

Bristol City Council

Further Representation to the South Gloucestershire Core Strategy

Matter 6: Green Belt

Bristol City Council has raised concerns about the proposal for Green Belt development at Haw Wood to the west of the A4018. These matters are discussed in detail in respect of Filton and the Communities of the North Fringe. This submission addresses the issue in general terms, in response to the Inspector's questions.

Q.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?

1.1 The Core Strategy should primarily explore whether there is potential land **outside** the Green Belt to meet objectively assessed needs. A substantial proportion of land within South Gloucestershire lies outside the Green Belt surrounding the cities of Bristol and Bath.

1.2 The NPPF attaches great importance to Green Belts. Paragraph 17 sets out 12 core land-use planning principles which include the statement that;

...planning should:... take account of the different role and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them...

The inclusion of protection of Green Belts in the Core Planning Principles is a significant development of policy introduced by the NPPF. The former PPS1, which set out national planning policies including key principles, made no reference to Green Belts.

1.3 NPPF paragraph 79 goes on to explain that the essential characteristics of Green Belts are their openness and their permanence. NPPF paragraph 83 says:

'Once established, Green Belt boundaries should only be altered in exceptional circumstances...'

Green Belt boundaries in South Gloucestershire have been established in the adopted South Gloucestershire Local Plan 2006.

1.4 The presumption in favour of sustainable development (NPPF paragraph 14) also refers to the significance of Green Belt. It says that Local Plans should meet objectively assessed needs unless specific policies within the NPPF indicate development should be

restricted. Footnote 9 to paragraph 14 identifies those policies as including those for land designated as Green Belt.

- 1.5 The NPPF therefore clearly establishes that Green Belt should be permanent and open, and that its boundaries should only be altered in exceptional circumstances.
- 1.6 Bristol City Council considers that if changes to the boundary of the Green Belt around Bristol are proposed, that the South Gloucestershire Core Strategy should demonstrate exceptional circumstances including why development needs could not be met in locations outside the long established and defined Green Belt. It should also be demonstrated that policies in the NPPF do not indicate that development should be restricted, having regard to paragraph 14 and its footnote 9.

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

- 2.1 In respect of the proposal for removal of land from the Green Belt at Haw Wood, Bristol City Council does not consider that the Core Strategy incorporating Post Submission Changes December 2011 (PS2) is consistent with the NPPF. This is explored in more detail in the City Council's responses to Matter 9 Filton Airfield and Matter 22 Communities of the North Fringe.

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

- 3.1 As explained in paragraph 1.1 above, a substantial proportion of land in South Gloucestershire lies outside the Green Belt. Having regard to the wider Housing Market Area, there are likely to be a range of options for addressing objectively assessed development needs in the future on land outside the Green Belt. It is noted that NPPF paragraph 52 raises the possibility of supplying new homes through larger scale development such as new settlements or extensions to existing villages and towns. It does not specifically promote urban extensions within Green Belts surrounding cities.
- 3.2 The NPPF does not refer to a need to change Green Belt boundaries. Instead paragraph 83 indicates that boundaries should be '*capable of enduring beyond the plan period*'. Having regard to the considerations set out above and to the protective policy the NPPF sets out for Green Belt, Bristol City Council considers it is likely that existing Green Belt boundaries are readily capable of enduring beyond the plan period.