

PSM6

**South Gloucestershire
Core Strategy
Examination**

**Position Statement
for
Matter 6: Green Belt**

May 2012

Matter 6 – Green Belt

Q1 In preparing the Core Strategy has the Council adequately explored the potential of land within the Green Belt to meet identified and future development needs?

Council response – Yes.

- 1.1 In preparing the Core Strategy the Council has adequately explored the potential of land within the Green Belt to meet identified and future development needs. Following the Inspector's request in his letter of 15th August 2011 the Council has in addition prepared the supporting South Gloucestershire Strategic Green Belt Assessment, December 2011 (GBA) (Examination Library Ref: PS7). This further aids understanding of how the Council has explored the potential of land within the Green Belt. In doing so it confirms the approach undertaken by the Council in preparing the Core Strategy. The Assessment confirms the Council has taken a two stage approach:
- The initial stage of the analysis:
 - Identified the purposes of the Green Belt as defined by national planning policy;
 - Defined the methodology used to strategically review how different strategic areas of the South Gloucestershire Green Belt perform against the purposes (based on the findings of the 2006 South Gloucestershire Strategic Green Belt Assessment (Examination Library Ref: EB46)); and
 - Set out the outcome of this evaluation.
 - The second stage analysis:
 - Defined the methodology for the comparison of the different strategic areas against the key factors of sustainability, environmental constraints and infrastructure availability/delivery issues (identified from the Council's evidence base) and the outcome of the first stage analysis; and
 - Set out the outcome of this evaluation.
- 1.2 As requested by the Inspector, the GBA confirms that the Council in preparing the Core Strategy has sought to review Green Belt in an open and transparent way, taking into account public consultation responses in its initial 2006 Strategic Green Belt Assessment. As the GBA explains, the outcome of this extensive work was the re-confirmation of two Green Belt sites (land to the east of Harry Stoke and land the west of the A4018) as sustainable locations for future strategic development and their removal from the Green Belt in the Core Strategy, following the identification of exceptional circumstances, as required by NPPF paragraph 83.
- 1.3 The Core Strategy is a strategic document containing strategic policies and identifying the location of strategic development. The Council therefore considers that the GBA assists the Inspector to further understand the methodology and approach taken by the Core Strategy to strategically appraise land in order to identify whether any Green Belt land would be appropriate and in a sustainable location to contribute towards providing for the strategic development needs of the District.
- 1.4 By comparison, the appropriate process for the identification of non strategic development sites is through the Policies Sites and Places DPD and/or Neighbourhood Planning. Paragraph 1.8 of the Assessment confirms that "Should

there be a need for future detailed amendments to Green Belt boundaries, arising from non strategic sites, for example on smaller sites on the edge of existing urban areas and defined settlement boundaries, these will be addressed through other DPDs and/or Neighbourhood Planning.” For reasons of clarity, the Council considers that it would be appropriate to include this statement in Policy CS5 and at paragraph 6.6. These changes are set out in Appendix A.

- 1.5 In summary, the Council considers that it has adequately explored the potential of the Green Belt to meet identified development needs and that in response to the Inspector’s request the GBA further aids this understanding and confirms the approach taken by the Council. The Council is of the opinion (as set out in the Council’s response to Matter 7 and 8) that the Core Strategy provides sufficient flexibility and resilience in both its provision for housing and economic development to enable it to respond to rapidly changing circumstances and the national policy context to promote economic growth. Moreover, on the basis of the evidence of past and current delivery, the Council would point out that the Core Strategy provision is likely to be above that required by the housing industry thereby providing some flexibility (headroom) at the start of the next plan period. Notwithstanding this, the consideration of long term future development needs beyond the Core Strategy plan period are addressed more fully in the response to Question 3 below.

Q2 Is the Council’s approach to its Green Belt consistent with the requirements of the national planning framework?

Council response – Yes.

- 2.1 The Council’s approach to the Green Belt is consistent with the requirements of the NPPF with regard to reviewing the long term need to retain Green Belt boundaries, the Government’s stance on the protection of Green Belts and the weight the Government attaches to the Green Belt and its purposes. This is evidenced with regard to how the Core Strategy and the GBA are in conformity with the following sections of the NPPF:
- At paragraph 17 of the NPPF it requires that plan making should be underpinned by 12 core land use principles. The 5th principle includes the need to take account of the protecting the Green Belt around our main urban areas. In addition paragraph 79 of the NPPF confirms that the Government attaches great importance to Green Belts and at paragraph 80 the 5 purposes of the Green Belt are set out. Through the preparation of the Core Strategy, the Council considers that these aspects of the NPPF have been taken into consideration in a logical, open and transparent manner. Consequently the Council considers that the Core Strategy’s approach to Green Belt set out in Policy CS5 conforms to the requirements of these paragraphs of the NPPF.
 - At paragraph 81 of the NPPF local planning authorities are required to plan positively to enhance the beneficial use of the Green Belt in relation to opportunities for access, opportunities for outdoor sport and recreation; to retain and enhance landscape and visual amenity and biodiversity. The Council considers that Policy CS2 (Green Infrastructure) and supporting text in the Core Strategy addresses this requirement. A further requirement of paragraph 81 is the need to plan positively to improve damaged and derelict land. This is covered by Policy CS9 (Managing the Environment and Heritage) which promotes the re-use of contaminated land with appropriate remediation and at

paragraph 8.14 the Core Strategy which addresses the benefits of recycling previously development land, whilst ensuring that there is no significant impact on biodiversity.

- At paragraphs 82 and 83 of the NPPF it states that changes to established Green Belt should only be undertaken in exceptional circumstances. Through the preparation of the Core Strategy, the Council considers that this requirement is addressed in paragraph 6.6 of the Core Strategy where the exceptional circumstances required to alter the Green Belt boundary to facilitate two urban extensions are set out. The GBA which confirms the approach taken by the Council further assists the Inspector in understanding the logical, open and transparent way areas have been removed from the Green Belt in the Core Strategy.
- At paragraph 83 of the NPPF it states that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. The Council considers that this requirement is met by Chapter 4 and Policy CS5 of the Core Strategy.
- At paragraph 84 of the NPPF local planning authorities are required to take account of the need to promote sustainable patterns of development. The Council considers that this requirement has been addressed through the preparation of the Core Strategy and the consequences of alternative development strategies have been considered in Section 3 of the Sustainability Appraisal (Library Ref: PS3). The Council considers that the strategy for development and Policy CS5 of the Core Strategy represent the most sustainable pattern of development for the District;
- At paragraph 85 (bullet points 1 and 2) of the NPPF local planning authorities are required when defining Green Belt boundaries to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development and to not include land which is unnecessary to keep open. Through the preparation of the Core Strategy the Council considers that these requirements have been met by the identification of two areas of land proposed to be removed from the Green Belt. This is set out in the Core Strategy Proposals Map Changes, December 2011 (Examination Library Ref: PS4) (Table 1A and two maps at Appendix 3). The GBA (Appendix 2 and 3) also provides further explanation on this.
- At paragraph 85 (bullet point 6) of the NPPF local planning authorities are required to define new Green Belt boundaries using physical features that are readily recognisable and likely to be permanent. The Council considers that this has been achieved by using highways to define the revised Green Belt boundaries to the west of the A4018, Cribbs Causeway and to the east of Harry Stoke. The revised boundaries are shown in the Core Strategy Proposals Map Changes, December 2011 (Examination Library Ref: PS4) (Table 1A and two maps at Appendix 3). Further consideration of this is provided at Matter 22.
- At paragraph 85 (bullet point 3) of the NPPF local planning authorities are required where necessary, to identify in their plan areas of “safeguarded land” to meet longer term development needs beyond the plan period. In 2011 South Gloucestershire Strategic Green Belt Assessment considered whether it was necessary to identify safeguarded land with respect to the land to the west of

the A4018, which was identified as a contingency site in an earlier version of the Core Strategy. However it was determined that in order to ensure flexibility and to be able to respond to rapid change (NPPF paragraph 14) the use of safeguarded land in this location would not be appropriate, because as a result of the NPPF, a review of the development plan would now be necessary to release the land for development (paragraph 85 bullet point 4), where as under PPG2 it was not. Longer term development needs beyond the plan period, together with the need to change Green Belt boundaries at the end of the plan period (paragraph 85 bullet point 5 of the NPPF), are considered in more detail in the response to Question 3.

- 2.2 The December 2011 Core Strategy is silent on the matter of what types of new building and other forms of development are considered not to be inappropriate development in the Green Belt. The Council confirms that development management decisions will be made in the context of the Green Belt policy set out in paragraphs 89 and 90 of the NPPF, subject to this being reviewed in the Policies, Sites and Places Development Plan Document and any appropriate Neighbourhood Planning initiative.
- 2.3 The Council has also given further consideration to the status of Policy GB1 (Green Belt) of the South Gloucestershire Local Plan. This is now proposed to be deleted, as it is out of date when compared to the Green Belt policy in the NPPF. This will require a consequential change to Appendix 2 (Replaced Local Plan Policies) of the Core Strategy. This change is set out in Appendix A.
- 2.4 The Council considers it would be beneficial to retain the “Development in the Green Belt, June 2007” Supplementary Planning Document (SPD), (Examination Library Ref: RD53) until such time as it is replaced either by a new policy in the Policies Sites and Places DPD or by a refreshed and updated SPD. The Council is of the opinion that this SPD will provide valuable guidance where it accords with Green Belt policy in the NPPF, in particular in relation to the disproportionate test. A suggested change to paragraph 6.6 covering this matter is set out in Appendix A.
- 2.5 In summary, the Council is satisfied that its approach to the Green Belt is consistent with the national planning framework. Where the Core Strategy is silent on matters relating to development which is not inappropriate in the Green Belt, decisions will be based on policy in the NPPF, subject to this being reviewed in the Policies, Sites and Places DPD and any appropriate Neighbourhood Planning initiative. Two minor changes to the Core Strategy are proposed relating to the removal of the outdated Local Plan policy on Green Belt and the temporary retention of the “Development in the Green Belt” SPD.

Q3 How likely is it that existing Green Belt boundaries would need to be changed at the end of the plan period?

Council response

- 3.1 South Gloucestershire Council does not consider it possible to predict, whether it is or is not likely that there will be a need to alter Green Belt boundaries at the end of the plan period. There are 4 critical factors, of which the outcomes are presently unknown, which it will be essential to determine before the need or otherwise to strategically change the Green Belt can be known. These are:

i. Financial and economic circumstances - Given the great uncertainty with respect to economic circumstances and future housing need no decision maker can with any confidence determine now the need to change Green Belt boundaries at the end of the plan period. We are currently experiencing a period of exceptional and most unusual economic uncertainty and as many commentators have stated this is ‘unchartered economic water.’

ii. Considering and testing other strategic planning strategies - It cannot be said now that in 2026 further urban extensions involving the removal of Green Belt, will be the most appropriate way to address future housing need. It is most probable, that alternative strategic options may need to be considered which could involve the search for appropriate and sustainable strategic locations beyond the Green Belt – as per paragraph 52 of the NPPF and not necessarily within South Gloucestershire.

iii. Actions required by other authorities in the West of England. – There is the very real possibility that there could be development elsewhere in the Sub Region taking place before 2026 and beyond that may influence the future distribution of development. North Somerset are committed to an early review (5 years) of their development plan – to test the need for the strategic release of Green Belt in south west Bristol, as unlike South Gloucestershire, their Core Strategy expressly requires a review by 2016. Likewise, although as at May 2012, the outcome of the BANES EiP is not yet known, the future of the Green Belt at south east Bristol is still outstanding. Finally, the Bristol Core Strategy (adopted 2011), has Green Belt land safeguarded for future development needs. These UAs have therefore to varying degrees/ reasons to accept early reviews. This is not the case in South Gloucestershire. We have objectively and fully met our housing requirement up to 2026/27 while providing sufficient flexibility to respond to rapidly changing circumstances. It is therefore essential that the uncertainty pertaining in the other 3 UAs – North Somerset, BANES and Bristol is resolved before it can not be said that existing Green Belt boundaries in South Gloucestershire would need to be changed at the end of the plan period.

iv. Transportation Infrastructure - the Council is fully committed to working in partnership with the West of England in order to deliver the transport requirements needed to support the quantum/ locations of growth set out in the Core Strategy. For this reason its priorities are currently firstly the North Fringe to Hengrove (NFH) package which has secured Programme Entry Status from DfT, with construction expected to commence in 2014 and secondly, the Greater Bristol Metro project which is currently the next major scheme priority for the West of England. Beyond these projects, it is very difficult to predict what funding will be available. Although the Emersons Green to Temple Meads Rapid Transit scheme is identified as a future major scheme, given the status of this project, it would not be delivered until at least after 2020. The Council makes clear in Matter 7 and 8 that as there is no prospect or certainty that the transport funding needed to secure this major scheme will be forthcoming and much work needs to be undertaken before this will be known, the Bristol East Fringe is not sustainable now, nor is it likely to be for the foreseeable future. Therefore, it can not be said with any degree of confidence that existing Green Belt boundaries in South Gloucestershire would need to be changed at the end of the plan period.

- 3.2 In the event that circumstances do arise that would necessitate the long term consideration of the strategic extent of the Green Belt beyond 2026, then the Council contends that this should be considered holistically across the West of England and can not be divorced from the need to ensure that future development in the West Of England area is delivered in the most sustainable locations for the area as a whole, in accordance with NPPF paragraph 84.
- 3.3 In summary the Core Strategy provides a robust plan for the period up to 2026, which the Council also believes affords some flexibility at the start of the next plan period. For the 4 critical reasons set out above the Council does not consider it is possible to predict whether it is or is not likely that there will be a need to alter Green Belt boundaries at the end of the plan period. Should circumstances arise that necessitate the long term consideration of the strategic extent of the Green Belt beyond 2026, then the Council contends that this should be considered holistically across the West of England in order to deliver development in the most sustainable locations for the area as a whole.

4.0 Conclusion

- 4.1 In conclusion the Council considers that in preparing the Core Strategy it has adequately explored the potential of land within the Green Belt to meet identified and future need and that its approach to its Green Belt is consistent with the requirements of the national planning framework. The Council does not think it can be said that, having weighed up all relevant considerations, it is likely that Green Belt boundaries would need to be changed at the end of the Plan period as it considers this will depend on the circumstances pertaining at the time and it is not possible to anticipate these circumstances with any certainty. The Inspector is respectfully asked to take the matters set out in this paper into consideration.

Appendix A

Suggested Modifications to Matter 6

Policy / para	Proposed Modification	Justification	Main (M) or Additional (A) Modification
Policy CS5 2nd to last para (p56)	“Following the developmentother areas to compensate for the loss of Green Belt. In the meantime, exceptional circumstances will need to be demonstrated to justify any further amendments to the Green Belt. <u>Any non strategic amendments to the Green Belt, where exceptional circumstances can be justified will be addressed through the Policies Sites and Places DPD and/or through Neighbourhood Planning.</u> Any development in the Green Belt will.....relating to the Green Belt.”	To ensure there is clarity over the future amendment of the Green Belt:	M
Para 6.6 (p57)	<u>“...which justifies the release of this land from the Green Belt. Any non strategic amendments to the Green Belt, where exceptional circumstances can be justified, will be addressed in the Policies, Sites and Places DPD and/or through Neighbourhood Plans.”</u>	To ensure there is clarity over the future amendment of the Green Belt:	M
Para 6.6 (p57)	<u>“....Places DPD and/or through Neighbourhood Plans. The Council’s Supplementary Planning Document (SPD) “Development in the Green Belt, June 2007” will provide guidance, where it accords with the Green Belt policy in the NPPF, until such time as it is replaced and updated either by a new policy in the Policies Sites and Places DPD or by a refreshed SPD.</u>	To ensure the retention of the guidance in the Council’s Green Belt SPD where it accords with the NPPF until the document can be replaced and updated.	M
Appendix 2 Table 1 (p249)	Add under South Gloucestershire Local Plan: <u>GB1 Green Belt</u>	Policy GB1 is out of date compared with NPPF.	A