

View Response

Response #964661

From Bristol and England Properties...

Agent Daniel Millward - Pegasus Grou...

Date Started: 17 May 2021 12:18. Last modified: 17 May 2021 12:18

Status Complete

1: Understanding who is responding

Please help us understand the type of groups and people that are responding and engaging with the preparation of our new Local Plan, by choosing which one of the following stakeholder groups you best represent.

You must choose one option to be able to submit your response.

You must provide an answer to this question.

Developer, land agent or site promoter

If other, please state:

«No response»

2: Comments on the Sustainability Appraisal

If you have any comments on the Sustainability Appraisal please tell us below:

7. SUSTAINABILITY APPRAISAL FOR THE PHASE 1 DOCUMENT:

7.1 There does not appear to be a specific set of questions relating to the Sustainability Appraisal for the Phase 1 document. However, we have made some general observations below, principally in respect of the approach to the Green Belt.

7.2 Paragraph 3.27 acknowledges Green Belt as a planning consideration, but not a specific sustainability issue that needs to be addressed through the SA. Indeed, the Green Belt designation and desire to protect it is often a barrier to delivering sustainable development. Where Green Belt constrains development around an urban area with development pressures, development is simply pushed further away from the centre leading to longer commuting times, dormitory settlements, and less sustainable patterns of development.

7.3 Furthermore, Green Belt land is often among the most sustainably located land within a District and its release has the potential to make a significantly greater contribution to the wider objectives and guiding principles of the Plan.

7.4 We understand that the Council has included the protection of the Green Belt as an objective to be assessed through the SA, with a view to understanding how the various building blocks would contribute to its protection. However, it is important that any SA of development options needs to be 'policy off' in Green Belt terms because whether land is or is not designated as such is essentially irrelevant in sustainability terms.

7.5 This is why we have concerns with the SA's conclusion that the loss of Green Belt land may have a minor adverse impact in sustainability terms on the basis that it supports the optimisation of development density and Brownfield sites (paragraph 4.18). It is our view that Green Belt releases are only considered once all other reasonable alternatives have been considered, including how development within existing urban

areas can be maximised. As such, whether Green Belt land is released or not, has no real bearing on the extent to which Brownfield sites are maximised.

7.6 This is not to say that Green Belt land should not be protected. National Policy is clear in that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated. However, the development of Green Belt land is not inherently more or less sustainable than the development of non-Green Belt land and so it should not factor into the SA.

7.7 The significant adverse impacts of the five building blocks to the Green Belt identified in Table 4.4 of the SA are essentially irrelevant for the purposes of assessing sustainability.

7.8 This is also the case at Table 4.7 which summarises the sustainability effects of options for growth at rural communities in the context of the Green Belt. The fact that Option 2 would have a significant adverse impact on the Green Belt, compared with a minor positive impact of Option 1 is irrelevant for the purpose of the Sustainability Appraisal. What is important is that Option 2 performs as well or better against all of the other SA objectives.

7.9 That said, it does not appear that the consideration of impacts to the Green Belt have affected the SA's recommendations and we note its support for the exploration of Green Belt releases to meet the District's development needs.

3:

Upload an attachment

You can upload up to 10 files.

«No files»