

Bath & North East Somerset Core Strategy

Issue Three

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

Participant Statement by Savills on behalf of HorseWorld

12 December 2011



Introduction

This Statement explains the views of HorseWorld in the context of the questions identified by the Inspector. Responses have only been provided to those questions where HorseWorld have specific comments on the soundness of the Plan. The final section sets out the recommended changes to the Core Strategy to address the concerns over soundness.

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.***

Our position, as set out in the Statement to Issue One, is that the overall scale of housing development proposed in the Core Strategy is unjustified and therefore unsound, and that in order to rectify this and make the Core Strategy sound requires the identification of further land for housing. The need to deliver the level of development required in the most sustainable form constitutes exceptional circumstances which justify a change to the Green Belt boundary.

PPG2 was published in January 1995 and is now almost 17 years old. Whilst still a significant material consideration, it must be viewed in the context of sustainable development principles and more up to date and emerging planning policy and guidance. This was recognised by GOSW at the RSS examination (see CD3/5, paragraph 4.0.31, 2nd sentence).

The draft NPPF maintains that “*Green Belt boundaries should only be altered in exceptional circumstances*” but importantly adds at paragraph 139 that “*when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development*”. Planning for the most sustainable pattern of development should be the overriding consideration and given greater weight in plan making than a rigid adherence to the preservation of the Green Belt; indeed, according to PPS1 “*sustainable development is the core principle underpinning planning*”.

This conclusion is consistent with both RPG10 and the Proposed Changes to the draft RSS. In both instances these strategic plans sought to balance the need for retention of Green Belt, where this meets the purposes of PPG2, and the need to achieve the most sustainable pattern of development.

Policy SS4 of RPG10 recognised the need for Green Belts to be reviewed and advocates the removal of “*land from the Green Belt for development if, on balance, this would provide the most sustainable solution for accommodating future development requirements*” [our emphasis]. In recognising the need for growth in the Bristol sub-region there is a clear acknowledgement that the circumstances justified a test of ‘balance’ rather than the higher hurdle of ‘exceptional circumstances’.

The Proposed Changes to the SWRSS took this a stage further and identified areas of search within the Green Belt for urban extensions having come to the conclusion that this is the most sustainable means of accommodating the scale of growth required. The PPG2 test of “*exceptional circumstances*” was considered by the Panel in relation to the RSS who concluded that the scale of development required and the principles of a ‘Sustainable Future for the South West’ provide the exceptional circumstances (see CD3/5, paragraph 4.0.32). We consider that the balanced assessment by the Panel is still relevant and the conclusion that exceptional circumstances exist for these reasons remains sound.

It is also relevant to note that South Gloucestershire Council has recently concluded in the pre-examination changes to the Core Strategy that the need to identify additional land for housing constitutes exceptional circumstances.

With regards the final part of the question, it does not automatically follow that the additional housing required should be located in the Green Belt. All potential development options need to be considered on their merits and the sustainability implications balanced accordingly.

In determining the most appropriate and sustainable location for development there does however need to be consideration of the wider context of the authority and, in particular, the implications of development beyond its boundary. The purpose of the urban extensions proposed within the RSS was to meet the housing needs of Bristol which cannot be accommodated within its boundary. For the reasons outlined in our Statement to Issue One, the increase in the housing provision is required to meet the needs of Bristol and there is considerable logic therefore to locating this development adjacent to the urban area.

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?

We consider that not only is there potential to accommodate additional housing in the Green Belt but that the edge of Bristol is the most suitable, sustainable and appropriate location.

HorseWorld own a considerable amount of land in the Whitchurch area, a proportion of which falls within the urban extension proposed in the Spatial Options Consultation 2009 and the area assessed by the Council in September 2011 (CD4/A17 Annex K). The trustees of HorseWorld are under a legal obligation to support the ongoing work and long term financial security of the charity and should the opportunity arise to raise a significant capital receipt from the sale of a large area of land then it would be incumbent upon them to consider the opportunities very carefully. I have been advised by the trustees that the wider land ownership of HorseWorld would be available for an urban extension if required and considered suitable for development. However, this is not what the charity is itself currently

promoting on advice from Savills. The position that the trustees have taken is that they would like to secure the financial future of HorseWorld through the delivery of a new Visitor Centre, cross-subsidised by the sale of the current site. It is this scale of development which is actively being promoted through the Core Strategy and to which the remainder of this Statement relates.

If the larger areas identified through the Spatial Options Consultation 2009 or as assessed by the Council in CD4/A17 Annex K, were not considered suitable for release, for the reasons outlined below, we consider that a smaller scale release of land from the Green Belt should be endorsed.

The development proposed by HorseWorld would involve the sensitive redevelopment of the existing visitor centre, associated car park and land within the immediate curtilage. This development would cross-subsidise the delivery of a new visitor centre and associated facilities on adjacent land, improving the visitor experience, increasing the good work of the Charity and securing its long-term financial future.

The land proposed for housing is previously developed, would become redundant with the delivery of a new visitor centre and is capable of accommodating approximately 80-100 dwellings. Whilst not a strategic site which would be appropriate for allocation through the Core Strategy, given the suitability and sustainability of the site it is considered that the land could make a valuable contribution to the delivery of the strategic housing requirement without compromising the purposes of the Green Belt.

The site is surrounded on three sides by the existing urban area and benefits from strong landscaping on its perimeter which would limit the wider visual impact. With the exception of the proposed low impact visitor centre, the development would not result in an eastward extension of the urban area and would not therefore conflict with any of the first three purposes of the Green Belt identified in PPG2. Furthermore, there is no specific historic character or setting which would need to be preserved by the Green Belt nor, for the reasons outlined elsewhere in this Statement, is it considered that the development would conflict with the regeneration of South Bristol. There is therefore potential for development in the Green Belt at Whitchurch which would assist in meeting the strategic housing requirement

but would do so in a manner which would not conflict with the purposes or function of the Green Belt.

With regard the suitability of the site, the development would be considerably smaller than the area assessed within CD4/A17 Annex K, and we do not consider that the negative consequences of development that have been identified are applicable to a smaller scale of development.

The assessment contained in CD4/A17 Annex K identifies only three potential major negative consequences of development at Whitchurch:

- (i) Impact on the regeneration of South Bristol;
- (ii) Protection and enhancement of habitats and species; and
- (iii) Impact on water consumption and the need for further mineral extraction.

On the first of these matters, it is not considered that the development will have any detrimental impact on the regeneration of South Bristol. The scale of housing needed to address the latest household projections for Bristol is significantly greater than can be accommodated within the administrative area. By 2026 there is projected to be an additional 72,000 households in Bristol, of which a minimum of 26,500 will be delivered in the City Council area. In macro terms there is therefore more than sufficient market demand to deliver both South Bristol and growth at Whitchurch.

An Ecological Impact Assessment of the land at Whitchurch has been undertaken on behalf of HorseWorld. The assessment does not identify any ecological constraints to the development which could not be overcome through appropriate mitigation on land within the ownership of HorseWorld. The ecological implications of development, whilst important for masterplanning, are not considered to be a constraint which would impact upon the acceptability of development in principle.

With regards the third issue, all residential development allocated within the Core Strategy will impact on water and mineral consumption, indeed this is an inevitable consequence of new housing. There appears to be little value in comparing potential urban extensions on this basis as it is considered highly unlikely that there would be any comparative difference in

the merits of each. Addressing the need for housing in our view outweighs this negative impact.

With regards the integration with the urban area of Bristol, we do not consider that this would in any way conflict with the small scale proposals for HorseWorld. Indeed, the development would integrate well physically with the urban form.

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?

Not only would development adjoining Bristol be an appropriate location for growth, it would in our view, represent the most suitable and sustainable approach to the delivery of the development needs of the area. Furthermore, it would not only be compatible with but would complement the strategy and allocations contained within the draft Core Strategy. This will have two major beneficial effects. Firstly, it will address directly the need for development to serve the Bristol housing market and secondly, it will distribute development across the housing market area which will assist in delivery.

One of, if not the, most significant flaws of the Core Strategy is the failure to genuinely recognise and address the implications of being part of the wider Bristol housing market area. This is important in two regards. Firstly, the City of Bristol generates a need for housing and employment development which cannot all be met within the tight administrative boundary. This was recognised at the Bristol Core Strategy examination (see paragraph 48 of CD3/13). Secondly, the Core Strategy fails to acknowledge the geographical relationship with the edge of the Bristol urban area and as a consequence is very inward looking. One of the clearest examples of this is Policy RA1 which identifies Whitchurch as a rural settlement. Whilst this would be the case if Bristol did not exist, the close proximity to the Bristol urban area and strong functional relationship clearly demonstrates that it is part of a larger urban area, albeit not one within the Bristol administrative area.

Paragraph 1.18 of the Core Strategy claims that account has been taken of the functional relationship with neighbouring authorities. We contend that this is not the case and that for

the reasons outlined above, there appears to be no recognition, either in terms of development requirements or geography to the presence of Bristol.

This shortcoming is implicit in the methodology outlined in paragraph 4.5 of TP9, which states that the “*smart*” and “*balanced*” economic growth proposed by the Council seeks to make sure “*that the growth in local work place jobs matches the growth in the local labour force such that the need to commute is minimised*”. Nowhere within TP9 is there an explicit recognition of the need to plan for a proportion of growth which cannot be accommodated within the Bristol urban area. This failure to recognise and plan for the wider growth of the area in our view renders the Core Strategy unsound.

Recommended Changes to the Core Strategy

The Core Strategy does not identify sufficient land to meet identified housing needs. At present it is therefore unsound. In order to rectify this fundamental deficiency we advocate the need to consider changes to the Core Strategy which allocate additional land for residential development at a number of locations, including Whitchurch.

We strongly contend that there is potential for development within the Green Belt in this location which could come forward without compromising the purposes or function of the Green Belt. This development would make a valuable contribution towards delivery of the strategic housing requirement in an appropriate and sustainable location. In so doing it would, in part, rectify what we consider to be fundamental flaws regarding the soundness of the Core Strategy outlined in response to Issue One.

We therefore request that the Inspector recommends further assessment work is undertaken by B&NES to establish the most suitable and appropriate location and scale for an urban extension(s) to the Bristol urban area.

Savills

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