



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

**RESPONSE TO BNES/29 -  
RESPONSE TO ISSUES RAISED AT THE  
GREEN BELT HEARING SESSION ON  
26<sup>TH</sup> JANUARY 2012**

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## Comments of BNES 29

1.1 BNES 29 merely reiterates arguments rehearsed in previous Hearing Statements produced by the Council. It is clear that the housing targets of the Submitted Core Strategy have been based on proposing no change to the Green Belt. The Council's approach is that the Core Strategy's policies will result in a scale of housing provision that is well below reasonable assessments of future housing requirements, which Pegasus Planning Group have addressed in Hearing Statements in response to Issue 1 and its appendices.

1.2 The Council is unwilling to admit that a shortage in the supply of land for housing creates exceptional circumstances that would justify revisions to the Green Belt. In BNES 29, paragraph 2.4, they say:

*"In seeking to demonstrate exceptional circumstances to alter Green Belt boundaries the Council will need to consider whether circumstances have changed significantly since the Inset boundaries were last defined in the Bath & North East Somerset Local Plan, adopted 2007 (CD5/1). Without prejudging the outcomes of this review process the Council considers that there has been little change in circumstances and therefore, it is unlikely that the Inset boundaries will be altered. This is also reflected in the distribution of additional housing provision set out in the spatial strategy."*

1.3 In paragraph 2.5, they add:

*"Therefore, the Core Strategy does not rely upon or envisage Green Belt Inset boundaries being altered to release land for the purposes of development to meet the strategic housing requirement."*

1.4 However, what the Council does not address is the distinction between strategic changes to the general extent of the Green Belt and detailed changes in Green Belt boundaries. The Core Strategy needs to consider both:

- a) to propose changes in the general extent of the Green Belt and
- b) to provide a clear policy framework for subsidiary development plan documents, such as the proposed Placemaking Plan and Neighbourhood Plans, to make detailed changes.

1.5 Both kinds of change can make a contribution to strategic housing requirements as well as serving local housing needs.

1.6 The Council's approach appears to be that the review of Inset boundaries relates to all settlements that are excluded from the Green Belt and for which inset boundaries

are defined, these are listed in paragraph 2.4 of BNES/29 and include Keynsham. The Council intend to review these boundaries through the Placemaking Plan and Neighbourhood Planning, they consider that there has been little change in circumstances, and therefore it is unlikely that the inset boundaries will be altered.

- 1.7 However, this approach is not justified by a detailed analysis of the impacts on Green Belt purposes of specific sites, or by an analysis of the housing needs of the settlements. It implies a maximum of size of site that could be considered for detailed changes in Green Belt boundaries i.e. around 30 dwellings.
- 1.8 The Council continues to refer to Colin Buchanan & Partners' Strategic Green Belt Review (CD3/17), the purpose of which was to advise on a robust methodology for a strategic, consistent review of the Green Belt across the South West Region and then to assess the technical work undertaken on the Green Belt carried out by the appropriate Joint Study Areas
- 1.9 CD3/17 examined the Green Belt roles of broad areas, but did not consider the implications of specific changes to the general extent of the Green Belt or detailed reviews of the inner boundaries of Inset Settlements. In the Hearings various participants explained that a review of Green Belt should consider specific sites, so that the benefits of development can be weighed against the significance of the specific Green Belt purposes that apply to the sites.
- 1.10 BNES/29 makes reference to land at south west Keynsham as promoted by Bloor Homes. The Council maintain that the strategy makes provision for "significant" levels of additional housing and employment development at the town without the need to change the Green Belt. BNES/29 refers to the already released significant area of land from the Green Belt in the Local Plan. However, this was a release (K2A and K2B) made in the context of meeting housing needs in the plan period 1996 – 2011 and was recommended by the Inspector, those needs have not been addressed as the sites have not been developed in the plan period. As reported in the Hearing Session K2A is owned by the Council and is to be put on the market, although there is no clear timescale and K2B was refused by planning permission by the Council and then granted permission on appeal in 2011. The Council's strategy relies on existing Local Plan allocations and brownfield sites.

- 1.11 The Local Plan Inspector's Report at paragraph 5.109 urged the Council in the absence of any replacement RSS to follow the requirements of RPG10 in the preparation of its LDF. "To prepare the LDF in accord with RPG10 having regard to any emerging RSS." RPG10 remains as part of the development plan until the Orders are made to abolish it following the Localism Act.
- 1.12 The Local Plan Inspector's Report at paragraph 5.115 states that Keynsham is on a strategic transport route between the main employment centres of Bristol and Bath. It is served by a mainline station and a wide choice of bus services. Keynsham is considered to provide an appropriate location for additional residential development , even if further housing development would add to the level of out commuting, there are good public transport services available to attract future resident away from the use of the private car.
- 1.13 Pegasus Planning Group on behalf of Bloor Homes have already outlined in the Hearing Statement on Issue 3 the need to review the Green Belt and why land at south west Keynsham should be removed. Reference has been made to the Local Plan Inspector's (May 2006) pages 208 – 214 (CD5/31) which concluded that the Green Belt separation of Keynsham and settlements to the south is more extensive than for other areas of Keynsham, so development of K2 would not undermine the separate identify of the town. Whereas development east, west or north west of the town would contribute to coalescence of Keynsham.
- 1.14 A review of the Green Belt and settlement boundaries for Keynsham should not be constrained in the ways suggested in BNES 9 and BNES 29. Sites such as south west Keynsham are capable of contributing to strategic and local housing needs without harm to the purposes of the Green Belt.
- 1.15 The shortage of housing provision in the Core Strategy means that the strategy is fundamentally unsound without a proper review of the Green Belt to investigate opportunities to meet strategic and local housing needs.