

**Issue 3: Is the retention of the general extent of the Green Belt justified?**

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- 1) RPS has noted the Inspector's comments at paragraphs 10.1 to 10.4 of ID/7 and to that end has agreed a Statement of Common Ground with the Council. RPS accepts the notion that any changes necessitated by unsoundness in relation to the Green Belt will have to be referred back to the Council, and if it is willing would have to undergo further consultation. RPS representations on Issue 1 set out how it considers that process could work:
  - In the event that the Inspector recommends that the minimum requirement is for 12,100 homes and requires a proportion of that requirement to meet some of Bristol's needs within its administrative area, an immediate solution to meeting that requirement is through a site specific allocation at Hicks Gate. A sustainability appraisal has already been carried out and its delivery would accord with the policies in the Bristol City CS.
- 2) RPS contends that the 12,100 homes target is ultimately insufficient; this is merely a fall-back position to enable the CS to be found sound and does not reduce in any way the impediment for CS review. Those provisions will need to be clearly set out and will require a Green Belt review of all available options alongside a clear remit for higher economic growth. Such a strategy will at least ensure that the CS can be found sound in the short term and that an appropriate strategy for both B&NES and Bristol is established.
- 3) RPS further acknowledges that the Inspector has set out that he would not be in a position to impose a recommendation for a specific location in the Green Belt<sup>1</sup>. This approach is however contrary to the location specific recommendations that were made for the Bristol CS and to that end, and for the reasons set out below, RPS maintains that there is scope to advance the strategy outlined above to ensure the CS can be found sound.

**The Overall Approach**

- 4) The issues raised in relation to cross-boundary matters in Issue 1 will not be rehearsed again, however, if our contention is right that B&NES has to respond to Bristol growth then there is no alternative but to consider Green Belt release. There is no sense considering alternative provision elsewhere (Bath, Somer Valley etc) even if further land could be identified within those areas since that will not address the issue. In any event, Bath aside, there is no other more sustainable location to accommodate housing and economic growth than on the edge of Bristol.
- 5) There is no contingency within the CS and flexibility needs to be woven in. The options for doing so were debated at length at the Bristol CS examination (higher densities, reliance on windfalls etc) but these were not deemed sufficient as no reliance could be placed on them. Location specific releases are the only practicable means of providing reliable contingency and the necessary degree of certainty.
- 6) Contingency has to be a fundamental element of this CS. Even if the principle of a five year review was accepted then the implications on delivery are stark. Given the Government's agenda and support for sustainable development and the terms of RPG10, there has be an overwhelming sense that the housing and economic provisions in the CS will increase in a CS

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<sup>1</sup> ID7 paragraph 10.2

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review. That process will inevitably necessitate Green Belt review and urban extension consideration. When will that review begin? 2017? When will the revised CS be adopted? Anytime after that presumably, but delays are inevitable and history suggests that this Council is not likely to commit to gathering evidence in three years time to secure an adopted CS Review by 2017. The fact of the matter (as recognised by the RSS Panel) is that urban extension sites inevitably have long lead in periods and under this scenario will not be coming forward until 2020 at best. That is simply a wasted opportunity to respond positively to the Government's agenda and more importantly the negative consequences will be realised as rehearsed in our statement on Issue 1. To that end, if there is dogged insistence that 11,000 homes is an immovable target then the logical consequence (however unpalatable) is to find this CS unsound. This 'event' would at least force the Council's hand to produce a pro-growth CS in the next two years in strict compliance with the Localism Act and NPPF. It remains a shame that those would be two wasted years.

- 7) No doubt the Inspector would look to avoid that scenario however practicable, and to that end, the scenario rehearsed above, we contend has merit. The context for the special circumstances for Green Belt release have been well established for many years, dating back to the adoption of RPG10 and ratified on numerous occasions since.

**Adjoining Bristol**

**Potential to accommodate additional housing in the Green Belt adjoining the Bristol City boundary without serious conflict with the overall purpose of the Green Belt and national policy objectives/legal requirements, and deliverable in relation to integration with development over the City boundary**

- 8) The Statement of Common Ground between RPS and Council Officers establishes that the content of the Officers Report to Council on 15 September 2011 (CD5/24) is relevant. That report establishes that,

*"Hicks Gate area has a critical role in the Bristol-Bath Green Belt maintaining the separation of Keynsham and Bristol. Development at this location would significantly impact on this green belt gap. However, by keeping development back from the ridge-line the highest landscape impact can be significantly avoided. This could also maintain the principle of the green belt gap"* (page 29)

- 9) Similar references are contained within the SA that was updated ahead of the meeting (CD4/A17)

*"...in terms of green belt separation this option (if development is kept back from the ridge line) could go ahead and still maintain the principle of the green belt gap – although the green belt impact remains."*<sup>2</sup>

- 10) The development proposals as set out in the Statement of Delivery have never sought to extend up towards the ridgeline. Of course, it is readily accepted that development here (or anywhere else within the Green Belt for that matter) is inappropriate development and will affect the fundamental objectives of Green Belt Policy. Critically, if it is right that the exceptional circumstances have already been established to justify Green Belt deletion on the edge of Bristol, then the above evidence from B&NES supports the notion that development at Hicks Gate can be acceptable in the context of harm to the retained Green Belt.

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<sup>2</sup> CD4/A17, p.9 Annex K

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11) In terms of its practical integration with adjoining land in Bristol, then depending on how it is viewed, the Hicks Gate location either suffers or benefits from the fact it is a truly cross-boundary site. In terms of suffering then it does so because of the need for cross-boundary cooperation and distinctive lack of it to date. There is no doubt that the promotion of an urban extension in one administrative area in the West of England is more straightforward than two (see South Gloucestershire examples below). RPS has always acknowledged that the site should be promoted comprehensively and that the two authorities must come together to coordinate development and the delivery of infrastructure effectively. On the other hand, the benefits of a cross-boundary site are such that the scope for integration is much higher given the absolute need for the two authorities to come together and ensure both sets of interests are protected. This is less so the case at other urban extension opportunities on the edge of Bristol in both B&NES and North Somerset where the scope for cooperation and integration is much reduced.

12) The context for cooperation is explicit in policy via the Bristol CS:

*“Proposals for urban extensions in the Green Belt beyond Bristol City Council’s boundaries may emerge through the development plans of neighbouring authorities. If appropriate proposals come forward the Council will continue to work with the adjoining authorities to consider the impact on existing areas, to assess infrastructure requirements and to ensure integrated and well-planned communities are created to the benefit of existing and future residents.”<sup>3</sup>*

13) There is clear scope to bring forward development at Hicks Gate through the B&NES CS. Policy BCS5 of the Bristol CS explicitly identifies Hicks Gate as a contingency site (its broad location being identified on the Key Diagram).

**Given that the adopted Bristol Core Strategy identifies Brislington (adjoining Hicks Gate) as a long term contingency for further housing development is the Core Strategy’s silence in relation to development here sound (irrespective of any conclusions on the other issues)?**

14) RPS regards the silence expressed by the CS to be alarming. Officers have sought to belatedly address the matter and this is clearly laid out in their report to Council on 15 September 2011 (CD5/24). Whilst RPS do not accept that a contingency here goes far enough given the reasoning above, it is at least helpful to understand professional Officers opinion. Evidently Officers were looking to respond positively to the Inspector’s original questions and introduce a greater level of flexibility into the CS; the Council chose not to support those recommendations which in the Officers own words leaves the soundness of the CS vulnerable.

15) Arguably the issue of the contingency option was forced upon Bristol City, but the Council did accept it on the basis that it was the only means in which the CS could be found sound.

**Would development adjoining Bristol be an appropriate location? How compatible would it be the rest of the strategy?**

16) Given the context of all our representations to date, and through this examination, the Inspector will not be surprised to learn that RPS considers development on the edge of Bristol to be entirely appropriate. Whilst presently it may not be compatible with the CS, that is only

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<sup>3</sup> Policy BCS6, Bristol CS

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on the basis that it does not refer to it, and for all the reasons already established that is not a justifiable stance. If the Council supports the notion of sustainable development then it cannot dispute the benefits of mixed use development on the edge of Bristol; such a strategy does not conflict with the other strategic aims of the CS.

- 17) The context for the appropriateness of development adjoining Bristol stems back to 2001 and the adoption of RPG10. Every policy advance since then, whether it is at national, regional, county or district level reaffirms the appropriateness of Green Belt review and continued support for sustainable economic, housing, and cultural growth at Bristol. The Bristol CS examination process established that there was a pressing need but insufficient capacity to deal with all of Bristol's issues within its administrative area and thus requires the support of its neighbouring authorities to deliver. Arguably Hicks Gate was not released for immediate strategic development in the Bristol CS purely because it needs to be developed comprehensively and needs B&NES to fall into line. The need for it to do so is well established.
- 18) The housing context in Bristol is worsening. Indeed, despite the fact the Bristol CS has recently been adopted, at a Bristol City Full Council Meeting on 22 November 2011, Cllr R Stone moved:

***“BRISTOL HOUSING CRISIS***

*Council notes that it is becoming increasingly difficult for Bristol residents to obtain a home whether they are buying or renting. Latest reports suggest an income of £42,058pa is necessary to buy an average priced home costing £210,133, yet average income in the city is just £20,722pa. Additionally private sector rents are rising dramatically removing this as a housing option.*

*Council recognises that with nearly 16,000 people currently on the waiting list we are facing a mounting housing crisis which needs radical action.*

*Funding for new build homes with affordable rents has recently been cut by the Government and only 12 council houses were delivered this year when 76 originally were financed by the last government.*

*Council believes we should set a Bristol building target of 5,000 homes over the next 5 years sponsored by the Council – and that this would help kick-start the economy locally providing jobs and apprenticeships as well as desperately needed homes.*

*In addition Council notes the availability of the new Community Infrastructure Levy as a means of providing funding for the infrastructure associated with new housing developments.”*

- 19) Notably, in direct contrast to B&NES, South Gloucestershire Council has taken on the mantle of responsibility and sought to identify strategic levels of growth within the Green Belt to support Bristol's needs. Two Green Belt locations on the edge of the Bristol North Fringe have been identified for development, one as part of the Cribbs Causeway/Patchway development area, the other west of the M32. The revised submission Core Strategy (as reported to Council on 15 December 2011) confirms:

*“In promoting this Strategy for Development, the Council has sought to limit the impact of new housing development on the Green Belt. The Council remains in principle opposed to significantly reducing the Green Belt to accommodate land for housing growth per se. However, in order to meet the need for housing in sustainable*

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*locations, two areas of Green Belt have been released in the North Fringe of Bristol, to the west of the M32 and to the west of the A4018 at Cribbs Causeway.*<sup>4</sup>

- 20) Whilst clearly acknowledging the release of Green Belt land to be regrettable, it goes on to confirm:

*“The Strategy for Development will address these issues [unsustainable commuting patterns and infrastructure provision] by ensuring that new development is concentrated within the Bristol North Fringe and East Fringe urban areas, thereby reducing commuting and the need to travel.”*<sup>5</sup>

- 21) Accordingly, very special circumstances have been identified for both sites, which are rehearsed below;

For Cribbs Causeway: *“This latter site is in the Green Belt, but the need for housing, together with the need to ensure sustainable patterns of development and sustainable communities, represent the exceptional circumstances which justify the release of this land from the Green Belt.”*<sup>6</sup>

For West of M32 (2,000 homes): *“The need for housing and to ensure sustainable development and sustainable communities, in combination with the impact of the Stoke Gifford Transport Link are the exceptional circumstances in which land will be removed from the Green Belt at this location to deliver a new neighbourhood.”*<sup>7</sup>

- 22) The Cribbs Causeway land has historically been identified as a contingency location in the draft stages of Core Strategy preparation. Clearly that established a degree of flexibility but SGC accepts that it did not go far enough:

*“In relation to the Council’s position on the contingency site (land west of the A4018) the following alternative options were considered:*

- releasing the site from the Green Belt and safeguarding it for future use beyond the plan period; and*
- maintaining the site in the Green Belt and continuing its identification as a contingency site.*

*However neither of these two options would have been consistent with national policy, as they would have led to a strategy that would have potentially failed to meet housing need and would not have provided sufficient flexibility to respond to rapid shifts in demand or other economic changes (as required in paragraph 14 of the draft NPPF). This is because in accordance with emerging national planning policy a review of a development plan would be required to release safeguarded land or Green Belt land.”*<sup>8</sup>

- 23) Both authorities are part of the same partnership area and have signed up to the West of England LEP; however, one authority has sought to undertake its responsibilities more diligently than the other. There is a canyon-like difference between the two authorities’ approaches to achieving sustainable development; the SGC CS Examination is in March 2012 and there is no reason why B&NES could not have followed a similar approach. We submit that the SGC Core Strategy and reports submitted to its Full Council Meeting (15 December 2011) be added to the Core Document Library.

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<sup>4</sup> Paragraph 1.39, SGC Revised CS

<sup>5</sup> Paragraph 4.5, SGC Revised CS

<sup>6</sup> Paragraph 4.13, SGC Revised CS

<sup>7</sup> Paragraph 4.17, SGC Revised CS

<sup>8</sup> Paragraph 6.4, SGC Strategic Green Belt Assessment (December 2011)

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- 24) There is no possible reason how B&NES can argue that development on the edge of Bristol is inappropriate or unnecessary.