

**MATTER 22 – COMMUNITIES OF THE NORTH FRINGE / CRIBBS / PATCHWAY / EAST OF HARRY STOKE AND UNIVERSITY OF THE WEST OF ENGLAND**

- 1.1 The following statement is made by Pegasus Planning Group on behalf of our clients Ms N. Keller and Mr P. Keller. Our clients own a plot of land 'West of the A4018' which is proposed to be designated as 'Green Belt land within the Cribbs Patchway Neighbourhood' by the South Gloucestershire Post-Submission Core Strategy.
- 1.2 A site plan and further details of our clients land was provided as part of our February 2012 representations and is therefore not repeated here.

**QUESTION 6 – IS IT REALISTIC TO EXPECT THE RANGE AND TYPE OF FACILITIES REQUIRED CAN BE PROVIDED AS PART OF THE CRIBBS/PATCHWAY NEW NEIGHBOURHOOD**

- 1.3 Our statement is concerned with the Haw Wood Character Area of the New Neighbourhood which Policy CS26 defines as "*a new residential community to the west of the A4018 for approximately 1,000 dwellings, including sporting and community facilities and strategic green infrastructure*".
- 1.4 Three parcels of land are identified within the Councils SHLAA as making a contribution to the Haw Wood Character Area:
- SHLAA118: 41.38 Ha, theoretically capable of delivering 1,448 dwellings;
  - SHLAA125: 13.52 Ha theoretically capable of delivering 473 dwellings; and
  - SHLAA126: 3.46 Ha theoretically capable of delivering 121 dwellings.
- 1.5 However, all of the land covered by SHLAA125 is not proposed for release from the Green Belt. All 1,000 dwellings will therefore need to be delivered across SHLAA168, and SHLAA126. A landscape buffer (circa 10 Ha) will be required along the western edge of SHLAA125 to shelter new development from the M5 and a new local centre will be required.
- 1.6 Without releasing SHLAA125, flexibility in terms of delivering the 1,000 dwellings, let alone sporting and community facilities, is therefore limited, particularly if any unforeseen constraints arise.

- 1.7 SHLAA125 is suitable for the delivery of some housing, but is considered to be a particularly suitable location for recreational and community facilities, green infrastructure, and a small element of commercial development (expanded upon below).
- 1.8 In response to the Inspectors question, Pegasus Planning Group therefore consider that without release of the entire area of land 'west of the A4018' it is not realistic to expect the delivery of the range and type of facilities required to support the Haw Wood Character Area. Restricting the developable area by not releasing all land west of the A4018 from the Green Belt will restrict the flexibility of the Masterplan for Haw Wood Character Area, leading to potentially piecemeal, disjointed development.

**QUESTION 8 – ARE PROPOSALS FOR REVISED GREEN BELT BOUNDARIES BOTH TO THE WEST OF THE A4018 AND AS PART OF THE EAST OF HARRY STOKE NEW NEIGHBOURHOOD APPROPRIATE?**

- 1.9 Our statement will refer only to the proposed revision to the Green Belt boundary to the west of the A4018.

**Land west of the A4018**

- 1.10 As demonstrated by our previous representations (February 2012), land to the west of the A4018 is one of the most sustainable locations for residential development in the West of England. It is well located to the existing communities of Bristol and the North 'fringe', is within easy reach of major employment, retail and leisure facilities, and as demonstrated by Figure 5 Of the Core Strategy, is extremely well related to existing and planned public transport facilities.
- 1.11 For these reasons, Land to the west of the A4018, including the land owned by our client, was identified within the Regional Spatial Strategy as an area of search to accommodate longer term development. The Council's Sustainability Appraisal confirmed that combined with development of Filton airfield, development of greenfield 'land west of the A4018' will support the provision of sustainable transport measures and community facilities to support a thriving a healthy new community.
- 1.12 As demonstrated by the Councils Strategic Green Belt Assessment, exceptional circumstances exist which necessitate the release of some Green Belt land within South Gloucestershire if the Council is to meet its housing needs in a sustainable

way. These exceptional circumstances are supported by the NPPF which clearly encourages local planning authorities to prepare Local Plans which promote a positive strategy for meeting housing needs.

- 1.13 Based upon the findings of the Council's Green Belt Assessment, 'land west of the A4018' represents the most sustainable location for development and is therefore recommended for removal from the Green Belt. The Council's Green Belt Assessment was undertaken in the context of PPG2, which has now been replaced by the NPPF, however, Pegasus Planning Group consider that the assessment methodology and findings remain robust in light of the NPPF.
- 1.14 The Council's Green Belt Review first considered the extent to which areas of Green Belt within South Gloucestershire fulfilled the 5 purposes of Green Belt set out by PPG2 - these 5 purposes have remained exactly the same within the NPPF. Upon finding that the majority of Green Belt land could be seen to fulfil at least 3 of the 5 purposes, the review then went on to consider which locations would deliver the most sustainable pattern of development.
- 1.15 This approach is supported by the NPPF, which at paragraph 84 states that:
- "When reviewing Green Belt boundaries local planning authorities should take into account the need to promote sustainable patterns of development"*
- 1.16 Based upon a wide range of evidence (including the Sustainability Appraisal, evidence on environmental constraints submitted to the RSS EIP, and transport infrastructure plans) land west of the A4018 represents the most sustainable pattern of development.
- 1.17 Release of land west of the A4018 is therefore highly appropriate in light of the findings of the Council's Green Belt Assessment and Sustainability Appraisal, the general approach of which remains valid in light of the NPPF.

**Proposed new Green Belt boundary west of the A4018**

- 1.18 However, whilst we fully support the removal of 'land west of the A4018' from the Green Belt, we do not support the extent of land proposed for removal and the resulting new Green Belt boundary.

- 1.19 As explained by our previous representations, the Council's decision to release only part of 'land west of the A4018' is not considered to be consistent with national policy, and this remains true in light of the NPPF. The approach cannot therefore be judged as 'sound'.
- 1.20 Much like PPG2, paragraph 85 of the NPPF states that when defining or reviewing Green Belt boundaries, local planning authorities should:
- Not include land which it is unnecessary to keep permanently open;
  - Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
  - Define boundaries using physical features that are readily recognisable and likely to be permanent.
- 1.21 South Gloucestershire Council currently propose to retain a triangular shaped area of 'land west of the A4018' as Green Belt within the New Neighbourhood Area in the north east corner, bounded by Haw Wood to the west, Hallen Railway line to the south, and Station Road to the east. This area of land is known as 'SHLAA125: Land at Cribbs Causeway' within the Council's December 2011 SHLAA.
- 1.22 The decision to retain this area of land as Green Belt, whilst releasing the rest of 'land west of the A4018' is not consistent with the advice provided by paragraph 85 of the NPPF.
- 1.23 If the Council were to follow the advice provided by the NPPF they would recognise that this left over 'green wedge':
- Does not need to be kept permanently open. It is a highly sustainable location (as confirmed by the Council's Green Belt Assessment) which is suitable for various forms of development (a mix of residential, commercial, leisure and open space) which can contribute to the New Neighbourhood at Haw Wood;
  - Will not perform any of the five purposes of Green Belt (please see Table 1 of our February 2012 representations);
  - The M5 represents the most readily recognisable, permanent boundary for Green Belt to the east;

- The Council cannot be confident that this piecemeal wedge of Green Belt will not need to be released to support the New Neighbourhood before the end of the plan period.

1.24 If the Council wishes to protect this land for recreational or community facilities it should do so as part of the Masterplan for the Haw Wood Character Area, informed by a complete evidence base which has considered all possible options for the New Neighbourhood. By retaining this wedge of land as Green Belt at this stage the Council are prejudicing the masterplan for the area, which makes a mockery of the masterplan SPD (which should be informed by objectively assessed evidence and stakeholder engagement) proposed by Policy CS26, and at this stage the Council cannot be confident that this represents the best arrangement for the masterplan.

#### **Contribution of our clients land to the New Neighbourhood**

1.25 Based upon the findings of the Council's SHLAA our clients land was identified as being suitable for the delivery of residential development. However, we are aware of the presence of a nearby oil depot and pipelines (Hallen GPSS) which place some of the land within HSE consultation zones. Further advice from the HSE is required to determine the exact restrictions which would be applied, nevertheless, HSE PADHI guidance indicates that the land does not need to be kept permanently open or completely free from all forms of development.

1.26 The land therefore has the potential to contribute to the provision of some housing, and in particular, the community and recreational facilities and strategic green infrastructure required support the New Neighbourhood.

1.27 By leaving the land east of Haw Wood as Green Belt the Council will fail to capitalise on the contribution this could make to the New Neighbourhood and instead be left with a poor quality area of open space. The land is already characterised by built-form associated with private sports facilities therefore does not provide attractive open space that can be used by all of the community.

1.28 The land closest to Haw Wood in particular provides a logical location for green infrastructure, to serve the Haw Wood Character Area of the New Neighbourhood and provide a strategic green link between Bristol and South Gloucestershire. Such recreational facilities and green infrastructure provision is sought by Policy CS26 in connection with the Haw Wood Character Area.

- 1.29 Some participants are concerned that the increase in housing numbers and associated population could impact negatively upon Haw wood, a locally important wildlife site. By using a proportion of land east of Haw Wood to create high quality open space accessible to all of the new community; it would act as a 'buffer' zone to Haw Wood. Providing an area of high quality recreational land for use by residents of the new neighbourhood will encourage recreational use of this land rather than the Haw Wood itself, helping to minimise the impact upon wildlife.
- 1.30 Whilst the provision of some facilities for outdoor sports and recreation is considered appropriate development within the Green Belt (NPPF paragraph 89), this does not justify the need to keep the land within the Green Belt (or the need to keep the land permanently open). If the Council wishes the land to contribute to the provision of open space or green infrastructure associated with the new neighbourhood (as indicated by its inclusion within the New Neighbourhood boundary) it should release it from the Green Belt (in line with national policy) and use a more appropriate designation informed by the masterplan for the Haw Wood Character Area. Removal of the land from the Green Belt would reduce restrictions on the type and design of facilities that can be provided so as to better meet the needs of the new neighbourhood.
- 1.31 As identified by the Councils Open Space Audit (2010) and the New Neighbourhoods Delivery Statement Cribbs/Patchway Update (December 2011) the provision of recreational space across the north fringe of the Bristol urban area needs specific consideration to address existing shortfalls. In order to ensure that disjointed piecemeal green infrastructure is not provided within the Haw Wood character area, a comprehensive masterplan is needed for the area.
- 1.32 The provision of open space and recreational facilities associated with the Haw Wood Character Area must be located to the west of the A4018 if it is not to become disjointed and inaccessible from the majority of the residents. By restricting the developable area the Council are removing flexibility within the Masterplan.
- 1.33 The NPPF encourages local authorities to be flexible in their policies and housing supply in order to respond to unforeseen needs of changing circumstances. At the New Neighbourhood, South Gloucestershire Council are removing flexibility by restricting the area of land available for development. This will restrict the Councils capacity to respond to any currently unidentified constraints and the possibility that

other sites identified as part of the Council's housing supply fail to come forward in the timescales anticipated or deliver the numbers anticipated.

- 1.34 In answer to Inspectors questions Pegasus Planning Group therefore believe that the proposed removal of 'land to the west of the A4018 is entirely appropriate, however the proposed change to the Green Belt boundary in this area is not. Based upon its evidence base the Council has no justification to retain 'Green Belt land within the New Neighbourhood' west of the A4018 The revised Green Belt boundary proposed west of the A4018 is therefore not justified, effective or consistent with national policy.
- 1.35 The Green Belt boundary west of the A4018 cannot therefore be considered sound as currently proposed.

