

North Somerset Core Strategy

Examination into the soundness of the consequential changes to policies CS6, CS14, CS19, CS28, CS30, CS31, CS32 and CS33

North Somerset Council response to Inspector's matters and issues for examination

May 2016

Matter 3 – Policies

Issue 5 – Does the increased housing requirement justify any modification to:

a) Policy CS6: Green Belt

b) Policy CS19: Strategic Gaps

Does the increased housing requirement justify any modification to:

a) Policy CS6: Green Belt

1. The Green Belt policy as currently worded is that the boundaries will remain unchanged during the plan period.
2. The government attaches great importance to Green Belts. Once established the boundaries should only be altered in exceptional circumstances. When reviewing Local Plans local planning authorities should have regard to the intended permanence of Green Belt boundaries in the long term so that they are capable of enduring beyond the plan period. (NPPF paragraph 83). Inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. (NPPF paragraph 87).
3. The Council's case is that sufficient deliverable sites exist in sustainable locations to provide flexibility and choice without the need to use Green Belt locations.
4. The CS13 Core Strategy Inspector's Report stated at paragraph 72 that the 2014 Housing and Economic Land Availability Assessment 'identifies a potential supply of land for housing which is more than sufficient to deliver the housing requirement set out in the MD6/6(a) version of Policy CS13'. The HELAA 'identified potential' excluded sites within the Green Belt. The Inspector had therefore concluded that sufficient capacity existed without the need for Green Belt review.
5. Furthermore, the Core Strategy will be reviewed by the end of 2018. This is being undertaken through the Joint Spatial Plan which will identify a new housing target 2016-2036 for the West of England, strategic locations for future growth and a district apportionment.

6. The Joint Spatial Plan is the process through which the Bristol-Bath Green Belt will be reassessed. The Issues and Options document November 2015 (CC/20) explored alternative scenarios including development in the Green Belt. A Green Belt appraisal document was published as part of the supporting evidence (CC/29). The draft plan is due to be published for consultation in Autumn 2016.
7. North Somerset only contains part of the Bristol-Bath Green Belt which is also located in Bristol, South Gloucestershire, Bath and NE Somerset, Mendip and Wiltshire. Reviewing the Green Belt through the Joint Spatial Plan will enable a comprehensive approach across the sub-region to identify the most sustainable pattern of development to 2036 and which will endure into the future.
8. Reviewing either the whole or parts of the Green Belt within North Somerset in isolation is not necessary nor appropriate in the context of the Core Strategy. To do so would be premature in terms of the comprehensive sub-regional approach and could result in short-term changes being made which may eventually prejudice a more comprehensive approach to sustainable development patterns across the West of England.

Issue 5 – Does the increased housing requirement justify any modification to:

b) Policy CS19: Strategic Gaps

9. Core Strategy Policy CS19 simply states that ‘the Council will protect strategic gaps to help retain the separate identity, character and/or landscape setting of settlements and distinct parts of settlements’. The policy itself does not identify the location of the strategic gaps nor identify their extent (either as a strategic diagram or in detail).
10. It is the Site Allocations Plan, not the Core Strategy which will determine the locations of the strategic gaps and their detailed boundaries for inclusion on the Policies Map. An evidence paper on Strategic Gaps (March 2016) was prepared to support the detailed plan making process (CC/19).
11. In the supporting text to Policy CS19, a number of locations are identified ‘as appropriate for investigation for possible designation as strategic gaps’ (paragraphs 3.242/3.243). The original Core Strategy Inspector’s Report (March 2012) concluded that subject to the main modifications which clarified that strategic gaps were important open areas yet to be identified in detailed planning documents and emphasised that the listed locations were merely indicative at this stage, then ‘Policy CS19 is justified and effective in setting

out the core principle that important open areas will be protected, including within the selected broad development locations' (CC/03 paragraph 48).

12. This approach to Policy CS19 agreed in 2012 remains valid and no modification is required.