# West of England Joint Study Area Second Report

**Appendix 18** 

# STRATEGIC APPRAISAL OF GREEN BELT IN THE WEST OF ENGLAND

### **BACKGROUND REPORT**

### Introduction

- 1. This background report has been prepared in order to support the West of England Partnership's work on spatial strategy and, in particular, the representations to be made on the submitted Draft RSS.
- 2. The report also recognises the commitment of the Partnership, as set out in the "First Detailed Proposals" (FDPs) to the Assembly agreed in September 2005, to undertake further work to develop its proposals on green belt and urban extensions. The FDPs refer in paras 2.4 and 2.21-23 to "further work on strategic review of Green Belt" in particular (2.21), to consider "whether the strategic value of any general areas in meeting the fundamental role and objectives of the Green Belt is outweighed by the benefits of ... development".
- 3. The report has developed out of that on "Review of Green Belt" which was considered at the Partnership's Planning, Transport and Environment Group (PTEG) meeting on 14 October 2005. That meeting resolved, inter alia:
  - To agree the approach to reviewing the Green Belt set out in the report as a basis for developing the sub-regional spatial strategy in conjunction with conclusions resulting from the Greater Bristol Strategic Transport Study and Strategic Sustainability Assessment.
  - That, following receipt of the Assembly's draft brief for work on the consistency of Green Belt reviews across the region, a working group of UA and Joint Unit officers be convened to comment on the brief; agree the approach; provide information; and scrutinise the work of the appointed consultants.......
- 4. Since that PTEG meeting, there have been further developments, in particular :-
  - The consultants, Colin Buchanan and Partners, appointed by the South West Regional Assembly to report on Green Belt Review, undertook their study and reported back to the Assembly. Their report is available at <a href="www.southwest-ra.gov.uk/swra/ourwork/RSS/RSS">www.southwest-ra.gov.uk/swra/ourwork/RSS/RSS</a> greenbelt.shtml
  - The Regional Assembly considered the First Detailed Proposals, the consultants' report, and other matters, and agreed at its meeting on 10 March 2006 to submit Draft RSS to ODPM. This contains a number of proposals in relation to green belt in the West of England.

- South Gloucestershire Council undertook public consultation in March-April 2006 on a draft strategic assessment of green belt within its area. Responses were reported to Cabinet on 3 July 2006.
- The Regional Assembly is currently (July 2006) considering, in the light of
  information available to it, whether further work, either covering the region as
  a whole or specifically within the West of England, should be commissioned
  on the case for including or excluding areas from the green belt, taking into
  account sustainability considerations and the need to develop urban
  extensions.

### 5. This report therefore :-

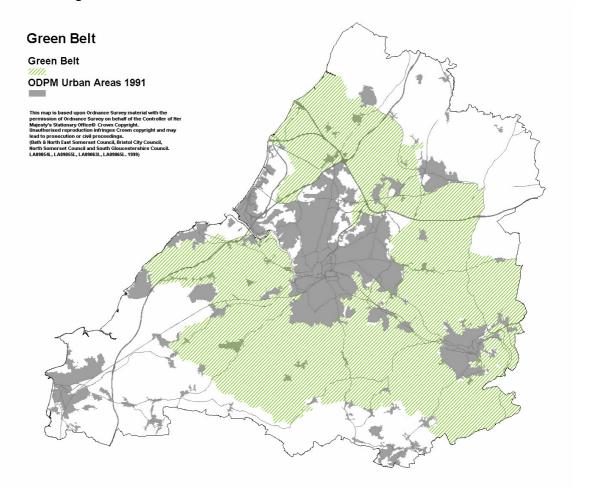
- Briefly summarises the history of green belt in the West of England
- Briefly summarises the methodology for review proposed in the Buchanan report
- Briefly summarises the work done in the sub-region which provided a basis for the "First Detailed Proposals", and for the changes to the general extent of the green belt proposed in Draft RSS
- Reviews the earlier appraisal of general areas against green belt purposes, as reported to PTEG, in the light of the Buchanan methodology
- In particular, reviews the areas specifically identified in Draft RSS, either for release of land from the green belt or for inclusion in the green belt, in terms of this appraisal
- Identifies the scope of further work, not yet completed, to refine and develop the First Detailed Proposals' conclusions on areas of search for urban extensions.

### Green Belt history and policy

- 6. In 1955 (Circular 42/55), the Government invited local planning authorities to consider establishing green belts. The Bristol and Bath Green Belt was first set up through the Somerset and Gloucestershire County Plans, and boundaries were agreed by the Minister in the mid-1960s. In the 1970s and 1980s, various changes were agreed, which either added land to the green belt for instance, between Portishead and Clevedon or took land out of the green belt, particularly immediately south of the M4 in the Bradley Stoke and Emerson's Green areas. These changes were first agreed in terms of their general extent through the Structure Plan, with detailed boundary changes then being agreed through Local Plans.
- 7. The basic objective of the Green Belt in the West of England has always related to controlling the pattern of development associated with the main urban areas of Bristol and Bath. The original submitted Structure Plan in 1980, for example, stated the strategic objective to be "to retain the Green Belt in Avon as a means of directing the future pattern of growth and to assist in concentrating development within and on the fringe of Bath and Bristol without resulting in the

coalescence of these urban areas or urban sprawl." This recognised that Green Belt is a tool to direct growth to the most appropriate locations, rather than to prevent development. At that time, as part of the overall strategy for the subregion, development was positively directed towards settlements beyond the Green Belt, such as Yate, Thornbury, Clevedon, Nailsea and Peasedown St John.

8. The area now designated as "green belt" is shown below. It covers some 47% of the total area of the West of England, and the outer boundary extends into Wiltshire and Somerset. However, the Joint Study Area as defined by the Regional Assembly and West of England Partnership does not extend into Wiltshire and Somerset. The map therefore only shows the green belt within the West of England.



- 9. The process of review needs to take into account current national, regional and local policy considerations. Among the most important are:
  - PPG2: National planning policy guidance on green belts was last revised in 1995, in particular with the inclusion of references to the need to promote sustainable development in defining green belt boundaries, and to the positive management of green belt land to promote specific objectives. There are no current plans to revise PPG2.

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<sup>&</sup>lt;sup>1</sup> County of Avon Structure Plan Written Statement, Avon County Council, 1980.

- **PPG3 (Housing)**: Guidance on planning for housing, issued in 2000, states that there may be a case for reviewing green belt boundaries to allow the development of urban extensions where this would be the most sustainable of the available options. Draft revised guidance (PPS3) was published in December 2005.
- **RPG10**: Regional guidance published in 2001, which now has the status of RSS, stated that a review of the Bristol and Bath Green Belt should be undertaken, to examine whether alterations of the inner and outer boundaries are needed to allow for long term sustainable development needs.
- Communities Plan: The Sustainable Communities Plan, launched by ODPM in 2003, calls for each region to maintain or increase the current area of land designated as green belt.
- 10. As stated in the report to PTEG in 2005: "The objectives and purposes of green belt policies are quite specific and limited, and can be misunderstood. In particular, they are not environmental designations. They do not address all the reasons why areas of countryside surrounding urban areas may be valued. Nor do they provide planning solutions to many of the pressures that arise within the urban-rural fringe. Other policies may be more relevant to these wider issues: for example proposals for green infrastructure, landscape improvements, public open space and other access. Such policies may help to achieve important planning objectives for urban-rural fringe areas whether or not they are green belt. They may be used to reduce the impacts of removing a green belt designation and implemented in conjunction with planned urban extensions to create sustainable communities. They may also be used in conjunction with green belt extensions or in areas of existing green belt."

### The process of Green Belt review

- 11. The process of "Green Belt review" is best seen as comprising a number of distinct stages and processes, at both strategic and local levels, which, taken together, lead from an existing position of a green belt boundary as defined in Local Plans to a new situation with a reviewed, and possibly different, boundary.
- 12. Current planning guidance is that the general extent of the green belt will be set through RSS. As under the old system of Structure and Local Plans, the strategic document will review, and if appropriate redefine, the general extent of the green belt, which will then need to be interpreted and implemented on the ground by local authorities in Local Development Documents (LDDs). The RSS itself will not make any changes to detailed boundaries, but the LDDs which set detailed boundaries will need to be in general conformity with the RSS. Processes of public consultation and inquiries will take place at both stages.
- 13. At the strategic level, proposals for changing the general extent of the green belt should emerge through consideration of a variety of factors, of which the appraisal of broad areas against the purposes of green belt designation is one.

Decisions on changing the general extent of the green belt will also need to take account of overall strategy and sustainability considerations, including landscape and infrastructure factors. This approach appears to be implicit in the methodology proposed in the Buchanan report, which contains the following statements:-

- 3.2.4 The starting point for review is to examine each part of the ..Green Belt.. to determine the relative importance of each of the five criteria [from PPG2] and identify a ranking of criteria for each Green Belt. This part of the exercise should consider an area wider than the existing Green Belt, so as to be able to determine whether or not the purpose for having Green Belt is justified in areas not currently designated.......
- 3.2.6 It is important that in this first part of the study, the Green Belts are appraised using only the five criteria from PPG2.....
- 3.2.7 The purpose of the [next] stage is to establish a search areas database and to establish the sustainability criteria that will be used in evaluating the areas within each Green Belt......
- 3.2.9 The first step is to develop .... an Environmental Capacity Framework. This is the assembly of information and analysis required to identify potential development locations and their capacity for development. Thus, it will include, for example, information on absolute and partial constraints, landscape character and quality......
- 3.2.12 Before land is considered for removal from the Green Belt, it should have been subject to an analysis of suitability for development which includes landscape assessment..........
- 3.2.14 The second step establishes ... sustainability criteria ... in order to rank the search areas for development. The criteria should reflect the Government's sustainability objectives and those contained within the draft RSS. This process enables areas to be considered for release from Green Belt on the basis of sustainability.......
- 3.2.15 The third step is to assemble a database of search areas within [the] Green Belt, bringing together both the outputs from the application of the Environmental Capacity Framework and the analysis of purpose. At this stage initial judgements can be made where areas identified as being potentially suitable for development conflict with areas with a strong justification for inclusion in the Green Belt. All areas should then be subjected to sustainability testing.
- 3.2.16 The final stage of the process is to apply the sustainability criteria to the areas of search, and from this analysis to define areas which can then be introduced to the development of the spatial strategy for each JSA. This pool of potential locations for development would be drawn upon in the identification of the strategic options, which also has to reflect the estimates of demand.
- 14. This report focuses on the process of strategic green belt appraisal against the purposes of green belt designation that is, the process recommended in paras. 3.2.4-3.2.6 of the Buchanan report. This appraisal process does NOT assess

areas against sustainability criteria; nor does it identify areas for release from, or inclusion in, the green belt, or identify areas for development. Further work would be necessary to complete these stages.

### Green Belt purposes and sustainability criteria

- 15. Nationally, the five purposes of green belt designation are set out in PPG2, as follows:-
  - 1.5 There are five purposes of including land in Green Belts:
    - to check the unrestricted sprawl of large built-up areas;
    - to prevent neighbouring towns from merging into one another;
    - to assist in safeguarding the countryside from encroachment;
    - to preserve the setting and special character of historic towns; and
    - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 16. The 'First Detailed Proposals' (para 2.20) describe the fundamental objectives of the Green Belt in the sub-region in the following, slightly different, terms:
  - checking the unrestricted sprawl of the Bristol urban area and Bath
  - preventing neighbouring towns from merging into one another, by maintaining the physical separation and distinct identities of the Bristol urban area, Bath, and other settlements in the sub-region, including in particular the area between the two cities
  - safeguarding the countryside from encroachment
  - preserving the setting and special character of historic cities and towns, including the World Heritage Site of Bath
  - assisting in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 17. The report to PTEG in October 2005 noted differences of view on the extent to which national Green Belt policy contributes positively to sustainability objectives. These are summarised in the table below: -

Green Belt arguments in support of sustainability objectives	Green Belt arguments in conflict with sustainability objectives
The permanent presumption against development in the Green Belt provides certainty to communities over the prospect of future development, local amenity, and land values, and so contributes significantly to their	The purposes of Green Belt were set at a time when the control of urban expansion was the major concern of strategic planning policy. Now that a wider range of sustainability issues is addressed, the plan-led system allows a more subtle and targeted policy

quality of life.

approach. Green Belt designation is inflexible and difficult to change, and some of its purposes- such as "to check the unrestricted sprawl of large built-up areas" and "to preserve the setting and character of historic towns" - are either unclear (for instance, over whether all urban expansion should be described as "sprawl"; and over whether all towns or villages adjoining or within the green belt can be described as "historic" or whether that term only refers to certain major urban areas such as Bath, or to parts of those areas) or difficult to prove in every case.

Green Belt policies can help encourage urban regeneration, which has recognised sustainability benefits including maximising the use of existing urban infrastructure and improving the amenity of urban residents themselves.

Green Belt policies can conflict with the sustainability objective of seeking to concentrate development at urban areas. Where opportunities for development within urban areas are limited, Green Belt designation can prevent consideration of what is often the next best option in terms of improving urban services, through development adjoining urban areas.

Green Belt designation protects areas between and adjoining settlements, which are often not capable of being protected for their intrinsic environmental qualities but which often have important amenity value to residents. By maintaining the physical separation of settlements, Green Belts contribute towards community identity and the amenity of the residents of neighbouring urban areas, and help foster a sense of place.

Green Belt designation stops the outward expansion of an urban area at a specific point in time, with no consideration of what its optimum size might be, or how it might change. Green Belts were originally expected to discourage commuting, but as travel has become easier many areas beyond the Green Belt have developed as commuter settlements.

### The process so far – "First Detailed Proposals" and Draft RSS

- 18. Early work in developing a strategy for the sub-region focused on considering green belt criteria as part of a single process of appraisal of strategic opportunities for development in urban extensions. This work contributed to the identification of general locations for consideration for development, as set out in the 2004 consultation document "Directions for Change", and was summarised in the JSA report submitted to SWRA in 2005. The work was also subsequently taken into account in land use tests as part of the Greater Bristol Strategic Transport Study, and the First Detailed Proposals.
- 19. The rationale behind the identification of strategic locations for detailed review of their designation as Green Belt is as summarised in the "narrative of process" reported to the Partnership meeting on 24 February 2006 (agenda item 3, appendix 1), as follows:
  - As part of the process of drawing up greenfield development scenarios, schedules were drawn up during early 2004 of areas for search for urban extensions. These were initially constructed through a sieve mapping technique, which identified areas close to the three main urban areas and smaller towns which were relatively unconstrained by national and international environmental designations, floodplain, slopes, etc. Areas of search were assessed using broad sustainability criteria drawn from Draft PPS1 and Green Belt criteria drawn from PPG2.......
  - This process was reported in the public consultation document "Your Area, Your Vision: Directions for Change", published in November 2004. The broad areas of search identified through the initial application of sustainability criteria were shown diagrammatically in the document, and were set out in the form of three spatial scenarios to highlight future directions for possible development.
  - Parallel work on the Greater Bristol Strategic Transport Study identified the need to test 5 alternative scenarios for development for the period 2006-26. These were developed in May 2004, drawing on the schedules of areas for search for urban extensions ....
  - [In early 2005] work was undertaken to devise a further GBSTS test, drawing on the results of Tests 1-5, and the further work undertaken on urban capacity, SSA and Green Belt review. However, processes of SSA and Green Belt review had not been completed by the time when land use inputs to GBSTS Test 6 were required.
  - 13 Discussions between authorities in spring / summer 2005 concluded that the further Test 6 should be based on: -
    - Higher rates of development within the main urban areas than those previously tested
    - Urban extensions within the Green Belt immediately adjoining the Bristol urban area to the south west and south east, on the basis that, subject to further testing, these could be considered justifiable on sustainability grounds, in particular as these would be relatively well

- located in relation to the city centre and possible transport improvements, and supported the approach in the Vision of encouraging the regeneration of south Bristol.
- Development adjoining the Bristol urban area to the north and north east, within South Gloucestershire, to be located south of the M4 and M5, on the basis that the motorways form a robust inner boundary of the Green Belt which should be maintained
- Some development within all the smaller towns, and also adjoining Portishead and Keynsham.
- The programme of the GBSTS and the need to test land-use scenarios in transport terms was a major determinant of the process of option testing and development in the West of England. It is described in the GBSTS working papers and Final Report. Sustainability appraisal of the Test 6 land-use scenario was undertaken using the broad criteria established at regional level. Schedules and maps indicating the general extent of areas of search and environmental constraints were produced and considered at SSA workshops with the SWRA's consultants in May 2005. The Test 6 scenario represented the clearest expression of a preferred option that could be made at the time.
- Discussions between authorities concluded, on the basis of the SSA and other work, that the First Detailed Proposals for RSS should be based on the locational distribution set out in GBSTS Test 6. Generally, the areas identified in First Detailed Proposals were suggested by the sustainability appraisal of locations, although the area north east of Bristol is explained largely on Green Belt grounds.
- In preparing First Detailed Proposals, further work within the authorities led to some variations from the proposals tested in GBSTS Test 6. In particular, these included:
  - Revised assessments by the unitary authorities of the capacity of urban extensions south west and south east of Bristol which, in both cases, led to reduced assumptions about the scale of development in those areas
  - Inclusion of an urban extension south of Bath, accompanied by references to emphasise that other options for sustainable development around Bath would need to be considered because of the World Heritage Site status of the city and the environmental importance of its immediate surroundings.
  - Revised assessments of the scope for further development in and adjoining smaller towns in North Somerset, in particular Portishead...."

### Areas of search for urban extensions

20. As a result of these processes, the First Detailed Proposals (para 2.21-22) identified five strategic locations "for more detailed review of their designation as Green Belt... to enable the development of sustainable new communities adjoining or close to the main urban areas to be considered:-

- Adjoining Bristol to the south west, within North Somerset and Bristol City...
- Adjoining Bristol to the south east, within Bath and North East Somerset and Bristol City....
- Adjoining the Emerson's Green area to the north east of Bristol, within South Gloucestershire....
- Immediately north of Bristol within South Gloucestershire, between Harry Stoke and the M32....
- To the south of Bath....."
- 21. The report to PTEG in October 2005 presented a summary appraisal of these general areas, in terms of green belt and other considerations. The green belt part of that appraisal is reassessed in later sections of this report.
- 22. The Draft RSS identifies these same five areas in slightly different terms in policies SR4 and SR5, as Areas of Search A-E, with indications of dwelling capacity, and shows them diagrammatically on inset diagram 4.1.

### Areas for consideration for extension of the Green Belt

- 23. The First Detailed Proposals made no recommendations on adding areas to the Green Belt, because the development proposals were not considered to be sufficiently locationally specific to justify such proposals. However, the FDPs stated (para. 2.23): "Areas will be added to the Green Belt through Local Development Documents, drawing on further strategic work, where the protection of land from development over the long term will meet the purposes of the Green Belt and support the spatial strategy for the sub-region. In particular this may help contain the expansion of small settlements which have an imbalance between homes and jobs and where other policies such as national environmental designations or recognised flood risk areas, which would give the certainty of long term protection from development, do not exist."
- 24. The report to PTEG in October 2005 went further than the FDPs, by providing an initial assessment of areas in which Green Belt extensions might be appropriate. In particular, it stated that "future development on the edges of Bristol could reduce the width of Green Belt in some areas, such as to the south west of the city. There may also be a possibility of development being proposed adjoining some other settlements immediately beyond the current Green Belt. In most cases, these areas have relatively few strategic environmental designations that would constrain further development." It also showed, diagrammatically, "possible areas for consideration of extensions to the Green Belt, where this could contribute to overall Green Belt purposes and prevent the coalescence of settlements: -
  - To the north and east of Thornbury
  - To the north of Yate / Chipping Sodbury
  - To the south west of Nailsea / Backwell
  - In the area between Peasedown St John, Radstock and Midsomer Norton"

25. The Buchanan report, in error, identified these areas as being proposed within the First Detailed Proposals. The Draft RSS, policy SR3, then identified possible areas for Green Belt extensions, to include "land to the north of Thornbury and Yate / Chipping Sodbury, south west of Nailsea and south east of Clevedon, south west of Bath towards Norton Radstock, and land to the west of the Royal Portbury Dock...." These areas are shown diagrammatically in Draft RSS inset diagram 4.1. The final reference, to land west of Royal Portbury Dock, reflects a proposal in the Joint Replacement Structure Plan, carried forward in the North Somerset Local Plan, rather than one arising from this strategic review.

### The PTEG Green Belt appraisal

- 26. An initial assessment of the extent to which broadly defined areas contribute more rather than less to PPG2 Green Belt purposes was undertaken in the report to PTEG in October 2005. The general location of the areas assessed is shown in Appendix 1.
- 27. The assessment was set out in the form of a schedule, and the overall findings were summarised diagrammatically in map form (Appendix 2). Areas adjoining Bath or elsewhere which are substantially protected from development by policies other than Green Belt, in particular national or international environmental designations such as AONBs or major areas of floodplain, were excluded from the assessment.
- 28. The analysis suggested that all the locations for consideration as possible urban extensions contribute significantly to key Green Belt purposes. Those areas of Green Belt that contribute relatively less to Green Belt purposes are areas away from the main corridors separating towns, in which major development would be unlikely to be considered because of sustainability criteria.

### The Buchanan Green Belt appraisal

- 29. The Buchanan report proposed, and undertook, a process of scoring different areas in terms of the degree to which they meet Green Belt purposes. Unlike the PTEG report, it did not consider areas which are not currently Green Belt.
- 30. The methodology used in the Buchanan report was to take the written assessments in the PTEG report, and in each case allocate a score of 1 or 0. All areas were scored 1 in terms of "safeguarding the countryside", and 0 in terms of "encouraging regeneration / recycling". In aggregating these scores, the Green Belt purposes of "preventing sprawl" and "safeguarding the countryside" were then given a double weighting in all areas. For areas "around Bristol", the purpose of "preventing coalescence" was also given a double weighting; and for areas "around Bath" the purpose of "protecting historic setting" was given a double weighting. These weightings were not explained or justified in the report.
- 31. The Buchanan methodology produced scores for each of the general locations assessed in the PTEG report, which were then mapped. The Buchanan map is

- attached (Appendix 3); it shows the overall PTEG assessment, as well as the results of the consultants' own assessment.
- 32. The results of the PTEG and Buchanan assessments were broadly similar, in that areas closest to the main urban areas were identified through both approaches as generally being most important to Green Belt purposes. There were some relatively small differences, for example Buchanans' conclusions that, out of those areas "adjoining" the Bristol urban area, the Easton-in-Gordano and Warmley areas were of least importance in terms of PPG2 purposes.

### **South Gloucestershire Strategic Green Belt Assessment**

- 33. South Gloucestershire Council prepared its own assessment of green belt within its area, which was subject to public consultation in March-April 2006 and was intended as an input to the authority's response to Draft RSS.
- 34. The study assessed how areas of existing Green Belt fulfil statutory purposes as set out in PPG2, and whether land that is not in the existing Green Belt in certain areas could fulfil those purposes. It drew on and developed the work reported to PTEG, and also took on and developed other criteria. For the purposes of the assessment, South Gloucestershire was divided into 23 areas, most but not all of which broadly matched those used in the PTEG work. For each area, a commentary was prepared and assessment sheet completed. Representations were invited on the commentary, and these were reported to the authority's Cabinet in July 2006 together with revised assessment sheets.

### **Revised strategic West of England assessment**

35. As part of the process of reviewing the implications of the Buchanan report, work has been done to refine and develop the assessment of different areas against PPG2 Green Belt purposes. This has taken on board the appraisal work undertaken in South Gloucestershire, including representations received, and other analysis.

### 36. In particular:

- The PTEG report did not differentiate between different areas in terms of the PPG2 purpose of "assisting in safeguarding the countryside from encroachment". The revised assessment now does this, by referring to how areas protect the separate identity and settings of villages, and to prominent and valued landscape features. However, it is inappropriate to give undue emphasis to landscape character or quality in this appraisal, given that these are not necessary attributes of green belt. Further work on landscape would be necessary as part of the wider process of boundary review, but that is not part of this study;
- The PTEG report did not differentiate between different areas in terms of the PPG2 purpose of "assisting in urban regeneration". Although the view that

Green Belts do actually achieve this purpose is disputed, the revised assessment notes whether particular areas potentially could have this function; but conversely also notes areas in which the release of land for development could potentially contribute to the regeneration of adjoining areas - for instance, adjoining south Bristol. In the schedule, areas adjoining the urban areas are considered to have more potential to assist in regeneration than those areas further away.

- The revised assessment refines the assessment of some areas. For
  instance, it notes those areas which directly separate Bristol and Bath and so
  contribute to one of the fundamental original purposes of green belt
  designation in this area; and also those areas which contribute generally but
  less directly to the separation of urban areas.
- Comments in the South Gloucestershire assessment, as revised following consultation, have been summarised, generalised and taken on board, in so far as they relate to PPG2 criteria.
- 37. With one exception, the general areas used in this revised assessment are as in the PTEG and Buchanan reports. Additional comments have been included in relation to the Severn Beach area, which is not currently within the Green Belt, and which was omitted from the previous assessment reported to PTEG. An area was proposed for inclusion in the Green Belt by South Gloucestershire Council in its Deposit Local Plan, but the finding of the Inspector, subsequently accepted by the Council, was that inclusion in the Green Belt would first require a case to be made at the strategic level, which has not yet been done.

### Findings of the revised assessment

- 38. The revised assessments are set out in Appendix 4. These assessments are inevitably subjective to some extent. In addition, some of the PPG2 criteria are open to different interpretations. For example, it is not wholly clear what criteria are implied in PPG2 to define "large built-up areas", "neighbouring towns" or "historic towns"; or at what point a "village" should be defined as a "town".
- 39. Appendix 5 summarises these revised assessments, by giving a simple statement of the extent to which locations meet (or potentially could meet) each of the five PPG2 criteria for green belt designation. The weighting of PPG2 purposes in the Buchanan report, which in some cases lacks a clear justification, has not been used. However, greater weight has been given to the objective of avoiding coalescence between Bristol and Bath, which was a key driver behind the establishment of the Green Belt and is identified in the FDPs (para 2.20) as a fundamental objective of Green Belt in the sub-region.
- 40. In each case, the extent to which general areas meet these criteria is summarised as "very strong", "strong", "moderate", "uncertain", or "weak". An overall single assessment is then suggested, derived from these. This verbal approach is considered to be more appropriate than a numerical scoring system,

- such as that used in the Buchanan report, which could be interpreted as giving a spurious illusion of quantified objectivity. However, for comparison, the Buchanan scorings are also shown in the final column.
- 41. The revised assessments suggest that the differences in methodology between the PTEG and Buchanan reports only produce marginal differences in the overall assessment of areas' importance in terms of green belt purposes. However, the greater weight given to the separation of Bristol and Bath in this assessment leads to the Keynsham-Saltford area, in particular, scoring more highly in terms of green belt importance than in the Buchanan study.
- 42. The assessments also confirm that, generally, areas closest to the main urban areas, which in theory could be considered for urban extensions, have the greatest importance in terms of green belt purposes. Any release of such land from the green belt would therefore require exceptional circumstances to be shown in relation to other criteria.
- 43. The revised assessment suggests that a case exists at the strategic level for the inclusion of the Severn Beach area within the Green Belt, as suggested by South Gloucestershire Council.

### Assessment of areas identified in Draft RSS against Green Belt criteria

44. The Draft RSS identifies five "areas of search" for urban extensions within the current green belt in the West of England<sup>2</sup>; and also identifies three new broad areas for inclusion within the green belt. The conclusions of the green belt appraisal work for these areas are summarised in following paragraphs. These do not assess sustainability considerations, which are the subject of separate work.

### Area of search A - South west of Bristol

45. This general area is shown in the schedules as areas 26 (Highridge / Barrow Common) and 27 (Ashton Vale / Long Ashton). It is assessed as of high overall importance to the functions of green belt in the sub-region. In particular, it contributes substantially to the setting of the Bristol urban area – in particular, that of the Ashton and Bedminster areas, close to the historic city centre and Clifton. It also contributes to preventing coalescence in the A370 corridor between Bristol and Nailsea / Backwell – specifically in the Long Ashton area – and in the A38 corridor between the urban area and airport. As with other areas around Bristol, its designation as Green Belt protects the countryside and prevents urban sprawl. In relation to the area's role in relation to urban regeneration, this area's protection as Green Belt could arguably encourage investment in south and central Bristol in the medium term, while its release from Green Belt could then allow the continuation of investment and development in the general area in the longer term.

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<sup>&</sup>lt;sup>2</sup> Area of search F, adjoining Weston-super-Mare, is neither within the Green Belt nor suggested for inclusion in the Green Belt.

### Area of search B – South east of Bristol

46. This general area is shown in the schedules as areas 16 (Hicks Gate) and 17 (Whitchurch). It is assessed as of high overall importance to the functions of green belt in the sub-region. In particular, the area as a whole, and particularly the Hicks Gate area, is located generally within the corridor between Bristol and Bath. Development within this area would contribute to coalescence between the two cities, protection against which is one of the fundamental purposes of the Green Belt in the sub-region. Both the Hicks Gate and Whitchurch areas contribute to preventing coalescence between Bristol and Keynsham and to the setting of the Bristol urban area. As with other areas around Bristol, its designation as Green Belt protects the countryside and prevents urban sprawl. Stockwood Vale and the Dundry slopes are considered particularly important in landscape terms. As with the area south west of Bristol, this area's protection as Green Belt could arguably encourage investment in south and central Bristol in the medium term, while its release from Green Belt could then allow the continuation of investment and development in the general area in the longer term.

### Area of search C - North of Bristol

47. This general area is shown in the schedules as area 6 (Harry Stoke); and in South Gloucestershire's appraisal as area 10. It is assessed as of high overall importance to the functions of green belt in the sub-region. It contributes substantially to the setting of the Bristol urban area, by maintaining a green wedge between the Harry Stoke, Hambrook and Frenchay areas, and providing a link of open land between the Stoke Park historic parkland area within the City boundary and the countryside around Winterbourne to the north of the M4. It provides a green entrance to the city and reduces the apparent size of the urban area. As with other areas around Bristol, its designation as Green Belt protects the countryside and prevents urban sprawl. This area's protection as Green Belt could again arguably encourage investment within the urban area in the medium term, while its release from Green Belt could then allow the continuation of investment and development in the general area in the longer term.

### Area of search D - North east of Bristol

48. This general area is shown in the schedules as area 10 (Pucklechurch), possibly extending over area 11 (Warmley); and in South Gloucestershire's appraisal as area 17 (and possibly 18 and 19). It is assessed as of moderate overall importance to the functions of green belt in the sub-region. This broad area contributes substantially to the setting of the Bristol urban area between Kingswood and the M4. As with other areas around Bristol, its designation as Green Belt protects the countryside and prevents urban sprawl. The Pucklechurch ridge is considered particularly important in landscape terms, in views from both the urban area to the west and the AONB to the east. In general terms the area contributes only marginally to the purpose of preventing coalescence with any other towns, in relation to the gap between Yate and the Bristol urban area; but it does protects the separate identity of villages such as Pucklechurch and Shortwood.

### Area of search E - South of Bath

49. The general area shown in Draft RSS is indicated in the schedules as area 21 (Odd Down). This area is of high overall importance to the functions of green belt in the sub-region. Work done by Bath and North East Somerset Council suggests suggests that the area of search shown in RSS should be drawn more widely, to include the area immediately west of Bath as well as to the south, although it is acknowledged that development to the west of the City would be more damaging to green belt purposes as the area lies directly within the strategic gap between Bristol and Bath. Areas adjoining Bath contribute substantially to the setting of the historic city (World Heritage Site), and to the prevention of coalescence between the City, Peasedown St John, Radstock, and villages close to the City. As with other areas, designation of these areas as Green Belt protects the countryside and prevents urban sprawl. The valleys and slopes towards Englishcombe, and the Odd Down plateau, are considered especially important in landscape terms, particularly in relation to the adjoining AONB.

# Possible Green Belt extension north and east of Thornbury and Yate / Chipping Sodbury

50. These general areas are shown in the schedules as areas 32 and 33; and in South Gloucestershire's appraisal as areas 8, 13, 14 and 16. The case for their protection as Green Belt rests on their ability (either as a single area or two separate areas) to check the unrestricted sprawl of the two towns, and protect their settings. Thornbury and Chipping Sodbury town centres are both of recognised historic importance. Both towns, with Yate, expanded as a result of planning strategy from the 1960s. The enhanced protection of these towns would support current overall strategic objectives of focusing development and investment within the major urban areas of the sub-region, rather than previous strategies which allowed the rapid expansion of smaller towns.

## Possible Green Belt extension south west of Nailsea and south east of Clevedon

51. This general area is shown in the schedules as area 38, extending into area 39. The submitted Draft RSS shows a possible green belt extension south west of Nailsea, but not south of Clevedon; North Somerset Council are making representations on this point. As with the area adjoining Thornbury and Yate, the case for the area's protection as Green Belt rests on its ability to check the unrestricted sprawl, and protect the setting, of the two towns. In addition, it could help prevent coalescence between the towns and villages in the area. Conversely, it could be argued that much of the area is already effectively safeguarded from development by national environmental floodplain designations.

### Possible Green Belt extension between Bath and Norton Radstock

52. This general area is shown in the schedules as area 36. The case for Green Belt protection in this area is of a similar weight to the previous areas. It would help check sprawl around Norton Radstock, protect the town's setting, and help

prevent coalescence between the towns and villages in the area. It could also help focus urban regeneration initiatives both within Norton Radstock itself, and at the strategic level within Bath.

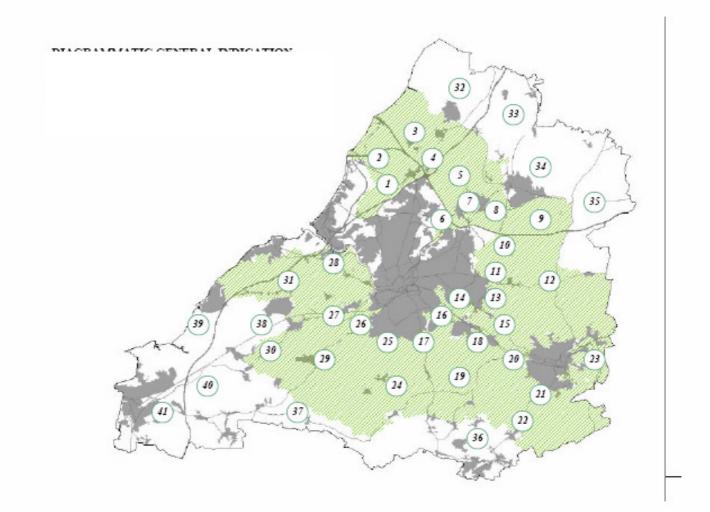
### **Further work**

- 53. This note and schedules should be seen as only a part of a wider area of work to refine and develop the First Detailed Proposals' conclusions on areas of search for urban extensions. Final recommendations on changes to the general extent of the Green Belt, at both inner and outer boundaries, will also need to take into account this wider work in terms of a broad range of sustainability criteria, not only appraisal against PPG2 purposes.
- 54. In line with the conclusions of the Buchanan report, this further work will require a reappraisal of different areas in terms of sustainability considerations. This should include an appraisal of the landscape character of areas of current and potential green belt, deriving from assessments undertaken in each of the authorities. Wider assessment in terms of sustainability criteria should also draw on the work on general locations which was carried out in 2004-05 and which was reported in summary to the Partnership Board in February 2006<sup>3</sup>.
- 55. This work needs to be revised, updated and agreed, and should take into account subsequent studies including GBSTS and more detailed work within each authority. Processes for progressing such work jointly have not been agreed between the authorities. In June 2006, the Regional Assembly indicated that they would consider commissioning further work, region-wide and/or within the West of England, to ensure that this work was completed in advance of the EIP.

<sup>3</sup> West of England Partnership Board, 24 February 2006, agenda item 3, appendix 1 - http://www.westofengland.org/downloads/3 FDPs2.pdf

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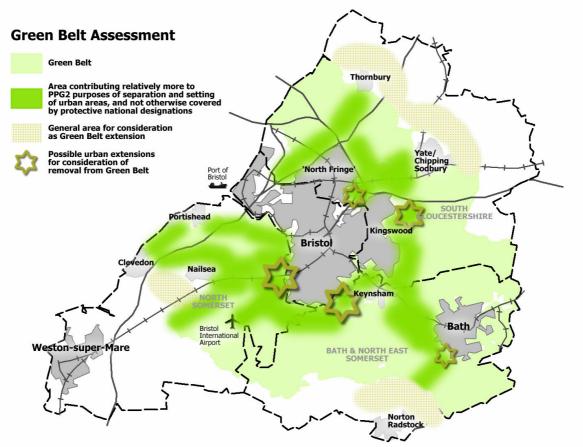
APPENDIX 1:
DIAGRAMMATIC GENERAL INDICATION OF AREAS ASSESSED IN TERMS OF
CONTRIBUTION MADE TO PPG2 GREEN BELT PURPOSES



### Appendix 2

Initial Green Belt Assessment

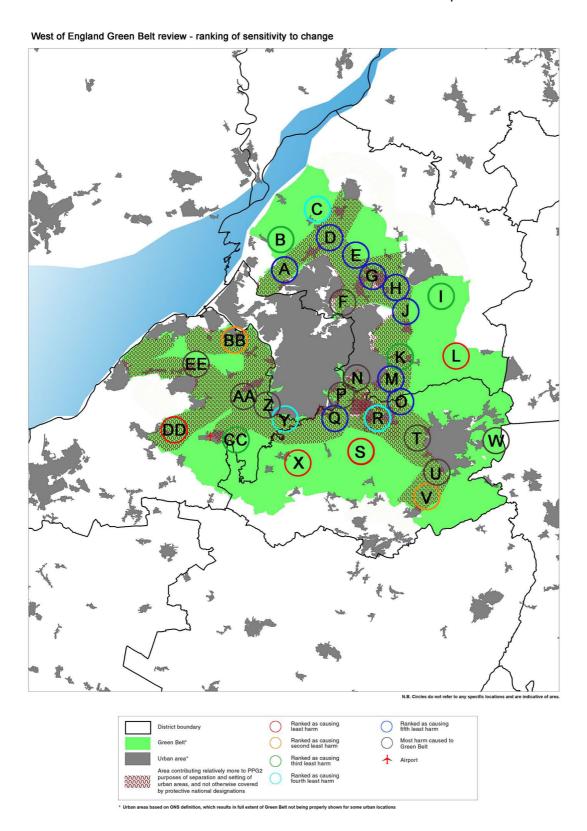
From report to West of England Partnership Planning, Transport And Environment Group, 14 October 2005



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Appendix 3

### Green Belt Assessment from Colin Buchanan and Partners report



APPENDIX 4 REVISED STRATEGIC ASSESSMENT OF CONTRIBUTION OF AREAS WITHIN AND BEYOND THE CURRENT GREEN BELT TO PPG2 GREEN BELT PURPOSES

	PPG2 Green Belt purposes :	to check the unrestricted sprawl of large built-up areas	to prevent neighbouring towns from merging into one another	to assist in safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns	to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
		A	AREAS WITHIN EXISTING GREEN BELT	TING GREEN BELT		
-	Almondsbury / Hallen area	Yes. M5 forms clear boundary N of Cribbs Causeway.	Yes- protects land between Bristol and Severnside (could be seen as green wedge within urban area)	Yes. Protects separate identities of villages. Prominent slopes seen from W protect views of urban area.	Urban character generally not 'special' in this area, apart from Blaise Castle / Kingsweston area with which there is some visual relationship with green belt area S of M5	Possible but no evidence
0	Pilning area	Yes. Prevents coalescence of Pilning with Sev'side	Contributes to protection of land between villages.	Yes. Prevents coalescence of Pilning with Sev Beach	No	No
က	Tockington / Alveston area	No	Contributes to protection of land between villages.	Yes. Protects open setting of villages inc Tockington	Contributes to protection and setting of Thornbury	No
4	Hortham area	Yes. M4 forms clear N boundary to urban area W of Stoke Gifford, along M5 / A38,	Contributes to protection of land between villages.	Yes. Protects separate identity of Almondsbury village. Prominent in views from M5.	No – urban character not 'special' in this area	οN
2	Earthcott area	Yes. M4 forms clear N boundary to urban area W of Stoke Gifford.	To some extent protects land between Bristol urban area, Thornbury and Yate	Yes. Protects identity of Winterbourne village.	No	Possible but no evidence

	PPG2 Green Belt purposes :	to check the unrestricted sprawl of large built-up areas	to prevent neighbouring towns from merging into one another	to assist in safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns	to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
9	Harry Stoke / Hambrook area	Yes. Protects key gateway to Bristol urban area along M32	Protects land between Harry Stoke, Hambrook and Frenchay – green wedge within urban area	Yes. Development may undermine viability of agriculture.	Yes. Protects key gateway to Bristol urban area along M32, linking with Stoke Park.	Possible but no evidence
2	Frampton Cotterell / Winterbourne area	Yes. M4 forms clear N boundary to urban area in this area. Area also contributes to preventing sprawl of Yate.	Yes – important in protecting land between Bristol urban area and Yate	Yes. Important in protecting separate identity of villages	ON.	Possible but no evidence
8	Coalpit Heath area	Yes. M4 forms clear N boundary to urban area in this area.	Yes – important in protecting land between Bristol urban area and Yate	Yes. Prevents coalescence between Coalpit Heath and Yate	No	No
6	Wapley area (S of Yate)	Could prevent "unrestricted sprawl" of Yate	Yes – important in protecting land between Bristol urban area and Yate	Yes. Protects against southern expansion of Yate. Much of area prominent in views.	ON	No
10	E of Emersons Green / Pucklechurch area	Yes. Prevents coalescence between Emersons Green and Pucklechurch.	To some extent protects land between Bristol urban area and Yate	Yes. Contributes to preventing coalescence between urban area and villages. Prominent ridgeline in views from urban area. Visible from AONB.	O <sub>N</sub>	ON.
11	Warmley / Shortwood area	Yes. Ring road provides clear physical boundary to urban area	Contributes to protection of land between villages.	Yes. Protects separate identities of Warmley and Shortwood villages. Area visible from AONB and Kingswood.	Not as such – urban character not 'special' in this area, but includes village conservation areas	Possible but no evidence
12	Wick / Marshfield area	No	Contributes to protection of land between villages.	Protects open setting of villages, but distant from urban areas	ON	No

	PPG2 Green Belt purposes :	to check the unrestricted sprawl of large built-up areas	to prevent neighbouring towns from merging into one another	to assist in safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns	to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
13	Oldland Common area	Yes	Yes. Contributes to protection of land between Bristol urban area and Bath	Yes. Protects separate identity of Bitton etc. Area visible from AONB and Kingswood.	Not as such – urban character not 'special' in this area	Possible but no evidence
14	Hanham area	Yes	Yes – protects land between Bristol urban area and Keynsham	Yes – protects Avon valley in E Bristol, also partly covered by conservation designations. Hanham Hill prevents views of urban area from S.	Yes – Hanham conservation area	Possible but no evidence
15	Bitton area	Yes	Yes – protects land between Bristol urban area and Bath	Yes. Protects separate identities of Bitton and Keynsham. Ridge important in views from urban area and AONB.	No, but includes village conservation areas.	ON
16	Hicks Gate / Stockwood Vale area	Yes	Yes – protects land between Bristol urban area and Bath and between Bristol and Keynsham	Yes	Yes – protects gateway to Bristol urban area	Possible, but conversely development may assist urban regeneration
17	Whitchurch area	Yes	Partly protects land between Bristol urban area and Keynsham and contributes to protection of land between Bristol urban area and Bath	Yes. Protects separate identity of Whitchurch village.	Not as such – urban character not 'special' in this area	Possible, but conversely development may assist urban regeneration
18	Keynsham/Saltford area	Contributes to preventing "sprawl" of Keynsham	Yes – protects land between Bristol urban area and Bath	Yes. Protects separate identities of Keynsham and Salfford.	Protects Keynsham	Possible but no evidence
19	Marksbury area (S of Keynsham)	No	Contributes to protection of land between villages.	Protects open setting of villages, but distant from urban areas	No	No
20	Newton St Loe area (W of Bath)	Yes	Yes – protects land between Bristol urban area and Bath	Yes. Protects separate identities of Newton St Loe, Corston etc.	Yes	Possible but no evidence

	PPG2 Green Belt purposes :	to check the unrestricted sprawl of large built-up areas	to prevent neighbouring towns from merging into one another	to assist in safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns	to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Ош	Odd Down area (S of Bath)	Yes	Yes – protects land between Bath and Peasedown St John	Yes. Protects separate identities of villages.	Yes	Possible but no evidence
ㅁ 읈 ㅁ	Dunkerton area (between Bath and Peasedown St John)	No	Yes – protects land between Bath urban area and PSJ	Protects separate identities and open setting of villages, but distant from urban areas	O.N.	N <sub>O</sub>
Z	N and E of Bath	Yes	Contributes to protection of land between villages.	Yes, but countryside otherwise protected as AONB	Yes	Possible but no evidence
O	Chew Magna area	No	Contributes to protection of land between villages.	Protects open setting of villages, but distant from urban areas	No	No
	Dundry area	Yes	Contributes to protection of land between villages.	Yes	Yes	Possible but no evidence
10	Highridge / Barrow Common area	Yes	Protects land between Bristol urban area and airport	Yes	Yes – protects gateway to Bristol urban area	Possible, but conversely development may assist urban regeneration
4 4	Ashton Vale / Long Ashton area	Yes	Contributes to protection of land between villages.	Yes – protects land between Bristol and Backwell and Bristol and Long Ashton	Yes	Possible, but conversely development may assist urban regeneration
шс	Easton in Gordano / Pill area	No- separated from urban area by river and from RPD by M5	Contributes to protection of land between villages.	Yes	Yes	No
٧	Airport area	Yes	Contributes to protection of land between villages.	Yes	No	Yes – contributes to best use of airport land
ОВ	Cleeve area (S of Backwell)	Not directly	Contributes to protection of land between villages.	Protects open setting of villages, but distant from urban areas	No	No

	PPG2 Green Belt	to check the	to prevent	to assist in	to preserve the setting to assist in urban	to assist in urban
	purposes :	unrestricted sprawl of large built-up areas	neighbouring towns from meraina into one	safeguarding the countryside from	and special character of historic towns	regeneration, by encouraging the
				encroachment		recycling of derelict and other urban
						land.
31	Tickenham area	Yes	Yes -contributes to	Protects open setting of Yes	Yes	No
			protection of land	villages, but distant		
			between Bristol urban	from urban areas		
			area, Nailsea,			
			Clevedon and			
			Portishead			

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	PPG2 Green	to check the	to prevent neighbouring	to assist in safeguarding	to preserve the	to assist in urban
	· sesodind head	unrestricted sprawi or large built-up areas	towns noth merging into one another	ine countryside nom encroachment	seung and special character of historic towns	regeneration, by encouraging the recycling of derelict and other urban land.
×	Severn Beach	Could prevent coalescence of Severnside with Severn Beach	Could protect land between Severn Beach and Severnside	Yes. Could prevent coalescence of Severnside with Severn Beach	ON.	NO.
32	N / E of Thornbury	Could prevent "unrestricted sprawl" of Thornbury	Contributes to protection of land between villages.	Yes	Yes	Possible
33	Falfield / Charfield area	No	Contributes to protection of land between villages.	Protects open setting of villages, but distant from urban areas	No	No
34	N / E of Yate / Chipping Sodbury	Could prevent "unrestricted sprawl" of Yate	Contributes to protection of land between Yate and Wickwar	Yes	Yes – could contribute to protection of Chipping Sodbury, and possibly also Wickwar	Possible
35	Hawkesbury / Badminton area	No	Contributes to protection of land between villages.	Protects open setting of villages, but distant from urban areas. Mostly AONB	No	No
36	Adjoining / N of Norton Radstock	Possibly	Yes – could prevent further coalescence of towns / villages	Yes	Yes	Possible
37	Churchill / Blagdon area	No	Contributes to protection of land between villages.	Protects open setting of villages, but distant from urban areas. Mostly AONB	No	No
38	SW of Nailsea/ Backwell	Yes	Yes – could prevent further coalescence of towns / villages	Yes – but mostly floodplain	Possibly	No
36	S of Clevedon	Yes	Contributes to protection of land between villages.	Yes – but mostly floodplain	Yes	Possible

- 6		
	o Z	Possible
	o Z	ON.
	Possibly – but mostly floodplain	Yes – but mostly floodplain
	Contributes to protection of land between villages.	Could prevent coalescence with villages (Hutton, Locking)
	Could possibly contribute to preventing "unrestricted sprawl" of WsM	Could prevent "unrestricted sprawl" of WsM
	40 Huish area	Weston-super- Mare area (W of M5)
	40	41

# REVISED STRATEGIC ASSESSMENT OF CONTRIBUTION TO GREEN BELT PURPOSES (BASED ON VERBAL ASSESSMENT IN APPENDIX 4)

**APPENDIX 5** 

PPG2	PPG2 Green Belt purposes :	to check the unrestricted sprawl of large built-up areas	to prevent neighbouring towns from merging into one another	to assist in safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns	to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	OVERALL ASSESSMENT OF AREA'S CONTRIBUTION TO GREEN BELT PURPOSES	CBP REPORT SCORE For comparison
			AREAS WITHII	AREAS WITHIN EXISTING GREEN BELT	EN BELT			
-	Almondsbury / Hallen area	strong	strong	strong	moderate	weak	strong	9
2	Pilning area	strong	weak	strong	weak	weak	moderate	4
က	Tockington / Alveston area	weak	weak	strong	moderate	weak	moderate	5
4	Hortham area	strong	weak	strong	moderate	weak	moderate	9
5	Earthcott area	strong	moderate	strong	weak	uncertain	moderate	9
9	Harry Stoke area	strong	strong	strong	strong	uncertain	strong	7
_	Frampton Cotterell / Winterbourne area	strong	strong	strong	weak	uncertain	strong	9
80	Coalpit Heath area	strong	strong	strong	weak	weak	moderate	9
6	Wapley area (S of Yate)	strong	strong	strong	weak	weak	moderate	4
10	E of Emersons Green / Pucklechurch area	strong	strong	strong	weak	weak	moderate	9
<del>-</del>	Warmley / Shortwood area	strong	weak	strong	moderate	uncertain	moderate	4
12	Wick / Marshfield area	weak	weak	moderate	weak	weak	weak	2
13	Oldland Common area	strong	strong	strong	moderate	uncertain	strong	9
14	Hanham area	strong	strong	strong	strong	uncertain	strong	7
15	Bitton area	strong	very strong	strong	weak	weak	strong	9

PPG2	PPG2 Green Belt purposes :	to check the unrestricted sprawl of large built-up areas	to prevent neighbouring towns from merging into one another	to assist in safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns	to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	OVERALL ASSESSMENT OF AREA'S CONTRIBUTION TO GREEN BELT PURPOSES	CBP REPORT SCORE For comparison
16	Hicks Gate / Stockwood Vale area	strong	very strong	strong	strong	uncertain	very strong	7
17	Whitchurch area	strong	strong	strong	moderate	uncertain	strong	9
18	Keynsham/Saltford area	strong	very strong	strong	strong	uncertain	very strong	5
19	Marksbury area (S of Keynsham)	weak	weak	moderate	weak	weak	weak	0
20	Newton St Loe area (W of Bath)	strong	very strong	strong	strong	uncertain	very strong	7
21	Odd Down area (S of Bath)	strong	strong	strong	strong	uncertain	strong	7
22	Dunkerton area (between Bath and Peasedown St John)	weak	strong	moderate	weak	weak	moderate	က
23	N and E of Bath	strong	moderate	moderate	strong	uncertain	moderate	7
24	Chew Magna area	weak	weak	moderate	weak	weak	weak	2
25	Dundry area	strong	weak	strong	strong	uncertain	strong	5
56	Highridge / Barrow Common area	strong	strong	strong	strong	uncertain	strong	7
27	Ashton Vale / Long Ashton area	strong	weak	strong	strong	uncertain	strong	7
58	Easton in Gordano / Pill area	weak	weak	strong	strong	weak	moderate	က
29	Airport area	strong	weak	strong	weak	strong	moderate	4
30	Cleeve area (S of Backwell)	weak	weak	moderate	weak	weak	weak	2
31	Tickenham area	strong	strong	moderate	strong	weak	strong	7

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PPG	PPG2 Green Belt purposes :	to check the unrestricted sprawl of large built-up areas	to prevent neighbouring towns from merging into one another	to assist in safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns	to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	OVERALL ASSESSMENT OF AREA'S POTENTIAL CONTRIBUTION TO GREEN BELT PURPOSES	CBP SCORE
×	Severn Beach	strong	strong	strong	weak	weak	moderate	na
32	N / E of Thornbury	strong	weak	strong	strong	weak	moderate	na
33	Falfield / Charfield area	weak	weak	moderate	weak	weak	weak	na
34	N / E of Yate / CS	strong	moderate	strong	moderate	weak	moderate	na
35	Hawkesbury / Badminton area	weak	weak	moderate	weak	weak	weak	na
36	Adjoining / N of Norton Radstock	moderate	strong	strong	moderate	uncertain	moderate	na
37	Churchill / Blagdon area	weak	weak	moderate	weak	weak	weak	na
38	SW of Nailsea/ Backwell	strong	moderate	moderate	strong	weak	moderate	na
33	S of Clevedon	strong	weak	moderate	strong	uncertain	moderate	na
40	Huish area	moderate	weak	moderate	weak	weak	weak	na
4	Weston-super-Mare area (W of M5)	strong	weak	strong	weak	uncertain	moderate	na

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