

COMMENTS ON BNES 29: THE COUNCIL'S RESPONSE TO ISSUES RAISED AT THE GREEN BELT HEARING SESSION ON 26.01.12

There is nothing new in BNES 29, which merely reiterates arguments rehearsed in previous notes. It is clear that the housing targets of the Draft Core Strategy have been based on proposing no change to the Green Belt. The result of the Council's approach is that the Core Strategy's policies would result in a scale of housing provision that is well below reasonable assessments of future housing requirements. However, 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.

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.

It is important to distinguish 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.

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

The Council's approach appears to be that changes in the boundaries of Inset Villages, such as Saltford, should be constrained by the general policy for rural villages (as amended in BNES9) for small scale housing developments of around 30 dwellings at each of the villages. 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 site that could be considered for detailed changes in Green Belt boundaries.

The Council continues to refer to Colin Buchanan & Partners' Strategic Green Belt Review (CD3/17), which 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 site.

Saltford is a large village with a population of about 4,200, a good range of facilities and good public transport links to Bristol, Bath and Keynsham. It has a very tightly drawn settlement boundary, which is inseparable from the inner boundary of the Green Belt. The comment in paragraph 8.4.1 of BNES 9 that the two have different purposes is inexplicable:

The housing development boundary and the Green Belt Inset boundary have different purposes and are indicated as separate notations on the Proposals Map (CD5/1).

The Green Belt is a primarily settlement policy to prevent urban coalescence. The settlement boundary of Saltford can only be modified if the inner boundary of the Green Belt is also amended. These boundaries currently place a tight constraint on any organic growth of the village, which is likely to limit severely opportunities for the provision of housing to meet local needs including the needs identified in the Parish Plan for social housing and properties for residents wishing to downsize.

The site at Manor Road, Saltford (SHLAA site SA 2) is a clear candidate for a review of the Settlement Boundary and Green Belt Inset Boundary. It is bounded to the north and east by housing and to the south and west by Saltford Golf Club. Its development would not therefore have any significant impact on Green Belt purposes such as the coalescence of Saltford and Keynsham. It should be considered either as part of a strategic review of the Green Belt or within a detailed review of Green Belt Boundaries

A review of the Green Belt and settlement boundaries for Saltford should not be constrained in the ways suggested in BNES 9 and BNES 29. Sites such as Manor Road are capable of contributing to strategic and local housing needs without harm to the purposes of Green Belt.

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.