



**BATH AND NORTH EAST SOMERSET  
CORE STRATEGY EXAMINATION**

**ISSUE 3**

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

10.1 *Responses and subsequent discussion on this sub-matter should not repeat matters most appropriately addressed under Issue 1 (overall provision) or concerns about delivery within the urban area to be addressed in the context of the spatial areas.*

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1.1 In view of the latest information on the household projections and the lack of development opportunities outside the Green Belt, and the uncertainty about the delivery of brownfield sites, Pegasus Planning Group considers that the retention of the Green Belt is not justified.

1.2 The need to review the Green Belt was originally identified in the south west as long ago as 1994 in the first RPG10. Paragraph 4.11 stated that:

*“There are three areas of green belt in the South West – around Bristol and Bath ...Development plans should continue to pursue policies aimed at preventing inappropriate development in the green belts. The need to provide additional development consistent with the principle of reducing the need to travel set out in PPG13, may require some reappraisal of the current configuration of green belts, especially where detailed boundaries have yet to be justified.”*

1.3 RPG 10 produced in 2001, (and currently the RSS until the Orders are produced to implement the Localism Act) also refers to the need to critically review the Green Belt. Policy SS4 states that Green Belts should continue to fulfil the purposes in PPG2. However, as a key element of the future planning of the region, local authorities when preparing their development plans should

- *“...critically review the Green Belt to examine whether boundary alterations are needed to allow for long term sustainable development needs.*
- *Remove land from the Green Belt for development if, on balance, this would provide the most sustainable solution for accommodating future development requirements;*
- *Include additional land within the Green Belt where clearly necessary for the purposes set out in PPG2”*

1.4 The issue was that some growth from the Principal Urban Areas e.g. Bath, Bristol was “leaping” the Green Belt to nearby commuter towns, leading to less sustainable

patterns of development and travel. The RPG stated that the need to ensure that future patterns of development are more sustainable means that the boundaries of these Green Belts should be reviewed in the next round of Structure Plans.

1.5 Policy SS9 Bath also indicated that there was a need to review the Green Belt.

*“The local authority, developers, infrastructure and transport providers and other agencies should work together to achieve the following for Bath:....*

- *Critically review the Green Belt.”*

1.6 The Avon Structure Plan<sup>1</sup> was adopted in September 2002 and a number of its policies are saved<sup>2</sup>. It was prepared in accordance with RPG10 (1994). However, the RPG of 2001 was published after most of the policies in the Structure Plan were agreed for adoption. The Structure Plan states in paragraph 2.17 that the full implications of the new RPG10 would be addressed in the next review of the Structure Plan. It went on to say that the main principles of the Structure Plan’s locational strategy generally conformed to the new guidance.

1.7 The policy towards Green Belt is set out in saved Policy 16. The Structure Plan states that in paragraph 2.21 that it will be for the next Structure Plan Review to address the implications of RPG10 2001, which places more emphasis on the need to review the Green Belt boundaries and to remove land from the Green Belt.

1.8 With the introduction of the Regional Spatial Strategies as a result of the 2004 Planning and Compulsory Purchase Act – the strategic review of the Green Belt became the responsibility of the South West Regional Assembly and was undertaken by the West of England Partnership Joint Study Area (Section 4(4) authorities) as part of the evidence base for the emerging RS.

1.9 More recently the RRS 10 Secretary of States Proposed Changes, which was based on the 2004 household projections (17,000 households for Bath and North East Somerset) identified the need for urban extensions in the Green Belt to accommodate future development needs relating to Bath and Bristol. In order for these cities to fulfil their economic potential the most sustainable solution was to provide for urban extension to the cities, including six locations that had been the

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<sup>1</sup> CD3/1 Joint Replacement Structure Plan (2002)

<sup>2</sup> CD3/2 Joint Replacement Structure Plan Saved Policies Schedule

subject of a review of the green belt. To address these exceptional circumstances the RSS made changes to the general extent of the green belt by removing the designation from the areas required to accommodate the proposed urban extensions. The housing requirement for BANES was 21,300 dwellings for the plan period 2006 – 2026.

- 1.10 In the consultation on the Spatial Options produced in October 2009 BANES included the Spatial Options for Bath and New Neighbourhood in an urban extension to Bath and also a New Neighbourhood at South East Bristol. Up until December 2010 the Council was considering urban extensions in the Green Belt. In December 2010 the Council changed its approach on the basis of the Council's evidence base rather than the regional housing figures (Cabinet Report 2<sup>nd</sup> December 2010).
- 1.11 Given the 2008 based household projections and the lack of capacity on brownfield sites, and the uncertainty regarding the delivery of those sites, Redrow Homes consider that the retention of the Green Belt is not justified.

10.2 *If I were to find the plan unsound in relation to the overall scale of development planned or its delivery and that there was potential for additional development in the Green Belt, I would refer the matter back to the Council for further consideration. On the basis of the present planned hearings, I would not be in a position to impose a recommendation for a specific location in the Green Belt, not least because parties (both existing and possibly new) who support the plan and oppose development in the Green Belt would not have had a right to be heard.*

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10.3 *I consider that there is considerable scope for the participants pursuing major alternative development sites in the Green Belt to produce succinct Statements of Common Ground with the Council (or with other parties) to help focus discussion at the hearings. These should not cover lengthy descriptive background, but highlight matters that will assist me in grappling with the complexity and diversity of material relating to these sites, with clear cross referencing to existing material (eg agree what evidence studies remain relevant for what types of proposals; what evidence is lacking; what are the critical areas of disagreement; and what would need to be done to overcome unsoundness if I were to conclude that some development opportunities should be explored in the Green Belt).*

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### ***The overall approach***

10.4 *On the assumptions set out in the following 3 scenarios would there be any need/justification for development in the Green Belt; would any such scenario result in the exceptional circumstances necessary to change a Green Belt boundary (as required by PPG2); and, if so, does that mean that a change to the Green Belt is required to make the plan sound or only that such a change is an option to be balanced against any disadvantages?*

- *that the overall scale of development proposed and its delivery is sound;*
- *that the overall scale of development proposed is sound, but its delivery is uncertain and needs supplementing and/or a specific contingency needs to be identified;*
- *that the overall scale of housing development is unjustified and should be significantly more.*

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1.1 Pegasus Planning Group on behalf of Redrow Homes do not support the first scenario. Pegasus Planning Group have previously made representations in response to the consultation stages on the Core Strategy and have objected to the overall level of housing provision.

1.2 Pegasus Planning Group on behalf of Redrow Homes do not support the second scenario. The delivery is uncertain and needs to be supplemented and a contingency identified. This has already been addressed in representations made earlier on the plan. The SHLAA only identified sites for 11,200 dwellings, even the Council's own technical requirement is for a need of 12,100 dwellings.

1.3 It also considers that the overall scale of housing development is unjustified and should be higher as set out in its representations to the Publication Version of the plan in February 2011 and previously to the Spatial Options in January 2010.

1.4 According to the Draft NPPF July 2011, the appropriateness of the Green Belt should only be considered when a Local Plan is being prepared or reviewed. Local Planning authorities are then required to consider the permanence of the boundaries at that time so that they are capable of enduring beyond the plan period.

1.5 When drawing up or reviewing Green Belt boundaries local planning authorities are also required to take account of the need to promote sustainable patterns of development.

- 1.6 Given the failure of the SHLAA to even identify sufficient land to meet the Council's own technical evidence, and when the latest housing requirement and its implications are considered then the boundary of the Green Belt should be changed in order to make the plan sound.



**Bath**

10.5 *Is there the potential to accommodate additional housing in the Green Belt adjoining Bath (either at the scale of urban extensions proposed in the Spatial Options Consultation 2009 (CD5/4) or as smaller extensions, such as assessed by the Council in September 2011 - CD4/A17 Annex K) without serious conflict with the overall purpose of the Green Belt here and national policy objectives/legal requirements, such as the setting of the WHS, AONBs and their setting, Ancient Monuments and their setting, and the Special Area of Conservation?*

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1.1 Pegasus Planning Group on behalf of Redrow Homes Ltd have no comments on this question.

### ***Adjoining Bristol***

- 10.6 *Is there the potential to accommodate additional housing in the Green Belt adjoining the Bristol City boundary (either at the scale of urban extensions proposed in the Spatial Options Consultation 2009 or as smaller extensions as assessed by the Council in September 2011 - CD4/A17 Annex K) without serious conflict with the overall purpose of the Green Belt here and national policy objectives/legal requirements and deliverable in relation to integration with development over the City boundary?*
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- 1.1 Pegasus Planning Group on behalf of Redrow Homes Ltd have no comments on this question.

*10.7 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)?*

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1.1 Pegasus Planning Group on behalf of Redrow Homes Ltd have no comments on this question.

*10.8 If I were to conclude that there was a need for more housing development within B&NES to serve its needs, would development adjoining Bristol be an appropriate location? How compatible would it be the rest of the strategy?*

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- 1.1 Pegasus Planning Group on behalf of Redrow Homes Ltd have no comments on this question.

## **Keynsham**

10.9 *Is there the potential to accommodate additional housing in the Green Belt adjoining Keynsham, and if so of what scale, without serious conflict with the overall purpose of the Green Belt here and national policy objectives/legal requirements?*

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1.1 Pegasus Planning Group on behalf of Redrow Homes consider that there is potential to accommodate additional housing in the Green Belt on land at Lays Farm to the west of Charlton Road; without leading to coalescence with Bristol or nearby settlements. The potential to accommodate additional housing in the Green Belt at Keynsham was recognised by the Panel at the Regional EIP in 2007 (CD3/5)

1.2 At the Examination in Public the Panel were advised by the Government Office for the South West that PPG2 which had not been updated as a Planning Policy Statement that *“it should be read in the context of the major emphasis that sustainable Development and Climate change have been given in the revision of other planning statements.” Paragraph 4.0.31*

1.3 The Panel concluded that *“...the scale of demand and the application of the principles of a Sustainable Future for the South West as set out in Policies SD1-4 provide the exceptional circumstances to justify alterations to the Green Belts within the region”.* Paragraph 4.0.32. As Bath is constrained the Panel considered other areas which meet the needs in a sustainable way.

1.4 In response to the need to identify further locations to accommodate additional growth; whilst placing the emphasis on sustainable development principles, the Panel identified the need for an area of search around Keynsham. Keynsham was considered as an area well supported by public transport facilities and offering a range of local facilities and services and employment opportunities. The Panel also considered information on environmental constraints and the main purposes of the Green Belt and submissions regarding the sustainability of proposed development sites. Keynsham was identified as a suitable location. It was put forward as an appropriate solution as Keynsham’s location would allow development to serve the wider needs of the conurbation.

1.5 The Panel recommended the following:

*“Keynsham can provide a wider range of community services for new development and we are confident that it would also be an attractive location for associated employment development. In our opinion the combination of these factors make Keynsham a suitable location. We recognise that development at Keynsham could be seen as threatening one of the main roles of the Green Belt in ensuring the separation of Bristol and Bath. We believe that there is sufficient scope for development around Keynsham to allow development to proceed without threatening the integrity of the separation. On this basis we propose a total of 3,000 dwelling in this location.”*

- 1.6 The identification of Keynsham as an area of search was endorsed by the Secretary of State in the Proposed Changes to the RSS in July 2008 (CD3/7) paragraph 4.1.3 refers to the exceptional circumstance, that in order to fulfil the economic potential and role of the existing urban areas and to provide development in the most sustainable locations.
- 1.7 Paragraph 4.1.13 of CD3/7 acknowledged that the town of Keynsham has strong functional relationships with Bristol and forms part of the SSCT. Policy HMA1 West of England makes provision for the expansion of Keynsham to strengthen the role of the town as a service centre and for an Area of Search for 3,000 dwellings at Keynsham. The policy also made provision to remove the Green Belt in the area of search.
- 1.8 The purposes of including land in the Bristol/Bath Green Belt are set out in Table 6A in the adopted Local Plan (CD5/1).
- 1.9 Pegasus Planning Group on behalf of Redrow Homes consider that additional land is needed in order to meet the housing requirement and the Company seek to promote land to the west of Keynsham as a suitable site for development. This land can either meet the much lower housing requirements contained in the Core Strategy because of the uncertainty attaching to a number of the existing sites within the urban area; or it can form part of an urban extension which will definitely be required to meet the housing numbers consistent with the 2008 based household projections.
- 1.10 Pegasus Planning Group on behalf of Redrow Homes have in earlier representations proposed the development of a site to the west of Keynsham which is a rounding off

of the settlement of Keynsham and is well contained in the landscape, well related to the town centre, employment, schools and other facilities.

- 1.11 The site comprises 7.92 hectares and lies to the west of Charlton Road. The site is located along the southern part of the western edge of Keynsham. The eastern boundary is defined by Charlton Road beyond which lies existing residential development. The site is bounded to the north by further residential areas and Lays Farm which is a complex of farm buildings, small industrial units and areas of hardstanding and storage units (known as Lays Farm Business Centre). The western boundary is defined by a field hedgerow which is generally continuous along its length and is tall in stature and as such is prominent. The southern boundary of the site is defined by a low clipped hedge. The site is currently subdivided into a series of fields which are managed as pasture. No prominent hedges lie within and subdivide the site.
- 1.12 There is a strong visual relationship between the site itself and the adjacent highway and its associate lighting columns as well as with the residential area to the east. There is a similarly strong visual relationship between the site and the residential properties and Lays Farm to the north as vegetation along the northern boundary is limited.
- 1.13 The site benefits from a strong physical framework of existing built form on two of its four sides. The existing adjacent built form has an urbanising effect upon the site creating a characteristically urban fringe environment.
- 1.14 The site sits alongside a local distributor road, Charlton Road which would facilitate an access point to serve the site.
- 1.15 Development of the site would constitute a minor extension of the development envelope of Keynsham.
- 1.16 Development of the site would not materially extend the settlement envelope significantly further south over and above that which currently exists. The adopted Local Development Plan allocates residential development to two areas north of Parkhouse Lane (Policy K2 of the adopted Local Plan).
- 1.17 In terms of extending the development envelope westward, the Lays Farm Business Centre currently defines the most westerly point of Keynsham's development envelope and is reinforced by an existing tall hedgerow. This same hedge would

continue broadly southward to define the western limit of any development on the proposed Redrow site. As a consequence, development of the site would not materially extend the settlement boundary further westwards that which currently exists.

- 1.18 North of Lays Farm there is a ridge line which is broadly orientated north-south across this area of open land with the existing western edge of Keynsham lying to the east and below the crest of this local high ground; as a result there is little inter-visibility between this existing edge of Keynsham and the residential district of Stockwood to the west which is in Bristol City Council area. This topographical feature maintains visual as well as physical separation between these two settlements.
- 1.19 Whilst development of the site would extend development westward, it would not materially change the general disposition of built form and settlement boundaries between Stockwood and Keynsham and it would not lead to coalescence. The tall hedge on the western boundary would provide an initial strong framework to the development both physically limiting the development on its western boundary and also softening its appearance from the wider countryside to the west and the Green Belt.
- 1.20 Although the site falls within the Green Belt, existing development which lies immediately to the north and east of the site provide a strong development framework within which development of the site would be framed. It is considered that development can be accommodated on the site without harming the purposes and objectives of the Green Belt and specifically the role it performs locally between Stockwood and Keynsham. The western and southern boundaries of the site would need to be strengthened with tree cover to establish a stronger landscape framework to both physically and visually contain the development. This would enable the site and its development to form a new urban edge of Keynsham in this locality without causing material harm in landscape and environmental terms or from a Green Belt perspective. A site analysis was prepared and submitted with representations in January 2010. The landscape analysis confirmed that development of land to the south of Lays Farm (and Business Centre) could be successfully accommodated and could be effectively integrated into the surrounding countryside and town without harm to the Green Belt. The site could accommodate a minimum of 150 dwellings.