

BANES Core Strategy Examination
Written Statement Issue 3

1.0 Is the retention of the general extent of the Green Belt justified?

1.1 We have said elsewhere¹ that the strategic housing requirement of BANES needs to be significantly increased not only to meet needs arising within BANES but also (importantly) to meet the needs of the Core City of Bristol which can not be accommodated within Bristol City Council's administrative boundaries. We have said that this necessitates a review of the Green Belt boundary adjacent to Bristol in order that new urban extensions can be provided. We are critical of the approach which has been adopted by the Council (given a clear political steer by its elected Members) that the Green Belt should not be reviewed and have provided evidence to demonstrate that the Council's assessment of housing needs is a retrospective (unsuccessful) attempt at justifying a lower requirement in order to suggest that the existing Green Belt boundary could be retained.

1.2 Whilst we recognise the desire of those within BANES living closest to the existing Green Belt boundary resist change (and for obvious reasons the political desire to base a Core Strategy on this proposition), we are of the view that a wider measure of public good and one that embraces sustainable development in a holistic way should be adopted which:

- positively plans for growth within not only BANES but also Bristol;
- recognises and moreover advocates the benefits of economic and physical growth;
- accepts that the proper planning of the area needs to consider how the needs of adjoining Bristol City Council can be met if they cannot be accommodated within its administrative area (as now required in law by the Localism Act's duty to co-operate);

¹ See BANES Examination Written Statement Issue 3, Appendix 1 - 'Whitchurch Development Area: Summary of Evidence Submitted' (December 2011).

- acknowledge that a long term plan-led approach is taken in order that decisions made during a period of economic downturn do not 'plan for an ongoing recession' and constrain future economic growth potential;
- avoid the need to review the Green Belt Boundary at the end of the plan period.

1.3 We believe the plan's approach to Green Belt policy is unsound given the direct conflict between existing and emerging national and regional policy. The decision to base the spatial strategy around the retention of the Green Belt conflicts with:

- PPG2, "if boundaries are drawn excessively tightly around existing built-up areas it may not be possible to maintain the degree of permanence that Green Belts should have. This would devalue the concept of the Green Belt and reduce the value of local plans in making proper provision for necessary development in the future".
- draft NPPF, "The appropriateness of existing Green Belt boundaries should only [as is the case here in BANES] be considered when a Local Plan is being prepared or reviewed . At that time, authorities should consider the Green Belt Boundaries have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period [we are not aware that the Council is suggesting it can meet this test]" and "local authorities should take account of the need to promote sustainable patterns of development".
- RPG10 Policy SS4, "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" (because as described in para 3.11 "some growth relating to these PUAs appears to have been leaping the Green Belt to nearby commuter towns, leading to less sustainable patterns of development and travel").
- RS Proposed Changes, "removal of the green belt to accommodate urban extensions at Areas of Search .. 1B [Whitchurch]"

- 1.4 At every tier, right up to the first drafts of the Core Strategy, there has been an acknowledgement of the strategic [we say national] importance of reviewing the Green Belt boundary to meet Bristol's development needs adjacent to its urban area – the submitted Core Strategy has however adopted a blinkered approach to securing the short term political goal of restricting Green Belt development with the inevitable long term adverse impacts of encouraging long distance commuting and/or restricting economic growth. This fundamental failing undermines the soundness of the submitted plan and if maintained would undermine the legitimacy of the plan led system and the new Localism agenda. Localism places a responsibility on planning authorities to meet development needs on the basis of evidence and whilst the RS is being removed its replacement with the new Duty to Co-operate should ensure that local plans are responsibly prepared having regard to 'larger than local' issues.
- 1.5 We think the Council has accepted that any increase in the strategic housing requirement for the district would necessitate a review of the Green Belt in order to accommodate an urban extension to the south east of Bristol. This would be the most sustainable option and all other options – such as the following – have been discounted:
- a dispersal strategy to small settlements;
 - "leap frogging" the Green Belt to small settlements beyond Bristol and Bath;
 - further urban extensions to Bath (given heritage and countryside constraints);
 - a new settlement or settlements.
- 1.6 Indeed the Council has previously accepted that urban extensions to the south east of Bristol would be the most appropriate location and significant site specific work has been undertaken. Whilst the need for development was identified in the RS (which now carries reduced weight) this did not happen in isolation. BANES has tested through its own examination and consultation the potential of development at Whitchurch to meet a higher housing requirement for example.
- in 2006, BANES published its RSS Urban Extension Environmental Capacity Appraisal which looked at Whitchurch and concluded that "this area offers the opportunity for significant levels of development";

- in 2007, the Launch Document [CD5/3] asked “is the land identified by Bath & North East Somerset within the ‘area of search’ the best option for urban extension development ” (page 39);
 - in 2008, the Council with CABE and other stakeholders undertook an Urban Extension Workshop [CD4/UDL6] looking at each area within the RS area of search (out of which came a masterplan for the area²);
 - in 2009, the Council published its Spatial Options Consultation including (Diagram 39 page 141 CD5/4) a “Broad location for development at Whitchurch”.
- 1.7 In broad terms it is fair to say that the Council’s engagement with development proposals at Whitchurch stopped when the likelihood of the RS being finalised receded and a policy vacuum was created in the absence of an alternative assessment of housing needs taking into account BANES’ relationship with Bristol.
- 1.8 The Strategic Housing Land Availability Assessment Report of Findings May 2011 Appendix 1e paints a broad picture of the Council’s assessment of land at Whitchurch and Hick’s Gate, but it is worth pointing out that:
- the “concept master plan for 3,500 homes at Whitchurch” was drawn by Barton Willmore but the concept very much came out of the CABE enabled workshop (it will also be noted that the “Broad location for development at Whitchurch” shown in the October 2009 Spatial Options consultation reflects that shown in this plan)
 - the main difference between Barton Willmore and the Council in respect of points of detail concerns the degree to which the setting of Maes Knoll should be seen as a constraint to development – Barton Willmore maintains that additional development to the south and east of the concept plan could reasonably be accommodated but we avoid detailed consideration of that here.
- 1.9 Paragraph 6.14 of Topic Paper 9 sets out the Council’s perverse interpretation of the new duty “an urban extension within BANES on the edge of Bristol is not in accordance with the new duty to co-operate .. [because] Bristol City Council are not planning for

² Willmore Objections to BANES Draft Core Strategy Policy DW1 (January 2011), appendix G.

urban extensions (in their adopted Core Strategy) and do not support extensions to Bristol outside of the City Boundary. This misses the point entirely. As the draft NPPF set out, both Authority's should be working together positively to meet the needs of the wider area and "enable local authorities to work together to meet development requirements which cannot wholly be met within their own areas". In the case of Bristol and BANES such an approach would inevitably result in a Green Belt review to deliver an urban extension to Bristol.

APPENDIX 1