

Planning Policy – Core Strategy Examination  
B&NES Council  
PO Box 5006  
Bath  
BA1 1JG

18 April 2014

Dear Sir/ Madam

**Inspectors Hearing Note ID/49 – Comments on Planning Practice Guidance**

As noted in ID/49 the Government published Planning Practice Guidance (PPG) last month and there are no transitional arrangements. The advice in PPG is therefore relevant to the examination of the B&NES Core Strategy.

In relation to the Housing and Economic Land Availability Assessment which is intended to guide councils in identifying appropriate land to meet development needs, Paragraph 034 of the PPG “Can unmet need for housing outweigh Green Belt Protection?” states that:

“Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”.

With regard to identifying appropriate land to meet development needs, the Core Strategy Amendments (November 2013) propose removing highly sensitive land from the Green Belt (including land off of Lansdown Lane in Weston (CSA26, CSA28 and CSA25), which is part of the World Heritage Site and part of the Cotswolds AONB) to allocate it for residential development purposes to meet an unmet need for affordable housing (i.e. this approach is effectively a proposal to develop on existing sensitive Green Belt land to meet unmet housing need, which is considered to be contrary to guidance in the new PPG). We do not consider that unmet need for affordable housing in this instance outweighs the considerable harm to the Green Belt (World Heritage Site and AONB) and as such does not constitute very special circumstances for removing this land from the green belt and allocating it for development.

As noted in our previous objection (December 2013), in the Council’s report BNES/51, the Council confirm that the main reason land is needed to be released from the Green Belt is to achieve affordable housing requirements over the plan period (para 3.28). Proposed amendment CSA6 (1.26b) states that “The supply of market and total housing that will be delivered...is significantly greater than objectively assessed requirements. This is because the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement”. The proposed amendments (November 2013) seek to remove highly sensitive land from the Green Belt to achieve affordable housing requirements. As noted in our previous objection, we question the Council’s approach of proposing Green Belt Boundary amendments (which once established, should only be altered in exceptional circumstances (para 83 of the NPPF) and strategic site allocations (i.e. that the subject of CSA26, CSA28 and CSA25) on highly sensitive land which is part of the World Heritage Site

and AONB to achieve affordable housing requirements. Instead of proposing such Green Belt Boundary alterations, we consider that the Council should review existing less sensitive sites and require affordable housing to be provided as part of any new development in order to achieve the affordable housing supply needed without altering green belt boundaries to achieve this.

In summary, in line with the PPG, we do not consider that unmet housing need in Bath outweighs the harm to the Green Belt in Weston (and specifically to the west of Lansdown Lane) which would be caused by developing Green Belt land in this location. Given that the PPG states that unmet housing need is unlikely to outweigh harm to the Green Belt and other harm to constitute “very special circumstances”, we consider that B&NES approach of removing land from the Green Belt in Weston (in the proposed amendments, November 2013) and allocating it for residential development to assist in meeting unmet affordable housing need does not accord with advice in the PPG and is therefore not sound.

We trust that the above comments will be taken into consideration in the Core Strategy Examination.

Yours faithfully

Mr and Mrs D. Perry