



North Somerset Local Plan 2038

Impact on Green Belt of the four approaches in the Choices for the Future document

April 2021



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1. Introduction

This paper assesses the four approaches put forward in the North Somerset Local Plan Choices for the Future (November 2020) against the aims and purposes of the Green Belt. Its purpose is to assist in the identification of a preferred spatial strategy.

At this early stage of the plan making process the alternatives presented are illustrative and while places and broad scales of growth are identified, these do not relate to specific locations or sites. This paper therefore considers the broad implications of different growth patterns in relation to the overall impact on the Green Belt. It does not, at this stage, suggest making amendments to the Green Belt. This work would be carried out once a preferred spatial strategy has been selected.

2. Aim and purposes of the Green Belt

‘The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.’ (NPPF paragraph 133)

The Green Belt serves five purposes. These are:

- a) *‘to check the unrestricted sprawl of large built-up areas*
- b) *to prevent neighbouring towns merging into one another*
- c) *to assist in safeguarding the countryside from encroachment*
- d) *to preserve the setting and special character of historic towns; and*
- e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.* (NPPF paragraph 134).

3. Background

The Green Belt has been in existence in North Somerset since the early County Development plans of the 1950s. However, it was the Avon County Structure Plan, adopted in 1985, which established the general extent of the Bristol and Bath Green Belt, with the detailed boundary for North Somerset defined in the South West Avon Green Belt Local Plan in 1988.

Subsequent plans have continued to define the boundary with the current Core Strategy rolling forward the boundary from the previous Plan unchanged (CS6). Detailed boundaries are defined on the Policies Map, but a general view of the Bristol and Bath Green Belt is shown in Appendix 1.

4. When they can be altered?

The NPPF is clear that once established

‘Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. (NPPF paragraph 136).

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. (NPPF Paragraph 137).

The North Somerset Local Plan will assess whether the scale of development required can be accommodated over the plan period, taking into account government guidance, NPPF paragraph 136 and steps a to c set out in paragraph 137, and therefore conclude whether exceptional circumstances can be demonstrated to justify Green Belt changes.

5. Considerations to take into account when reviewing boundaries

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be considered. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. (NPPF paragraph 138).

6. Green Belt Assessment evidence

A two-stage assessment of the Green Belt was carried out as part of the evidence for the Joint Spatial Plan. Whilst the Joint Spatial Plan has been withdrawn the evidence base, in particular, stage one of this assessment remains of relevance. The North Somerset element has been reviewed in the North Somerset Green Belt Assessment April 2021. This has been used in this study to assess the four approaches.

Stage 2 of the JSP evidence assessed only limited areas of the Green Belt in relation to the Strategic Development Locations which were proposed at that stage. Further work to review any possible releases of Green Belt will be carried out once a spatial strategy and broad locations have been agreed and detailed sites can be identified.

The Green Belt Assessment of the JSP (November 2015)¹ and March 2021 review concluded that the Green Belt in the Plan area continues to retain the fundamental characteristics of openness and serves the purposes of the Green Belt.

7. General correction of anomalies

In addition to a strategic consideration of the four approaches the review of the Local Plan provides the opportunity to consider the correction of more minor anomalies in the Green Belt boundary. Most of these anomalies have resulted from cartographical issues as the plan have moved to a digital format. These are generally very small adjustments. Secondly, there are cases where development has already taken place and the land no longer fulfils Green Belt purposes. Thirdly, there is an opportunity to create more permanent boundaries where new transport infrastructure has been created which would better serve the issue of permanence. These we be detailed in the Local Plan and supporting evidence.

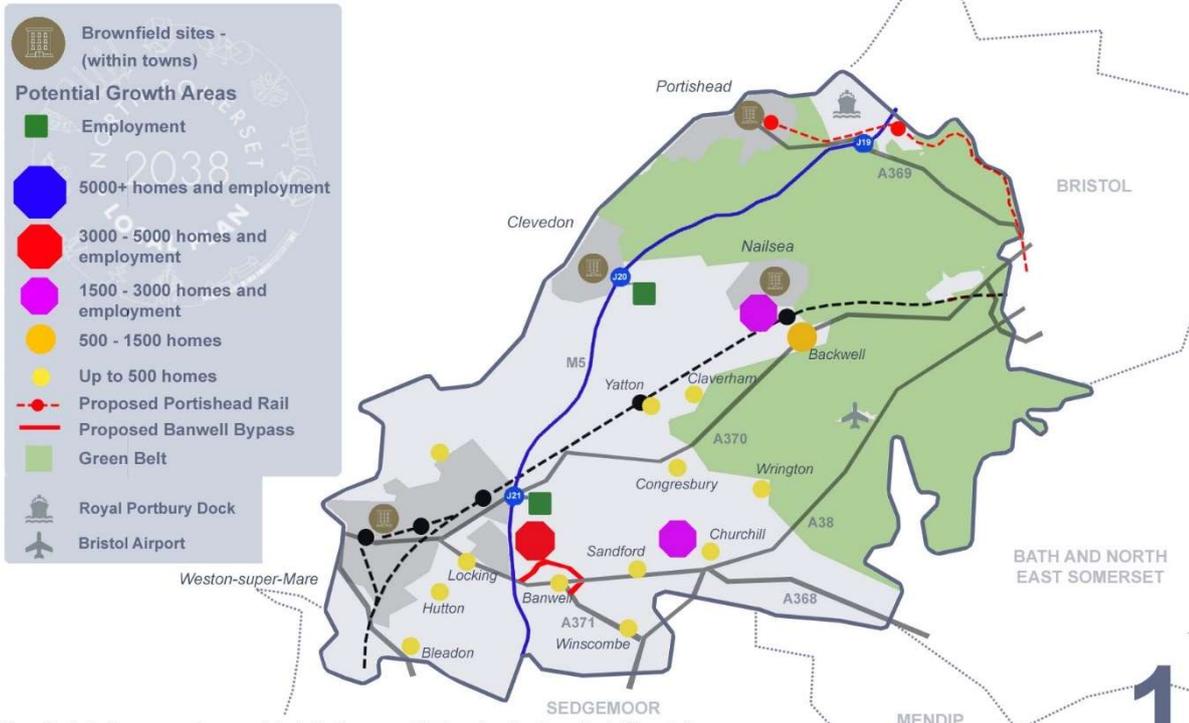
8. Impact on the Green Belt of the four options set out in the Choices Consultation

The Choices consultation set out four approaches identifying how growth could be delivered. The impact on the Green Belt of each approach is set out below. In each approach a number of places are identified together with an indication of the scale of development. For each approach an assessment has been made regarding the impact potential development would have on the five purposes of the Green Belt (set out in section 2 above) together with an overall assessment of the impact on the integrity of the Green Belt to keep land permanently open and fulfil the purposes.

¹ West of England Joint Spatial Plan Green Belt Assessment November 2015

Approach 1: Retain the Green Belt

1: RETAIN GREEN BELT



Maps illustrate the proposed approach by indicating a possible broad scale of growth at different places. The places identified are indicative only and must not be taken to imply any specific site. The scale of development identified for each place is not a target and may be much less, and may include more than one possible location.

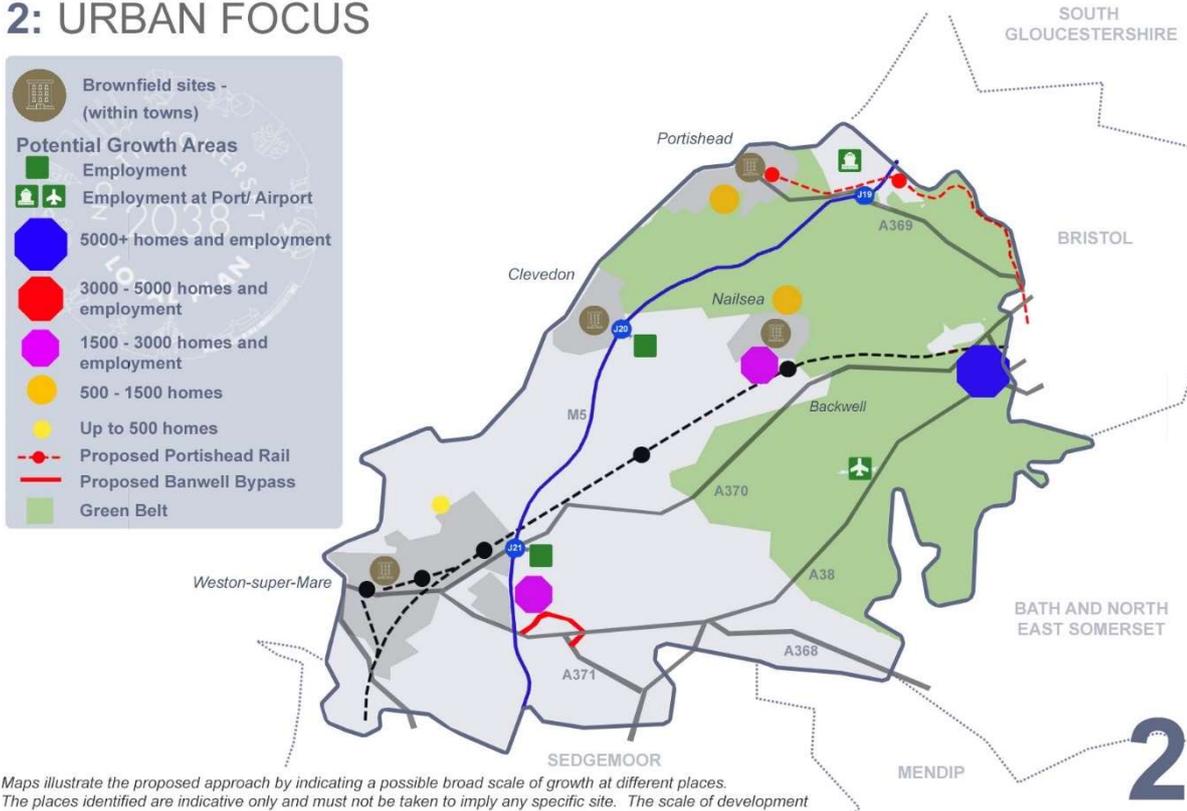
Approach 1 makes no strategic change to the Green Belt. All development options are in non-Green Belt locations.

Approach 1- Retain the Green Belt	Impact
Places impacted	No change
Check the unrestricted sprawl of large built-up areas	No change
Prevent neighbouring towns merging into one another	No change
Assist in safeguarding the countryside from encroachment	No change
Preserve the setting and special character of historic towns	No change
Assist in urban regeneration	No change

Overall impact on the integrity of the Green Belt to keep land permanently open and fulfil the purposes.

As this option makes no significant changes to the Green Belt it fully supports the aim or purposes of the Green Belt and any minor correction of anomalies will serve to secure the overall permanence of the designation as currently defined.

2: URBAN FOCUS



Maps illustrate the proposed approach by indicating a possible broad scale of growth at different places. The places identified are indicative only and must not be taken to imply any specific site. The scale of development identified for each place is not a target and may be much less, and may include more than one possible location.

2

Approach 2- Urban Focus	Impact
Places impacted (cell numbers from Green Belt Assessment March 2021)	<ul style="list-style-type: none"> • SW Bristol 5000+ homes (Green Belt cells 4, 12, 13, 14) • Nailsea 500-1500 homes (Green Belt cells 9 and 10) • Portishead 500-1500 homes (Green Belt cells 19, 20, & 21) • Port - employment (Green Belt cell 21) • Airport – employment (Green Belt cell 7)
Check the unrestricted sprawl of large built-up areas	Would significantly increase the sprawl of the Bristol large built-up area at SW Bristol. Would increase the sprawl of the urban area at the port.
Prevent neighbouring towns merging into one another	It could result in the loss of the separate identity of Long Ashton and merger with Bristol. The merger of Bristol with Nailsea in the Bristol Long Ashton Nailsea/Backwell corridor could be an issue as the open gap between the towns would be reduced. The merger of Portishead with the Port is an issue to the east of Portishead where there is only a narrow open gap.
Assist in safeguarding the countryside from encroachment	All development would result in encroachment into the countryside other than at the airport where specific land is in operational use and cannot be considered countryside.

Preserve the setting and special character of historic towns	The historic setting of Bristol in the vicinity of the Suspension Bridge and Avon Gorge could be impacted dependent on the location of development.
Assist in urban regeneration	All Green Belt assists in urban regeneration as it collectively encourages the recycling of derelict and other urban land. Development at SW Bristol could impact the regeneration initiatives in South Bristol although this is difficult to assess at this stage.

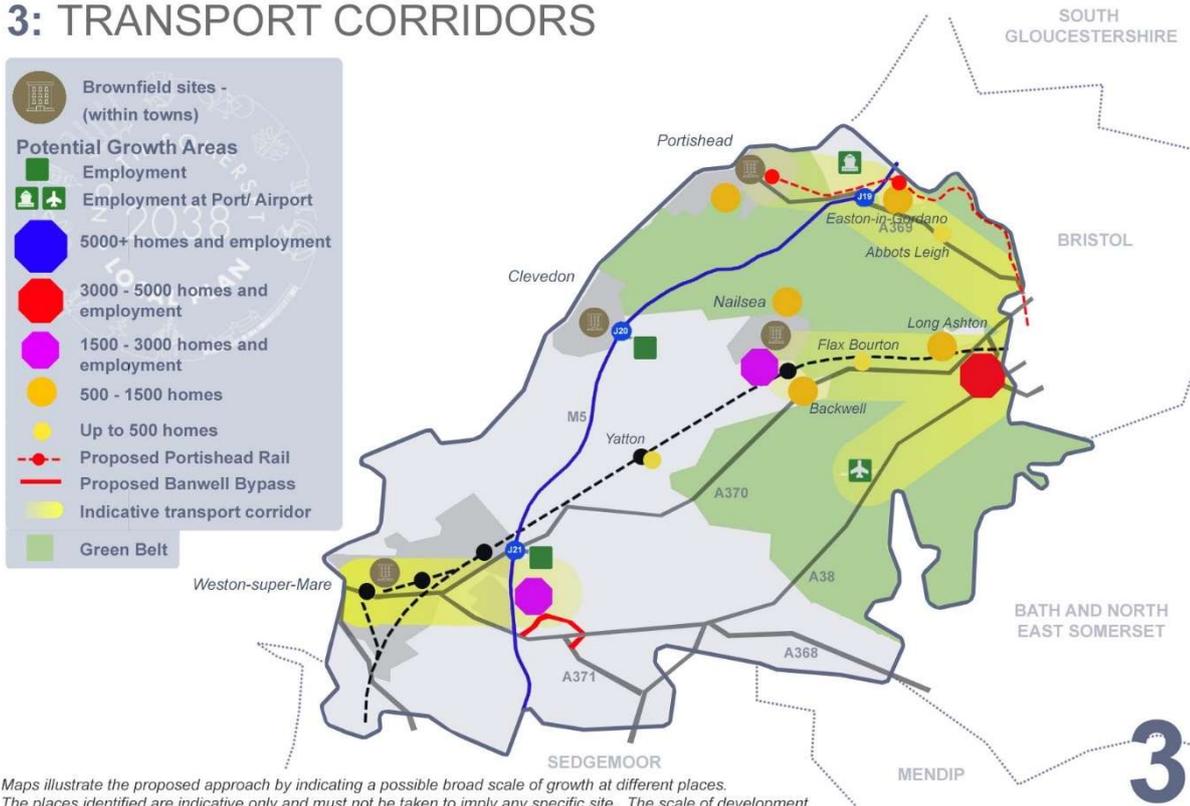
Overall impact on the integrity of the Green Belt to keep land permanently open and fulfil the purposes.

Whilst development would cause significant harm to the Green Belt it would be limited to three key locations as well as the port and airport. 6000 + houses would be developed in the Green Belt. It would result in significant sprawl of the Bristol area. This may be contained dependent on the detailed boundaries. It could significantly reduce the overall width of the Green Belt between Bristol and Nailsea/Backwell especially if development took place at both ends of the gap. The merger of Long Ashton and Bristol and/or the new development could be an issue and would increase sprawl if Long Ashton was encompassed into the built-up area. The merger with Portishead is a significant issue at the port and encroachment into the countryside would take place at all locations.

Whilst the impact on openness would be significant, development would be concentrated in a lesser number of locations than Approaches 3 & 4 and consequently the harm to the overall Green Belt would be less.

Compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land would need to be considered.

3: TRANSPORT CORRIDORS



Maps illustrate the proposed approach by indicating a possible broad scale of growth at different places. The places identified are indicative only and must not be taken to imply any specific site. The scale of development identified for each place is not a target and may be much less, and may include more than one possible location.

3

Approach 3 Transport Corridors	Impact
Places impacted potential number of homes (Cell numbers from Green Belt Assessment March 2021)	<ul style="list-style-type: none"> • SW Bristol 3,000 -5000 homes (Green Belt cells 4, 12, 13, 14) • Nailsea 500-1500 homes (Green Belt cells 9 and 10) • Portishead 500-1500 homes (Green Belt cells 19, 20, & 21) • Port - employment (Green Belt cell 21) • Airport – employment (Green Belt cell 7) • Easton-in Gordano 500-1500 homes (Green Belt cells 22, 24) • Abbots Leigh up to 500 homes (Green Belt cells 15, 23, 24) • Long Ashton 500-1500 homes (Green Belt cells 12 -16) • Flax Bourton up to 500 homes (Green Belt cell 11) • Backwell 500-1500 homes (Green Belt cells 5, 8, 9, 11)
Check the unrestricted sprawl of large built-up areas	Would increase the sprawl of the Bristol large built-up area at SW Bristol although this would be a lesser scale than Approach 2. Would increase the sprawl of the urban area at the port. It risks increasing the sprawl from Bristol along the arterial routes. There is the potential risk of increasing the

	sprawl of Bristol to the south side of the river Avon at Easton-in Gordano.
Prevent neighbouring towns merging into one another	It could result in the loss of the separate identity of Long Ashton and merger with Bristol. The A370 to Nailsea, could see the potential merging of Long Ashton, Flax Bourton, Backwell and Nailsea perhaps separated by only small areas of open land along the route. The depth of the Green Belt at this point is one of the narrowest in North Somerset. Development along the A369 risks merger of the built-up areas from the motorway junction towards the city. The merger of Portishead with the Port is an issue to the east of Portishead where there is only a narrow open gap.
Assist in safeguarding the countryside from encroachment	All development would result in encroachment into the countryside other than at the airport where specific land is in operational use and cannot be considered countryside.
Preserve the setting and special character of historic towns	The historic setting of Bristol in the vicinity of the Suspension Bridge and Avon Gorge could be impacted dependent on the location of development.
Assist in urban regeneration	All Green Belt assists in urban regeneration as it collectively encourages the recycling of derelict and other urban land. Development at SW Bristol could impact the regeneration initiatives in South Bristol although this is difficult to assess at this stage.

Overall impact on the integrity of the Green Belt to keep land permanently open and fulfil the purposes.

In this approach most new development outside of the towns in North Somerset would be located in the Green Belt. The maximum number of new homes in the Green Belt in this approach could be up to 13,500. This increases both the amount of Green Belt land needed as well as the number of places where there would be a release.

It causes harm to the Green Belt from sprawl at SW Bristol and the port. It risks increasing the sprawl from Bristol along the arterial routes. In particular the A370 to Nailsea, which could see the potential merging of Long Ashton, Flax Bourton, Backwell and Nailsea perhaps separated by only small areas of open land along the route. The depth of the Green Belt at this point is one of the narrowest in North Somerset. This could bring the integrity of the Green Belt into question as it could effectively separate the Green Belt into two halves, north and south. The merger of Long Ashton with Bristol and/or any new development at SW Bristol would be an issue as in the urban focus approach.

Development along the A369 not only risks merger of the built-up areas from the motorway junction towards the city but could have the impact of increasing the perceived sprawl of Bristol to the south side of the River Avon.

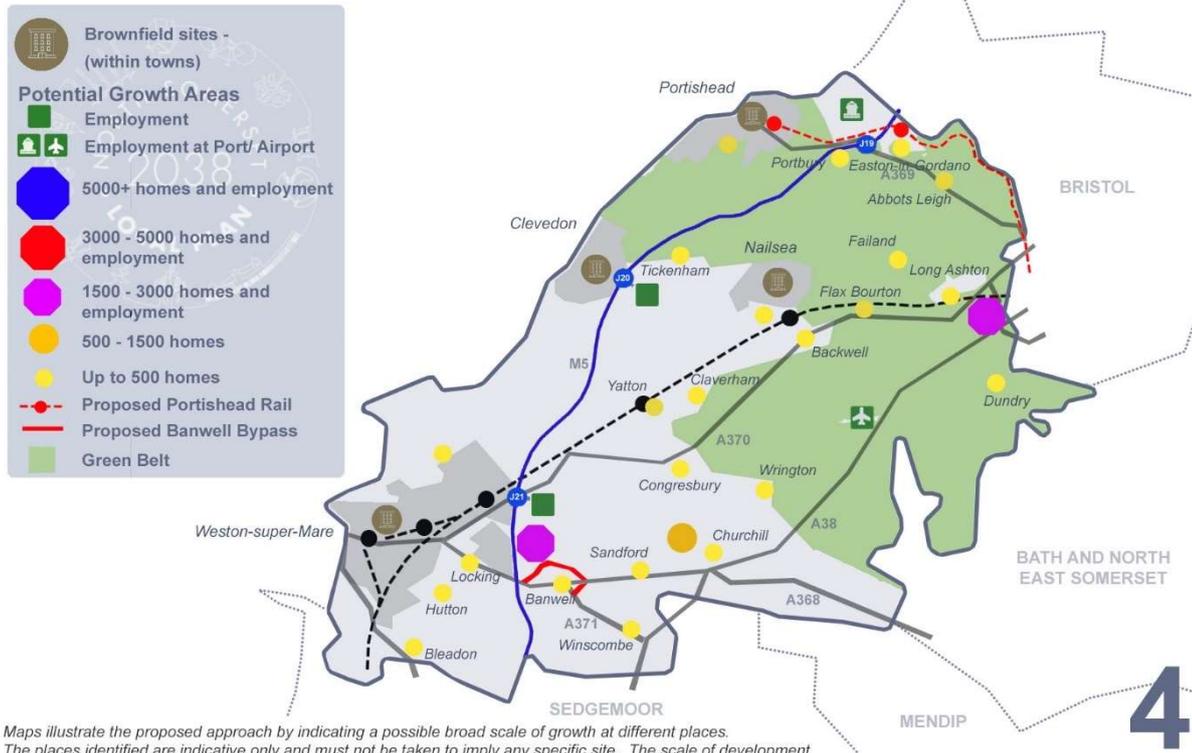
Sprawl along the A38 is less of a problem as the area has less existing development and is more open. Development would be mostly concentrated at both ends of the corridor.

Encroachment into the countryside harms the Green Belt. Introducing more areas of potential release of Green Belt would not necessarily reduce the size of releases in other areas. Much depends on creating long term physical boundaries which can endure. It may mean that whilst land would no longer be designated Green Belt it could be protected for development for beyond the plan period.

Of the three approaches which propose development in the Green Belt this approach requires the most change in terms of amount of land released and potentially the most harm. Compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land would need to be considered.

Approach 4: Greater Dispersal

4: GREATER DISPERSAL



Maps illustrate the proposed approach by indicating a possible broad scale of growth at different places. The places identified are indicative only and must not be taken to imply any specific site. The scale of development identified for each place is not a target and may be much less, and may include more than one possible location.

4

Approach 4 Greater Dispersal	Impact
<p>Places impacted, potential number of homes (Cell numbers from Green Belt Assessment March 2021)</p>	<ul style="list-style-type: none"> • SW Bristol 1500-3000 homes (Green Belt cells 4, 12, 13, 14) • Portishead 500-1500 homes (Green Belt cells 19, 20, & 21) • Port - employment (Green Belt cell 21) • Airport – employment (Green Belt cell 7) • Easton-in Gordano up to 500 homes (Green Belt cells 22, 24) • Abbots Leigh up to 500 homes (Green Belt cells 15, 23, 24) • Long Ashton up to 500 homes (Green Belt cells 12 -16) • Flax Bourton up to 500 homes (Green Belt cell 11) • Backwell up to 500 homes (Green Belt cells 5, 8, 9, 11) • Portbury up to 500 homes (Green Belt cell 23) • Tickenham up to 500 homes (Green Belt cell 17) • Failand up to 500 homes (Green Belt cells 16, 23) • Dundry up to 500 homes (Green Belt cells 2, 3) • Claverham up to 500 homes (Green Belt cell 8)

	<ul style="list-style-type: none"> • Congresbury up to 500 homes (Green Belt cell 8) • Wrington up to 500 homes (Green Belt cells 6, 8)
Check the unrestricted sprawl of large built-up areas	Would increase the sprawl of the Bristol large built-up area at SW Bristol although this would be a lesser scale than Approaches 2 and 3. Would increase the sprawl of the urban area at the port. It risks increasing the sprawl from Bristol along the arterial routes. There is the potential risk of increasing the sprawl of Bristol to the south side of the river Avon at Easton-in Gordano.
Prevent neighbouring towns merging into one another	It could result in the loss of the separate identity of Long Ashton and Dundry and merger with Bristol. The A370 to Nailsea, could see the potential merging of Long Ashton, Flax Bourton, Backwell and Nailsea. Development along the A369 risks merger of the built-up areas from the motorway junction towards the city. The merger of Portishead with the Port is an issue to the east of Portishead where there is only a narrow open gap.
Assist in safeguarding the countryside from encroachment	All development would result in encroachment into the countryside other than at the airport where specific land is in operational use and cannot be considered countryside.
Preserve the setting and special character of historic towns	The historic setting of Bristol in the vicinity of the Suspension Bridge and Avon Gorge could be impacted dependent on the location of development.
Assist in urban regeneration	All Green Belt assists in urban regeneration as it collectively encourages the recycling of derelict and other urban land. Development at SW Bristol could impact the regeneration initiatives in South Bristol although this is difficult to assess at this stage.

Overall impact on the integrity of the Green Belt to keep land permanently open and fulfil the purposes.

This approach would be a major change to the Green Belt, with land at villages and land next to the urban areas excluded from the Green Belt. It causes harm to the Green Belt from sprawl at SW Bristol and the port and It would pepper-pot the Green Belt with development at villages encroaching into the countryside. Although it would potentially require less Green Belt land to be released than in the transport corridor approach (maximum of 10,500 homes) the impact would be felt over a wider range of settlements. Many of the issues regarding merger along the transport corridors are replicated in this approach and approach 3.

It would most likely prompt major developer interest and speculation on a large number of sites. Although the boundaries at some of the villages are likely to be reviewed in the Local Plan, in this approach significant additional land would need to be allocated for development.

Compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land would need to be considered.

Overall Conclusions

Maintaining the current Green Belt whilst correcting minor anomalies has the least impact on the Green Belt and indeed could create clearer boundaries.

Of the three other approaches the Urban Focus has the least impact. It restricts development to fewer locations albeit that these would be significant releases of Green Belt. Any release of Green Belt land will impact on the purposes of the Green Belt, this would need to be minimised by careful choice of location and establishing firm boundaries.

The Transport Corridors approach has the greatest impact on the Green Belt not only because of the scale of releases but also because of the impact on sprawl and merger. By focussing development along radial routes it emphasises the sprawl from Bristol along these routes and could lead to the merging of settlements. Only limited sections of Green Belt would remain to perforate the routes impacting the overall openness and threatening its permanence.

The dispersal approach is a major change to the Green Belt pepper potting the area with development at villages and releases around towns. Whilst the scale of releases would be less than in the transport approach the impact would be felt across the area and it would have the same issues of sprawl and merger along the radial routes although to a lesser degree.

Overall assessment of the four approaches in relation to Green Belt aims and purposes

Approach	Summary
Retain the Green Belt	No harm to the Green Belt.
Urban Focus	Harms the Green Belt and the Green Belt purposes. In particular the strategic purpose of preventing the sprawl of Bristol would be compromised and a new inner boundary would need to be created. However, development would be concentrated in a limited number of locations and the overall integrity of the Green Belt could be maintained.
Greater Dispersal	Significant harm to Green Belt purposes. This option would not only harm the locations next to the urban areas as above but also at smaller settlements.
Transport Corridors	This option has the potential to create the most harm as it would mean the greatest number of houses within the Green Belt. It causes issues of sprawl, merger and encroachment.

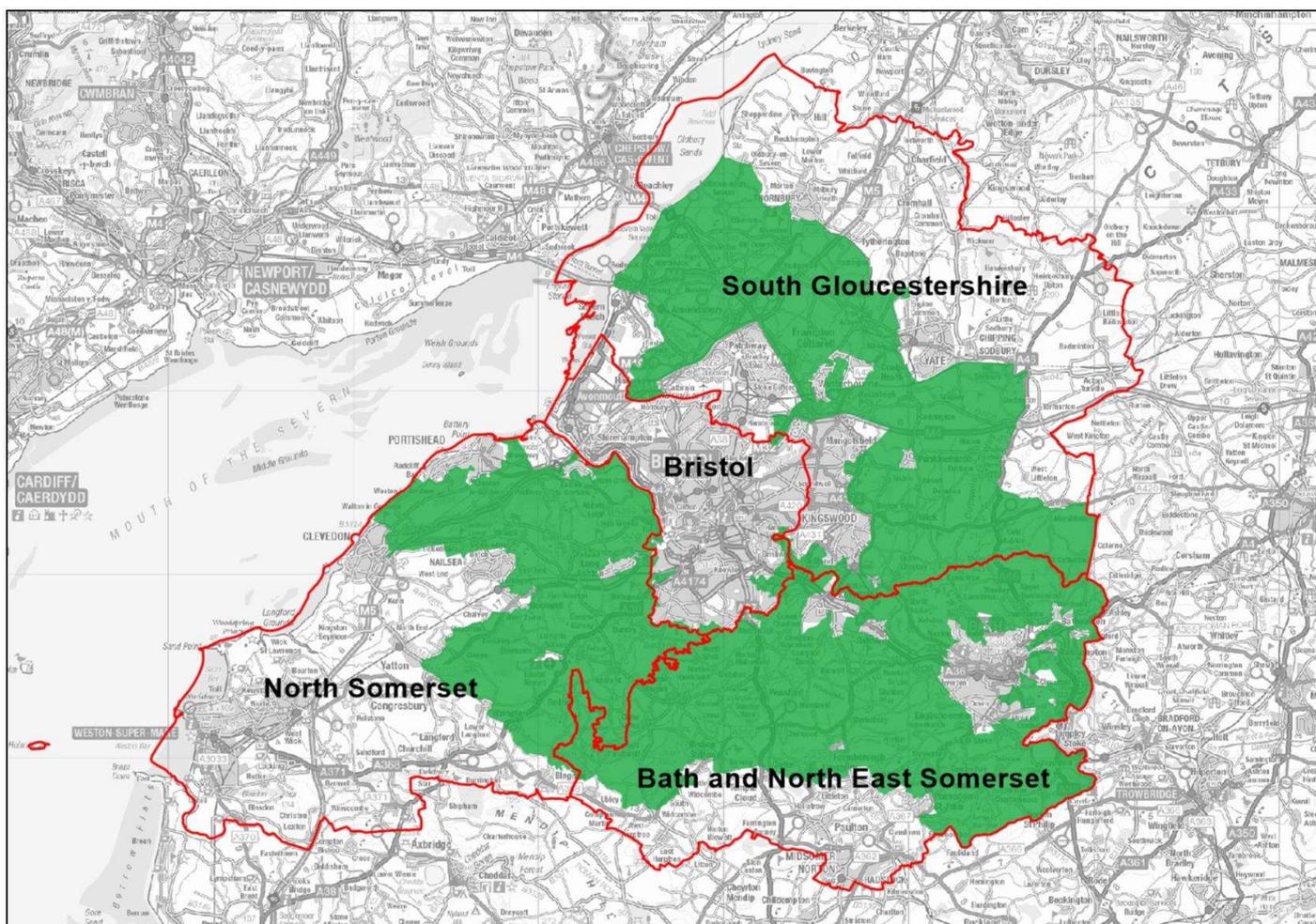
Next steps

Once the spatial strategy has been agreed, and broad locations for growth identified, further detailed analysis will be undertaken to inform site selection options and Green Belt boundaries.

Consideration is being given to whether the exceptional circumstances exist to justify new Green Belts at any major urban extensions.

If it is concluded that it is necessary to release Green Belt land for development, then consideration will be given to how this harmful impact can be offset by compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. (NPPF para 138)

Appendix 1 Map of the Bristol and Bath Green Belt



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