

**BACKGROUND TO THE PROPOSED AMENDMENTS TO THE B&NES CORE STRATEGY NOVEMBER 2013**

**1.0 INTRODUCTION**

1.1 The [Schedule of Amendments](#) to the B&NES Core Strategy was published for public comment on 11<sup>th</sup> November 2013. Most of these amendments have arisen from the Council's consideration of outstanding matters raised by the Inspector in his note ref ID/40. This paper sets out the Council's response and why changes have been made as a result. These relate to;

- Calculation of the 5 year Housing Land Supply
- Allocation of strategic development sites in the Green Belt and the consideration of Safeguarded Land
- Non-strategic Green Belt sites on the edge of Bath and Keynsham
- Sites at smaller settlements in the Green Belt
- Major Existing Developed Sites in the Green Belt
- Clarity on the policy for Twerton and Newbridge Riverside.

**2.0 Calculation of the 5 year Housing Land Supply**

2.1 In ID/40, the Inspector raised preliminary issues about the Council's calculation of the five year housing land supply. The Inspector has subsequently issued ID/40 which sets out the matters that he considers need to be addressed in relation to the Strategic Housing Market Area.

2.2 In response to the Inspector's comments in ID/40, the Council has proposed amendments to Policy DW1 but the full explanation of this will be more helpfully set out as part of the Council's broader response to ID/42. The Inspector has set a deadline of 22<sup>nd</sup> November 2013 for the Council's response.

2.3 The Amendments to the Core Strategy also set out more specifically the Council's proposals for the review of the Core Strategy in light of the Inspector's comments in ID/39 paras 15 & 16.

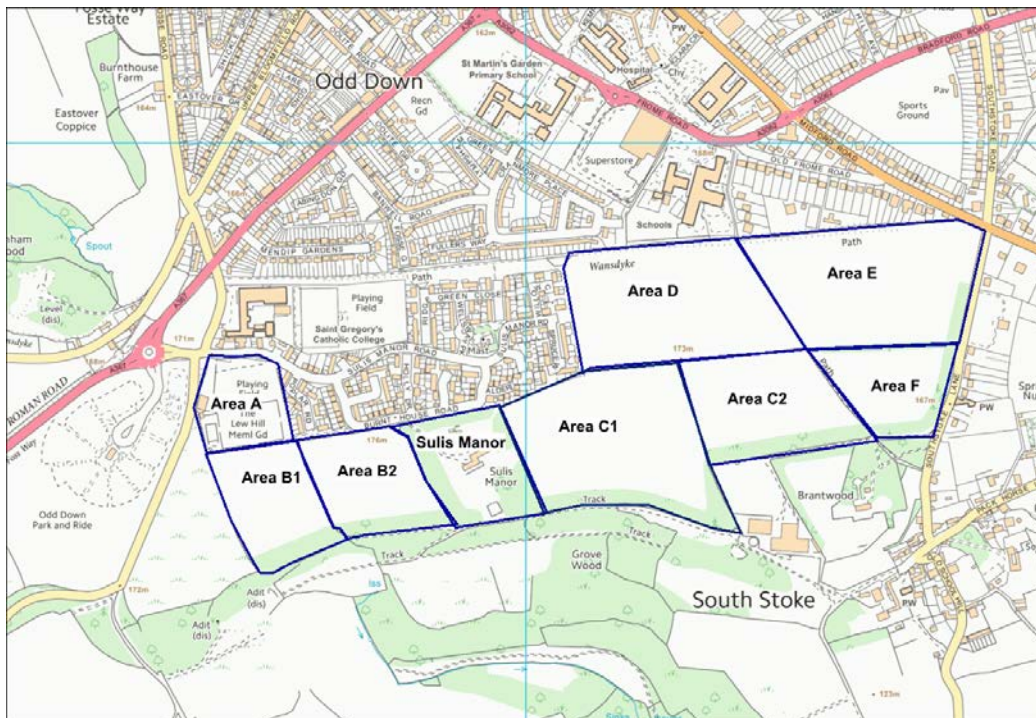
### **3.0 ALLOCATION OF STRATEGIC SITES IN THE GREEN BELT & IDENTIFICATION OF SAFEGUARDED LAND**

- 3.1 The identification of the broad locations to meet the needs of development in the Proposed Changes to the Core Strategy (March 2013) was informed through the Sustainability Appraisal (SA) process, based on the necessary level of evidence. The SA informing these changes is presented in the SA report (CD9/A1/2) and Annex L (CD9/A1/5). In order to identify the most suitable sites within the broad locations previously identified, further site assessments were undertaken in these locations to identify the areas that offer reasonable prospects of accommodating the required uses and capacities using the same SA framework. The outcomes are presented in Annex O (CD10/A1/3). This paper therefore needs to be read in conjunction with the SA appraisal in order to be properly understood.
- 3.2 In order to identify specific sites for allocation and detailed Green Belt boundary changes, further detailed evidence has been required and this is listed in the updated [Core Documents list](#).
- 3.3 The more precise allocation of sites has also required further SA (CD10/A1). This has entailed the assessment of land parcels in the broad locations in order to ascertain the most sustainable options (CD10/A1). The new evidence and the results of the SA are also reflected in the updated SHLAA.
- 3.4 This paper summarises how the Council has drawn on the SA and other evidence in order to assess the options, decide on the most appropriate sites for allocation and draw revised Green Belt boundaries at each of the five locations.
- 3.5 The Council explained in BNES 47 paras 5.12 to 5.29 how it had considered the issue of Safeguarded Land and why it concluded that it was more appropriate to address this issue in conjunction with the other WoE Authorities as part of the planned review. However, in ID/40 para 24, the Inspector continues to be concerned whether the consideration of Safeguarded Land will be properly addressed and taken forward effectively. The Council acknowledges that its proposed approach could be dependent on an external trigger for additional housing land such as the need to accommodate needs from Bristol. Such a requirement may not be forthcoming leaving the issue of Safeguarded Land in B&NES unaddressed. It has therefore given the matter further consideration in the B&NES context as part of the assessment of the allocation of sites below.

## Odd Down, Bath

### *Development Area*

- 3.6 In March 2013, based on the evidence available at the time, the Council identified land in the Green Belt at Odd Down for around 300 dwellings. Using this and also more recent evidence to inform the Sustainability Appraisal (CD10/A1) process, the Council has assessed in more detail the sustainability, suitability and deliverability of land parcels available for development. These land parcels are illustrated in **Map 1** below. This paper does not reproduce the assessments made in the Sustainability Appraisal but sets out high level findings.
- 3.7 The proposed site allocation is shown on the Policies Map and illustrated on the concept diagram to be read with revised **Policy B1A**.
- 3.8 Whilst the Odd Down location is strategically well located for development, as evidenced in the March 2013 Council report, the area is also subject to considerable environmental sensitivities with some significant international, national and local heritage, landscape and ecological designations. The group effect of these is substantial and this impacts greatly on the capacity of this location. Whilst all land cells have some environmental value, the Sustainability Appraisal shows that this impact is less on land parcels A and parts of B1, B2, C1, C2 & Sulis Manor. These parcels therefore form the core of the site allocation.



Map1: Extract from Sustainability Appraisal Annex O (November 2013)

- 3.9 Land to the west of area B1 has been excluded as the development of this area is deemed to be too harmful in terms of landscape and visual impact and impact on heritage assets. While it may be considered in terms of replacement sports pitches, subject to design, these could be appropriate uses in the Green Belt and therefore this was excluded from the site boundary.
- 3.10 Manor Farm is included within the site boundary as the landowner is promoting the farm area for further employment development through the conversion of existing buildings within the remit of Green Belt policy. Whilst this objective is not a requirement of the Core Strategy, the provision of additional employment space in this way within the remit of Green Belt policy has merits and so the Core Strategy seeks to facilitate this by including it in the site but retaining the cluster of farm buildings within the Green Belt. This approach would enable links between new development and this employment land to be considered as part of a Masterplan.
- 3.11 The evidence shows that development of housing on Cell D is likely to cause substantial harm to the Wansdyke Scheduled Ancient Monument and its setting. However, excluding this from the site would not allow potential options for this area to be considered fully as part of a Masterplanning process and for a finer resolution assessment to be undertaken and the precise northern boundary of development to be determined. Excluding this area limits the flexibility to consider its role further, for example, there could be potential for open uses here such as sport pitches which avoids substantial harm. The inclusion of this area within the site also facilitates improvements to the management of the Wansdyke (being within the site boundary) and to enhanced pedestrian/cycle connections with local facilities. This area does not perform as strongly in Green Belt terms as other parts of the plateau and Green Belt policy is not intended to be used to protect the setting of Scheduled Ancient Monuments, there are bespoke policies that afford this protection. Necessary safeguards are included in the Placemaking Principles to ensure that substantial harm is avoided.

#### *Alternative Options*

- 3.12 The Council did consider the option of excluding area D from the site but for the reasons given above, has rejected this option. However, this option has been published for comment (Option BT2) to enable the full range of views to be considered through the examination.
- 3.13 Cells F & E were considered for inclusion but were rejected as the development of these areas is deemed to be too harmful in terms of landscape and visual impact and impact on heritage assets. These parcels in particular have multi-layered environmental sensitivities. Drawing a Green

Belt boundary which encompasses these areas is unlikely to yield additional development capacity.

- 3.14 However as an alternative option, these fields could also be included as part of a larger site with the requirements in the wording of the policy to protect these particular environmental interests. This approach is not favoured by the Council and is not proposed but is published for comment to enable the full range of views to be considered through the examination (Option BT1).
- 3.15 Alternative site boundary options are published for consultation at Odd Down. The land cells tested in the SA (CD10/A1) and discussed above form the alternative options rejected.

#### *Policy Requirements*

- 3.15 The Placemaking Principles/Concept Diagrams are set out in revised Policy B1A and are a response to the evidence base. These also respond to mitigation recommendations included in the SA (CD10/A1) and the Habitat Regulations Assessment (CD10/A2).

#### *Green Belt boundaries*

- 3.16 The site boundary and area removed from the Green Belt is evidentially greater than the potential developable area. This is due to the following factors:
- The need to use appropriate well defined Green Belt boundaries using recognisable physical features as required in the NPPF
  - Uncertainty about the precise southerly, easterly and northerly extent of development and the need for this to be defined through higher resolution assessment as part of the Masterplanning process, as outlined in the Placemaking Principles. Policy B1A has been revised to set out clearly the parameters for the master plan as part of a planning application, and in particular the need to protect environmental interests within the site which constrain the overall site capacity to around 300 dwellings
- 3.17 The *Green Belt Stage 2 Report* (CD9/E9) considers the role of each of the land cells in relation to the Green Belt purposes. The areas of greatest Green Belt harm have been avoided (i.e. cells E, F and land to the east of B1 as shown on **Map 1**).
- 3.18 For the purposes of the Core Strategy the site allocation boundary and the new Green Belt boundary are co-terminus at Odd Down – with the exception of Manor Farm which is included in the site boundary at the request of the

landowner but is retained within the Green Belt. This Green Belt boundary change is depicted on the Policies Map and the Concept Diagram as part of policy B1A.

3.19 The Green Belt boundaries for Odd Down are defined by the following features:

- The site abuts existing development (Sulis Meadows) /the Wansdyke to the north
- An existing field boundary (hedgerow, trees and stone wall) forms the boundary to the east
- An existing hedgerow forms the boundary to the west
- An existing strong tree line forms the boundary to the south

3.20 The inclusion of cell D in the site (**Map 1**) is not considered to constitute an appropriate Green Belt boundary, and there are other policies than Green Belt policies which afford protection to this area.

#### *Safeguarded land*

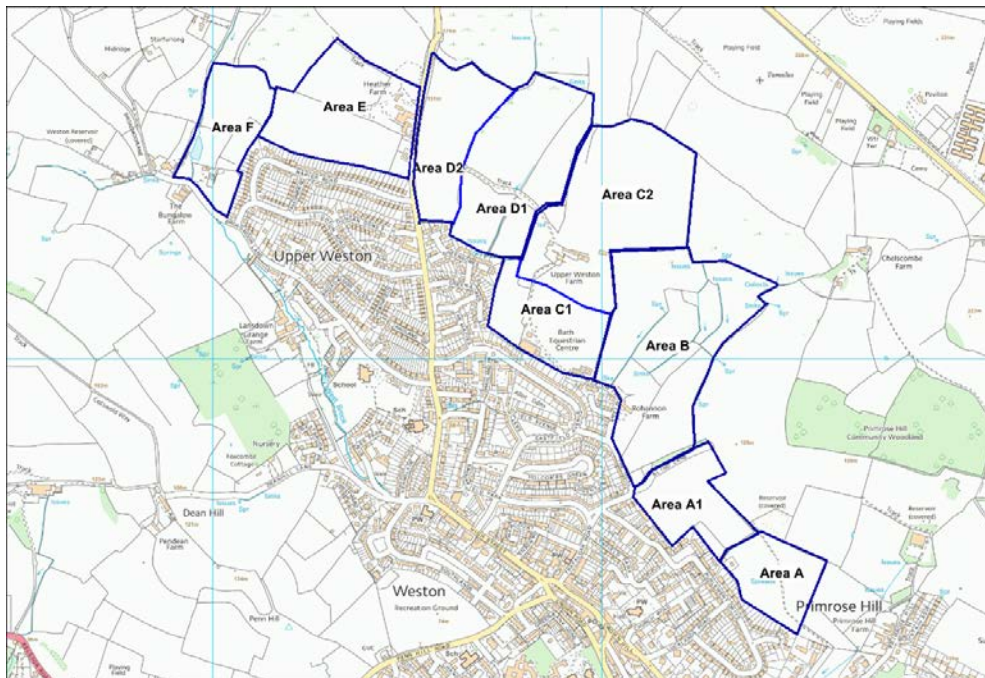
3.21 No Safeguarded Land has been identified at Odd Down, as the Council considers that 300 dwellings constitutes the capacity limit of the site, and that development of a higher level would be harmful. As explained in BNES 47 (para 5.15-5.18), Bath is the most sustainable location for development in the District and it would be inappropriate to safeguard land in a sustainable location if it is available now to meet development needs.

## **Weston, Bath**

### *Development Area*

3.22 In March 2013, based on the evidence available at the time, the Council identified land in the Green Belt at Weston for around 300 dwellings. Using this and also more recent evidence to inform the SA process, the Council has assessed in more detail the sustainability, suitability and deliverability of land parcels available for development. These land parcels are illustrated in **Map 2** below. This paper does not reproduce the assessments made in the SA but sets out high level findings. This paper therefore needs to be read in conjunction with the SA in order to be properly understood.

- 3.23 The proposed site allocation and revised Green Belt boundaries are shown on the Policies Map and illustrated on the concept diagram in revised **Policy B3B**.
- 3.24 The more recent evidence prepared to inform the site allocation has demonstrated that the initial capacity assumptions should be tempered in order to: avoid areas of high harm to the WHS and its setting, AONB (CD9/LV/2) & Heritage Assets (CD9/LV/1); avoid areas of high/medium flood risk and land instability and therefore maintain viability to deliver affordable housing (CD9/I3); overcome transport access objections (CD10/E8); avoid high pressure gas main buffer zone (CD10/E15) and avoid the area designated as a Village Green (CD9/E4).
- 3.25 The council's assessment summarised with reference to the cells in **Map 2**.



*Map 2: Extract from Sustainability Appraisal Annex O (November 2013)*

- 3.26 Areas A, A1, B, C2 are not included in the site primarily as the development of these areas is deemed to be too harmful in terms of landscape and visual impact and impact on heritage assets. In addition, slope and geology associated with flood risk renders many of these areas undeliverable, either being ruled out entirely or having medium level mitigation issues which would render policy complaint housing schemes difficult to deliver (e.g. delivery of affordable would be likely to be significantly compromised). Cell A is also now designated as a Village Green and is therefore unavailable.

- 3.27 Area F is not considered suitable due to a transport objection to development at this location and the costs of relocating the high-pressure gas pipeline which runs through the site. There are also localised flood risk issues, although these might be able to be resolved.
- 3.28 Area D1 (Lower Slopes) poses housing deliverability issues, based on current evidence, because it is located within an area of flood risk (surface water) which has a natural flood route through the site. The costs of remediating the flood risk (medium risk) would significantly undermine the provision of affordable housing, the main reason why sites need to be released from the Green Belt. Furthermore, appropriate access to this site has not been identified.
- 3.29 The development of the upper slopes of cells D1 and E would be significantly harmful in terms of landscape and visual impact.
- 3.30 The development of the eastern part of area C1 would be harmful in terms of landscape and visual impact and impact on heritage assets. However, a lack of a recognisable physical feature means that the Green Belt boundary has been drawn to include this land. The precise easterly extent of development will be defined as part of the Masterplanning process. Necessary safeguards are included in the Placemaking Principles to ensure that substantial harm is avoided.
- 3.31 Similarly the development of the western part of area E is deemed to be too harmful in terms of landscape, visual impact, impact on heritage assets and due to underlying geology. However, a lack of a recognisable physical feature means that the Green Belt boundary has been drawn to include this land. The precise westerly extent of development will be defined as part of the Masterplanning process. Necessary safeguards are included in the Placemaking Principles to ensure that substantial harm to recognised assets is avoided.
- 3.32 No alternative site boundary options are published for consultation at Weston.

*Policy Requirements*

- 3.33 The Placemaking Principles/Concept Diagrams are set out in revised Policy **B3B** and are a response to the evidence base. These also respond to mitigation recommendations included in the Sustainability Appraisal (CD10/A1) and the Habitat Regulations Assessment (CD10/A2).



### *Green Belt boundaries*

- 3.34 The site boundary and area removed from the Green Belt is marginally greater than the potential developable area. This is due to the following factors:
- The need to use appropriate well defined Green Belt boundaries using recognisable physical features
  - Uncertainty about the precise easterly extent of development of land behind Eastfield Avenue and the westerly/northerly extent of development at Land west of Lansdown Lane and the need for this to be defined through higher resolution assessment as part of the Masterplanning process, as outlined in the Placemaking Principles.
- 3.35 The *Green Belt Stage 2 Report* (CD9/E9) considers the role of each of the land cells in relation to the Green Belt purposes. The areas of greatest Green Belt harm have been avoided (i.e. parts of E, C2 and B as shown on **Map 2**). The land taken out of the Green Belt has been minimised.
- 3.36 The Green Belt boundaries for Weston are defined by the following features:
- Land east of Lansdown Lane – bounded by development to the south, the new Green Belt boundary utilises existing field boundaries to the north and west and Lansdown Lane to the west.
  - Land east of Lansdown Lane – bounded by existing development and a lane to the south, utilises existing field boundaries to the north and west and Lansdown Lane to the west.
  - Land behind Eastfield Avenue – bounded by existing development to the south and west, the new Green Belt boundary utilises existing field boundaries to the east and north.

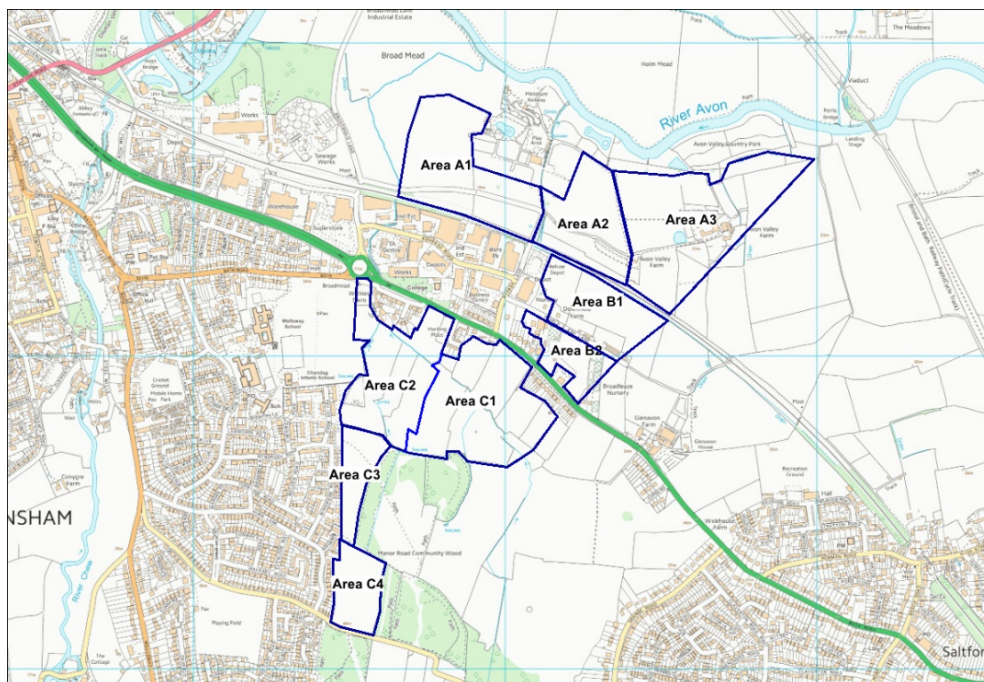
### *Safeguarded Land*

- 3.37 No Safeguarded Land has been identified at Weston, as the Council considers that 150 dwellings constitute the capacity limit, and that development of a higher level would be harmful/not deliverable.

## East Keynsham

### Development Area

- 3.38 In March 2013, based on the evidence available at the time, the Council identified land in the Green Belt at East Keynsham for around 250 dwellings. Using this and also more recent evidence to inform the SA process, the Council has assessed in more detail the sustainability, suitability and deliverability of land parcels available for development. These land parcels are illustrated in Map 3 below. This paper does not reproduce the assessments made in the SA but sets out high level findings. This paper therefore needs to be read in conjunction with the SA in order to be properly understood.
- 3.39 The proposed site allocation and revised Green Belt boundaries are shown on the Policies Map and illustrated on the concept diagram in revised Policy KE3 The Council's assessment summarised with reference to the cells in **Map 3**



Map 3 Extract from Sustainability Appraisal Annex O (November 2013)

### Development Area

- 3.40 The allocated site (residential development on C2 and the western part of C1, and employment development on the western parts of B1 and B2) is located either side of the A4. The allocated site performs well in the SA in sustainable transport terms, has good potential to improve linkages between the new and

existing communities, local schools and the community woodland; and, well located for new employment use adjacent to the current employment area. The site has less impact on the Green Belt than land north of the railway line.

- 3.41 The residential site is allocated for 250 dwellings which would normally require around 8ha of land at 40dph. The allocated site is approximately 12ha in size in order to take into account of the need to provide land for a primary school (c.1ha); take account of an element of flood zone which it is assumed will prevent development in the North West corner of the site (c.1ha); and because of the need to follow strong and permanent Green Belt boundaries.
- 3.42 The employment site requires an area of land of between 6 and 7ha in order to accommodate 30,000sqm of employment floorspace. The allocated site is 7.5ha in size because of the need to follow strong and permanent Green Belt boundaries.

#### *Green Belt Boundaries*

- 3.50 The Green Belt boundaries for East Keynsham are defined by the following features:
- Manor Road Community Woodland to the south / south east
  - Existing hedgerows to the east
  - A terrace of houses along the southern side of the A4
  - An existing hedgerow between the A4 and Worlds End Lane
  - An existing fence between Worlds End Lane and the railway line (this boundary to be strengthened as shown on the concept diagram)
  - The railway line to the north of the site

#### *Policy Requirements*

- 3.51 The Placemaking Principles/Concept Diagrams are set out in revised Policy KE3 and are a response to the evidence base. These also respond to mitigation recommendations included in the SA and the Habitat Regulations Assessment.

### *Alternative Option KM2*

- 3.43 An alternative approach would have been to allocate a more linear site alongside the eastern edge of the town. This would include land east of Minsmere Road (C3) along with land immediately to the north to the A4 (C2). Reasons for rejection include access to the site (it relies on C2 to be developed first in order to get access to the A4), it is further from the main public transport corridor and town centre; and has less solar potential than the allocated site due to its orientation. However, this area has been included as Safeguarded Land for future development beyond the plan period once the allocated site has been developed.

### *Alternative Option KM1:*

- 3.44 Land north of railway is being proposed by the River Regeneration Trust (A1-A3). The proposals put forward for this area include a potentially innovative mix of housing and employment land, and which could also include other uses such as a marina. Reasons for rejection include uncertainty regarding the deliverability of infrastructure (including access to the site, which would require connections to the A4175 and a bridge over the railway line to the A4); greater impact on the Green Belt than the allocated site (shown to cause harm to 4 of the 5 national Green Belt purposes and also harm to the local Green Belt purpose); greater landscape and visual impact harm (shown in the SA to be a major negative effect); and being more remote from the town centre than the allocation. The site would require large areas of land to be removed from the Green Belt due to limited physical features in parts of the site that could be used as new, defensible Green Belt boundaries.

### *Safeguarded land*

- 3.45 In BNES 47 para 5.18, the Council explained why no safeguarded land was identified at Keynsham as follows;

*“5.18 At Keynsham, the capacity of the two urban extensions is a result of infrastructure constraints and the Green Belt. East Keynsham is the most sustainable location for an urban extension in terms of transport and access to facilities. However, the impact on the A4, the existence of a major gas line and the difficulties in accessing land north of the railway line constrain the level of development. In terms of Green Belt, the Keynsham - Saltford gap is a highly sensitive part of the Bristol Bath Green Belt (see Stage 1 Green Belt Review, CD9/E2). Based on this analysis, the Council cannot justify a greater level of development. If it could then it should allocate this now due to the sustainable advantages of this location. As with Bath, it would be inappropriate to safeguard land in a sustainable location if it is available*

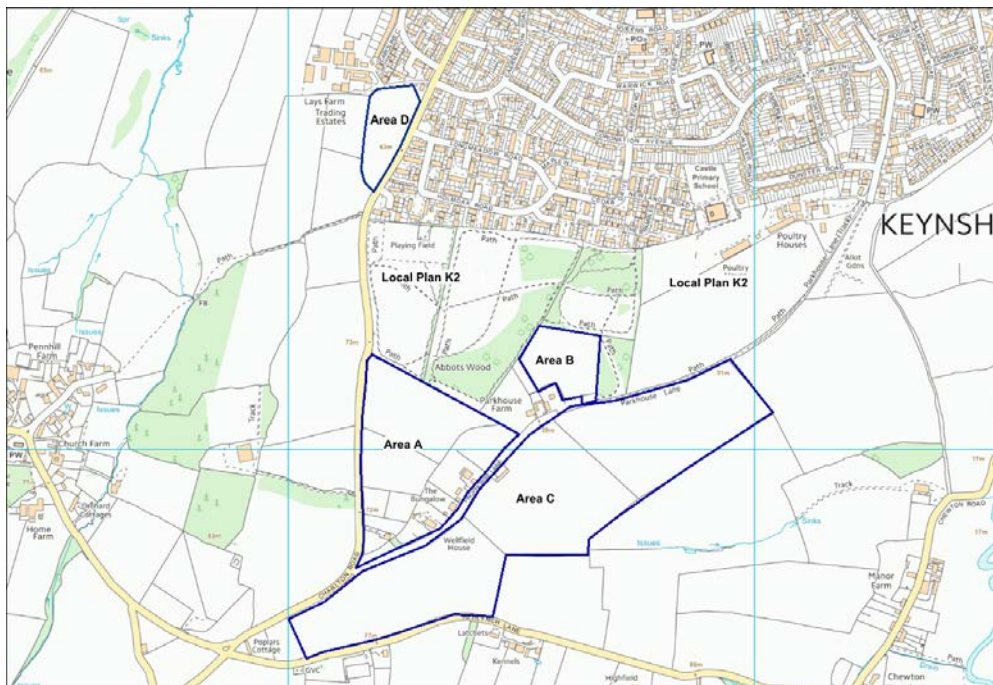
*now to meet development needs. Moreover, there is insufficient evidence to demonstrate that the issues that are constraining the capacity of this location could be adequately overcome and hence it would be unsound to safeguard land for the long term. “*

- 3.46 As stated in para 3.5 above, the issue of safeguarded land in the Core Strategy has been reviewed. The assessment of land parcels indicates the existence of additional, available and suitable land for development east and south of the allocated site. The Council maintains that it is premature to bring this land forward for development now for the same reasons that development is constrained to about 250 dwellings in this location. Whilst the Green Belt arguments are not so significant, the transport capacity limits the acceptable amount of development. There is no convincing evidence that these constraints can be overcome during the plan period.
- 3.47 Therefore, it is proposed that safeguarded land is identified at east Keynsham as shown in the Schedule of amendments (CSA35) in order to meet longer-term development needs beyond the plan period. This will ensure that the Green Belt boundary here will endure beyond the plan period, and will not need to be altered at the end of the plan period. Even then, the development of this land will be subject to demonstration that transport constraints can be properly addressed (as per NPPF paragraph 32).
- 3.48 This is considered to be the most appropriate location for safeguarded land east of Keynsham; development of C1 causes less harm to the Green Belt than land north of the railway (harm to purpose 3, limited harm to purpose 2 and the local 6<sup>th</sup> purpose) and has many of the benefits of the allocated site in terms of its location adjacent to the A4. Development of C3 only harms purpose 3 of the Green Belt, would have the advantage of being close to local services (local centre and schools), would provide a through public transport route from the A4 to the Chandag Estate and provide a more positive frontage to between the built up area of Keynsham and Manor Road Community Woodland than currently exists.
- 3.49 In the mean time, in the interests of clarity, this land will be treated as Green Belt. Otherwise there would be considerable ambiguity on the policy for this area and what uses are acceptable.

## South West Keynsham

### *Development Area*

- 3.52 In March 2013, based on the evidence available at the time, the Council identified land in the Green Belt South West of Keynsham for around 200 dwellings. Using this and also more recent evidence to inform the SA process, the Council has assessed in more detail the sustainability, suitability and deliverability of land parcels available for development. These land parcels are illustrated in Map 4 below. This paper does not reproduce the assessments made in the SA but sets out high level findings. This paper therefore needs to be read in conjunction with the SA in order to be properly understood.
- 3.53 The proposed site allocation and revised Green Belt boundaries are shown on the Policies Map and illustrated on the concept diagram in revised Policy KE4
- 3.54 The allocated site (area A) is located to the east of Charlton Road, to the north of Parkhouse Lane, and to the south of K2a / Abbots Wood. The allocated site performs well in the SA in that it contributes to improving health and well-being by enabling accessibility to the countryside and improving green infrastructure; potentially improving public transport provision in this area of Keynsham; and linking to K2a to the north.



*Map 4 Extract from Sustainability Appraisal Annex O (November 2013)*

- 3.55 The residential site is allocated for 200 dwellings which would normally require around 6ha of land at 35dph. The allocated site is approximately 8ha in size in order to take into account the need to provide land for green infrastructure (c.2ha).

*Green Belt Boundaries*

- 3.56 There are clearly defined Green Belt boundaries for South West Keynsham which are;

- Charlton Road to the west
- Parkhouse Lane to the south / south east
- An existing hedgerow to the north

*Alternative Option KM3:*

- 3.57 The Council also considered the allocation of the triangular field south of Lays Farm / west of Charlton Road, on the western side of Charlton Road (Area D above). Development of this field (unlike the other fields immediately surrounding it) would not result in a narrowing of the Green Belt gap between Bristol and Keynsham. With a capacity of around 50 dwellings, this site does not have the capacity to be a full alternative for the land required. It could provide a partial alternative but not additional development land because the transport evidence indicates that a greater level of development than that proposed in Policy KE4 would have an even more serious impact on the congestion in the town centre. The proposal in Policy KE4 has the benefit of accommodating 200 dwellings as part of a comprehensive scheme.

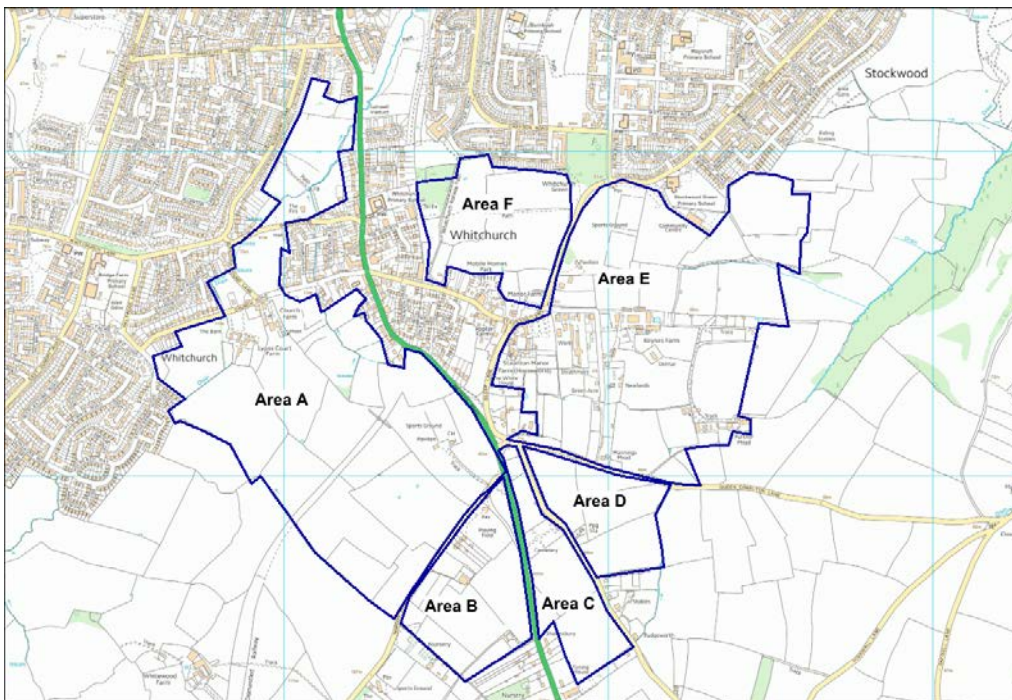
*Safeguarded land*

- 3.58 The site allocation of land at KE4 uses all the suitable development land and the configuration of Green Belt boundaries does not lend itself to identifying safeguarded land. Moreover, safeguarded land at Keynsham is already identified at East Keynsham. The site south of Lays Farm does not have the capacity to be a strategic reserve.

## Whitchurch

### *Development Area*

- 3.59 In March 2013, based on the evidence available at the time, the Council identified land in the Green Belt at Whitchurch for around 200 dwellings. Using this and also more recent evidence to inform the SA process, the Council has assessed in more detail the sustainability, suitability and deliverability of land parcels available for development. These land parcels are illustrated in **Map 5** below. This paper does not reproduce the assessments made in the SA (CD10/A1) but sets out high level findings. This paper therefore needs to be read in conjunction with the SA in order to be properly understood.
- 3.60 The proposed site allocation and revised Green Belt boundaries are shown on the Policies Map and illustrated on the concept diagram in revised **Policy RA5** .



Map 5: Extract from Sustainability Appraisal Annex O (November 2013)

### *Development Area*

- 4.61 The area removed from the Green Belt is marginally greater than the developable area due to the need to use appropriate well defined Green Belt boundaries using recognisable physical features. The site boundary is slightly smaller to exclude some existing employment uses.



- 3.62 The *Green Belt Stage 2 Report* (CD9/E9) considers the role of each of the land cells in relation to the Green Belt purposes. The areas of greatest Green Belt harm have been avoided (i.e. A and F and the northern part of E) as shown on **Map 5**). The land taken out of the Green Belt has been minimised.
- 3.63 Areas A & B are not included as development of this area is deemed too harmful in Green Belt and heritage terms. This is also within a Strategic Green Infrastructure corridor. Development of a large part of this area is deemed to be too harmful in terms of landscape and visual impact and impact on heritage assets. Transport officers consider that development on this side of the A37 would lead to in severe problems on A37 as no alternative routes are available.
- 3.64 Areas C & D are not included as development is considered to be too peripheral. Development of these areas is deemed to be harmful in terms of landscape and visual impact.
- 3.65 Area F and the northern part of E is not included as development of this area is deemed too harmful in Green Belt terms. This is also within a Strategic Green Infrastructure corridor.
- 3.66 Alternative sites are published for consultation at Whitchurch. The land cells tested in the SA (CD10/A1) and discussed above form the alternative options rejected.

#### *Green Belt boundaries*

- 3.67 The new Green Belt boundaries are defined by the following features:
- The allocation abuts existing development to the west
  - Existing strong treed hedgerows to the south and east
  - The private lane to the north-east and north

#### *Safeguarded land*

- 3.68 Unlike at Keynsham, no safeguarded land has been identified at Whitchurch. This is because consideration is being given to identifying the long term needs of B&NES and development in this location is better located to meet the needs of Bristol rather than Bath. Furthermore, the Council is still of the view that the arguments set out in para 5.25 5.28 of BNES47 still apply to Whitchurch;

*“5.25 ..... the decision on SGL is in fact a decision on the location of future long term growth options. Therefore, the other option is not to include a strategic steer on SGL at this stage but to address the issue of SGL with the other WoE Authorities as part of the planned review. This would overcome the risk that B&NES would be prematurely deciding the spatial strategy for long term growth in the sub-region. It would enable a co-ordinated approach to be taken on the longer term spatial strategy for the sub-region. This is of particular significance in light of the fact that Keynsham and Whitchurch currently fall within the Greater Bristol HMA and there are limited opportunities for SGL at Bath.”*

*“5. 28 - Whilst it is not ideal that Green Belt boundaries may need to be reviewed soon after being established in order to identify SGL, the boundaries may need to be reviewed in any case as part of the forthcoming WoE review of Core Strategies in order to meet growth needs identified through the WoE SHMA review. The issue of long term growth and SGL is more effectively addressed in a co-ordinated and comprehensive way.”*

#### **4.0 NON-STRATEGIC GREEN BELT SITES ON THE EDGE OF BATH/KEYNSHAM**

##### **The issues**

- 4.1 The Inspector’s concern in this issue is to ensure that potential non-strategic sites on the inner Green Belt of Bath & Keynsham have an opportunity of being considered in the Placemaking Plan for allocation for development. These sites suggested through the SHLAA ‘Call for Sites’ are listed in BNES47 from page 36 and have been assessed in the revised SHLAA (CD10/E19) which shows that there are some potentially suitable and available sites which could be considered for allocation during the preparation of the Placemaking Plan.
- 4.2 The most appropriate approach is to make an allowance for such sites which could provide the exceptional circumstances needed to consider their removal from the Green Belt, if justified (see ID/47 para 26).
- 4.2 However, the analysis in section 2 above shows that the Core Strategy identifies sufficient land to meet the District’s housing requirement (including affordable housing) for the plan period without the contribution of these sites. If their allocation is left to the Placemaking Plan they would be unlikely contribute to the 5 year land supply. The five Green Belt sites which are more strategic in nature have been brought forward and allocated in the Core Strategy to contribute to the District’s 5 year land supply plus 20% buffer in line with the NPPF. BNES 47 paras 6.3-6.4 explain that these sites were not

allocated in the Core Strategy as they were not considered a strategic solution to meeting housing needs.

- 4.3 Therefore whilst the Council is sympathetic to the aim of allowing these sites to be considered for allocation, the scope to achieve this is inhibited by the very high test that applies to releasing sites from the Green Belt. These sites would make only a relatively small contribution to supply and they are not needed for the five year housing land supply in the context of the Council's agreed strategy. They must therefore be regarded as objection sites during the examination period.

## **5.0 SITES AT SMALLER SETTLEMENTS IN THE GREEN BELT**

- 5.1 Through concerns raised in ID/36 the Inspector is seeking to ensure that the sustainability merits of modest development in the larger Green Belt villages are considered in the context of strategic release of land from the Green Belt at Whitchurch and an increase in the scale of development at RA1 villages to 50 dwellings. In BNES/47 (paragraphs 6.13 to 6.21) the Council set out the approach it has taken in respect of considering the relative sustainability of development in various parts of the District. The assessment concluded that, within the context of the overall housing requirement and the sustainability led sequential locational preference, the exceptional circumstances required to release land from the Green Belt at the larger (RA1) villages excluded from the Green Belt could not be demonstrated. In ID/40 the Inspector concluded that he could not suggest a way forward at this stage and that the Council's approach would need to be explored further at the hearings.
- 5.2 From the Inspector's note (ID/36) it appears there may be some confusion regarding the application of Policy RA1 to villages excluded from the Green Belt. Therefore, within the context of the Council's position (set out in paragraph 5.1 above and BNES/47) some suggested amendments are included in the schedule to make it clear that Policy RA1 applies to villages excluded from the Green Belt that meet the Policy criteria . This means that development can come forward within the defined HDBs, or through the conversion of existing buildings in line with Green Belt policy, but that as set out above the exceptional circumstances necessary to warrant altering the inset boundaries of these villages to enable development outside the HDBs do not exist.

## **6.0 MEDS**

- 6.1 In paragraph 29 of ID/36 the Inspector suggested that the Council should clarify its approach to Major Existing Developed Sites (MEDS) in the Green Belt, the scope of the intended review of MEDS in the Placemaking Plan and how this relates specifically to the MEDS at Bath Spa University Newton Park campus. In BNES/47 (paragraphs 6.22 to 6.26) the Council responded to the Inspector's concerns and agreed that some amendments to the supporting text of the Core Strategy are needed to clarify the approach to the MEDS. As requested by the Inspector in paragraph 30 of ID/40 the Council's suggested amendments are included in the Schedule of Amendments for consultation. The explanation for these amendments is set out in BNES/47 (6.22 to 6.26) and is not repeated here.

## **7.0 TWERTON AND NEWBRIDGE RIVERSIDE**

- 7.1 In paras 31 and 32 of ID/40 the inspector asked for further clarification of the wording of Policy B3 relating to Twerton and Newbridge Riverside. This is provided and explained in the Schedule of Amendments, change ref **CSA19**, page 14.