



# Placemaking Plan Options Document

## Requests for land to be removed from the Green Belt

### Analysis and recommendations

November 2014

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## Requests for land to be removed from the Green Belt following the consultation on the Launch Document in July 2013

### Context

The NPPF makes it clear that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in exceptional circumstances. The Core Strategy sets out the strategic approach to the Green Belt reflecting national policy together with the general extent of the Green Belt.

Land has been removed from the Green Belt through the Core Strategy to accommodate the Strategic Site Allocations. Through the Placemaking Plan there may be some scope to amend minor anomalies in the boundary only if the change can be fully justified and exceptional circumstances can be demonstrated within the context of national Green Belt policy as set out in the NPPF. Boundaries should be clearly defined using readily recognisable physical features, such as roads and hedgerows, and likely to be permanent.

The Placemaking Plan Launch consultation, which took place between July and September 2013, provided the opportunity for respondents to make a case for exceptional circumstances to justify an amendment to specific parts of the detailed Green Belt boundary. Such requests were to be accompanied by the changes sought to the Green Belt boundary on an Ordnance Survey map base together with full written justification.

In response a number of requests were received to remove specific areas of land from the Green Belt. These have been reviewed and the analysis and recommendations are set out in the table below.

### Analysis and recommendations

	Respondent [Rep No]	Location	Analysis	Conclusion and recommendation
1	Mr and Dr Sweetenham [4800]	Combe House, Lynbrook Lane, Bath BA2 5NB	<b>Case</b> The case for removing this area of land from the Green Belt is based on an assessment against the purposes of the Green Belt as set out in the NPPF. It concludes that the land in question does not fulfil these five purposes and therefore is an	There are no exceptional circumstances to justify removing this land from the Green Belt.  No change recommended to the Green Belt boundary.

	Respondent [Rep No]	Location	Analysis	Conclusion and recommendation
			<p>anomaly that should be rectified through the Placemaking Plan. Although the respondents state there are no current plans to develop the land, development should not be precluded in principle. They point to the sustainability of the location and that there are other policy designations to control development on this site if it were to be removed from the Green Belt.</p> <p><b>Response</b></p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances. Whilst this site is relatively small and abuts the Green Belt boundary, it still contributes to the purposes of the Green Belt in this location (as evidenced in the Green Belt assessment undertaken by Arup for the Core Strategy) and there are no change in circumstances since boundary last defined in 2007 or compelling or overriding reasons put forward to justify amending the Green Belt boundary in this location.</p>	
2	Mr and Mrs Collins [4805]	Orchard House, Bathwick Hill, Bath BA2 6LB	<p><b>Case</b></p> <p>The case for removing this area of land from the Green Belt is based on an assessment against the purposes of the Green Belt as set out in the NPPF. It concludes that the land in question does not fulfil these five purposes and therefore is an anomaly that should be rectified through the Placemaking Plan. Although the respondents state there are no current plans to develop the</p>	<p>There are no exceptional circumstances to justify removing this land from the Green Belt.</p> <p>No change recommended to the Green Belt boundary.</p>

	Respondent [Rep No]	Location	Analysis	Conclusion and recommendation
			<p>land, development should not be precluded in principle. They point to the sustainability of the location and that there are other policy designations to control development on this site if it were to be removed from the Green Belt.</p> <p><b>Response</b></p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances. Whilst this site is relatively small and abuts the Green Belt boundary, it still contributes to the purposes of the Green Belt in this location (as evidenced in the Green Belt assessment undertaken by Arup for the Core Strategy) and there are no change in circumstances since boundary last defined in 2007 or compelling or overriding reasons put forward to justify amending the Green Belt boundary in this location.</p>	
3	F R Daw [4811]	Prior Park Garden Centre, Prior Park Road, Bath	<p><b>Case</b></p> <p>The case for removing this area of land from the Green Belt is based on an assessment against the purposes of the Green Belt as set out in the NPPF. It concludes that the land in question does not fulfil these five purposes especially as the commercial operation lies in its entirety within the Green Belt.</p> <p>The respondent also draws attention to the objection made to the Bath City Plan (1990) to remove the site from the then proposed Green Belt and allocate for housing. The Inspector</p>	<p>There are no exceptional circumstances to justify removing this land from the Green Belt.</p> <p>No change recommended to the Green Belt boundary.</p>

	Respondent [Rep No]	Location	Analysis	Conclusion and recommendation
			<p>recommended that the land be deleted from the Green Belt and the part occupied by the garden centre developed for housing. The Council disagreed (June 1989) and the site was included in the Green Belt.</p> <p>Although the respondent does not allude to any current plans to development the site, at some future date it might be appropriate to consider the 'recycling' of this land and this is put forward as the principal reason for the site to be excluded from the Green Belt. They point to the sustainability of the location and that there are other policy designations to control development on this site if it were to be removed from the Green Belt.</p> <p><b>Response</b></p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances. Whilst this site is relatively small and abuts the Green Belt boundary, it still contributes to the purposes of the Green Belt in this location (as evidenced in the Green Belt assessment undertaken by Arup for the Core Strategy) and there are no change in circumstances since boundary last defined in 2007 or compelling or overriding reasons put forward to justify amending the Green Belt boundary in this location.</p> <p>The Government places great importance on protecting the Green Belt. However, should the</p>	

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			<p>respondent wish to redevelop the site at some point in the future the NPPF provides scope for this to be considered under para 89 which allows as appropriate development in the Green Belt:</p> <p><i>limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.</i></p>	
4	Richard Hemmings [4695]	Land to the West of Keynsham	<p><b>Case</b></p> <p>It is requested that land is released from the Green Belt in the Hicks Gate area and allocated for residential development to meet the strategic housing need.</p> <p><b>Response</b></p> <p>This site and the issue of housing development in the Green Belt adjoining Keynsham were considered at the Core Strategy Examination. The Inspector agreed that land to the south west and east of Keynsham should be removed from the Green Belt and allocated for development and is satisfied that there are no clearly preferable alternative sites in the Green Belt abutting Keynsham which should be allocated or safeguarded in this plan (para 220 of Inspector's Report).</p>	<p>The Inspector, in his Report, has concluded that sufficient land allocated though the Core Strategy and with previous commitments the District's housing requirement can be met within the Plan period without the need to allocate further land at this stage.</p> <p>There are no exceptional circumstances to justify removing this land from the Green Belt. No change recommended to the Green Belt boundary.</p>

	Respondent [Rep No]	Location	Analysis	Conclusion and recommendation
5	Mrs O Perry [5176]	Land to south east of Farmborough	<p><b>Case</b></p> <p>It is requested that land at Farmborough is considered for exclusion from the Green Belt for future housing development.</p> <p><b>Response</b></p> <p>There is no case for exceptional circumstances accompanying the request to justify removing this land from the Green Belt. The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances. Whilst this site is relatively small and abuts the Green Belt boundary, it still contributes to the purposes of the Green Belt in this location and there are no compelling or overriding reasons put forward to justify amending the Green Belt boundary in this location.</p>	<p>The Inspector, in his Report, has concluded that sufficient land allocated though the Core Strategy and with previous commitments the District's housing requirement can be met within the Plan period without the need to allocate further land at this stage and that there are no exceptional circumstances to justify removing land from the Green Belt adjoining villages (which includes this land).</p> <p>No change recommended to the Green Belt boundary.</p>
6	Dr J Gilbert [5175]	Land at Horseshoe Walk, Bath	<p><b>Case</b></p> <p>It is requested that a small triangle of land is removed from the Green Belt as it is felt that Green Belt restrictions make it difficult to make effective use of this land and cites the need for a larger garage to be reconstruct and reoriented as the principal reason for the request.</p> <p><b>Response</b></p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances. Whilst this site is</p>	<p>There are no exceptional circumstances to justify removing this land from the Green Belt.</p> <p>No change recommended to the Green Belt boundary.</p>



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			relatively small and abuts the Green Belt boundary, it still contributes to the purposes of the Green Belt in this location (as evidenced in the Green Belt assessment undertaken by Arup for the Core Strategy) and there are no change in circumstances since boundary last defined in 2007 or compelling or overriding reasons put forward to justify amending the Green Belt boundary in this location.	
7	Crest Nicholson (SW) Ltd [4711]	Manor Road, Saltford	<p><b>Case</b></p> <p>It is requested that land is released from the Green Belt adjoining Saltford and allocated residential development to meet the strategic housing need.</p> <p><b>Response</b></p> <p>Appeal (APP/F0114/A/13/219535) to allow up to 99 dwellings (12/05315/OUT) was overturned by SoS in March 2014 on Green Belt grounds. The merits of allocating this site for housing were considered through the Core Strategy Examination. The Inspector's Report, para 220 stated:</p> <p><i>'I am satisfied that there are no clearly preferable alternative sites in the Green Belt abutting Keynsham which should be allocated or safeguarded in this plan.... Land at Manor Road (Land parcel C4 in Green Belt Stage 2 Report Table 3.3.4, CD9/E9) is a relatively small parcel. Even if this was combined with the triangle of safeguarded land to the north (in the control of</i></p>	<p>The Inspector, in his Report, has concluded that sufficient land allocated though the Core Strategy and with previous commitments the District's housing requirement can be met within the Plan period without the need to allocate further land at this stage.</p> <p>There are no exceptional circumstances to justify removing this land from the Green Belt.</p> <p>No change recommended to the Green Belt boundary.</p>



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			<p><i>the same developer) it would not enjoy the accessibility benefits of the allocated land.'</i></p> <p>The Inspector concluded there were no exceptional circumstances to remove this land from the Green Belt and that more generally no exceptional circumstances exist that warrant removing land from the Green Belt adjoining villages within the District in order to meet the strategic housing requirement.</p>	
8	Stokefield Trust [397]	Land to the north of Pack Horse Lane, Southstoke, Bath	<p><b>Case</b></p> <p>The respondents claim that this site does not perform a true Green Belt function; and part or the entire site has potential for residential purposes without compromising the landscape quality of the area and developed at a density of 30 dph, this site could deliver between 50 – 55 dwellings within 5 years.</p> <p><b>Response</b></p> <p>This land is included in the SHLAA as a Bath Green Belt site E14biii. The assessment of the site describes the site as the visually more exposed area of the three parcels of land which comprises SHLAA site E14. It concludes that development of this site would be inappropriate.</p>	<p>The Inspector, in his Report, has concluded that sufficient land allocated though the Core Strategy and with previous commitments the District's housing requirement can be met within the Plan period without the need to allocate further land at this stage.</p> <p>There are no exceptional circumstances to justify removing this land from the Green Belt.</p> <p>No change recommended to the Green Belt boundary.</p>
9	Stratland LLP [4788]	Land at Hicks Gate, Keynsham	<p><b>Case</b></p> <p>It is requested that land is released from the Green Belt in the Hicks Gate and allocated for residential development to meet the strategic housing need.</p>	<p>The Inspector, in his Report, has concluded that sufficient land allocated though the Core Strategy and with previous commitments the District's</p>

	Respondent [Rep No]	Location	Analysis	Conclusion and recommendation
			<p><b>Response</b></p> <p>The merits of allocating this site for housing were discussed at the Core Strategy Hearings. The Inspector concluded that the allocation of this site is not a credible option to be pursued at this stage within B&amp;NES only. See Report for detailed reasoning (paras 114 - 116).</p>	<p>housing requirement can be met within the Plan period without the need to allocate further land at this stage.</p> <p>There are no exceptional circumstances to justify removing this land from the Green Belt.</p> <p>No change recommended to the Green Belt boundary.</p>
10	Sebastian Greene [3]	Land at Mulberry House, Golf Course Road, Bathwick, Bath BA2 6JG	<p><b>Case</b></p> <p>The Green Belt boundary cuts across the householder's garden and it is requested that the boundary is moved to exclude all land within the curtilage of the property from the Green Belt.</p> <p><b>Response</b></p> <p>Planning permission (07/00124/FUL) for earth sheltered accommodation ancillary to main dwelling refused 29.3.07 on Green Belt and access grounds.</p> <p>No case for exceptional circumstances has been submitted other than it is claimed that the Green Belt boundary which cuts across the garden does not follow any feature on the ground. From scrutiny of historic maps it appears that the Green Belt boundary in this location did follow a recognisable feature when the Green Belt boundary was originally drawn which may no longer be obvious or in existence as the Green Belt was defined before Mulberry House was</p>	<p>There are no exceptional circumstances to justify removing this land from the Green Belt.</p> <p>No change recommended to the Green Belt boundary.</p>

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			<p>built.</p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances. Whilst this site is relatively small and abuts the Green Belt boundary, it still contributes to the purposes of the Green Belt in this location (as evidenced in the Green Belt assessment undertaken by Arup for the Core Strategy) and there are no change in circumstances since boundary last defined in 2007 or compelling or overriding reasons put forward to justify amending the Green Belt boundary in this location.</p>	