

North Somerset Core Strategy Examination**North Somerset Council
Position Statement: Issue 3b****Green Belt implications of the Core Strategy compared the draft RS**

1. The Government attaches great importance to Green Belts. They have a fundamental aim of preventing urban sprawl by keeping land permanently open. PPG2: Green Belts sets out the five purposes of including land in Green Belts:
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns from merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
2. The Core Strategy is not proposing any change to the general extent or detailed boundaries of the Green Belt. It will therefore fully protect the Green Belt and the five purposes for its designation.
3. By contrast the draft RSS would have substantially reduced the extent of the Green Belt to accommodate a 10,500 dwelling urban extension at SW Bristol, (as well as proposing revisions to the Green Belt at Royal Portbury Dock and Bristol Airport). This would have had an adverse impact on the Green Belt purposes, particularly leading to urban sprawl and encroachment into countryside, potentially undermining investment and regeneration potential at South Bristol, and in a location identified by the Colin Buchanan Strategic Green Belt Review (ED/21) as having the highest possible ranking across the whole of the Bristol and Bath Green Belt in terms of fulfilling Green Belt purposes.
4. The Government is currently consulting on the environmental assessment of existing regional strategies. The Environmental Report on the Revocation of Regional Planning Guidance for the South West (RPG10) was published in October 2011. This is clear that in environmental terms revocation of regional strategies will bring environmental benefits:

“The environmental effects of revoking the Plan will reflect future decisions by local authorities, individually and collectively. While the environmental effects cannot be predicted for certain because they depend on these local decisions, the revocation of regional strategies and their top-down targets will provide opportunities for securing environmental benefits because their revocation would remove threats to local environments. For example, revocation would remove the

topdown pressure on local authorities to review the extent of their Green Belt. Across England this would have been likely to effect more than thirty areas. Protecting the Green Belt brings many environmental benefits including safeguarding the countryside and preventing urban sprawl.” (Paragraph 1.25).

5. The Council supports this position and also the comments made in respect of the draft NPPF. The report emphasises that the Government has made it clear that the Framework will maintain existing environmental protections.

“The draft NPPF retains protection and improvement of the natural environment as core objectives for local planning and development management. It maintains protection of the Green Belt, Areas of Outstanding Natural Beauty, National Parks, Sites of Special Scientific Interest and other environmental designations which protect landscape character, stop unsustainable urban sprawl and preserve wildlife.” (Paragraph 1.3)

6. As a consequence of not altering Green Belt boundaries the openness and permanence of the North Somerset Green Belt will remain intact, and continue to fulfil the purposes of the Green Belt as set out in PPG2 and the draft NPPF. The draft RSS proposal to include an urban extension and alteration to the Green Belt at South West Bristol would cause significant harm to the Green Belt and would have significantly narrowed the Green Belt (PPG2 paragraph 2.9 advises that ‘wherever practicable a Green Belt should be several miles wide’).
7. National policy (PPG2 paragraphs 2.6-2.7) is clear that both the general extent and detailed boundaries of the Green Belt should be altered only exceptionally and where Local Plans are being revised and updated existing boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision. The justification for Green Belt extensions in the draft RSS was a consequence of the lack of development capacity consistent with the existing spatial strategy which could accommodate the scale of growth identified. The Council’s position is that the scale of development is no longer justified or achievable and that therefore the exceptional circumstances do not exist which could warrant a change to the North Somerset Green Belt.

Green Belt review

8. RPG10 (Policy SS4) stated that Green Belts should continue to fulfil the purposes set out in PPG2 but that local authorities when reviewing development plans should critically review the Green Belt to examine whether boundary alterations are needed to allow for long term sustainable development needs. The Council has not undertaken a comprehensive Green Belt review as this is not required to meet long term development needs. However, a strategic review was undertaken by Colin

Buchanan (ED/21) which, while produced in the context of the draft RSS, also provides the evidence for the Core Strategy.

9. This report considered a document review of work undertaken by the Joint Study Areas, advised on methodology as well as providing an analysis of purpose and sensitivity to change for various locations in the South West including the West of England area (Appendices 8, 10 and 11). The report concluded that “across all green belts there are a limited number of locations where urban extensions could be achieved without significantly and adversely affecting the purposes of the Green Belts” (para 6.1.1).
10. In respect of SW Bristol the evidence provided in the Colin Buchanan Strategic Green Belt Review (ED/21 Appendix 10) shows that both the areas identified as Highridge/Barrow Common area (Area Z) and Ashton Vale/ Long Ashton area (Area AA) receive the highest possible ranking for fulfilling Green Belt purposes of all the areas considered in the West of England Green Belt review. It should be noted that these areas in North Somerset which were ranked the highest for purposes of the Green Belt and where development would cause the most harm to the Green Belt were later selected for an urban extension in the draft RSS.
11. Since the draft RSS EIP the evidence and circumstances which underpinned the assumptions about the scale of demand have changed. The locally-derived housing target of 14,000 dwellings and opportunities for the delivery of development consistent with the Core Strategy spatial strategy justify the Council’s position that the scale of demand for housing no longer provides the exceptional circumstance required to alter the Green Belt.
12. At the time the draft RSS Panel Report placed much greater emphasis on sustainability principles than Green Belt purposes when considering urban extensions, concluding that ‘a rigid application of the five purposes to guide the selection of the required urban extensions would not generate the most sustainable outcome.’ North Somerset Council would accord much greater weight to Green Belt protection. It is not clear whether the Panel would have reached the same conclusions faced with the level of housing growth now proposed in the Core Strategy, current economic growth prospects (see councils position statement HD/01), including uncertainty around investment and funding, the localism agenda and the value local communities have since expressed for the protection of the Green Belt.

SW Bristol

13. As part of the early process of preparing the Core Strategy the Council considered the possibility of altering the Green Belt boundary in the vicinity of South West Bristol. The local communities and stakeholders were engaged in the process of assessing an urban extension through the Planning Together workshops. Consultants Broadway Malyan were later appointed to prepare a draft masterplan, design codes and delivery plan

and a Green Belt assessment of the area was carried out. Much of this work was however based on the premise that 10,500 units would have to be provided to conform with the draft RSS. The study raised significant concerns with the scale of the draft RSS housing requirement, density issues, the extent of developable land, existing constraints and severance issues.

14. In order to understand the implications of different scales of development Broadway Malyan also prepared an Alternative Spatial Growth Options Study (LD/19 August 2009). Three alternative spatial options based on reduced quantum of development were produced. These options were consulted upon through the Consultation Draft Core Strategy. This consultation identified a strong public objection to development in the Green Belt.
15. The Council carried out its own assessment of the Green Belt in this area (SD/50). Its purpose was to consider the area at South West Bristol which had been identified as a possible area for development in the RSS and provide a more detailed assessment at a local level. The work identified those parts of the area which contributed most to meeting the purposes of PPG2, helping to assess the emerging development proposals in relation to their impact on the Green Belt, providing a basis for establishing defensible long term boundaries should this have been required, and ensuring that if changes were inevitable then the resultant Green Belt remained as effective as possible.

Should a Green Belt Review be carried out at other locations?

16. Representations have been received suggesting that a review of the Green Belt should be conducted in order to consider non-strategic allocations in the District. Exceptional circumstances would need to be demonstrated to alter the boundaries. None have been demonstrated. The Council is satisfied that it has carried out an appropriate locally derived housing requirement and that it can accommodate sufficient housing allocations during the plan period without using Green Belt. Therefore the need for additional housing is not justified as an exceptional circumstance for altering boundaries.
17. With regards specifically to **Nailsea** the Colin Buchanan Strategic Green Belt Review (ED/21) considered the area to the north of Nailsea. Their analysis of purpose (Appendices 8 and 10) described the general area as the Tickenham area (EE) and awarded it the highest possible ranking in terms of meeting the five purposes of the Green Belt specified in PPG2. The land to the north of Nailsea was also considered at the Replacement Local Plan Inquiry in 2005. At this time the Inspector concluded (paragraph 17.40) that "I do not regard Nailsea as representing a more important key strategic location than Weston-super-Mare. Substantial growth in settlements within commuting distance of the PUAs should be resisted... as there are sequentially preferable sites available the loss of this large area of greenfield land cannot be supported despite indigenous local

population growth”. Other non-Green Belt land exists around the town. The Inspector also concluded (paragraph 17.46) that “no exceptional reasons exist to justify amending the Green Belt to facilitate the expansion of the industrial estate...the existing Green Belt boundary maintains separation of the hamlets and avoids the urban encroachment on to agricultural land ... the proposal would represent the urban area sprawling into the countryside... Moreover the reduction in the width of the valley floor would visibly reduce the openness that this part of the Green Belt currently displays.” Housing would (paragraph 17.47) “perpetuate and aggravate the dormitory nature of the town and the commuting habits to the PUAs”. As there has been no fundamental change in policy or circumstance since the inspector considered this site, the Council does not consider that any exceptional circumstance can be demonstrated to warrant a change to the boundary of the Green Belt.

18. At other sites, for example **Ham Green, Pill, Portbury** no exceptional circumstances can be justified to make any amendment to the Green Belt boundaries.

Should the Green Belt be extended?

19. Some representations have been received which suggest the Council should bring forward proposals to extend the Green Belt, notably to the south-west of Nailsea. Green Belt extensions were considered by the draft RSS Panel who concluded in the Panel Report that “the extensions to the Green Belts have not been justified in principle” (paragraph 4.0.37). In this context paragraph 2.14 of PPG2 indicates that where a local planning authority proposes to establish a new Green Belt, it should demonstrate why normal planning and development control policies would not be adequate. The Council supported the extension at Nailsea at the time when it was proposed in the Regional Assembly’s draft of the RSS but acknowledges that there is no evidence to suggest that countryside policies are inadequate or other exceptional circumstances exist to justify further areas of Green Belt. The proposed extension was presented as compensating for the loss at SW Bristol, so that overall there would be a small net increase in Green Belt in the region. This quantitative approach was not accepted by the Panel and loses all justification if land is not in fact to be removed from the Green Belt.

What about allocating sites for future long-term contingencies?

20. The issue of allocating land for long term development or ‘white land’ was considered at the draft RSS EIP. Whilst the Panel accepted that “planning will at some point in time have to deal with the post 2026 period. In the absence of reliable evidence of demand it is difficult to see how a judgement could be made now on the scale of any further release to achieve the degree of permanence desired.” (paragraph 4.0.35) Since the draft RSS Panel Report was prepared, economic uncertainties have made any future assessment of future development needs even less certain and the identification of potential locations would be premature. The Council

does not support the identification of Green Belt land as a long term contingency.

21. It is noted that in the case of the Bristol Core Strategy (ED/24) that the Inspector concluded that if required, consideration would be given to the use of some Green Belt land as a long-term contingency (Policy BCS5) – but the land at SE Bristol remained designated as Green Belt and was not designated as safeguarded land.

Bristol Airport and Royal Portbury Dock

22. Green Belt in these locations is addressed under issue 3h. The council does not believe that exceptional circumstances exist, which necessitate revision to the Green Belt boundaries. The Airport's long-term development needs have not been identified, as draft RSS Policy HMA1 requires, nor is there any scope to provide additional land for port-related uses between the Royal Portbury Dock and the M5 motorway.