

Matter 6: Green Belt

- 1) The Strategic Green Belt Assessment (December 2011) is a helpful paper setting out the process and history of Green Belt review in South Gloucestershire. RPS considers the rationale for the Green Belt releases to be sound in the context of the strategy for the distribution of homes across the district and exceptional circumstances that prevail in the individual circumstances for the Green Belt releases that have been made.
- 2) The NPPF does introduce new Green Belt guidance, to which the Inspector refers. NPPF paragraph 84 requires LPAs to have full regard to the principles of 'sustainable patterns of development'. Invariably major urban areas will tick the majority of 'sustainable development' boxes and any strategy for leapfrogging the Green Belt into rural areas is unlikely to be 'more sustainable'. We do however support the SGC strategy of 'leapfrogging' Green Belt insofar as it relates to strategic provision at Yate and Thornbury, and a reasonable provision in the rural areas to protect (at every level of settlement size) the vitality of the place and meeting need. To that end, the spatial choices made conform to the economic, social and environmental dimensions of sustainable development.
- 3) Paragraph 83 of the NPPF requires LPAs to have regard to development needs beyond the Green Belt and whether areas of 'safeguarded land' should be considered. The SGC response is contained in the conclusions of the Green Belt Assessment:

“Long term consideration of the strategic extent of the Green Belt must be considered holistically across the West of England and cannot be divorced from the need to ensure that future development is delivered in the most sustainable locations in accordance with national government guidance.”
- 4) RPS has some sympathy with the approach. If it is right that the Duty to Cooperate does not bite on LPAs that submitted their core strategies ahead of the enactment of the Localism Bill then it is right that it presents SGC with difficult choices without the benefit of understanding the strategic context. Of course, that doesn't necessarily prevent SGC making rational choices that affect its own jurisdiction, however, there is no doubt that exercise will be better informed by cooperation across the four LPA areas in the West of England; these are difficult and contentious decisions. If the overall housing requirement is found sound then there is no immediate pressure to identify contingencies. The NPPF and in particular the Duty to Cooperate will inevitably require the four LPAs to review their Plans in the next five year period.
- 5) The December 2011 Proposed Changes to the wording of the policy in respect of Green Belt are welcomed (and reiterated at paragraph 6.6). In respect of the East of Harry Stoke New Neighbourhood, emphasis is placed on the need to deliver homes in a sustainable location as part of the exceptional circumstances for Green Belt

release. This responds positively to RPS comments on the submission version of the CS and the Inspector's initial comments.

- 6) Whilst the policy wording confirms that the Green Belt will remain unchanged save for the land at the two new neighbourhoods, it is still not abundantly clear whether the CS is the mechanism for establishing its deletion. This is unhelpful in providing clarity at the planning application stage.
- 7) The uncertainty over Green Belt deletion is exemplified on Figure 5, the key diagram for the North Fringe. In both new neighbourhood areas the Green Belt notation is retained, despite the fact that the text box beneath the diagram states that the diagram is 'amended to reflect policy CS5, position on the Green Belt'. Moreover, in the case of East of Harry Stoke (and in particular on the principal development area north of the A4174) the land adjacent to the M32, M4 and A4174 is shown as 'Significant Green Infrastructure in the Green Belt'. This is wholly inconsistent with what RPS understands the CS is seeking to achieve.
- 8) The Strategic Green Belt Assessment (December 2011) is a helpful paper setting out the process and history of Green Belt review in South Gloucestershire. A diagram showing the deletion of the Green Belt as a change to the Proposals Map and post submission change is set out at Appendix 2 of the paper. This proposed change is not contained within the CS itself or detailed in the schedule of changes; the Green Belt Assessment is not part of the LDF. For the purposes of public scrutiny and certainty the proposed change must be explicit in the CS. Proposed changes are rehearsed in our January 2012 representations.
- 9) The proposals to extend the Green Belt as a consequence of the above deletions are wholly unjustified and there are no special circumstances for doing so.