

South Gloucestershire Local Development Framework Core Strategy DPD Examination

Inspector: Paul Crysell BSc MSc MRTPI

Jacqueline Mulliner
Terence O'Rourke

(via email)

Kath Thorne
Programme Officer
South Gloucestershire Council
PO Box 2081
South Gloucestershire
BS35 9BP

Telephone: 01454 863742

Programme.Officer@southglos.gov.uk

11 November 2011

Dear Ms Mulliner

The Programme Officer has forwarded copies of your recent correspondence with the Council regarding Green Belt issues in South Gloucestershire. I do not normally respond to exchanges on such matters because of the danger of initiating an on-going debate outside the formal examination process. In this instance, however, it may help if I clarify what I would expect from the further work the Council is undertaking in relation to the Green Belt in South Gloucestershire.

My overriding requirement is to understand the planning context behind the Council's approach to its Green Belt and how the Core Strategy, as currently drafted, has arrived at the sites earmarked for removal from GB designation. I can only do so if I have an appreciation, in broad terms, of how other 'logical parcels of GB land' (for want of a better description) perform against the purposes of the GB as set out in PPG2. There are likely to be many areas of the GB where development would not be acceptable, both for GB purposes and in regard to wider planning constraints. However, it seems to me that there will also be a number of areas around free-standing settlements and on the edges of the conurbation where there could be scope for some expansion/relaxation of GB boundaries. I would expect sufficient information to be forthcoming to show the relative merits of such locations in GB terms.

This would, I hope, address my first impression that the Council's approach to the GB has been limited and piecemeal. I accept it may have been unfair to reach this view at so early a stage but I do not have the information before me to do otherwise. A more complete appreciation of the contribution made by different areas of the GB would also inform my thoughts as to validity of the Council's preferred strategy, whether other development options were realistic and what, if any, further boundary changes might be necessary either during the plan period or beyond.

I note Mr Conroy's response to the points you raise on this matter. I do not necessarily interpret this as being inconsistent with my requirements although I cannot see how the Council can convince me its strategy is the most appropriate one without a more comprehensive assessment of its wider GB areas than I have at the moment."

Regards

P R Crysell
Inspector

From: Jacqueline Mulliner
Sent: 08 November 2011 13:37
To: Patrick Conroy
Subject: Re: 151044 111020 Green Belt Review
Dear Patrick

I believe our interpretation of what the Inspector has asked you to do in respect of Green Belt Assessment is quite different. Given that the examination is delayed to allow you to undertake necessary work, we feel that it is important to make the Inspector aware of these differences at this stage. We are therefore forwarding this correspondence to him.

Specifically, we felt his request was quite clear (letter date 15th August, paras 7 & 8):

- There needs to be an overall understanding of the future role of the Green Belt in South Gloucestershire.
- The Council must undertake a full assessment of its Green Belt to ensure that there would be no need to change boundaries during the remainder of the plan period or for a reasonable period beyond (as required by PPG2 paragraph 2.12 and reiterated in the draft NPPF).
- The Council's limited and piecemeal approach to the Green Belt brings into question the validity of its approach to assessing development potential and makes it difficult to be certain that the CS is founded on the most appropriate strategy.

In return you stated the Council's intention (letter dated 2 September 2011) to

- Provide an assessment of the Green Belt to determine whether the areas to be removed are the most appropriate ones and to ensure compliance with PPG2 and the draft NPPF; and you confirmed
- That the GB assessment will demonstrate that the Council has reviewed all GB boundaries and to establish whether they remain appropriate against the Plan's development strategy and policy framework.

What you now seem to be saying is that your focus will be on demonstrating consistency in approach between the removal of land from the Green Belt and the spatial strategy. This would appear to be aimed towards bolstering the piecemeal approach and is quite different from a full Green Belt Assessment which looks at all of the realistic opportunities for Green Belt release and has regard to possible growth beyond the plan period.

Yes, we have made objections to the Core Strategy which we will pursue through the examination, but the area around Warmley for a development of circa 2,500 is a reasonable alternative and, in all previous studies, has been considered as a suitable opportunity for Green Belt release. Nothing has changed and we would therefore expect the required Green Belt Assessment to acknowledge that position (for now or beyond the plan period), which will save a great deal of time at the examination and facilitate the Inspector's ability to make/recommend changes, if he feels it is necessary, rather than finding the plan unsound.

Yours sincerely

Jacqueline

On 3/11/11 08:41, "Patrick Conroy" <Patrick.Conroy@southglos.gov.uk> wrote:

Dear Jacqueline,

Thank you for your email regarding the South Gloucestershire Core Strategy, and in particular the Green Belt Assessment report. The focus of the Green Belt report is responding to the Inspector's request to ensure that the Core Strategy is founded on the most appropriate spatial strategy and that the approach to retaining / removing Green Belt is consistent with the Plan's identified spatial strategy. As your client has made duly made objections to the Core Strategy which include opposing the Plan's overall spatial strategy, this is now clearly a matter for the Inspector to consider as part of the EiP. I therefore wish to thank you for your offer to meet with us but I do not consider this to be necessary at this stage given your in principle objections which we are fully aware of.

Please don't hesitate to contact me if you have further questions regarding this matter.

Yours sincerely,

Patrick Conroy

From: Jacqueline Mulliner
Sent: 20 October 2011 15:09
To: Patrick Conroy; Programme Officer
Subject: 151044 111020 Green Belt Review

Dear Patrick,

Please see attached.

Kind regards

Jacqueline Mulliner
Technical Director

Terence O'Rourke Ltd, Everdene House, Deansleigh Road, Bournemouth, BH7 7DU
T: 01202 421142 F: 01202 430055 W: www.torltd.co.uk

Patrick Conroy
Team Leader
Spatial Planning Team
South Gloucestershire Council
PO Box 2081
BS35 9BP

20 October 2011

TOR151044

Dear Patrick

Green Belt Review

We are disappointed that you have not yet taken up our offer to discuss the Green Belt (GB) review with respect to land at Warmley (east Bristol), as set out in my email to you dated 14th September. You will be aware that this offer is made in the following context:

- RPG 10 and Joint Structure Plan recognition of the need for GB Review;
- The Strategic GB Review for the SWRA (Buchanan February 2006) which analysed the purpose of the GB at locations around Bristol and concluded that the GB around Warmley only served the purpose of preventing urban sprawl and safeguarding countryside;
- The submitted draft RSS (June 2006), which identified the Warmley area as an area of search for an urban extension and appropriate GB release
- South Gloucestershire Council's own participant statement to the RSS examination, which accepted GB review at east Bristol albeit objecting to the level of growth identified for this location;
- The RSS EiP Panel Report (December 2007) which supported GB review at east Bristol, stating *"We have considered the proposed Green Belt exclusions, including our additional proposals, against these intentions. We conclude that the proposals do not threaten the main purposes of the Green Belts within the region."* (Panel Report paragraph 4.0.36)
- SGC's Issues and Options consultation (April - June 2008) identified two options for growth at east Bristol, both accommodated 5,000 dwellings and included land at Warmley. SGC reported that the advantage of both were the protection of slopes and ridges and *"Natural features are respected to create a long term settlement edge."*

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You will recall that we met on many occasions, up to September 2010, to discuss the development potential around Warmley. Whilst we had always understood that there was concern about a development of more than 5,000 dwellings in this location, and then a political decision to drop east Bristol following the announcement by Government to revoke RSSs, the technical and professional position was always that GB review should look to this location to accommodate a sustainable urban extension and that the local ridgeline did present an appropriate opportunity to form a new long term defensible boundary to the GB without 'sprawl'. As you know, we did a great deal of landscape and urban design work that confirmed this position.

Clearly, there may be a need to release more land from the GB than that put forward by the Council in the draft Core Strategy and, in any event, there is a need to look to longer-term development needs.

We therefore look forward to seeing the results of your GB review and would reiterate that we would be happy to be involved in this process with a view to reducing the amount of examination time that might be otherwise taken up on this issue.

We look forward to hearing from you.

Yours sincerely



Jacqueline Mulliner
Technical Director

Cc. Paul Crysell, Inspector c/o Kath Thorne