

1. The Core Strategy sets out the Council's commitment to the Green Belt at para 1.39:

*"In promoting this Strategy for Development, the Council has sought to limit the impact of new housing development on the Green Belt. The Council remains in principle opposed to significantly reducing the Green Belt to accommodate land for housing growth per se.*

*However, in order to meet the need for housing in sustainable locations, two areas of Green Belt have been released in the North Fringe of Bristol, to the west of the M32 and to the west of the A4018 at Cribbs Causeway."*

2. The Green Belt Assessment has taken an insufficiently narrow approach and has not considered the impact of green belt changes upon traffic flows and the trans-green belt market towns
3. We draw attention to para 2.3 of the Green Belt Assessment conducted by South Gloucestershire, which reminds us that even the RSS process recognised that there were not sites that could be released in the Green Belt without causing harm, and that difficult choices would be needed. The availability of the Filton Airfield land as an unforeseen site means those difficult choices were not needed. Had the Supplementary Housing Paper consider the environmental carrying capacity of the area, it would have recognised that the Filton Airfield site enabled the Council to revisit this difficult question: the fact they did not revisit it is, we believe further evidence that the Council's review post RSS and Filton Airfield was insufficiently fundamental.
4. We object to Policy CS5 in relation to the removal of land from the north eastern Green Belt. We do not believe there has been sufficient justification offered for removal. In particular we object to the release of land to the west of the M32, and the land at Harry Stoke (4.15) - this again places development on the key radial corridor which provides the only private car and public transport (bus) links to major centres of employment, which will greatly worsen congestion cumulatively. Whilst it is said the road building associated with this will relieve traffic around Parkway Station itself, it will not relieve the A4174 congestion that is the crucial blockage point in terms of travel to work. This releases land at what is already the narrowest part of the Green Belt which is vulnerable to urbanisation and the proliferation of quasi urban activities – preservation of that Green Belt corridor as a substantial green buffer is essential to the character of both the city (its original purpose) but also to the character and nature of the trans-green belt market towns such as Yate. People chose to move to Yate or Thornbury as trans-green belt market towns (see CS14 for example for the distinction SGC itself draws between town centres in suburbs and market towns such as Yate and Chipping Sodbury) precisely because they believe they are distinctive from the suburbs within the Green Belt. We consider that diversity and choice essential to be retained.

5. There is no evidence to show development in this location is sustainable – it is assumed from a short comment in para 4.16. Para 4.16 setting out the case for this allocation of land stresses its proximity to the main line station and some employment locations. It does not mention the importance of that locality as a gateway to the station and employment locations for the massive developments at Emersons Green and areas to the north east, which underpins our contention that they have not looked at the overall impact of the location when taken in conjunction with other allocations. As with Filton Airfield, we could see the sustainability arguments for these allocations, were it not for the fact land is also being allocated at Yate, whose residents have to get through this very congestion hotspot to reach their traditional and still dominant centres of employment on the north fringe and in Bristol. The new road proposed in 4.17 will provide internal additional vehicle links within the North Fringe but will do nothing to relieve the congestion hotspots approaching the north fringe.
6. However the sustainability of a particular allocation is not just about whether it is well located in relation to centres of employment, but also about its impact on wider traffic movements, and in particular private vehicular commuter movements and the 'congestion hotspots. Para 2.7 of the strategy recognises the importance of the congestion hotspots, "Congestion hot spots are a significant problem..... It is estimated that at least £350m is lost to the economy of the West of England area each year due to journeys delayed as a result of congestion." The land release by the M32 immediately adjoins one of the worst hotspots.
7. This introduces additional multiple traffic movements directly into a bottleneck, but there is no evidence this has been modelled onto the traffic flows from other allocations to the north and east for whom this is a key travel to work bottle neck i.e. they have considered each site in isolation.
8. This land release is also at the narrowest and most vulnerable part of the Green Belt, where thousands of vehicles a day originating in Yate Sodbury drive through the Green Belt villages to work in the North Fringe and Bristol. There is constant pressure on the edges of the Green Belt, on the villages within the Green Belt and upon the main transport corridors for additional development. A stricter policy is required to prevent the creeping urbanisation of the Green Belt. We would therefore be opposed to any plan to reduce the north eastern section of the Green Belt. Diagram 1 of the Green Belt assessment illustrates very clearly the point we are making about the thinness and vulnerability of the green between between the M32 site (point 10 on the diagram) and Yate (point 12). Releasing more land at this very narrow point puts at risk the objective of preventing coalescence of neighbouring towns. We do not accept that area '15' on Diagram 2 can be distinguished from area 12, as the main road from the M32 to Yate, the A432 runs along the border between those two zones, and manifestly either both of them are discharging the functions or neither – one could not envisage preserving the green belt on one side of the road but not the other!. We also consider area 13 is part of the same zone, and if added to the Green Belt would help protect that Bristol to Yate corridor. Yate is the only substantial town crammed against the edge of the Green Belt, and that corridor therefore needs particular care to ensure it does indeed prevent coalescence. (Thornbury is smaller and has a far wider

Green Belt and the large towns equivalent to Yate south west of Bristol have a far wider Green Belt)

9. Strict protection of the character and size of the Green Belt is an essential corollary of the effort to make better use of urban land. An important characteristic of the Bristol urban area is the extent to which Green Belt hills can be seen from much of the city: creating the impression of a city in the country. It is vital that these green vistas remain, and that the urban public have ready access to real countryside. Unless vast additional acres of green fields are to be released for development, the land made available for development in urban areas needs to be more effectively used. This is likely to result in denser development patterns. If this happens, it is even more important for urban dwellers to have access to good quality countryside, as close to the city as possible. The Green Belt provides that opportunity, as long as it retains its quality and size. There is nothing in the context here to justify the relaxation of the Green Belt under the limited relaxation the government has introduced via planning policy guidance.
10. Preserving the integrity and depth of the Green Belt is also essential to the Green Belt and trans Green Belt communities. It is not easy to separate questions of quantity and quality in relation to the Green Belt. The north-east Green Belt is particularly narrow - only four miles wide in the vicinity Emersons Green. Horticulture, golf courses, garden centres, leisure activities and car-related ribbon activity mean that there is hardly a piece of road between Yate and Emersons Green which does not have some structure visible. It is very fragile. Any further incursion into it will further reduce its ability to do its job. Encroachment undermines the 'rural' character of the Green Belt, reduces the quality of life of Green Belt communities and risks coalescence.
11. We believe there is a strong case for extending the Green Belt further northwards in the area between Yate and Thornbury independent of any land being released from the Green Belt elsewhere, but land releases elsewhere strengthen the case for compensatory additions. This would give security to the villages and rural communities; reduce land speculation; reduce the spread of land degradation associated with speculation about the future use of the land; and end fears of coalescence between communities. It might also, incidentally, ease fears about expansion of Yate by providing a finite edge to the expansion of the town.
12. More locally, we believe there is a particularly strong case for small communities at the edge of Yate to be put into the Green Belt, for example the North Road community: the closer such communities are to Yate the more residents fear coalescence and the greater the adverse effects of speculation. Current planning legislation makes it very difficult indeed for their argument to be put, without re-opening the whole question of the Green Belt, something we consider far too dangerous to contemplate. The Core Strategy seeks to offer some protection to these communities by a strict policy in relation to rural development and by a commitment to consider replacement land being added to the Green Belt at an unspecified future date. The Core Strategy says that "following the development of these new neighbourhoods" the Council will examine the scope of extending the Green Belt designation to other areas to compensate (CS5). However it does not indicate which neighbourhoods and is therefore unclear, it could be read as

meaning not until 2026. This needs to be clarified. Table 2 of the Green Belt Assessment indicates that these meet most of the criteria for Green Belt designation. As area 13 on Diagram 2 is part of the corridor from Yate to the M32 we consider it too is part of the area 12 five criteria category.

13. We believe it would be extremely helpful if the Core Strategy could give further support to these efforts to protect trans-Green Belt locations: particularly where the Green Belt itself is dangerously narrow and therefore prone to 'leapfrog' development, by making an immediate recommendation that compensatory land is added to the outer edge of the Green Belt along the same strategic corridor as the land lost i.e. at Engine Common / North Road.
14. We are mindful of the problems we have encountered historically in relation to Green Belt extension, with Strategy documents saying it belongs in the Local Plan and the Local Plan saying that is too strategic. We have received sympathetic comments in previous Strategic and Local Plan inquiries, but each Inspector has felt someone else needs to take the decision through another process, so thirty years on we are no further forward with getting this added.
15. We believe the key moment for taking a decision about the necessary width of the green belt to meet its historic aims of preventing coalescence / urban sprawl is now, in this Core Strategy. We believe that further expansion of trans greenbelt communities such as the proposal at Yate fundamentally weakens the ability of the narrow Green Belt to do its job, and if it is to be narrowed further in this way, we need to provide a finality to the pressure on this green belt by wrapping it around Yate as far as the Wickwar Road, providing a definitive edge to the town (ideally on the line of current development, but if the 3000 houses are to go ahead at Brimsham then along the Tanhouse Lane line). At the very least we have argued consistently for 30 years that the Green Belt should be extended to the northwest of the town as far as the railway line, to make North Road a protected greenbelt community.