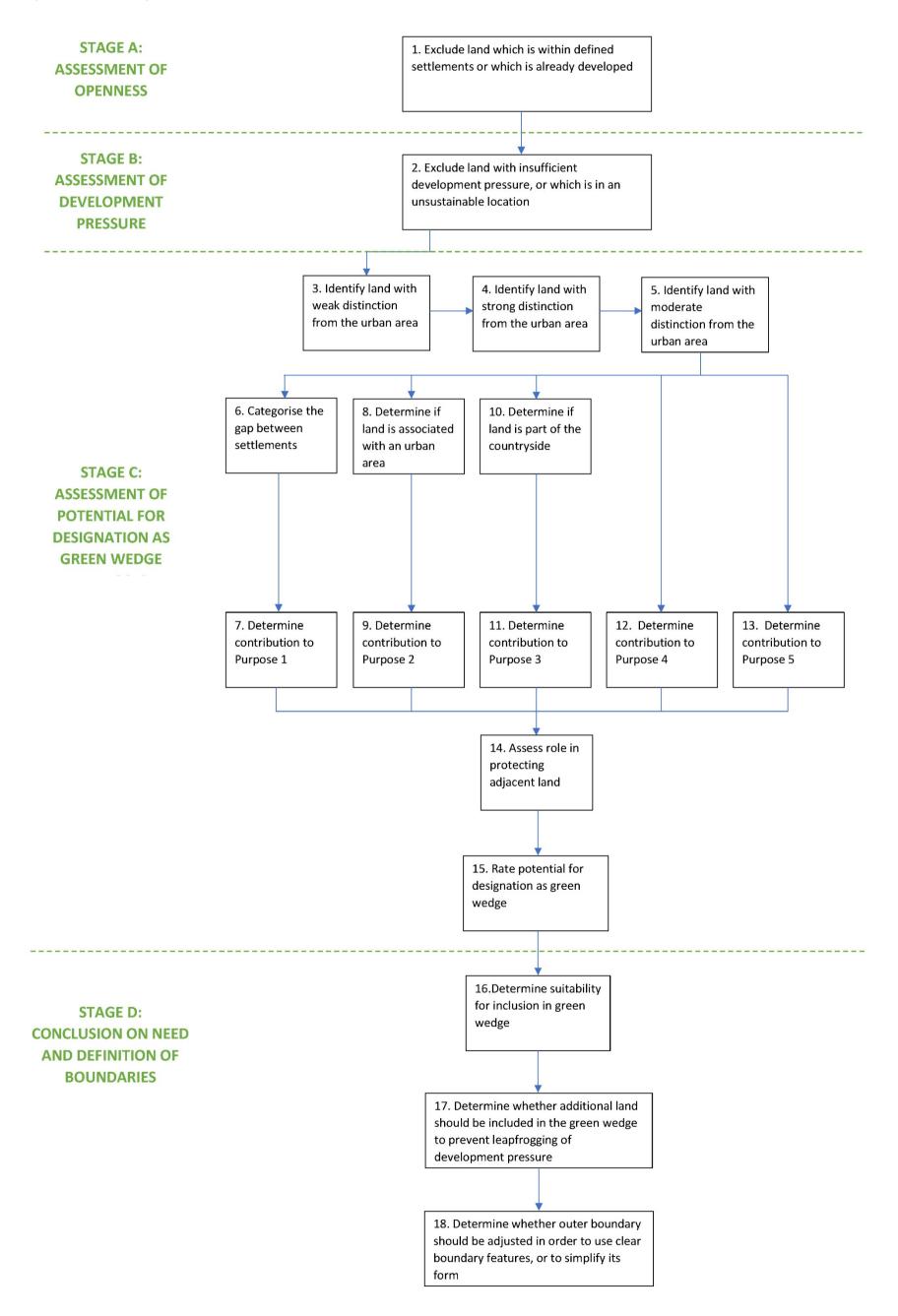
- **3.11** The proposed approach to assessing green wedges is essentially the same as the proposed approach to assessing Green Belt. As the purposes of both designations are the same, and the two designations are likely in some places to be defined alongside each other, it is important that they are defined in a consistent manner.
- **3.12** The key difference between the green wedge and Green Belt assessment processes is that the former needs to consider development pressure in order to justify why settlement boundaries are not an adequate control on inappropriate development. For Green Belt, Future Wales has determined an 'area for consideration' within which development pressure has been judged to be sufficient to warrant the widespread protection that the designation will provide.
- **3.13** This means that areas that would be considered too far removed from settlement boundaries to necessitate green wedge protection may not be considered too remote to designate as Green Belt.

- 3.14 Application of the Green Belt assessment methodology will result in a recommended area (or areas) for potential designation, but this will not take account of future development needs in South East Wales. It is at this stage that the Councils will need to consider whether some areas identified as potential Green Belt should instead be allocated or safeguarded for development, because sustainable development needs outweigh impact on the Green Belt purposes and the environment), or alternatively designated as green wedges, to be revisited at the next local plan review.
- **3.15** The carrying out of the Green Belt study in advance of any comprehensive application of the green wedge methodology will mean that a thorough analysis of the role of land in relation to the green wedge purposes will already have been carried out within the 'area for consideration' defined in Future Wales. This will reduce the analysis required when consideration is given to potential green wedge definition.

#### **Key considerations**

- **3.16** The principal difference from existing Council methodologies is in Stage C. The assessment of performance includes a more detailed analysis of the variations in the performance of land in relation to the green wedge purposes (referred to as 'contribution' to the purposes). There is also a separate consideration of how designating or not designating an area would affect adjacent open land.
- **3.17** Underpinning the approach of identifying variations in contribution to the green wedge purposes is the assumption that consideration of development pressure needs to be weighed up alongside consideration of the extent to which land would contribute to the purposes, in order to determine whether designation would be appropriate.
- **3.18** The likelihood of development is not on its own enough to justify protection by a green wedge. Regardless of level of development pressure land needs to make sufficient contribution to the green wedge purposes to justify retaining openness, otherwise it is a potentially suitable location for development (i.e. not *'necessary to keep open'* PPW paragraph 3.70).
- **3.19** The assessment of sustainability factors does not form part of the green wedge assessment process. However, it is recognised that the green wedge analysis process might be carried out alongside consideration of spatial options for future development, in which case it might be decided that the sustainability merits of development in a particular location outweigh value of protecting urban form. In this event, the stronger the performance the stronger the need-case would need to be to justify development.

Figure 3.1: Green Wedge Assessment Process



- **3.20** If there is a degree of development pressure, some weighing up of this against the findings of the contribution assessment will be needed in order to judge whether a green wedge designation is warranted. In some circumstances it may be judged that contribution is not strong enough to justify protection against development, given the level of need, but it may also be the case that land which would make a strong contribution to the green wedge purposes does not need to be designated because it has a strong enough sense of separation from the urban area, and weak enough development pressure, for settlement boundaries alone to be considered defensible.
- **3.21** Considering performance in relation to the green wedge purposes in this way can, alongside consideration of a range of sustainability criteria, help to identify areas that could be allocated for development through the LDP process, as well as identifying areas to protect.
- **3.22** The following sections set out the assessment stages and steps, together with the assumptions and explanations that underpin them, and the actions that result. Where relevant, reference is made to PPW text.
- **3.23** If a comprehensive analysis approach is adopted (see paragraph 3.10), it is suggested that the mapping of areas excluded from consideration for green wedge definition, as well as those that are finally defined, would be helpful.
- **3.24** The assessment steps are also set out in the assessment proforma shown in Figure 3.2. If carrying out the comprehensive analysis approach, it is suggested that the proforma could be utilised from Stage C onwards. Recording the reasons for not defining land as a green wedge provides a useful reference point for future reviews of the extent of green wedge coverage, enabling those future reviews to focus on what might have changed since the original assessment, rather than reassessing from scratch.

#### Stage A - Assessment of openness

Step 1 – Exclude land that is within defined settlements or which is already developed

- **3.25** Areas can be excluded from consideration for designation if they are already 'developed'. This is because PPW (at paragraph 3.65) recognises openness as an 'essential characteristic' of Green Belt / green wedges.
- 3.26 Land within a defined settlement boundary can be excluded from consideration on the assumption that settlement boundaries are defined to indicate areas within which development has already occurred, and where further development will potentially be acceptable. Where there are open spaces within settlement boundaries that are not considered suitable for development it can be assumed that

these will have some form of designation that protects them, and that a green wedge designation would therefore be unnecessary.

- **3.27** There may be areas outside of defined settlement boundaries that, as a result of development that would be considered inappropriate in a Green Belt or green wedge, also lack the 'essential characteristic' of openness and can therefore make no contribution to the green wedge purposes. If such areas are sizeable, or located directly adjacent to a settlement boundary, they can be excluded from the assessment process at this stage, but if not then they should be left in. Any urbanising impact that they have on adjacent open land will be considered at Stage C.
- **3.28** English case law is helpful in clarifying that Green Belt openness relates to a lack of 'inappropriate development' rather than to visual openness, thus both undeveloped land that is screened from view by landscape elements (e.g. tree cover) and land with development which is not considered 'inappropriate' are still 'open' in green wedge terms.
- **3.29** Reference should be made to the list of developments at PPW paragraphs 3.75-3.77 considered 'not inappropriate' in green wedges.

#### Step 1 action

Record and map areas outside of settlement boundaries that are considered to be already developed, unless isolated from the settlement edge and too small to consider excluding from a green wedge designation.

## **Stage B – Assessment of development pressure**

- **3.30** Paragraph 3.64 of PPW states that proposals for green wedges 'must be soundly based and should only be employed where there is a **demonstrable need** [emphasis added] to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust.'
- **3.31** PPW doesn't specifically refer to development pressure, but in order to judge whether alternative policy mechanisms are robust enough to prevent development it is considered necessary to consider the level of demand/need for development.
- **3.32** It is also clear, from Future Wales's policies requiring Green Belt designation, that it is in areas of significant anticipated growth that this designation is warranted. It can, therefore, also be assumed that green wedges are needed where development pressure is high (whether within the Future Wales 'area of consideration' for Green Belt or beyond it).

**3.33** At paragraph 5.6.6, PPW it indicates that new development sites 'should generally be located within or adjacent to defined settlement boundaries, preferably where there is public transport provision'. This suggests that land which is adjacent to an urban area can be considered vulnerable, but that development proposals on land which is isolated from urban edges can more readily be rejected as unsustainable, even if there is development pressure.

Step 2 - Exclude land with insufficient development pressure, or which is in an unsustainable location

- **3.34** A judgement is needed as to whether there **may** be sufficient pressure for development, in a location that cannot be dismissed as unsustainable, to warrant the additional protection provided by a green wedge. The degree of development pressure is hard to assess on a consistent basis, but the aim at this stage is to exclude areas that lack any significant development pressure, rather than to decide that there is sufficient development pressure to justify a wedge in a particular area.
- **3.35** Past, current and anticipated future planning applications can all be relevant to helping make a judgement on whether there may be sufficient development pressure to warrant the additional protection provided by a green wedge. It is helpful to give some consideration to scale, rather than just number of applications, in relation to the size of the open area in which they are proposed.
- **3.36** Regardless of existing planning applications there may be stated plans or aims which suggest that development pressure in a particular area is likely to increase in the foreseeable future.
- 3.37 In some cases, there may be physical features which clearly mark a change between land that is subject to development potential and land which is not, but if that is not the case it is unnecessary at this stage to define a precise boundary. Should land be identified at Stage D as suitable for green wedge designation, a judgement will be needed as to where the outer boundary should be drawn, and this will take into consideration the findings of the contribution assessment and the nature of potential boundary features in the vicinity. For this reason, the boundaries of land excluded at Step 2 should be considered provisional.

#### Step 2 action

Record and map (with provisional boundary) areas with 'insufficient pressure for sustainable development to necessitate green wedge designation'.

If the methodology is being applied to a specific parcel of land (an existing or candidate green wedge), and there is sufficient development pressure, in a sustainable location, to warrant its consideration as a green wedge then the nature of that pressure (whether existing or anticipated) should be noted.

## Stage C – Assessment of potential for green wedge designation

- **3.38** For those areas not excluded at Stages A and B it is necessary to consider variations in the potential for designating land as a green wedge. This may result in some land be excluded from consideration for green wedge designation, but in other cases these findings will be weighed up against other factors to make final judgements at Stage D.
- **3.39** Potential for green wedge designation is rated on a 5-point scale (high / moderate-high / moderate / low-moderate / low), with supporting text. This rating is determined by firstly assessing how land contributes to each of the Green Belt purposes, and secondly assessing the extent to which land plays a protective role in relation to adjacent undeveloped land.

#### **Assessment of contribution**

- **3.40** The five purposes of Green Belts or green wedges are to:
- Prevent the coalescence of large towns and cities with other settlements;
- Manage urban form through controlled expansion of urban areas:
- Assist in safeguarding the countryside from encroachment;
- 4. Protect the setting of an urban area; and
- Assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- **3.41** Designating land may also have other beneficial effects, either through preserving or enhancing existing attributes or introducing new ones PPW paragraph 3.69 mentions provision of countryside access, sport and recreation but it also makes it clear that 'the extent to which the use of land fulfils these objectives is not a material factor in determining whether land should be included in a Green Belt or green wedge'. Any such beneficial effects do not, therefore, form part of the assessment of performance.
- **3.42** Contribution to each Green Belt purpose is assessed on a 3-point scale of **strong**, **moderate** or **weak/no** contribution. The process is set out in Steps 3 13 on Figure 3.1.
- **3.43** Questions that need to be asked in order to assess contribution are:
  - Is the purpose relevant to this location?

- How strongly does land relate to the urban area?
- **3.44** The first question is necessary because the purposes are not equally applicable to all locations. This is most evident in relation to Purpose 1, where the level of contribution will be influenced by the location of land in relation to different settlements and on the size of the gap between them.
- **3.45** For Purposes 1, 2 and 3, the assumption underpinning the second of these questions is that land which has a stronger relationship with an urban area will, all other things being equal, make a weaker contribution to a green wedge purpose than land which has a stronger sense of separation from urbanising influences. This is because the development of land with a stronger sense of separation or 'distinction' would cause greater weakening of a settlement gap (Purpose 1), would have a bigger impact on settlement form (Purpose 2) and would intrude more strongly on the countryside (Purpose 3).
- **3.46** For Purpose 4 relationship with the urban area is considered differently, and on a more individual basis. Land that has a stronger relationship with an urban area may well play a stronger role in defining the character of that settlement than land which is more distant, but this will depend on the nature of each settlement's setting and the features which contribute to it.
- **3.47** For Purposes 1, 2 and 3 the variations in strength of relationship with the urban area are assessed in the same way, by considering the degree of 'distinction' from the urban area. Distinction is, therefore, assessed as Steps 3-5 and then applied to the relevant purposes in subsequent steps.

#### Assessment of role in protecting adjacent land

- **3.48** The second element in the assessment process determines whether land is performing a **minor**, **moderate** or **major** role in preserving the contribution to the green wedge purposes of adjacent undeveloped land.
- **3.49** Although only a single step in the assessment process (Step 14) this is an important consideration when determining what land should be included in a green wedge. It addresses the implications for adjacent land of *not* including a particular parcel of land in the green wedge.
- **3.50** The assumption is that if land is not protected by inclusion in the green wedge (or in an adjacent Green Belt) it could be developed, and if it is developed this could, in turn, weaken the integrity of adjacent open land by increasing urbanising influence on it.

#### Application of the assessment process

**3.51** If carrying out a comprehensive assessment of all areas, to identify potential locations for green wedge designation, the

assessment process should be applied settlement by settlement, starting at the urban edge and working around and outwards to identify any significant variations in the relevance of each purpose, the relationship between open land and the urban area(s) and the relationship between adjacent open areas. Where land lies in a gap between two settlements the assessor will need to consider the relationship between open land and both urban areas.

**3.52** To avoid overcomplication when identifying variations in potential for green wedge designation, it is suggested that a minimum parcel size should be set at 1ha.

#### Assessment of distinction from the urban area

- **3.53** Distinction from the urban area is a judgement of the extent of existing urbanising influence. This will depend on:
  - The strength and consistency of boundary features between the parcel and the urban edge(s);
  - The nature of landform and/or land cover within the parcel, or between the parcel and the urban edge(s); and
  - The scale, location and visibility of urban development or other urbanising influences.
- 3.54 The strongest distinction occurs where there are boundary features which provide visual separation and also impede physical movement, and which are consistent over a considerable distance. If a physical feature occupies a wide area, rather than just being a linear barrier, then distinction is strengthened further. A sizeable area of woodland, for example, will create very strong distinction from an urban area, as long as it is not overly surrounded by development. A motorway or river may not necessarily be a strong visual barrier (although associated vegetation means that it sometimes will be), but it is likely to be a physical barrier that covers a considerable distance.
- **3.55** Residential gardens would be an example of a weak boundary. If open land beyond them retains a relatively strong relationship with the wider countryside, then distinction will not be weak, and could still be strong if there is a strong landform feature, such as a hillside or valley. However, a lack of relationship with the wider countryside, for example because of a strong boundary feature or a degree containment by urban edges or by urbanising development outside of settlement boundaries, weakens distinction.
- **3.56** However, regardless of the strength of boundary features and the nature of landform or land cover, distinction will increase with distance from urban influences. The stronger the visual and physical relationship with the wider countryside, the shorter and more rapid the transition away from urban influence, and the cumulative impact of multiple minor

boundary features can be equally significant as a single strong boundary feature.

- **3.57** Caution must be used when considering views, recognising that seasonal variations and boundary maintenance regimes can have a significant impact. The scenic quality of views is not relevant to green wedge assessments.
- **3.58** Distinction is assessed as being either *strong*, *moderate* or *weak*. It is recommended that the assessment of distinction commences with the identification of areas that have *weak* distinction, followed by the identification of areas that have *strong* distinction. The remainder will, by default, have *moderate* distinction.
- **3.59** LANDMAP can be used as a reference when determining distinction, with the Visual and Sensory Aspect being most relevant. However, the scale of analysis for green wedges may be smaller, with urban fringe areas not fully reflecting the characteristics that make a larger LANDMAP aspect area rate highly.

Step 3 – Identify land with *weak* distinction from the urban area

- **3.60** Land has weak distinction from an urban area if it has:
- Weak boundary separation from it; and
- Some sense of separation from the wider countryside;
   and
- Is subject to urbanising influences either from proximity to a visually prominent urban edge, a degree of containment by urban edges, or the presence of urbanising development or activity within the area.
- **3.61** The following are considered to constitute 'weak boundary separation', unless there is a difference in landform between the urban edge and open land, or the open land is characterised by significant tree cover or waterbodies. If land has weak boundary separation from the wider countryside, as well as from the urban edge, it will have *moderate* rather than *weak* distinction from the urban area.
  - A hedgerow, unless substantial with mature trees.
  - Residential property boundaries (i.e. garden fences/vegetation).
  - A minor urban road. Roads that link settlements i.e. which can be considered country roads rather than urban roads – would not be considered a weak boundary feature, even if minor in terms of width.

#### Step 3 action

Working outwards from the urban edge, identify and record any areas with *weak* distinction. Map the boundary beyond

which distinction increases. Distinction will only increase with distance from an urban edge, so as soon as it is evident than land in a particular location has at least moderate distinction the analysis process can move on to the next section of urban edge.

Step 4 – Identify land with *strong* distinction from the urban area

- **3.62** Land has *strong* distinction from an urban area if it has:
  - Strong boundary separation, or sufficient distance and combination of minor boundaries to mean that there is little sense of proximity to any urban edges; and
  - Either visual screening from urban areas, or a strong topographical difference, or a boundary feature that cannot be easily crossed (such as a railway line without any road crossing in the vicinity); and
  - A lack of significant urbanising influence from development or activity outside of the settlement boundary. Traffic is not in itself an urban feature, but busy roads may have some containing influence that strengthens associated with the urban edge.
- **3.63** The following are considered to constitute 'strong boundary separation':
  - A major road (motorway, 'A' road or dual carriageway), railway or river.
  - A significant change in landform.
  - Woodland, a substantial tree belt or a sizeable waterbody.
  - A combination of lesser features e.g. a 'B' road with a well-treed hedgerow.
- **3.64** The above bullet points indicate that landform alone can be enough to constitute *strong* distinction, but consideration needs to be given to the topographical form of the adjacent settlement e.g. a valley side would constitute a 'significant change in landform' if the settlement is confined to lower ground, but not if it has in places already expanded further upslope.

#### Step 4 action

Working outwards from the urban edge, or from identified areas of weak distinction, identify and record and map any areas with **strong** distinction. The outer boundary may already be defined but if this is not the case, a judgement will need to be made as to where the level of distinction drops below strong – i.e. because there is another urban edge that is exerting urbanising influence.

Step 5 – Identify land with *moderate* distinction from the urban area

- **3.65** Land has moderate distinction from an urban area if doesn't meet the criteria for strong or weak distinction. Typical examples would be where:
  - Land has moderate boundary separation from the urban area and some relationship with the wider countryside but is subject to some urbanising influences; or
  - Land has weak boundary separation from the urban area, but a strong relationship with the wider countryside; or
  - Land has strong boundary or landform separation from an urban area, but also a degree of containment by other urban development, which weakens its relationship with the wider countryside.

#### Step 5 action

Record areas with *moderate* distinction. The identification of areas with *weak* or *strong* distinction will have defined the boundaries for area of *moderate* distinction.

Having identified variations in levels of distinction from urban development, the assessment can consider criteria associated with each green wedge purpose.

## Purpose 1 – preventing the coalescence of a large town or city with another settlement

- 3.66 The wording in PPW for Purpose 1 refers to preventing coalescence with a 'large town or city' but the PPW wording suggesting that green wedges "are local designations which essentially have the same purpose as Green Belts" is interpreted as allowing scope to consider smaller settlements in relation to this purpose. The fact that wedges defined between smaller settlements have been accepted at Local Development Plan examination is considered to justify this approach.
- **3.67** The role of land in relation to this purpose depends on the size and strength of the gap between settlements that would be left were the land to be developed, and on any variations in strength of relationship with the urban area -i.e. the degree of 'distinction'.

#### Step 6 - Categorise the gap between settlements

3.68 Step 6 considers the size of the gap between settlements. A degree of judgement is required when considering gap size, because physical landscape features, both natural and manmade, can have a significant impact on perceived separation. The size of the settlements in question is also relevant, with wider gaps being considered relevant to Purpose 1 if they are located between larger places, and

smaller gaps if the settlements being considered are smaller ones. Also, settlements may be linked or almost linked along a connecting road, but otherwise separated by open land.

- **3.69** The fourteen 'key settlements' in South East Wales as identified in the Wales Spatial Plan (2008 update), listed below, are defined as cities or large towns. Beyond this, there are other settlements which, in the context of each local authority's hierarchy, can be considered 'large towns'.
  - Aberdare
- Abergavenny
- Barry
- Blackwood
- Bridgend
- Caerphilly
- Cardiff
- Chepstow
- Cwmbran/Pontypool
- Ebbw Vale
- Llantrisant
- Merthyr Tydfill
- Newport
- Pontypridd.
- 3.70 At the other end of the scale, there are variations across planning authorities with regard to the minimum size at which settlements have been assigned defined boundaries, so the existence of a settlement boundary is not considered to be a clear indicator of what can be termed 'another settlement'. Judgement is required as to whether an area of built development has sufficient identity for its separation from another settlement to be potential worthy of protection by a green wedge. The size, form and age of development are all factors that could have a bearing on this judgement.
- **3.71** As a guideline for what constitutes a 'gap', separation of greater than 8km between two large towns, or greater than 4km between a large town/city and a smaller settlement, or greater than 2km between two smaller settlements, can be considered too wide for any land within it to make a significant contribution to Purpose 1. It is suggested that justification would need to be provided if this purpose was to be considered relevant to land in a wider gap.
- **3.72** Although settlements may be close enough for intervening land to be considered to form a gap between them, there may be development constraints (see Stage D for examples) which would prevent coalescence, or a significant

sense of loss of separation. If the constrained area is broad enough to retain significant separation, and there is an absence of direct connecting routes from which any significant reduction of separation could be experienced, then land in the gap will not make a significant contribution to Purpose 1.

- 3.73 Having established that land lies in a gap, some judgement may be required regarding whether that gap should be subdivided for assessment purposes. The analysis of distinction may already have identified subdivisions, but consideration should be given as to whether further splitting is required in order to reflect variations in gap size. Within an area that can be termed a gap there may be part which is in a narrow gap, but other parts which are peripheral to this, where the gap is wider but land is still performing a function with regard to Purpose 1.
- **3.74** Guideline definitions for different gap sizes, measured between defined settlement boundaries, are set out below. Justification, with reference to separating or connecting features, should be provided for any departure from these indicative distances.
- 4-8km (between large towns), or 2-4km (between large town and smaller settlement), or 1-2km (between smaller settlements) = a relatively wide gap;
- 2-4km (between large towns), or 1-2km (between large town and smaller settlement), or 0.5-1km (between smaller settlements) = a relatively narrow gap;
- <2km (between large towns), or <1km (between large town and smaller settlement), or <0.5km (between smaller settlements) = a narrow gap.

#### Step 6 action

If land lies in a gap between two large towns which is at least 8km, or in a gap between a large town/city and a smaller town or village which is at least 4km wide, or in a gap between two smaller towns or villages which is at least 2km wide, map land as being in a 'wide gap' and making **no significant** contribution to Purpose 1.

If there are development constraints that will prevent any significant loss of separation, such that the unconstrained land is not perceived as playing a significant role in preventing visual/physical links between settlements, record land as being in a 'gap protected by development constraints' and so making **no significant** contribution to Purpose 1.

For any other gaps, subdivide land as appropriate and record whether gap is *relatively wide*, *relatively narrow* or *narrow*.

#### Step 7 – Determine level of contribution to Purpose 1

**3.75** For each area of differing distinction (strong, moderate, weak) within a settlement gap, contribution to Purpose 1 can

be determined by combining consideration of the distinction from the urban area (Steps 3-5) and the gap size (Step 6). The narrower the gap and the stronger the distinction from the urban edge, the higher the contribution; the wider the gap and the weaker the distinction, the lower the contribution will be.

#### Step 7 action

Use **Table 3.1** below to determine Purpose 1 contribution ratings. Record contribution to Purpose 1 as either **strong**, **moderate** or **weak**.

Table 3.1: Contribution to Purpose 1

	Weak distinction	Moderate distinction	Strong distinction
Narrow gap	moderate	strong	strong
Relatively narrow gap	weak	moderate	strong
Relatively wide gap	weak	weak	moderate

## Purpose 2 – Managing urban form through controlled expansion of urban areas

Step 8 – Determine if land is associated with an urban area

- **3.76** Purpose 2 can be considered applicable to any land which has a relationship with an urban area. There are variations across planning authorities with regard to the minimum size at which settlements have been assigned defined boundaries. In most authority areas, settlements with a defined boundary can be considered urban in character, but it is suggested that the following are too small to be treated as urban areas:
  - 'Minor rural settlements' as defined in the Vale of Glamorgan LDP;
  - Three settlements in Blaenau Gwent: Trefil, Bedwellty Pits and Pochin;
  - Three settlements in Caerphilly: Waterloo, Rudry and Hollybush;
- Two settlements in Newport: Christchurch and Llanvaches.
- **3.77** It is anticipated that most locations not excluded at Stages A or B will lie in close enough proximity to a settlement to be considered to have a relationship with it, but there may

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be cases where a judgement needs to be made as to whether land is too far away to be performing any role in constraining urban form. In such instances, the presence of intervening land that has *strong* distinction from both the area being assessed and any urban settlements can be taken to indicate that there is no relationship.

#### Step 8 action

With reference to defined settlement boundaries and the list of exceptions noted in paragraph 3.76, record whether land is associated with an urban area. If it is not, record and map as making **no significant** contribution to Purpose 2.

#### Step 9 - Determine level of contribution to Purpose 2

**3.78** Consider degree of distinction from the urban area, and whether or not land relates to an urban area, to determine level of contribution to Purpose 2. The stronger the distinction, the stronger the contribution to this purpose is likely to be, but only to the point where there is sufficient open land to constrain the expansion of the urban area. Beyond this, land that is remote from urban areas will be contributing to safeguarding the countryside, rather than playing a direct role in shaping the expansion of existing urban areas.

#### Step 9 action

If distinction is strong, record contribution to Purpose 2 as **strong**.

If distinction is moderate, record contribution to Purpose 2 as **moderate**.

If distinction is weak, record contribution to Purpose 2 as

## Purpose 3 – assisting in safeguarding the countryside from encroachment

## Step 10 – Determine if land can be considered part of the countryside

- **3.79** Most land that is open and outside of settlement boundaries can to some degree be considered countryside, so Purpose 3 is widely relevant. Its categorisation as 'countryside' relates to openness and land use, NOT to landscape quality or condition. For example, horse paddocks may be characteristic of open land adjacent to urban edges but they are still a countryside land use.
- **3.80** Land can be considered part of the countryside if it has characteristics of countryside and is either:
  - Adjacent to the wider countryside; or

- Largely or wholly contained by urban development but has countryside uses and covers an extensive enough area to be considered 'countryside'.
- **3.81** Land can be considered 'partially countryside' if it is to some degree open but has uses which are associated with the urban area e.g. formal sports pitches, school playing fields or residential gardens.
- **3.82** Only if land is very strongly associated with urban development to be considered part of the countryside, as a result of urban containment and or urbanising development within the area, should it be considered urban rather than countryside.

#### Step 10 action

Record whether land is 'countryside', 'partial countryside' or 'not countryside'. If the latter, record and map as making **no significant** contribution to Purpose 3.

#### Step 11 - Determine level of contribution to Purpose 3

**3.83** Consider degree of distinction from the urban area, and the extent to which land can be considered 'countryside', to determine level of contribution to Purpose 3. The stronger the distinction the stronger the contribution to this purpose is likely to be. Around urban areas there will typically be a consistency with ratings for contribution to Purpose 2.

#### Step 11 action

If distinction is *strong* and land is 'countryside' then record contribution to Purpose 3 as **strong**. If land is 'partial countryside' then record contribution to Purpose 3 as **moderate**.

If distinction is moderate and land is 'countryside' then record contribution to Purpose 3 as **moderate**. If land is 'partial countryside' then record contribution to Purpose 3 as **weak**.

If distinction is weak, record and map land as making a **weak** contribution to Purpose 3.

#### Purpose 4 – Protecting the setting of an urban area

#### Step 12 – Determine level of contribution to Purpose 4

- **3.84** A role in relation to a settlement's setting may relate to its visual setting, to features which contribute to a sense of arrival/departure or to other features which contribute to the urban area's distinct character, including physical separation from other urban areas.
- **3.85** Unlike Purposes 1, 2 and 3, the strength of distinction from an urban area does not necessarily imply that land plays a stronger role in relation to this purpose. Land which relates

strongly to an urban area may have features which make it important to the settlement's setting.

- **3.86** LANDMAP can assist with determining contribution to this purpose, by indicating areas of visual importance (the Visual and Sensory Aspect) but it does not necessarily inform whether land has much relationship with the urban area. Likewise, Special Landscape Area (SLA), Conservation Area and other local landscape/visual/historic designations may indicate a potential role in urban setting. Local landscape studies will be particularly useful.
- **3.87** A strong visual relationship between a settlement core and the surrounding countryside, or a distinctive landscape feature, is likely to mean a stronger contribution to protecting the settlements setting.
- **3.88** Regardless of visual relationships, a distinct physical setting for a settlement, such as a valley bottom location, will mean that land around it, such as open higher valley sides, will play a strong role in preserving that distinctive urban setting.
- **3.89** Where land with a statutory designation, such as a National Park, forms part of a settlement's setting, land between the settlement and the designated land may to some extent be considered to perform a buffer role that contributes to the character of the urban area's setting.

#### Step 12 action

If land has characteristics which play a major role in defining the settlement's setting, positively influencing the character of the settlement, record contribution to Purpose 4 as **strong**. Note the nature of the contribution.

If land has characteristics which are of localised importance to settlement setting, or which play of minor role in the setting of the wider settlement,, record contribution to Purpose 4 as **moderate**. Note the nature of the contribution.

If land does not have characteristics which play any significant role in defining the setting or character of the settlement, record contribution to Purpose 4 as **weak**. Note the reason for the lack of contribution.

# Purpose 5 – assisting in urban regeneration by encouraging the recycling of derelict and other urban land

#### Step 13 – Determine level of contribution to Purpose 5

**3.90** Most Green Belt studies in England do not assess individual Green Belt land parcels against Purpose 5 (which has the same wording as the PPW Purpose 5), and either do not rate them or rate them all equally. This is on the grounds that it is difficult to support arguments that the release of one

parcel of Green Belt land has a greater impact on encouraging the re-use of urban land than another.

**3.91** It is likewise considered that variations cannot be identified on a localised basis in South East Wales. It is probably true to say that land which is more remote from urban edges is less likely to be subject to development pressure, and so is playing a weaker role with regard to Purpose 5, but the impact of development pressure on the need to designate a green wedge is already taken into consideration elsewhere in this methodology. Therefore, all open land with sufficient development pressure to justify protection can equally be considered to be encouraging re-use of urban land.

#### Step 13 action

Record contribution to Purpose 5 as equal.

Step 14 - Assess role in protecting adjacent land

- **3.92** It will aid decisions on green wedge location and extent to consider the role that land plays in relation to adjacent potential green wedge or Green Belt land, where that adjacent land makes a stronger contribution to the Green Belt purposes.
- **3.93** If land was to be developed instead of protected, and that would result in a significant loss of contribution to any of the Green Belt purposes for the adjacent land, then it can potentially be considered to be performing a role in protecting the contribution of that adjacent land. However, there also needs to be a likelihood that such development would result in a knock-on demand for development on that adjacent land.
- **3.94** A 'significant loss of contribution' is defined, for any Green Belt purpose, as one which would result in adjacent land not making a **strong** contribution to the purpose, when previously some of it did. This situation is likely to arise where there is no strong boundary feature to retain distinction between the land and its neighbouring area. Where there is a strong boundary, it is more likely that land could be developed without in turn significantly weakening the contribution of the neighbouring area.
- **3.95** Land can also be considered to be performing a protective role if its development, even if not weakening the distinction of adjacent land, would either:
  - significantly reduce the size of the gap between settlements (with reference to the categories noted at Step 6); or
  - diminish the extent to which land with a statutory designation contributes to the setting of an urban area.

#### Step 14 action

If development of land would not be likely to lead to pressure for development on adjacent land, because demand/need is not strong enough, record its protective role as **minor**.

If development of land would weaken the role of adjacent open land in two or more of the three ways listed in 3.93-3.95 then record its protective role as **major**.

If development of land would weaken the role of adjacent open land in one of the three ways listed in 3.93-3.95 then record its protective role as **moderate**.

If land does not play a significant protective role then record as **minor**.

#### Step 15 - Rate potential for green wedge designation

- **3.96** A rating, on a 5-point scale, should be provided for each identified parcel of land, based on highest contribution rating to any of the Green Belt purposes and the strength of its protective role. Use **Table 3.2** to determine the rating.
- **3.97** The number of purposes to which a parcel makes a particular level of contribution is not factored into the rating. This is because land does not need to contribute to multiple purposes to justify inclusion in a green wedge and may be considered to make a strong enough contribution just to one purpose to warrant designation. However, consideration of the number of purposes to which a parcel contributes can help to make judgements between parcels in similar or neighbouring locations (see Step 16 below).

Table 3.2: Potential for green wedge designation

Highest contribution  Buffer role	Weak	Moderate	Strong
Minor	Low	Low- moderate	Moderate
Moderate	Low- moderate	Moderate	Moderate- high
Major	Moderate	Moderate- high	High

#### Step 15 action

Record and map potential for green wedge designation in accordance with **Table 3.2**.

## Stage D – Conclusion on need and definition of boundaries

**3.98** Locations that have **not** been excluded on the grounds of lack of openness (assessed at Stage A) or lack of development pressure (assessed at Stage B) could potentially be considered as appropriate for designation as a green wedge. The final stage of the assessment process weighs up consideration of constraints, development pressure and contribution to make a final judgement as to whether a green wedge is needed in order to secure that value, or whether alternative policy mechanisms, such as settlement boundaries, can reliably achieve this.

Step 16 – Determine suitability for inclusion in green wedge

- **3.99** Decisions on inclusion in a green wedge will be influenced by:
  - The amount of land rated at different levels of potential for green wedge designation.
  - Sustainable development need in relation to the above.
  - Timescales for potential future development need.
- The number of purposes to which land makes a contribution.
- **3.100**Variations in need and in the outcome of the assessment across the Study Area may mean that the 'bar' for inclusion in a green wedge is higher in some areas than in others.
- **3.101**As a start point, if the potential for green wedge designation is rated as **low** it is difficult to justify any necessity to keep it open, regardless of level of development pressure. If there are other reasons why its openness is considered important to preserve, such as recreational value, then another form of designation should be employed.
- **3.102**Equally, if the potential for green wedge designation is **high** it is difficult to make a case for not designating it, regardless of level of development pressure. The exception would be land at an outer edge of the designation area which is sufficiently constrained to not require green wedge protection (see Step 18 below).
- **3.103**For ratings in between **high** and **low** it will be a question of balancing Green Belt ratings with sustainability considerations and development need, with the aim of maximising the inclusion of land rating towards the higher end of the scale.
- **3.104**Consideration of the number of purposes to which a parcel contributes can provide a finer level of detail to help to make judgements between parcels in similar or neighbouring

locations that have been given the same rating for potential for green wedge designation.

#### Step 16 action

Exclude land from the proposed green wedge that has **low** potential for designation.

Include land in the proposed green wedge that has **high** potential for designation.

For other areas, weigh up ratings for potential for green wedge designation alongside development need, sustainability considerations and, where appropriate, consideration of the number of purposes to which land contributes, to determine which areas warrant designation. Note reasons for inclusion/exclusion.

Step 17 – Determine whether additional land should be included in the green wedge to prevent leapfrogging of development pressure

- **3.105**PPW paragraph 3.72 refers to the need, when defining Green Belt, to have regard to 'the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel'. It doesn't refer to green wedges in this context presumably because the typically more localised scale of a green wedge, and its lack of permanence, make this less likely to be a significant concern but this is still a valid consideration.
- **3.106**If there is reason to believe that development pressure will be transferred to land beyond the proposed green wedge, as a result of an absence of constraining factors and the accessibility of the area, an extension should be considered.

#### Step 17 action

If leapfrogging is likely, extend the proposed wedge and record as 'Land included to broaden the green wedge, as its exclusion would create strong development pressure.' Note reasons.

Step 18 – Determine whether outer boundary should be adjusted in order to use clear boundary features, or to simplify its form

**3.107**Having decided that designation of a green wedge is justified, consideration needs to be given to the most appropriate outer boundaries. Typically, the lines drawn to identify variations in distinction will equate to physical landscape features, but this is not always the case. It is better to include land that does not necessitate protection, due to its strength of distinction and/or lack of development pressure, than to define a green wedge without a clear boundary. PPW

indicates (at paragraph 3.70) that 'green wedge boundaries should be chosen carefully using physical features'.

- **3.108**The boundaries recorded at Step 2 the exclusion of land with insufficient development pressure to warrant designation were provisional and it may be necessary to define a boundary within an excluded area in order to follow a clearly defined physical feature.
- **3.109**If extending further into an excluded area would facilitate definition of a more consistent boundary then this may be appropriate. There is no necessity for the boundary to be a 'strong' feature, as long as it is readily identifiable, but use of a consistent boundary feature is desirable where this is an option.
- **3.110**Some areas could be excluded from the green wedge on the grounds that they have designations that would, in practice, prevent inappropriate development (termed 'absolute constraints'). Such areas should not be excluded where they are surrounded by land that would form part of the wedge, as this would lead to a designated area punctuated by a 'hole', but at the outer edge of a green wedge an area subject to development constraint may be an appropriate and strong boundary.
- **3.111**The following designations are likely to be considered 'absolute constraints', but others may also be considered to fall into this category:
  - Special Area of Conservation (SAC).
- Site of Special Scientific Interest (SSSI).
- Local Nature Reserve (LNR).
- Flood Zone C2 (without flood defences).
- Historic Park or Garden.
- Scheduled Ancient Monument.
- Ancient Woodland.
- Registered Common Land.

**3.112** It is also desirable to avoid an overly convoluted boundary. To do this it may be appropriate to include:

- Land which is constrained from development (i.e. which has no need for green wedge protection).
- Land which is already developed.
- Land which performs weakly in relation to the green wedge purposes but which does not offer sufficient development potential to warrant leaving out of the designation.

Proposed Green Wedge Assessment Criteria and Guidance

South East Wales Green Wedge Definition Criteria March 2024

#### Step 18 action

If additional land is included in order to achieve clear boundaries, map and record as 'Additional land included in the green wedge to provide a clear/consistent boundary feature.'

If additional land is included in order to simplify boundaries, map and record as 'Land included to simplify green wedge boundary.'

If land is excluded because of absolute development constraints, map and record as 'Land excluded due to absolute development constraint'.

Note the physical features that define the green wedge boundaries (whether or not additional land has been included).

Figure 3.2: Draft proforma for green wedge assessment

NAME: [(candidate) green wedge name]	
LOCATION PLAN: [showing location of (candidate) green wedge, defined settlement boundaries and any	
development constraints or other relevant policy designations in the vicinity]	

STAGE A – ASSESSMENT OF OPENNESS

	outside of settlement boundaries that are considered to be already developed, unless isolated from I too small to consider excluding from a green wedge designation.
STAGE B - ASSESSM	ENT OF DEVELOPMENT PRESSURE
Step 2 – Exclude land	with insufficient development pressure, or which is in an unsustainable location
green wedge designatio	rovisional boundary) areas with 'insufficient pressure for sustainable development to necessitate n'. Where there is sufficient development pressure, in a sustainable location, to warrant consideration the nature of that pressure (whether existing or anticipated) should be noted.
STAGE C - ASSESSM	ENT OF PERFORMANCE IN RELATION TO THE GREEN WEDGE PURPOSES
	FROM THE URBAN AREA
Step 3 – Identify land v	vith weak distinction from the urban area
Working outwards from beyond which distinction	the urban edge, identify and record any areas with weak distinction. Note reasons. Map the boundary n increases.
Step 4 – Identify land v	vith strong distinction from the urban area
with strong distinction. N	the urban edge, or from identified areas of weak distinction, identify and record and map any areas lote reasons. The outer boundary may already be defined but, if not, a judgement will need to be evel of distinction drops below strong – i.e. because there is another urban edge that is exerting
Step 5 – Identify land v	with <i>moderate</i> distinction from the urban area
	erate distinction. Note reasons. The identification of areas with weak or strong distinction will have for area of moderate distinction.

Steps 6-15 to be completed for each area of differing distinction: PURPOSE 1 - PREVENTING THE COALESCENCE OF A LARGE TOWN OR CITY WITH ANOTHER SETTLEMENT Step 6 - Categorise the gap between settlements If land lies in a gap between two large towns which is at least 8km, or in a gap between a large town/city and a smaller town or village which is at least 4km wide, or in a gap between two smaller towns or villages which is at least 2km wide, map land as being in a 'wide gap' and making no significant contribution to Purpose 1. If there are development constraints that will prevent any significant loss of separation, such that the unconstrained land is not perceived as playing a significant role in preventing visual/physical links between settlements, record land as being in a 'gap protected by development constraints' and so making no significant contribution to Purpose 1. For any other gaps, subdivide land as appropriate and record whether gap is relatively wide, relatively narrow or narrow. Step 7 - Determine level of contribution to Purpose 1 Use Table 3.1 to determine Purpose 1 contribution ratings. Record contribution to Purpose 1 as either strong, moderate or weak. PURPOSE 2 – MANAGING URBAN FORM THROUGH CONTROLLED EXPANSION OF URBAN AREAS Step 8 - Determine if land is associated with an urban area With reference to defined settlement boundaries and the list of exceptions noted in paragraph 3.76, record whether land is associated with an urban area. If it is not, record and map as making no significant contribution to Purpose 2. Step 9 - Determine level of contribution to Purpose 2 If distinction is strong, record contribution to Purpose 2 as strong. If distinction is moderate, record contribution to Purpose 2 as moderate. If distinction is weak, record contribution to Purpose 2 as weak. PURPOSE 3 - ASSISTING IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT Step 10 - Determine if land can be considered part of the countryside Record whether land is 'countryside', 'partial countryside' or 'not countryside'. If the latter, record and map as making no significant contribution to Purpose 3.

Step 11 – Determine level of contribution to Purpose 3
If distinction is strong and land is 'countryside' then record contribution to Purpose 3 as <b>strong</b> . If land is 'partial countryside' then record contribution to Purpose 3 as <b>moderate</b> . If distinction is moderate and land is 'countryside' then record contribution to Purpose 3 as <b>moderate</b> . If land is 'partial countryside' then record contribution to Purpose 3 as <b>moderate</b> . If land is 'partial countryside' then record contribution to Purpose 3 as <b>weak</b> . If distinction is weak, record and map land as making a <b>weak</b> contribution to Purpose 3.
PURPOSE 4 – PROTECTING THE SETTING OF AN URBAN AREA
Step 12 – Determine level of contribution to Purpose 3
If land has characteristics which play a major role in defining the settlement's setting, positively influencing the character of the settlement, record contribution to Purpose 4 as <b>strong</b> . If land has characteristics which are of localised importance to settlement setting, or which play of minor role in the setting of the wider settlement, record contribution to Purpose 4 as <b>moderate</b> . Note the nature of the contribution.
If land does not have characteristics which play any significant role in defining the setting or character of the settlement, record contribution to Purpose 4 as <b>weak</b> . Note the reason for the lack of contribution.
PURPOSE 5 – ASSISTING IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND
Step 13 – Determine contribution to Purpose 5
Contribution to Purpose 5 is equal for all areas of open land.
Step 14 – Assess strength of protective role
If development of land would not be likely to lead to pressure for development on adjacent land, because demand/need is not strong enough, record protective role as <b>minor</b> . If development of land would weaken the role of adjacent open land in two or more of the three ways listed in 3.93-3.95 then record its protective role as <b>major</b> . If development of land would weaken the role of adjacent open land in one of the three ways listed in 3.93-3.95 then record its protective role as <b>moderate</b> . If land does not play a significant protective role then record as <b>minor</b> .
Step 15 – Rate potential for green wedge designation
Record and map potential for green wedge designation in accordance with <b>Table 3.2</b> .

STAGE D - CONCLUSION ON NEED AND DEFINITION OF BOUNDARIES
Step 16 – Determine suitability for inclusion in green wedge
Exclude land from the proposed green wedge that has <b>low</b> potential for designation. Include land in the proposed green wedge that has <b>high</b> potential for designation. For other areas, weigh up ratings for potential for green wedge designation alongside development need, sustainability considerations and, where appropriate, consideration of the number of purposes to which land contributes, to determine which areas warrant designation. Note reasons for inclusion/exclusion.
Step 17 – Determine if additional land should be included in the green wedge in order to prevent leapfrogging of
development pressure
If leapfrogging is likely, extend the proposed wedge and record as 'Land included to broaden the green wedge, as its exclusion would create strong development pressure.' Note reasons.
Step 19 – Determine whether outer boundary should be adjusted in order to use clear boundary features, or to simplify its form
If additional land is included in order to achieve clear boundaries, map and record as 'Additional land included in the green wedge to provide a clear/consistent boundary feature.' If additional land is included in order to simplify boundaries, map and record as 'Land included to simplify green wedge boundary.' If land is excluded because of absolute development constraints, map and record as 'Land excluded due to absolute development constraint'. Note the physical features that define the green wedge boundaries (whether or not additional land has been included).

## **Next Steps**

#### Consultation

- **4.1** This methodology has been prepared for consultation with the 10 local planning authorities in South East Wales. Following review of the comments received from these authorities, the document will be finalised for wider consultation i.e. with Welsh Government, statutory consultees and neighbouring authorities.
- **4.2** Following completion of the consultation period, all responses received on the proposed methodology will be reviewed and summarised in a consultation log for discussion with the South East Wales planning authorities. The consultation log will be used to revise the assessment where appropriate. A summary of the consultation, including details of how the criteria were refined, will be prepared alongside the finalised criteria.

### **Policy guidance**

**4.3** Developing consistent policy wording is important for the successful implementation of green wedge policies across the South East. Following any amendments to the draft method statement, recommendations will be made regarding green wedge policy wording.