

An aerial photograph of a village nestled in a valley. A river flows through the center, surrounded by lush green fields and scattered buildings. The scene is captured from a high angle, showing the layout of the settlement and its integration with the natural landscape.

Placemaking Plan (Pre-Submission Draft)

Requests for land to be removed from
the Green Belt

Analysis and recommendations

December 2015

Placemaking Plan (Pre-Submission Draft) - Detailed Green Belt boundary

Background

Through previous consultations on the Placemaking Plan there have been a small number of requests to make amendments to the Green Belt boundary around the built up area of Bath. These relate to the following properties the locations of which are indicated on Map 1:

- Combe House, Lynbrook Lane
- Orchard House, Bathwick Hill
- Prior Park Garden Centre, Prior Park Road
- Land at Horseshoe Walk
- Kingswood School, Lansdown Rd

An initial assessment of the cases for boundary changes undertaken in 2014¹ indicated that there are no exceptional circumstances that justify any amendments to the existing Green Belt boundary. This assessment has been reviewed in the light of further representations received during the consultation on the Placemaking Plan Options document. The analysis and recommendations are set out in the table below.

Policy context

The Government attaches great importance to Green Belts (NPPF, para 79) and its policy to protect land in the Green Belt from inappropriate development. The NPPF makes it clear that the fundamental aim of the Green Belt policy is to prevent urban

sprawl by keeping land permanently open. Green Belt boundaries are intended to be enduring, and once a Green Belt has been established and approved, exceptional circumstances are required to justify an alteration and not just general planning reasons. The adopted Core Strategy sets out the strategic approach to the Green Belt reflecting national policy together with the general extent of the Green Belt.

Through the Core Strategy it has been established that there are no exceptional circumstances to warrant altering the Green Belt boundary to provide for development opportunities other than the changes already made at the four allocated Strategic Sites at Odd Down, Bath, East of Keynsham, South West Keynsham and at Whitchurch.

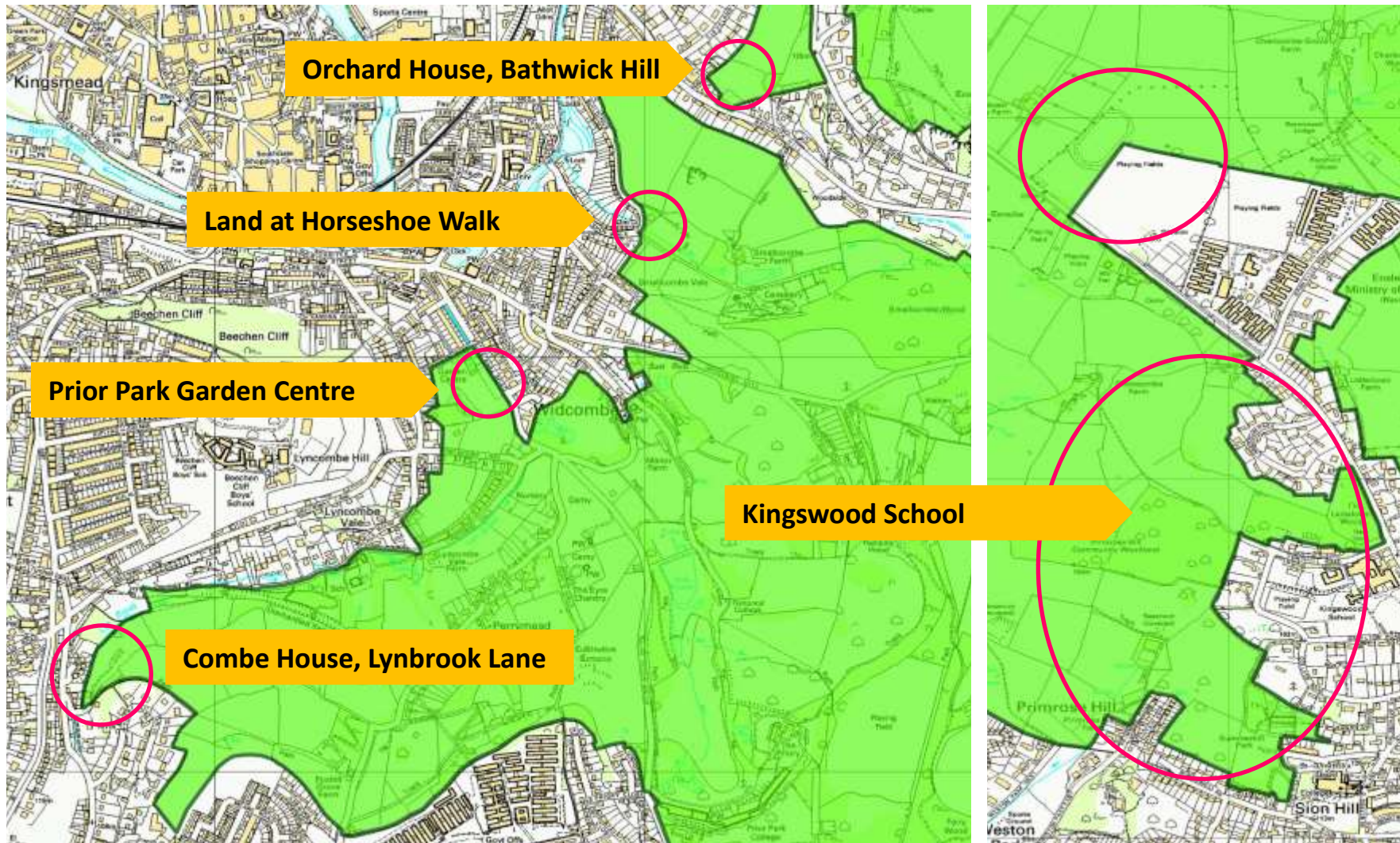
Summary of findings

The five cases have been reviewed in the light of the NPPF and the [Green Belt Review \(Stage 1\)](#), undertaken by Ove Arup & Partners Ltd (2013) for the Core Strategy.

In all cases:

- the established Green Belt boundary follows readily recognisable physical features such as roads and hedgerows, in accordance with Government policy
- there are no exceptional circumstances to justify removing this land from the Green Belt
- no change is recommended to the Green Belt boundary at these locations

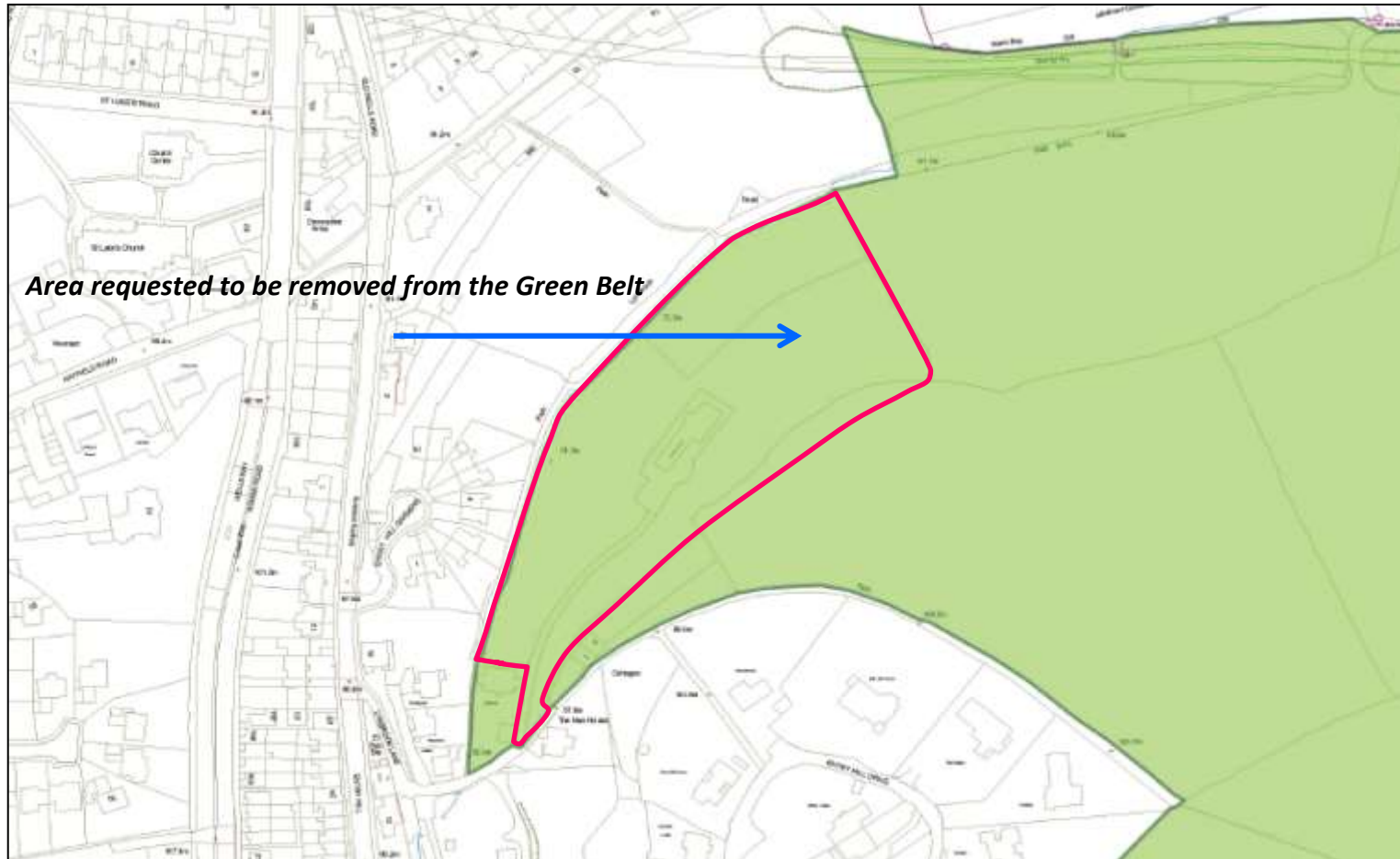
¹ [Requests for land to be removed from the Green Belt - Analysis and recommendations \(November 2014\)](#)



Map 1: Overview of Green Belt boundary amendment requests in Bath

Analysis and recommendations

1. Combe House, Lynbrook Lane, Bath BA2 5NB



Respondent [Rep No]

Analysis

Conclusion and recommendation

Mr and Dr Sweetenham [4800]

Case Summary

There are no exceptional

<p>Launch: 1 Sweetenham - Launch response [4800].pdf</p> <p>Options: 1a Sweetenham - Options response [4800].pdf</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 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>Since the respondents submitted representations on the Placemaking Plan Options they have sent a revised plan indicating that the change should only relate to the removal of Combe House and its garden from the Green Belt. This is reflected in the map above.</p> <p>Response</p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances.</p> <p>The boundary of the Green Belt in this location is clearly drawn to follow the line of Lyn Brook south to where it joins the path to the rear of Entry Hill Drive. This boundary forms a clear delineation between the open rural character and the denseness of the urban form. There are no obvious anomalies in the definition of the Green Belt boundary at this location.</p> <p>This site is relatively large and forms an important part of the Green Belt in this location. Removal of this land as defined in the map above will leave Lynbrook</p>	<p>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>Cottage and its garden as a Green Belt 'island' which would be anomalous.</p> <p>The Green Belt Review Stage 1 Report² undertaken by Arup for the Core Strategy in 2013 indicates that this site forms part of Land Parcel: South East of Bath and having assessed this parcel concludes it contributes to the five purposes of the Green Belt (see pages 49 - 51).</p> <p>There have been no change in circumstances since boundary last defined in 2007 or exceptional circumstances put forward to justify amending the Green Belt boundary in this location.</p>	
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² [Green Belt Review \(Stage 1\) \(6.1 MB\)](#), Ove Arup & Partners Ltd (2013)

2. Orchard House, Bathwick Hill, Bath BA2 6LB



Respondent [Rep No]	Analysis	Conclusion and recommendation
Mr and Mrs Collins [4805]	<p>Case Summary</p> <p>The case for removing this area of land from the Green Belt is based on an</p>	<p>There are no exceptional circumstances to justify</p>

<p>Launch: 2 Collins - Launch response [4805].pdf</p> <p>Options: 2a Collins - Options response [4805].pdf</p>	<p>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 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>Response</p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances.</p> <p>The boundary of the Green Belt in this location is clearly drawn to follow the rear gardens of the properties fronting Cleveland Walk, 28 - 33 Bathwick Hill, the line of the road westwards to include Orchard House and then the rear gardens between Hillstead and The Bungalow. This boundary forms a clear separation between the openness of the rural character and the denseness of the urban form. There are no obvious anomalies in the definition of the Green Belt boundary at this location.</p> <p>This site is relatively large and forms an important part of the Green Belt in this location. The Green Belt Review Stage 1 Report³ undertaken by Arup for the Core Strategy in 2013 indicates that this site forms part of Land Parcel: South East of Bath and having assessed this parcel concludes it contributes to the five purposes of the Green Belt (see pages 49 - 51).</p> <p>There have been no change in circumstances since boundary last defined in 2007 or exceptional circumstances put forward to justify amending the Green Belt boundary in this location.</p>	<p>removing this land from the Green Belt.</p> <p>No change recommended to the Green Belt boundary.</p>
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³ [Green Belt Review \(Stage 1\) \(6.1 MB\)](#), Ove Arup & Partners Ltd (2013)

3. Prior Park Garden Centre, Prior Park Road, Bath



Respondent [Rep No]	Analysis	Conclusion and recommendation
F R Daw [4811]	<p>Case Summary</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</p>	<p>There are no exceptional circumstances to justify removing this land from the Green Belt.</p>

<p>Launch: 3 Fred Daw - Launch response [4811].pdf</p> <p>Options: 3a Fred Daw - Options response [4811].pdf</p>	<p>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 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 redevelop 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>Response</p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances.</p> <p>The boundary of the Green Belt in this location is clearly drawn to follow Prior Park Road forming a clear separation between the open, rural character and the denseness of the urban form. There are no obvious anomalies in the definition of the Green Belt boundary at this location.</p> <p>This site is relatively large and forms an important part of the Green Belt in this location. The Green Belt Review Stage 1 Report⁴ undertaken by Arup for the Core Strategy in 2013 indicates that this site forms part of Land Parcel: South East of Bath and having assessed this parcel concludes it contributes to the five purposes of the Green Belt (see pages 49 - 51).</p> <p>There has been no change in circumstances since the boundary was last defined in 2007 or exceptional circumstances put forward to justify</p>	<p>No change recommended to the Green Belt boundary.</p>
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⁴ [Green Belt Review \(Stage 1\) \(6.1 MB\)](#), Ove Arup & Partners Ltd (2013)

	<p>amending the Green Belt boundary in this location.</p> <p>The Government places great importance on protecting the Green Belt. However, should the 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>	
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4. Land at Horseshoe Walk, Bath, BA2 6DE

Area requested to be removed from the Green Belt

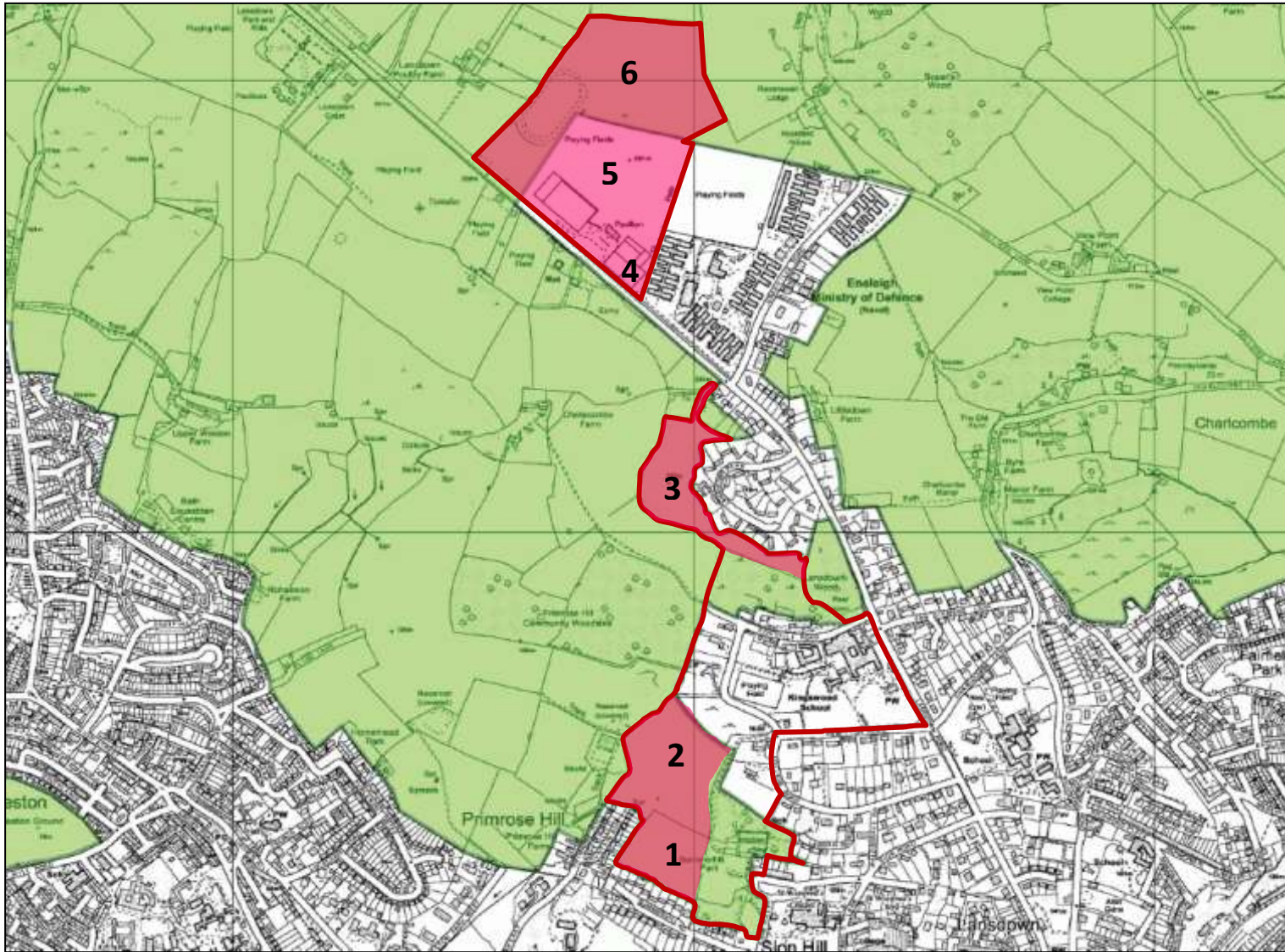


Respondent [Rep No]	Analysis	Conclusion and recommendation
Dr J Gilbert [Respondent 5175]	<p>Case Summary</p> <p>It is requested that a small triangle of land is removed from the Green Belt as it is felt that Green Belt restrictions make it difficult to make effective use of this land and cites the need for a larger garage to be reconstructed and reoriented as the principal reason for the request.</p> <p>Response</p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances.</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>

	<p>The boundary of the Green Belt is clearly drawn to follow the line of the road (Horseshoe Walk) and forms a clear separation between the openness of the rural character and the denseness of the urban form. There are no obvious anomalies in the definition of the Green Belt boundary at this location.</p> <p>Whilst this site is relatively small and abuts the Green Belt boundary, it still forms an important part of the Green Belt. The Green Belt Review Stage 1 Report⁵ undertaken by Arup for the Core Strategy in 2013 indicates that this site forms part of Land Parcel: South East of Bath and having assessed this parcel concludes it contributes to the five purposes of the Green Belt (see pages 49 - 51).</p> <p>There have been no change in circumstances since boundary last defined in 2007 or exceptional circumstances put forward to justify amending the Green Belt boundary in this location.</p> <p>However, should the respondent wish to redevelop his garage at some point in the future there maybe scope within the provisions of the NPPF for this to be considered. Para 89 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>	
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⁵ [Green Belt Review \(Stage 1\) \(6.1 MB\)](#), Ove Arup & Partners Ltd (2013)

5. Kingswood School, Lansdown Rd, Bath BA1 5RG



Respondent [Rep No]	Analysis	Conclusion and recommendation
Kingswood Foundation [4719]	<p><i>Case Summary</i></p> <p>The School is currently preparing an Estate Strategy to consider how it will expand and grow to meet future needs. Two main objectives for the Strategy:</p> <ul style="list-style-type: none"> - To develop and improve its facilities to meet its future needs and enhance its position - including improvements to its teaching, boarding and sports facilities - To make optimum use of its estate including justifying development of some of its land interests for residential development to allow the Kingswood Foundation to reinvest in improving its facilities. 'This could also assist the growth objectives of the B&NES Core Strategy'. <p>In order to achieve these objectives, the Foundation has also identified the following outputs:</p> <ul style="list-style-type: none"> - release of the Kingswood Foundation's land interests from the Green Belt in order to enable the School to make optimum use of its estate. - designation of the main campus as a 'major existing developed site in the Green Belt'. - inclusion of Areas 1-6 in any review of land available for potential residential development, and their subsequent removal from the Green Belt - however, in responding to the Options consultation the respondent has confirmed that Areas 1-4 are no longer being presented as options for disposal for development. This just leaves Areas 5 and 6 and only Areas 6 is in the Green Belt. <p>Response</p> <p>The NPPF clearly states that once established, Green Belt boundaries should only be altered in exceptional circumstances.</p> <p>With regard Area 6, the boundary of the Green Belt in this location is clearly drawn to follow the line of playing fields adjoining the former MoD site at Ensleigh. There are no obvious anomalies in the definition of</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>

	<p>the Green Belt boundary at this location.</p> <p>The extent of the area of land requested to be excluded is large. It forms an important part of the Green Belt in this location The Green Belt Review Stage 1 Report⁶ undertaken by Arup for the Core Strategy in 2013 indicates that this site forms part of Land Parcel: North West of Bath and having assessed this parcel concludes it contributes to the five purposes of the Green Belt (see pages 42 - 44).</p> <p>There has been no change in circumstances since the boundary was last defined in 2007 or exceptional circumstances put forward to justify amending the Green Belt boundary in this location.</p>	
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⁶ [Green Belt Review \(Stage 1\) \(6.1 MB\)](#), Ove Arup & Partners Ltd (2013)