

- 1. In preparing the CS has the Council adequately explored the potential of land within the Green Belt to meet identified and future development needs?**
- 2. Is the Council's approach to its Green Belt consistent with the requirements of the national planning policy framework?**
- 3. How likely is it that existing Green Belt boundaries would need to be changed at the end of the plan period?**

1. In preparing the CS has the Council adequately explored the potential of land within the Green Belt to meet identified and future development needs?

The planning authority has undertaken assessments of land in the Green Belt and published reports on the matter in 2006 and 2011, with the latter drawing heavily on the former. It must be noted that the work on the Green Belt has been done without the planning authority having properly identified what the development needs are for the plan period so that the results of the Green Belt assessment are not providing evidence to inform the right plan-making process in any case.

It is evident from reading the Strategic Green Belt Assessment that, even allowing for the difficulties of interpreting national Green Belt policy, this is a rather self-fulfilling document and it should only be used as evidence to inform the choice or examination of the spatial strategy with very great care. It may be somewhat telling that the Green Belt report post-dates the pre-submission Core Strategy. In seeking to justify its Core Strategy the Council draws on the conclusions of the 2011 report which conveniently coincide with the choices already made, but a deeper look into the document demonstrates the weakness of these conclusions.

Two examples are probably sufficient to invite caution in the use of the Strategic Green Belt Assessment. SLP is promoting land to the east of Bristol at Oldland Common and the Strategic Green Belt Assessment identifies an area called Oldland Common as a separately assessed parcel of land (no 21 in the report). The assessment finds that this land fulfils all five of the purposes for which land can be included in Green Belt (stated in PPG2 at the time of the assessment and now repeated in the Policy Framework). Whilst any land on the edge of an urban area can be said to fulfil three of these purposes making them unhelpful in any comparative exercise, two of the purposes are more spatially and locationally specific.

Keeping parcel 21 open, according to the Council's assessment, will '*preserve the setting of a historic town*'. The land at Oldland Common is very obviously not part of the setting of any historic town and this finding is ludicrous.

Similarly, according to the assessment, keeping parcel 21 open will 'prevent neighbouring towns from merging into one another'. The mapped depiction of the number of purposes served by different areas in the report at Map 2, page 11, does not show any settlement other than Bristol in the vicinity of parcel 21. Presumably the reasoning here is that the land is on the east of Bristol and Bath is east of Bristol.

The assessment is supposed to have included site visits according to the report. Had this been the case and the matter considered professionally, it would be quite evident that there is land at Oldland Common that could be taken out of the Green Belt for development without affecting the overall integrity of the Green Belt or its effectiveness in performing its most vital function of maintaining the separation of distinct towns suitable for development. For the most part the land on the immediate periphery of east Bristol does not have a significant role in maintaining the real or perceived separation and distinct identities of Bristol and Bath, because the form and character of the

intervening landscape naturally performs that role. There are clearly parts of the area currently designated as Green Belt that could be used in other ways without affecting the critical performance of the formative parts of the landscape.

It is clear that land at Oldland Common contributes to no more than three of the purposes of including land in the Green Belt and is therefore the same on this assessment as many other parts of the District, including land identified for development. The conclusions of the Strategic Green Belt Assessment are false and the use of this assessment of land against the purposes of including land in the Green Belt in justifying the strategy is highly misleading.

There is a further very evident failing of the Strategic Green Belt Assessment report. It includes a section on 'exceptional circumstances' (at section 6, page 31). The 'exceptional circumstances' identified by the Council, which it says; *'justify the release of land from the Green Belt at East of Harry Stoke/Stoke Gifford (north of the A4174 Avon Ring Road) (forming part of the strategic assessment Area 10) and west of the A4018, Cribbs Causeway (forming part of the strategic assessment Area 3), are the need to:*

- *meet future housing need, (evidence of future housing need is contained in the Supplementary Housing Paper (Document Reference PS8) .*
- *ensure sustainable patterns of development in accordance the Core Strategy's vision and spatial strategy; and*
- *create and plan comprehensively for sustainable communities.'*

All of these 'exceptional circumstances' are not location-specific and though they may apply to the area referred to in the quotation above, these 'exceptional circumstances' apply to precisely the same degree to the consideration of an urban extension to the east of Bristol.

Further doubt is poured on the credibility of this piece of work, if more were needed, by para. 6.2 of the report which tells the reader that the exceptional circumstances *'justifying the release of land to the east of Harry Stoke/Stoke Gifford (north of the A4174 Avon Ring Road) (forming part of the strategic assessment Area 10)'* from the Green Belt include *'the significant adverse visual impact on the openness of the Green Belt from the proposed Stoke Gifford Transport Link and its associated structures, junctions, lighting and traffic'*. The report does not say that the road is required because of the proposed development and intended to be paid for by the development.

Circularity is the prevailing characteristic of the Council's use of its Strategic Green Belt Assessment, as indeed it is of the whole plan making process.

2. Is the Council's approach to its Green Belt consistent with the requirements of the national planning policy framework?

The planning authority has not dealt properly with the Green Belt because it has not pursued the rational, evidence-based approach to plan making that is established as good practice and which the Government has again emphasised is what is wanted. The Council says in para 13 of EB21 (Justification for the strategy for housing to 2026) and again at para 8.1 of the Supplementary Housing Paper December 2011 that the level of development it seeks to provide for has been set taking on board the desire expressed by those parts of the present population that it listens to that the Green Belt should not be touched. It is evident through the evolution of the plan that whilst Green Belt land was originally included as the plan sought to carry forward the emerging RS it was taken out when the planning authority believed it would be under no obligation to conform to the RS. At this point the local authority set the level of housing provision as that which it believed could

be accommodated without using the Green Belt land which was creating the most organised resistance.

The Council's approach is the opposite of the accepted process of making good plans with a clear and justified spatial strategy that is a proper response to the place and which will use the potential of the place to meet the needs of all its future community. The statutory requirement on the Council as a plan maker is to seek more sustainable development. The Green Belt is then a policy tool to be used in achieving sustainable development. The Planning Framework is clear as the combination of PPS1, PPG2 and PPS3 were before, that Green Belt designation defers to the achieving of sustainable patterns of development, not the other way round.

The Planning Framework, as PPG2 did before, establishes the expectation that Green Belt, whilst intended to endure overall, may need to be adjusted from time to time, and is clear that when the need arises this process is to occur through development plans. Whilst this was a two stage process when there was a regional or sub-regional part to the development plan, it is now effectively a one stage process. That is, it is for the district level plan as necessary both to revise the general extent of the Green Belt and to define its boundary. This may be in more than one document making up the LDF, now reverting to the title of Local Plan, and South Gloucestershire Council is currently intending there to be other DPDs in addition to the strategic document, currently the Core Strategy, enabling defined site allocations to be included in the plan.

The approach to the Green Belt taken by the Council is not consistent with the Planning Framework as this deals with the way changes can be made to the Green Belt through the development plan and it also requires the consideration of safeguarded land. In both respects the way that the plan has been prepared fails to meet the requirements of the Framework. Safeguarded land is the subject of the next question under this Matter.

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

It is evident from the Council's own statements that the principal determinant of the spatial strategy has been a wish to leave the Green Belt undisturbed when the proper approach should be to identify where development should go to address the requirement arising and in the most sustainable locations, and if necessary consider changes to the Green Belt through the development plan to accommodate that development.

Land within the current Green Belt is needed to accommodate development required within this plan period and it is evident that the need to provide new land for development will continue beyond the plan period, so to meet the requirements of the Planning Framework, changes to the Green Belt boundary should be made in this plan now. This plan only addresses development requirements arising from changes in the population in the District and then probably inadequately. It does not address any housing or other development or infrastructure requirement arising from the wider functional area. The plan does not address all of the housing requirement that should be met within the District arising from the evidence and from the policy set out in the Planning Framework. At the same time the provision that is made relies upon using all of the supply the Council has identified through its SHLAA with no flexibility.

The three other local authorities with administrative areas that make up the West of England functional area are following the same approach of acting as though they are islands when housing is considered and continents when seeking to attract transport funding or employment. They have ignored the housing implications of the spatial, demographic and economic evidence and through

some bizarre fluke of timing in relation to legislative and policy changes seem to be getting away with wilfully avoiding addressing the needs of their communities for the plan period. The inevitable consequence is that when the Government's current intentions for strategic planning mature, or a further change to strategic planning arrangements occurs, (or to confront the excuse the planning authorities use, when the economy returns to the positive part of its cycle), the development requirement will be acknowledged to be far greater than is being planned for. Given the pattern of Green Belt in greater Bristol, the Green Belt will have to change to enable sustainable patterns of development to be pursued in meeting that requirement. There will be a need to find space for a considerable backlog of development and this will require changes to the Green Belt. It is inconceivable therefore that the Green Belt boundary could be the same through the 2030's as it is now. The current custodians of the Green Belt in north and east Bristol South Gloucestershire's Core Strategy should do as the Framework explicitly requires and change the Green Belt now to address not only the present requirement but to avoid the need for a change during the plan period.

Were the Inspector dealing with this plan to replicate the deeply unsatisfactory approach of deferring to (but being entirely unable to bring about) a review of the plan in some five years time to revisit the development requirement, post recession, it is entirely likely that the need to change the Green Belt boundary would arise rather sooner than the end of the Plan

Land that is safeguarded land is not to be presumed to be where development will take place when its need is acknowledged – that is for the decision taker at the time according to prevailing circumstances – but any change to the Green Belt should still be made where development would best contribute to the most sustainable spatial strategy.