

B&NES Core Strategy
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23 April 2014

Dear Sir/Madam

Inspector's Note ID/49 - Comments on Green Belt Review

The Inspector's Note ID/49 identifies that there has been an exchange of correspondence between the Planning Minister (Nick Boles) and the Chief Executive of the Planning Inspectorate concerning the approach taken to Green Belt reviews. A link to a copy of the letter is provided in ID/49. The note identifies that this letter can be referred to in hearings relating to the Green Belt. We did not appear at the hearings but wish to comment as follows.

In this letter, it states that:

"Fundamental to the National Planning Policy Framework and to this Government's planning reform is the idea that local authorities and the communities who elect them, are in charge of planning for their own area. That is why we abolished top down regional strategies, why we have emphasised the primacy of the Local Plan and why we gave communities the powers to create neighbourhood plans.

Alongside these reforms we were always very clear that we would maintain key protections for the countryside and, in particular, for the Green Belt. The National Planning Policy Framework met this commitment in full. The Framework makes clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt. The special role of the Green Belt is also recognised in the framing of the presumption in favour of sustainable development, which sets out that authorities should meet objectively assessed needs unless specific policies in the framework indicate development should be restricted. Crucially, Green Belt is identified as one such policy.

It has always been the case that a local authority could adjust a Green Belt boundary through a review of the Local Plan. It must however always be transparently clear that it is the local authority itself which has chosen that path - and it is important that this is reflected in the drafting of Inspectors' reports. The Secretary of State will consider exercising powers of intervention in Local Plans before they are adopted where a planning inspector has recommended a Green Belt review that is not supported by the local planning authority".

In BANES Core Strategy Topic Paper 2 (CD6/S3) (6/5/11) (Overall Strategy), Section 2 (Principles Underpinning the Strategy), and in particular Section 2.5 (Summary of the Strategy), BANES note (in bullet point 6) that *'No changes are proposed to the general extent of the Green Belt and strict controls will continue to apply as outlined in PPG2 (CD2/3)'*.

In June 2012 the Inspector noted (in ID/28) that there was a lack of an NPPF compliant assessment of housing requirements and drew other conclusions relating to housing numbers (para.4). In "the way forward" (para.7), the Inspector identified two options for the Core Strategy. Those being seeking a further suspension to the Examination to enable further work to be undertaken or withdrawing the Core Strategy. Para 7 states that in order to pursue further work the Council would need to consider the range of further work necessary...such further work would involve:

- "The identification of the housing requirement in a manner consistent with the NPPF;
- Changes to the Plan to fully accommodate the assessed needs and demands or evidence to demonstrate that doing so would result in adverse impacts which would significantly and demonstrably outweigh the benefits (NPPF,14);
- Subject to the outcome of the above, a possible review of the Green Belt's capacity to accommodate further development in a sustainable manner..."

REP/5139/002

Given that BANES clearly identified earlier in the Examination process that no changes were proposed to the Green Belt boundaries, it is concerning (given the advice in the letter from the Planning Minister), that the Inspector for the BANES Core Strategy Examination recommended that the Council review the Green Belt's capacity to accommodate further development. This is considered to be an example of the top down approach, with a recommendation for a Green Belt review being imposed by an Inspector when the Local Authority originally considered the extent of the Green Belt and decided that no change was necessary.

The latest and final iteration of the Core Strategy (post the above Inspector's recommendations) includes changes to the Green Belt, with tranches of land proposed to be removed from the Green Belt and new strategic site allocations being proposed on land which is currently in the Green Belt. Such changes to the Green Belt include highly sensitive land such as that in Weston which is part of the World Heritage Site and part of the Cotswolds AONB. Originally, the local authority proposed no change to the Green Belt in this location.

Despite the requirements of the NPPF, it is considered that the sensitive Green Belt around Bath and particularly Weston indicates that development should be restricted. It is not considered that the need to meet housing figures outweighs the harm to the Green Belt, particularly in Weston. Given the above evidence, it is not clear that the desire to review and alter the Green Belt came from the local authority. Instead, as identified above, the authority originally sought to protect the current extent of the Green Belt but were subsequently encouraged to review it by the Inspector to seek to address housing needs.

Given the above, the very strong local desire to protect the Green Belt in Weston and the Planning Minister's advice that it should be the local authority that chooses the path of Green Belt review/alteration, we consider that the proposals to alter the Green Belt around Bath are not sound and should not form part of the Core Strategy. Instead, it is considered that the current extent of the Green Belt should be protected and the boundaries (particularly in Weston) should remain unchanged (as per the adopted Local Plan and the original Core Strategy principles).

Yours faithfully

Mr and Mrs D. Perry