

Bath and North East Somerset Council

Bath Park and Ride

Green Belt Assessments

Final Report

Prepared by LUC

Peer Reviewed by Atkins

July 2021



Bath and North East Somerset Council

Bath Park and Ride Green Belt Assessments

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Contents

Chapter 1	
Introduction	2
Study aims and scope	2
Report authors	2
Report structure	2

Chapter 2	
Bristol and Bath Green Belt Policy and Context	4
Current extent of Bristol and Bath Green Belt	4
Evolution of the Bristol and Bath Green Belt	6
National Green Belt policy	6
Local planning policy	8
Bath and North East Somerset Green Belt Stage 1 and 2 Study (2013)	9

Chapter 3	
Green Belt Assessment Methodology	11

Chapter 4	
Bath Park and Ride Assessments	24
Planning Context	24
Appropriateness of proposed uses	26
Exceptional circumstances for alterations to Green Belt boundaries	26
Green Belt harm assessment	27
Odd Down	29
Newbridge	33
Lansdown	37

Chapter 1

Introduction

1.1 Atkins and LUC were jointly commissioned by Bath and North East Somerset Council (B&NES) to undertake Green Belt assessment work associated with three Park and Ride sites around Bath. The work was overseen by Atkins in a peer review capacity.

1.2 This study includes:

- A detailed assessment of the potential harm to the Green Belt associated with an intensification of development at the three Park and Ride sites at:
 - Lansdown;
 - Newbridge; and
 - Odd Down.
- A review of the 'appropriateness' in Green Belt terms of the proposed uses at the Park and Ride sites and the justification for their release, or otherwise, from the Green Belt.

1.3 This report will be used by the Council to inform decisions on the potential for removing land from the Green Belt for the provision of sustainable transport and solar energy infrastructure. This will feed into the preparation of the partial update of the B&NES Local Plan.

Study aims and scope

1.4 This study aims to look at the appropriateness of the potential uses in the Park and Ride sites, assess the harm of releasing the Park and Ride Sites from the Green Belt and offer advice on the exceptional circumstances for their release.

Report authors

1.5 This report has been prepared by LUC on behalf of B&NES. LUC has completed Green Belt studies at a range of scales for over 45 English Local Planning Authorities in the past five years.

1.6 The report has also been peer reviewed by Atkins.

Report structure

1.7 The remainder of this report is structured as follows:

- **Chapter 2** sets out the national and local policy context, an overview of the Bristol and Bath Green Belt and a summary of relevant previous Green Belt work;

- **Chapter 3** outlines the assessment methodology used to assess the Park and Ride sites; and
- **Chapter 4** sets out the assessment findings of the Park and Ride Sites, covering the Green Belt harm of their release from the Green Belt or potential development within the Green Belt, the appropriateness of the potential uses and advice on the exceptional circumstances case.

Chapter 2

Bristol and Bath Green Belt Policy and Context

2.1 This chapter provides a summary of national and local Green Belt policy, and sets out the evolution of the Bristol and Bath Green Belt, including previous relevant studies of the Bristol and Bath Green Belt.

Current extent of Bristol and Bath Green Belt

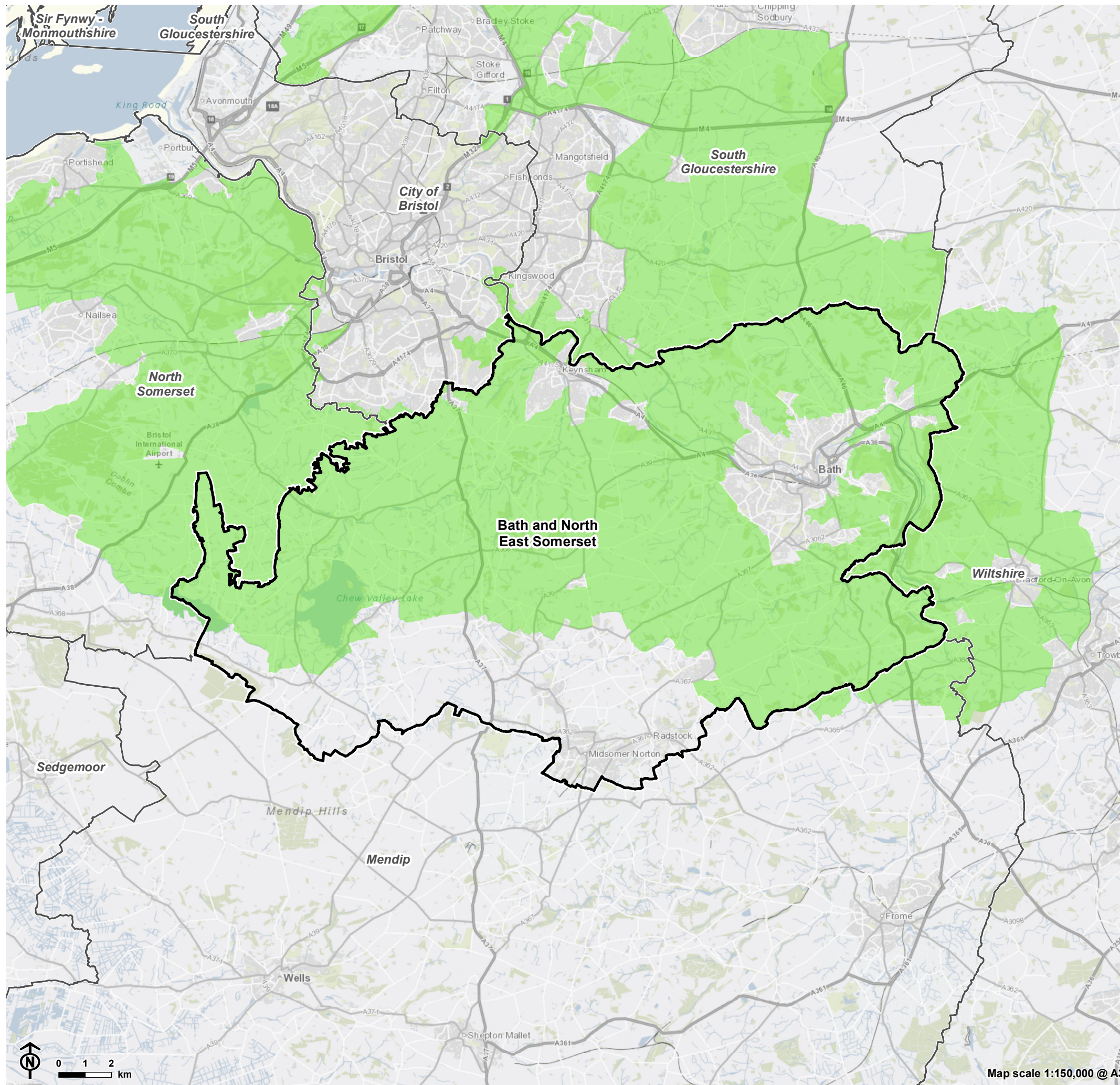
2.2 **Figure 2.1** illustrates the extent of the Bristol and Bath Green Belt today and its relationship with the region's settlements and local planning authority boundaries.

2.3 As set out in the Ministry of Housing Communities and Local Government Local Authority Green Belt Statistics for England: 2019 to 2020 (as of February 2021), the Bristol and Bath Green Belt is roughly 71,700ha distributed across the following local planning authorities:

- Bath and North East Somerset: 24,750ha
- Bristol City: 600ha
- Mendip District: 860ha
- North Somerset: 15,540ha
- South Gloucestershire: 23,040ha
- Wiltshire: 6,910ha

2.4 Therefore, over one third of the Bristol and Bath Green Belt (34.5%) falls within the Bath and North East Somerset.

Figure 2.1: Bristol and Bath Green Belt



- Bath and North East Somerset
- Neighbouring Local Authority boundary
- Green Belt



Evolution of the Bristol and Bath Green Belt

2.5 The Bristol and Bath Green Belt was first drafted in the 1950s through the preparation of the Gloucestershire, Somerset and Wiltshire County Development Plans and was formally designated through their adoption in the 1960s.

2.6 In 1955, the Government established (through Circular 42/55) the three main functions of the Green Belt as:

- checking growth of large built-up areas;
- preventing neighbouring settlements from merging; and
- preserving the special character of towns.

2.7 Emphasis on the strict control of development and the presumption against building in the Green Belt except in special circumstances was set out through further Government Green Belt guidance in 1962.

2.8 A written statement documenting Amendment 12 of the adopted Somerset County Development Plan (1966) offers the clearest known record of the reasons for designating the Bristol and Bath Green Belt and its established extent. Notable extracts include:

“It is considered that any substantial expansion of the built up areas of Bristol and Bath into the County of Somerset should be checked; also the merging of Bristol, Keynsham, Saltford and Bath should be prevented and the identity and existing character of the surrounding towns, villages and hamlets should be preserved. Land adjoining the boundaries of the County Boroughs of Bristol and Bath has therefore been defined in the Development Plan as Green Belt.”

“It is the intention of the Local Planning Authority when considering applications for planning permission for development within the Green Belt to limit such development generally to that necessary for the continued vitality of the countryside and the villages therein, so that the present rural character is preserved for the well-being of the inhabitants of the cities and countryside alike.”

2.9 The original extent of the Bristol and Bath Green Belt described in the 1966 written statement has been periodically altered throughout the 1970s, 1980s, 1990s and 2000s through a combination of separate but often significant releases around, for example Bath, Bristol and Keynsham, but also extensions, such as into the Gordano Valley west of Bristol.

National Green Belt policy

National Planning Policy Framework (2019)

2.10 Government policy on the Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF) Protecting Green Belt Land. Paragraph 133 of the NPPF states that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*.

2.11 This is elaborated in NPPF paragraph 134, which states that Green Belts serve five purposes, as set out below.

The purposes of Green Belt

- 1) To check the unrestricted sprawl of large built-up areas.
- 2) To prevent neighbouring towns merging into one another.
- 3) To assist in safeguarding the countryside from encroachment.
- 4) To preserve the setting and special character of historic towns.
- 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.12 The NPPF emphasises in paragraphs 135 and 136 that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans. It goes on to state that *“once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period.”*

2.13 When defining Green Belt boundaries, paragraph 139 states local planning authorities should:

- demonstrate consistency with Local Plan strategy, most notably achieving sustainable development;
- not include land which it is unnecessary to keep permanently open;
- safeguard enough non-Green Belt land to meet development needs beyond the plan period;
- demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

2.14 Current planning guidance makes it clear that the Green Belt is a strategic planning policy constraint designed primarily to prevent the spread of built development and the coalescence of urban areas. The NPPF goes on to state “local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land” (paragraph 141).

2.15 It is important to note, however, that these positive roles should be sought for the Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by keeping land permanently open. Openness is not synonymous with landscape character or quality.

2.16 Paragraph 143 and 144 state that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

2.17 New buildings are inappropriate in the Green Belt. There are exceptions to this which are set out in two closed lists. The first is in paragraph 145 which sets out the following exceptions:

- “buildings for agriculture and forestry;
- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages;
- limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in

continuing use (excluding temporary buildings), which would:

- *not have a greater impact on the openness of the Green Belt than the existing development, or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*

2.18 Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. These are:

- “mineral extraction;
- engineering operations;
- local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- the re-use of buildings provided that the buildings are of permanent and substantial construction;
- material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and
- development brought forward under a Community Right to Build Order or Neighbourhood Development Order.”

2.19 Finally, paragraph 135 states Green Belts should only be established in exceptional circumstances... and in proposing new Green Belt, local planning authorities must:

- demonstrate why alternative policies would not be adequate;
- set out the major change in circumstances the make the designation necessary;
- communicate the consequences for sustainable development; and,
- highlight the consistency of the new designation with neighbouring plan areas and the other objectives of the NPPF.

Planning Practice Guidance

2.20 The NPPF's Green Belt policies are supplemented by National Planning Practice Guidance (NPPG). The guidance sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations borne out by specific case law judgements. The guidance states openness is capable of

having both spatial and visual aspects¹. Other circumstances which have the potential to affect judgements on the impact of development on openness include:

- the duration of development and its remediability to the original or to an equivalent (or improved) state of, openness; and
- the degree of activity likely to be generated by development, such as traffic generation.

2.21 The guidance also elaborates on paragraph 138 of the NPPF which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreational need evidence to identify appropriate compensatory improvements, including:

- *“new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*
- *improved access to new, enhanced or existing recreational and playing field provision.”*

2.22 Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.

Local planning policy

Bath and North East Somerset Council Green Belt Policy

Past

2.23 The Joint Replacement Structure Plan, adopted in 2002 and now revoked, was the last strategic plan to cover the entire study area. Policy 16 of this Plan applied the five national Green Belt purposes within a local context inspired by the original justification for the Bristol and Bath Green Belt in the County Development Plans of the 1960s:

“A Green Belt shall continue to surround and separate Bristol and Bath, and will be kept open in order to:

- *check the unrestricted sprawl of the Bristol conurbation and Bath;*
- *assist in safeguarding the surrounding countryside from encroachment;*
- *prevent neighbouring towns merging into one another;*
- *preserve the setting and special character of villages, towns and historic cities; and*
- *assist in urban regeneration.”*

Present

2.24 Policy CP8 of the adopted Bath and North East Somerset Core Strategy (2014)² also applies the five national Green Belt purposes within a local context and lists a sixth local purpose emanating from the 1966 Somerset County Development Plan:

1. To check the unrestricted sprawl of Bath and Bristol.
2. To prevent the merging of Bristol, Keynsham, Saltford and Bath.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of Bath.
5. To assist in urban regeneration of Bath and Bristol by encouraging the recycling of derelict and other urban land.

¹ Two important Planning Appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect. However, in February 2020 the Supreme Court overturned the Court of Appeal Ruling on the case of Sam Smith v North Yorkshire County Council and Darrington Quarries Ltd (2018), and in doing so asserted that openness does not imply freedom from

all forms of potential development and that visual impact is not an obligatory consideration when assessing Green Belt openness. Further details are set out in Chapter 2 and in the case law section below.

² Bath and North East Somerset Council, Bath and North East Somerset Core Strategy (Part 1 of Local Plan), 2014. Available at: <https://beta.bathnes.gov.uk/policy-and-documents-library/core-strategy-and-placemaking-plan>

6. To preserve the individual character, identity and setting of Keynsham and the villages and hamlets within the Green Belt.

Future

2.25 Bath and North East Somerset are currently undertaking a partial update to the adopted Local Plan, which will update some of the policies within the adopted Core Strategy and Placemaking Plan, with a particular focus on housing land supply and policies where circumstances have changed since the adoption of the Core Strategy in 2014, including the Council's declaration of a Climate Emergency and an Ecological Emergency.

Bath and North East Somerset Green Belt Stage 1 and 2 Study (2013)³

2.26 This Green Belt study offers helpful insight into the application of national Green Belt policy to the assessment of the Bristol and Bath Green Belt. Green Belt study was commissioned to inform the adopted Bath and North East Somerset Core Strategy (2014).

2.27 The study was split across three separate reports:

- The first report published in April 2013 represented a high-level Stage 1 assessment of all existing Green Belt land in Bath and North East Somerset. This Stage 1 study informed the definition of the Broad Locations for Development set out within the Proposed Changes to the Submitted Core Strategy (March 2013).
- A second report was published in August 2013 exploring the potential planning case for extending the existing boundary of the Green Belt further south towards the local authority's southern boundary.
- The third and final report published in September 2013 assessed the five Broad Locations identified in the Proposed Changes to the Submitted Core Strategy in greater detail with a view to identifying alternative permanent and readily recognisable Green Belt boundaries in these locations.

2.28 The Stage 1 study was organised around 19 predefined parcels of land, 16 of which were taken directly from the Core Strategy Sustainability Appraisal. These 16 parcels surrounded the urban edges of Bath, Bristol, Keynsham and Saltford. The remaining three areas were defined in the Stage 1 Green Belt Study where the Sustainability Appraisal had not predefined Green Belt parcels adjacent to the main settlements. These three remaining parcels were much larger

covering broad areas of Green Belt in the south and western half of the area.

2.29 In acknowledgement of the varied size of the predetermined parcels and the potential for significant variations in Green Belt performance within each one, the Stage 1 assessment did not rate the contribution of each parcel to each purpose.

2.30 The five national Green Belt purposes and the sixth local Green Belt purpose specific to Bath and North East Somerset were used as the assessment criteria for the study. The key terms and concepts defined for the assessment of each purpose were as follows:

- Purpose 1: Bath and Bristol were defined as 'large built-up areas'.
- Purpose 2: Bristol, Bath, Keynsham, Midsomer Norton and Radstock were defined as 'towns' – Bath and Bristol because of their city status and size and Keynsham, Midsomer Norton and Radstock because of their established Town Councils. Despite being too small to be defined as a town, the settlement of Saltford was also considered relevant to the assessment of Purpose 2 by virtue of its location being vulnerable to merging with neighbouring Keynsham and Bath (as referenced in the original justification for the Bristol and Bath Green Belt).
- Purpose 3: 'countryside' was defined as open land. Open land was defined with reference to the appropriate Green Belt land uses referenced in the NPPF. Development not listed as appropriate in the NPPF was considered to compromise Green Belt openness and therefore encroach on the countryside, including villages. Prominent topography, landscape value, biodiversity value and the presence of Public Rights of Way and outdoor sport and recreation facilities were also considered as factors contributing to Purpose 3.
- Purpose 4: Green Belt with a recorded positive contribution to the setting or significance of the City of Bath World Heritage Site and/or Conservation Areas covering all or part of the settlements defined as 'towns' under Purpose 2: Bristol, Bath, Keynsham, Midsomer Norton and Radstock. Saltford was not defined as a 'historic town'.
- Purpose 5: Green Belt land adjoining Bristol, Bath, Keynsham, Midsomer Norton or Radstock and/or known to have experienced development pressure was considered to contribute to Purpose 5.

³ ARUP, Bath & north East Somerset Green Belt Review Stage 1 Report (April 2013) and Stage 2 Report (September 2013)

- Local Green Belt Purpose 6 (“*To preserve the individual character, identity and setting of Keynsham and the villages and hamlets within the Green Belt*”): Green Belt land considered to prohibit the merging or significant erosion of gaps between all settlements – cities, towns, villages and hamlets – and/or contribute to the open setting of hamlets, villages and/or Keynsham were considered to contribute to local Purpose 6.

2.31 The second report exploring the planning case to extend the Green Belt southwards towards the southern boundary of the local authority concluded that there was limited scope to do so at the time.

2.32 The third and final Stage 2 assessment report built on the Stage 1 assessment methodology in the following ways:

- Consideration of landscape value, biodiversity value and the presence of Public Rights of Way and outdoor sport and recreation facilities were not considered as part of the assessment of Purpose 3.
- Purpose 5 was considered to apply equally across to the five Broad Locations assessed.

2.33 Although the assessment criteria for Stage 2 were broadly similar to the Stage 1 assessment and no ratings were given, the criteria were applied to considerably smaller parcels of land offering greater scope to draw out variations in Green Belt performance across the five Broad Locations being considered for potential removal and allocation through the Core Strategy:

- Land adjoining Odd Down, Bath: eight parcels.
- Land adjoining Weston, Bath: nine parcels.
- Land adjoining East Keynsham: nine parcels.
- Land adjoining South West Keynsham: four parcels.
- Land adjoining Whitchurch, Bristol: six parcels.

Assessment of Bath Park and Ride Sites

2.34 The land to the north, west and south of Bath was assessed in Stage 1 of the Bath and North East Somerset Green Belt 2013 Study.

2.35 The Lansdown Park and Ride site to the north of Bath is located within the Stage 1 ‘North of Bath’ parcel. The parcel was judged to make a contribution to all Green Belt purposes and a particularly strong contribution to Purposes 3 and 4 due to the relatively open and undeveloped nature of the Green Belt and its contribution to the setting of historic Bath.

2.36 The Newbridge Park and Ride site to the west of Bath is located within the Stage 1 ‘North West of Bath’ parcel. The parcel was judged to make a contribution to all Green Belt purposes and a particularly strong contribution to Purposes 1,

2, 3 and 4. With regards to Purposes 1 and 2, strong contributions were recorded because of the role of this Green Belt in preventing the north westwards sprawl of Bath towards Kelston and the merging of Bath with Saltford and Bristol beyond. With regards to Purposes 3 and 4, strong contributions were recorded because of the relatively open and undeveloped nature of the Green Belt and its contribution to the setting of historic Bath.

2.37 The Odd Down Park and Ride site to the south of Bath is located within the Stage 1 ‘South of Bath’ parcel. The parcel was judged to make a contribution to all Green Belt purposes and a particularly strong contribution to Purposes 1, 3 and 4, particularly in the immediate vicinity of the inset urban edge of Bath where it is relatively open and undeveloped and is within the immediate setting of historic Bath.

2.38 The Green Belt land in and around the three Park and Ride sites was not assessed as part of Stage 2 of the Bath and North East Somerset Green Belt 2013 Study.

Chapter 3

Green Belt Assessment Methodology

3.1 There is no defined approach set out in national planning policy or guidance as to how Green Belt studies should be undertaken. This methodology is based on LUC's extensive experience of undertaking Green Belt studies for over 45 local authorities, several of which have been tested through Examination and found to be sound.

3.2 The relevant policy, guidance and case law that has informed the methodology is referenced where appropriate.

Assessment approach

3.3 The assessment provides an analysis of likely harm to the Green Belt purposes that would result from the release of three Park and Ride sites around Bath. This includes ratings for harm to each purpose, summarised into an overall harm rating, together with supporting text to provide justification.

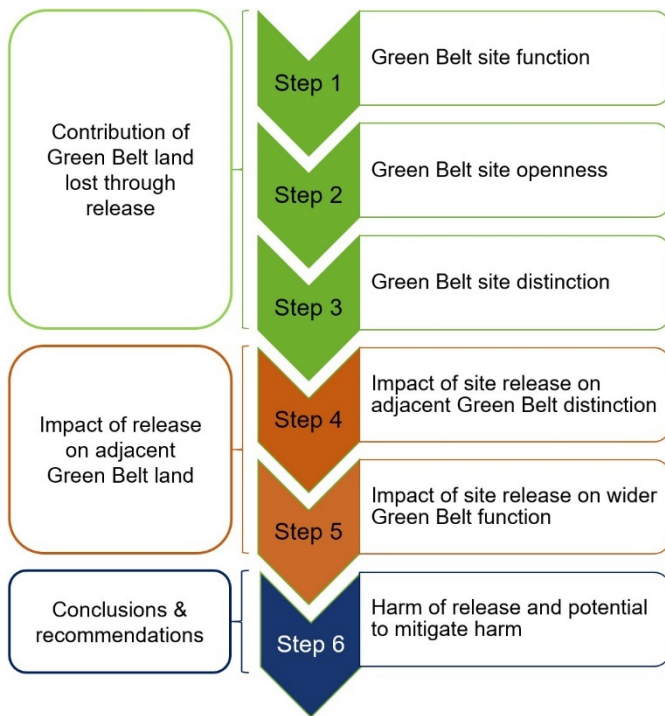
3.4 An assessment of **harm** provides a fuller analysis than an assessment of **contribution** by its additional consideration of the effect that the release of land would have on the integrity of the remaining Green Belt. Harm to the Green Belt purposes is assessed as a combination of the loss of contribution of the land that would be released together with the impact of that release on the contribution of the remaining Green Belt.

3.5 At a strategic scale of analysis it is only possible to assess contribution, focusing on broad variations in the function of the Green Belt, but at a more localised scale we are able to ask the question "how would the release of this particular piece of land affect the strength and function of the remaining Green Belt?".

3.6 This analysis can be used to help inform decisions regarding the release of land from the Green Belt, meeting the requirement of the Calverton case to consider the nature and extent of harm.

Summary of assessment process

3.7 The harm assessment process is divided into 6 steps, as set out below. Steps 1-3 consider different aspects of the **contribution** made by land within the site to the Green Belt purposes, and Steps 4-5 consider the impact that the release would have on the **integrity** of the remaining Green Belt. Step 6 combines the different elements to give ratings for **harm** to each Green Belt purpose, and an overall harm rating.



3.8 Two assumptions are made when assessing harm:

- Existing landscape features will, if they are to form a new Green Belt boundary, be retained and/or strengthened.
- Released land will be developed or have the potential to be developed in the future, resulting in a loss of openness. It has been assumed that development will be of the form described in Paragraph 4.3, and will not represent any expansion of the existing developed Park and Ride areas.

3.9 Step 6, the assessment conclusions, consider any specific development proposals for a site in order to provide commentary on the value of proposed measures to mitigate harm. Provision of this analysis address the need to consider options for minimising harm that was set out in the Calverton case.

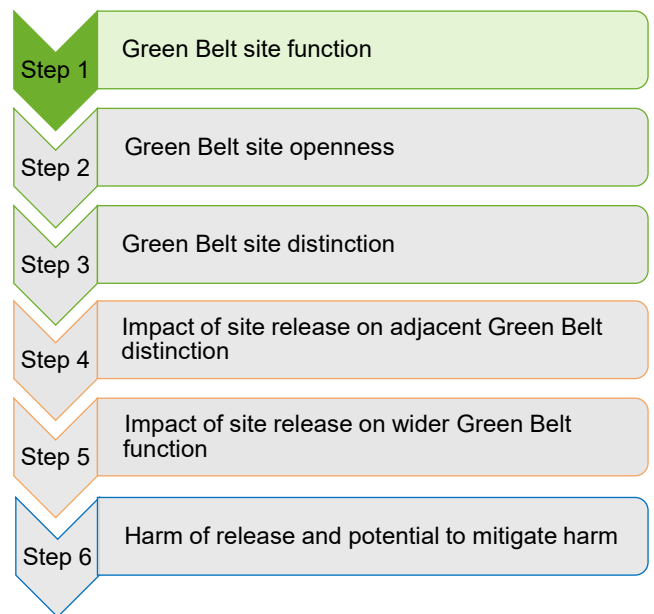
3.10 The following sections consider each assessment step in more detail. Each section includes a box summarising the key questions that is considered in the assessment process, and indicates how the answers to these inform the overall assessment of harm. Under **Step 6**, benchmark examples for harm ratings are provided, but professional judgement has been used in each individual case to consider how much weight to attach to each contributing element. Clear and detailed justification is provided in **Chapter 4** to support each Green Belt harm judgement.

Relationship with previous B&NES Green Belt assessment

3.11 Previous Green Belt assessments carried out within B&NES, whether at a strategic scale (the 2015-16 WECA assessments) or a more local scale (the 2016-2017 assessments of Strategic Development Locations), have been limited to consideration of contribution to the Green Belt purposes. This study expands this into a consideration of the harm that would result from release of land so, whilst similar factors are considered, the findings are not directly comparable.

3.12 Any differences between the definitions used in relation to each Green Belt purpose in the 2016-2017 B&NES assessments and those proposed to be used in this study are addressed under the relevant headings in Step 1 below.

Step 1: assess Green Belt site function



3.13 Each Green Belt purpose targets a different aspect of the relationship between urban areas and designated Green Belt land. The applicability of each of the Green Belt purposes to any given area of land depends on the nature of the urban areas with which that land is associated, with reference to the reasons for the establishment of the Bristol and Bath Green Belt as set out in adopted planning policy.

Purpose 1: preventing the sprawl of large-built-up areas

3.14 Green Belt Purpose 1 aims “to check the unrestricted sprawl of large built-up areas”. It is possible to argue that all land within the Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the study requires the definition of variations in the extent to which

land performs this purpose. This requires an area-based assessment against this strategic purpose.

3.15 There is no definition provided in the NPPF for a large built-up area. Green Belt studies in different locations have ranged from considering the large built-up area as just the principal settlement around which the Green Belt was defined to considering all inset settlement to be large built-up areas. Paragraph 1.12 above reports that the Bristol and Bath Green Belt was designated to check the substantial expansion of Bristol and Bath. Therefore, inset land contiguous with Bath and the Bristol conurbation are the only areas considered to form part of the large built up area. This is consistent with the 2013 and 2016-2017 B&NES Green Belt assessments.

3.16 In assessing the impact of releasing land in the context of a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role an area of land plays is dependent on its relationship with a large built-up area. However, it is also recognised that land which forms a narrow gap between a large built-up area and a smaller settlement plays a particularly significant role with regard to this purpose. This is because the merging of the latter into the former would be perceived as more significant sprawl than expansion into open countryside.

Purpose 1 question	
Does land have an association with Bath or Bristol, rather than with a separate, smaller settlement, or with the wider countryside?	
Higher potential harm to the purpose	Land is associated with either Bath or Bristol, and its development would represent some degree of expansion of the city. There is additional potential for harm if the land forms a narrow gap between a large built-up area and a distinct, smaller settlement.
Lower potential harm to the purpose	Land is associated with a settlement that is distinct from either Bristol or Bath, or lies in the countryside remote from any inset settlement.

Purpose 2: preventing the coalescence of towns

3.17 Green Belt Purpose 2 aims “to prevent neighbouring towns merging into one another”. The concept of what constitutes a ‘town’ has been widely interpreted in different Green Belt studies, ranging from settlements classified as

towns in Local Plan settlement hierarchies to all urban areas inset from the Green Belt regardless of size.

3.18 Regardless of whether a particular settlement is large enough to realistically be considered a town, it can be acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between ‘towns’.

3.19 The concept of ‘merging’ is clearer but assessing the extent to which land between towns contributes to preventing this is less so. However, it is generally acknowledged that the role open land plays in preventing the merging of towns is more than a product of the size of the gap between them⁴. Assessments therefore usually consider both the physical and visual role that intervening Green Belt land plays in preventing the merging of settlements.

3.20 Both built and natural landscape elements can act to either decrease or increase perceived separation. For example, intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation.

3.21 This study identifies that land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – i.e. the more fragile the gap, the stronger the potential contribution to this purpose of any intervening open land. Physical proximity is the initial consideration; however, where settlements are very close, a judgement is made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. that the characteristics of the open land relate more to the towns’ areas themselves than to the open land in between. Where this is the case, the impact of release of land for development on Purpose 2 may be reduced.

3.22 There is, in terms of NPPF Purpose 2, no separate assessment of gaps between settlements that are not considered to be towns, although the role of smaller areas of urbanising development in reducing perceived rural separation between towns is considered. The notable smaller settlements that fall within and in close proximity to gaps between towns in the study area include Bitton, Farmborough, Peasedown St John, Saltford, Westwood and Winsley, which are too small to be considered ‘towns’ in their own right.

3.23 Having reviewed the WECA authorities’ settlement hierarchies, the following settlements are considered to be

⁴ PAS guidance (Planning on the Doorstep), which is commonly referenced in Green Belt studies, states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. The PAS

guidance also refers to settlement character and the character of land in between as being relevant considerations when looking at retaining separate identities.

significant enough to be defined as towns in Green Belt terms, and close enough to the assessment sites to potentially have a bearing on this study:

- Bath
- Bristol
- Keynsham.

3.24 Bath and Bristol are large enough to be considered towns in Green Belt terms. The Bath and North East Somerset Core Strategy and Placemaking Plan⁵ refers to Bath and Keynsham as the only towns in the authority area that are inset into the Green Belt.

3.25 This study differs from the 2013 and 2016-2017 B&NES Green Belt assessments by not considering all settlements in effect as towns, regardless of size. It does, however, recognise the role that any urbanising development can play in affecting the perceived separation of towns. It addresses the value placed by Bath and North East Somerset on the role of Green Belt in preserving gaps with smaller settlements by separately assessing the Local Purpose (see Paragraphs 3.40 - 3.46).

3.26 The size of the towns in question also forms part of the consideration of the Green Belt’s role in maintaining separation. Bristol and Bath are the two large built-up areas around which the Green Belt is focused, and between which much movement takes place, and the central importance of maintaining the gap between them is recognised in the original designation of the Bristol and Bath Green Belt in 1966. The designation text (Amendment 12 of the adopted Somerset County Development Plan) also refers to the need to maintain gaps between the chain of urban areas – Bristol, Keynsham, Saltford and Bath – rather than just the overall separation between Bristol and Bath.

Purpose 2 questions

- Does the assessment area lie in a gap between towns?
- How wide is the gap, in relation to the size of the towns?
- Are the towns already linked to an extent?
- Are there physical landscape elements, such as hills or woodland, that increase the perceived size of the gap?
- Are there physical landscape elements, such as connecting main roads or railways, or intervening urbanising development, that reduce the perceived size of the gap?

Higher potential harm to the purpose	Land lies within a gap between towns which is perceived to be narrow in relation to the size of the settlements.
Lower potential harm to the purpose	Land lies in a gap between towns which is perceived to be wide; or Land is too contained by the built form of a town to be considered to lie within a gap between towns.

Purpose 3: preventing encroachment on the countryside

3.27 Green Belt Purpose 3 is “to assist in safeguarding the countryside from encroachment”. An assessment of Purpose 3 requires consideration of the extent to which land constitutes ‘countryside’ on the basis of the general usage of the term.

3.28 Some open land may, through its usage, have a stronger relationship with the adjacent urban area and, as a result, not be considered ‘countryside’ to the same degree as other open land. Equally, some land may be largely contained by urban development but may nonetheless retain, as a result of its usage and its size, a countryside character.

3.29 Contribution to Purpose 3 does not necessarily equate to the extent of built development, as development that is rural in form may often not be considered to detract from countryside character. The presence of urbanising development within the assessment site has an impact on the degree to which land is considered to be countryside, and an impact on other Green Belt purposes and so is set out as a separate step in the assessment process (see **Step 2** below).

3.30 It is important for the purposes of the assessment not to stray into assessing landscape character, sensitivity or value; whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land is not taken into consideration: any Green Belt land found to be in poor

⁵ Bath and North East Somerset, Bath and North East Somerset Core Strategy and Placemaking Plan (2017)

condition may perform well in its fundamental role of preventing encroachment by keeping land permanently open.

3.31 This study's recognition of the widespread applicability of Purpose 3 is consistent with its treatment in the 2013 and 2016-2017 B&NES Green Belt assessments.

Purpose 3 questions	
Does land lie adjacent to an urban area and have a use which diminishes the extent to which it can be considered 'countryside'?	
If largely contained by urban development, is the area of a size that enables it to retain a countryside character?	
Higher potential harm to the purpose	Land is countryside.
Lower potential harm to the purpose	Land has a use which, although potentially 'open' in Green Belt terms, diminishes the extent to which it is considered to be 'countryside'.

Purpose 4: preserving the setting and special character of historic towns

3.32 Green Belt Purpose 4 is "to preserve the setting and special character of historic towns". An extract from Hansard in 1988 clarifies which historic settlements in England were certainly considered 'historic towns' in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge⁶. Durham has since been added to this list.

3.33 Criteria for the assessment of contribution to the historic setting and special character of Bath have been determined with particular reference to the City of Bath World Heritage Site Setting Supplementary Planning Document (SPD) (August 2013). Informed principally by the World Heritage Site's Statement of Outstanding Universal Value, this identified the key aspects of the setting of Bath as being:

- *The character of the surroundings of the Site including the green undeveloped farmland, green spaces, trees and woodland and settlements within the setting.*
- *The views afforded from the city to the green hillsides, woodland and open spaces and conversely the*

opportunities provided by the surroundings to view the city and its surrounding landscape.

- *The historical associations with the city from the key Roman and Georgian periods. These include archaeological sites, historical routes into the city most of which are in use to this day, historic buildings, the opportunities for the enjoyment of the landscape within the setting including the interpretation and appreciation of the 'picturesque' qualities of the landscape.*

3.34 Particular mention is also made in the SPD to features associated with arrival and departure from the city:

- *Routes into and out of the city and the quality and character of their environs and views to and from them; and*
- *The River Avon, the Kennet and Avon Canal and surviving evidence of the Somerset Coal Canal and the quality and character of them and their environs and the views to and from them.*

3.35 The SPD also maps an 'indicative extent' for the setting of the city. Extending out typically 2-3km into the Green Belt, this zone encompasses all of the high ground visible from the urban area, but also the broader area of distinctive topography, both hills and valleys, through which approach routes to Bath pass.

⁶ Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.

Purpose 4 questions in relation to Bath	
Does land lie within the indicative extent of Bath's setting as defined in the World Heritage Site SPD?	
Does land contribute to the immediate visual setting of the city?	
In land prominent from principal routes into the city?	
Higher potential harm to the purpose	Land contributes to the immediate visual setting of Bath; or Land contributes positively to key approach routes to the city, including roads, rivers, canals and long-distance footpaths; or Landforms part of the setting of historical assets which have an association with the city's Roman and Georgian heritage, or has 'picturesque' qualities which make it distinctive.
Potential harm to the purpose	Landforms part of the rural landscape within the indicative extent of Bath's setting as defined in the SPD; or Is visible as a distant element in Bath's visual setting.
Lower potential harm to the purpose	Although within the indicative extent of Bath's setting as defined in the WHS Setting SPD, land is not visible from the City and is associated with modern development which diminishes its role as part of the setting of the WHS.

Purpose 5: assisting in urban regeneration by encouraging the recycling of derelict and other urban land

3.36 Green Belt Purpose 5 is "to Assist in Urban Regeneration by Encouraging the Recycling of Derelict and Other Urban Land". Most Green Belt studies do not assess individual Green Belt land parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that the release of one parcel of Green Belt land has a greater impact on encouraging re-use of urban land than another.

3.37 There is roughly 430ha of registered brownfield land within the study area, 415ha of which is located outside the Green Belt. The vast majority of the brownfield land (over 400ha) is located within the urban area of Bristol. Bristol's central location in the Green Belt and connectivity to the wider Green Belt settlements ensure that all Green Belt land in the study area makes a strong contribution to Purpose 5.

3.38 When considering the release of land, it is therefore assumed that harm to this purpose is *equal* for all parts of the Green Belt. As stated in paragraph 140 of the NPPF, any case for exceptional circumstances for release of Green Belt land must demonstrate that the local authority "*has examined fully all other reasonable options for meeting its identified need for development*", and this requirement will include justification as to why brownfield land outside the Green Belt cannot achieve this.

3.39 This approach is consistent with the 2013 and 2016-2017 B&NES Green Belt assessments, which identified all Green Belt land as assisting equally with regard to Purpose 5.

Local Purpose: preserving the individual character, identity and setting of Keynsham and the villages and hamlets

3.40 As set out in Paragraph 1.28, Bath and North East Somerset Council have, in addition to the five NPPF Green Belt purposes, a 'local purpose': "to preserve the individual character, identity and setting of Keynsham and the villages and hamlets".

3.41 In some cases 'local purposes' have been criticised by Inspectors where they are seen to be additional to the NPPF purposes (for example, the Inspector M. Middleton's Letter to Welwyn Hatfield Borough Council, December 2017). However, where it can be demonstrated that the local purposes relate to the reasons for the designation of Green Belt as an application of the national Green Belt purposes in a local context this has been found to be appropriate⁷. A written statement documenting Amendment 12 of the adopted Somerset County Development Plan (1966) makes reference to the preservation of '*the identity and existing character of the surrounding towns, villages and hamlets*' as a key consideration in the designation of the Bristol and Bath Green Belt.

3.42 The local purpose has been considered in planning appeals, notably in relation to the proposed development of up to 295 dwellings in the gap between Bristol and Whitchurch (APP/F0114/A/13/2199958). In this case, harm to the local purpose was cited alongside harm to national purposes 1 and 3 as a reason for not allowing the development, with no less weight being given to it.

3.43 It is, therefore, considered appropriate to assess sites within Bath and North East Somerset against the 6th/local purpose.

3.44 In terms of the scope of this purpose, the reference to "Keynsham and the villages and hamlets" suggests that impact on any settlement other than isolated dwellings should

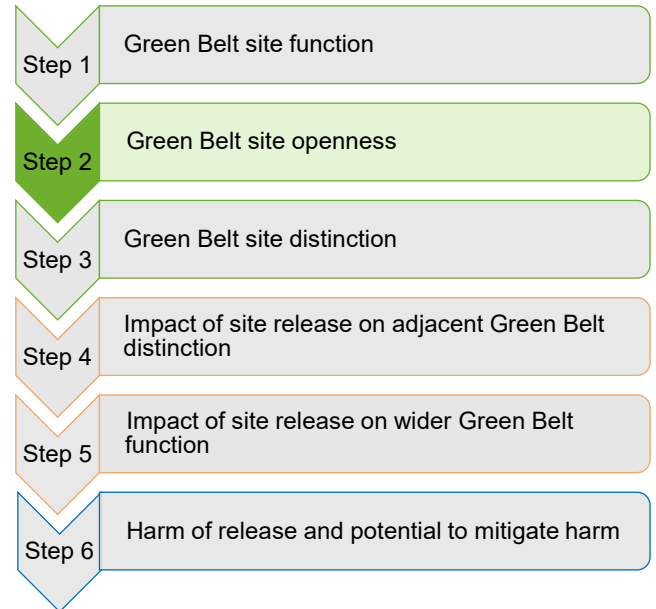
⁷ For example, the Inspector's interim findings (H Stephens) to Durham City Council (November 2014), and the Inspectors' Report (L

Graham and A Wood) to South Cambridgeshire District (August 2018).

be a consideration. The reference to “individual character, identity and setting” is taken to mean that any land which prevents the merging of any settlements, and consequent loss of separate identity and setting, will contribute to the Local Purpose. With regard to the landscape setting of smaller settlements, this is addressed separately in the Local Plan Policy NE2A.

Local Purpose questions	
Does the assessment area lie in a gap between settlements?	
How wide is the gap, in relation to the size of the settlements?	
Are the settlements already linked to an extent?	
Are there physical landscape elements that increase or reduce the perceived size of the gap?	
Higher potential harm to the purpose	Land lies within a gap between settlements which is perceived to be narrow in relation to the size of the settlements.
Lower potential harm to the purpose	Land lies in a gap between settlements which is perceived to be wide; or Land is too contained by the built form of a settlement to be considered to lie within a gap between settlements.

Step 2: Assess Green Belt site openness



3.45 The NPPF identifies openness as an ‘essential characteristic’ of Green Belt land, rather than a function or purpose. Land which is fully developed cannot, therefore, be considered to contribute to the purposes of the Green Belt, but land which still retains some openness may be considered still to make some contribution. Because such development already harms the Green Belt purposes, the additional level of harm that would result from the release of land is diminished. This applies to all Green Belt purposes with the possible exception of Purpose 4: in some instances development within a site, although urban in character, may also have historic qualities which do not necessarily lessen the contribution of remaining open areas to setting and special character.

3.46 Case law⁸ makes it clear that Green Belt openness relates to a lack of ‘inappropriate development’ rather than to visual openness, thus both undeveloped land which is screened from view by landscape elements (eg tree cover) and land with development which is not considered ‘inappropriate’, are still ‘open’ in Green Belt terms, and cannot be considered to make a weaker contribution to any Green Belt purpose.

3.47 Case law⁹ also highlights the Green Belt openness has a visual dimension. The visual impact of urban influence on openness is considered as part of the assessment of Green

⁸ The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.

⁹ Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016) confirmed openness to be open-textured and there is an important visual dimension to the application of the Green Belt purposes.

Belt land's relationship with urban and open land is set out below.

3.48 The definitions of appropriate development contained within the closed lists in paragraphs 148 and 149 of the NPPF is used to determine whether openness can be considered to be affected, but caution is exercised in such judgements. It is not within the scope of this study to review each form of development within a Green Belt site and ascertain whether it was permitted as appropriate development or not, unless it is clear cut. For example, buildings for agriculture and forestry are deemed to be appropriate development regardless of whether they preserve openness, or conflict with Green Belt purposes in this regard. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, a considered view needs to be taken on the extent to which the proposed land use has affected Green Belt purposes.

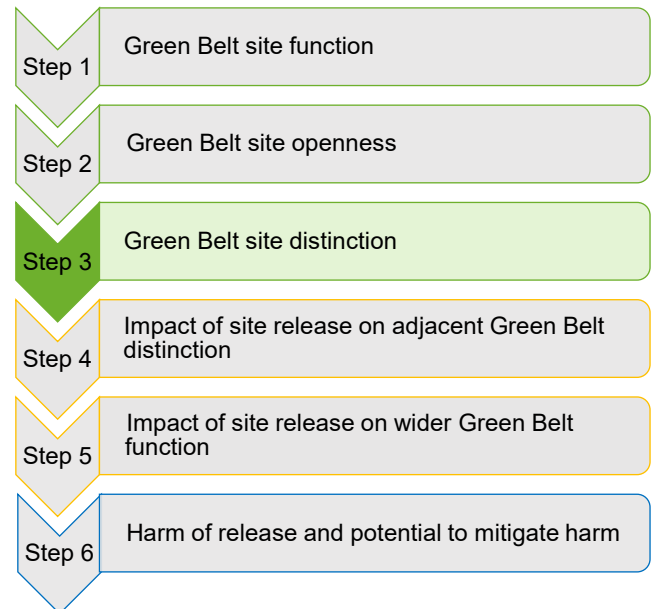
3.49 What is deemed to be appropriate development in the NPPF has to be carefully considered, as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriate as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

3.50 The extent to which loss of openness affects the harm that would result from the release of land depends on the extent, scale, form, density and location of the inappropriate development.

3.51 The consideration of openness does not extend to the consideration of the urbanising influence of development that lies outside of the assessment area. That consideration forms part of **Step 3** below.

Openness questions	
Does the assessment area contain development which is likely to be inappropriate?	
How does the extent, scale, form, density and location of this development affect perceived openness?	
Higher potential harm to the purpose	Land is 'open' in Green Belt terms.
Lower potential harm to the purpose	Land has development which diminishes Green Belt openness.

Step 3: Assess Green Belt site distinction



3.52 The extent to which land can be considered to relate to an urban area or to the wider countryside – referred to as the degree of 'distinction' from the urban area – is the third component of Green Belt assessment. Land that is related more strongly to urbanising development typically makes a weaker contribution to most of the Green Belt purposes:

- For Purpose 1: expansion of a large built-up area into land that has strong distinction from the existing settlement is likely to be perceived as more substantial sprawl than expansion into an area more significantly influenced by existing urban development.
- For Purpose 2: expansion into land that lacks strong distinction from a town is likely to have less perceived impact on separation from a neighbouring town.
- For Purpose 3: expansion into land that lacks strong distinction from a town is likely to have less perceived encroaching impact on the countryside. The Planning Advisory Service (PAS) guidance recognises this, stating that, when considering release of land, *“The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved”*. The second part of this quote, the consideration of the boundaries that can be achieved, is addressed at **Step 4** below.
- For Purpose 4 the situation is slightly different: land that has strong distinction from a historic town because of distance from it is unlikely to make much contribution to

its setting or special character, but land which is close to the town but distinct from it because of its physical prominence – eg a high hill – is likely by virtue of its distinction to contribute to the purpose.

3.53 The extent to which Green Belt land relates to an urban area and to the wider countryside is influenced by:

- Boundary features;
- Landform and land cover; and
- Degree of urbanising visual influence.

These are discussed below:

Boundary features

3.54 The location and permanence of physical boundary features can influence the contribution of the Green Belt to the Green Belt purposes. The strength of Green Belt boundaries can increase the sense of separation from the urban area. Areas with a greater sense of separation (distinction) from the urban area make a greater contribution to the Green Belt. The table below provides an indication of the strength attributed to different types of boundary. Stronger boundary features are also considered to have more permanence.

Strong boundary	Moderate boundary	Weak boundary
Physical feature significantly restricts access and forms consistent edge	Clear physical feature and relatively consistent edge, but already breached or easily crossed	No significant physical definition – edge may be blurred
For example: Motorway or dual-carriageway; railway; river/floodplain; sharp change in landform.	For example: Linear tree cover; mature, well-treed hedgerow; main road; stream; moderate change in landform.	For example: Regular garden/building boundaries or hedgerows; Estate/access road; some development crosses boundary.

3.55 The cumulative impact of multiple minor boundary features can be equally significant as a single strong boundary feature.

Landform and landcover

3.56 Landform and land cover may serve as boundary features, as indicated in **Table 3.1**, but this may extend into a broader feature which creates greater distinction between the urban area or countryside, for example a woodland, lake or

valley. Areas with a greater distinction from the urban area make a greater contribution to the Green Belt.

Urbanising visual influence

3.57 As noted previously, the absence of visual openness does not diminish openness in Green Belt terms; however, it is accepted that there is a visual dimension to the perception of openness that can have a bearing on the distinction between urban areas and countryside¹⁰.

3.58 Dominant views of an urban area, or dominant views of the open countryside can influence the perception of whether Green Belt is considered part of the urban area or open countryside. The presence of nearby ‘urbanising development’ within the Green Belt could also have an urbanising influence.

3.59 Even in the absence of significant boundary features, urbanising visual influence diminishes with distance from the urban area. In a visually open landscape, with an absence of physical features to screen views of the wider countryside, the influence of the urban area is likely to be weaker.

3.60 Caution is used when considering views, recognising that seasonal variations and boundary maintenance regimes can have a significant impact. The scenic quality of views is not relevant to Green Belt assessments.

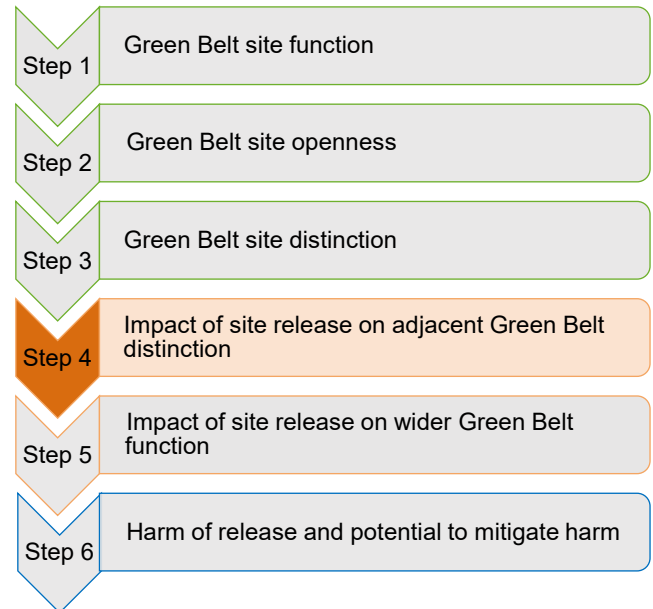
3.61 In some cases, land on the fringe of an inset settlement, outside of the Green Belt, may not currently be developed. Unless the development of such land is constrained by other factors or designations the assumption is made that it will be developed, and that it therefore, depending on the nature of the Green belt boundary, may have some urbanising visual influence.

¹⁰ Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) includes judgements relating to the visual aspects of openness. Turner v

Secretary of State for Communities and Local Government & East Dorset District Council (2016) makes reference to the important visual dimension of consideration of impact on the Green Belt purposes.

Questions associated with the relationship between urban areas and open land	
<p>Is there a strong boundary feature to separate the assessment area from the urban edge, or is the area far enough from the urban edge for several boundary features to combine to create separation?</p> <p>Does the boundary form a physical barrier to prevent movement, or is crossable or breached by development? Is it a landscape element that extends over a wider area than the site being assessed?</p> <p>Does the boundary form a visual barrier?</p> <p>Do landform or land cover within the assessment area, or between the area and the inset settlement, strengthen distinction?</p>	
Higher potential harm to the purpose	<p>Distinction from the urban area is strong:</p> <p>Eg there is a strong, unbreached boundary feature, such as a major road, which forms a consistent boundary over a wider area; or</p> <p>A prominent landform (eg a ridge) or landcover (eg a woodland) creates physical and visual separation</p>
Lower potential harm to the purpose	<p>Distinction from the urban area is weak:</p> <p>Eg there is an inconsistent boundary, with no clear feature to separate the urban area from the assessment area, and development in the inset settlement and within the Green Belt has an urbanising visual influence.</p>

Step 4: assess impact on site release on adjacent Green Belt distinction



3.62 Having considered the contribution land makes to the Green Belt purposes in terms of its function, its openness and its relationship with the urban area, we need to consider how the release of that land will affect the remaining Green Belt. The first aspect of this is to determine how distinct adjacent Green Belt is from the new urban edge, in comparison to how distinct it is now: the less distinct the adjacent Green Belt is from the urban edge the greater the resulting harm.

3.63 This is assessed by looking at the features(s) that would form the new Green Belt Boundary, but it also requires consideration of the relative strength of adjacent Green Belt land. If that adjacent land does not make a stronger contribution to any of the Green Belt purposes, then there is less potential for Green Belt harm than would be the case if stronger Green Belt land were affected.

3.64 The analysis has first been carried out without any consideration of specific development proposals for the assessed sites, but with the assumption that openness would be lost if land were to be released. Any reductions in harm associated with the specific development proposals at the three Park and Ride sites have been considered at Step 6 of the assessment process.

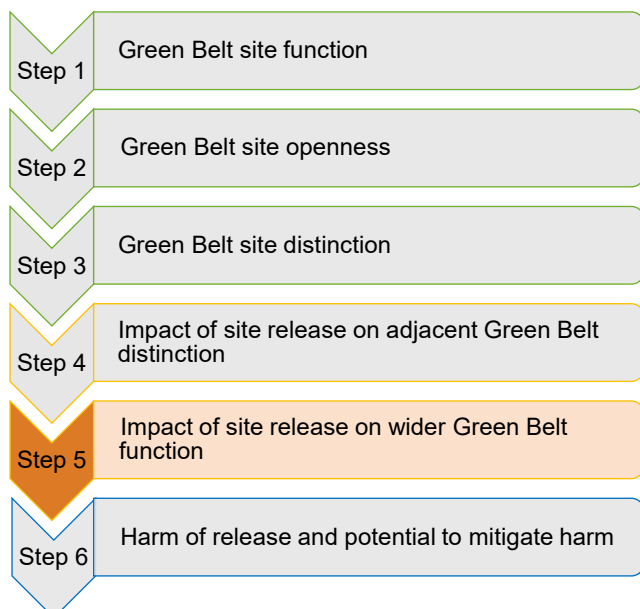
3.65 Unless the new Green Belt boundary is stronger than the current one, or the area being assessed is to a degree contained by existing urban edges, there is typically some additional harm as a result of knock-on urbanising impact on land which is currently more remote from urban areas.

3.66 It is assumed in the initial analysis that the newly released land would be developed, so unless there is a strong

visual barrier between this and the adjacent Green Belt it is assumed that some urbanising visual influence results. This judgement has been reassessed when considering any specific development proposals for the sites.

Questions in relation to impact of release on the distinction of adjacent Green Belt land	
With reference to the consideration listed under Step 3, would the new Green Belt boundary provide adjacent land with weaker distinction from the expanded inset area than is currently the case?	
Higher potential harm to the purpose	The distinction from the urban area of adjacent, stronger Green Belt land would be significantly less than is currently the case. Its contribution would therefore be diminished.
Lower potential harm to the purpose	The new Green Belt boundary would be stronger than the current one, resulting in no weakening of adjacent land's distinction from the urban area; or Although adjacent land would be weakened by the release, it does not make a stronger contribution to any Green Belt purpose than the site being assessed.

Step 5: assess impact of site release on wider Green Belt function



3.67 The second aspect of potential harm to the remaining Green Belt as a result of the release of land is harm to the Green Belt's function, as assessed at Step 1. Regardless of whether release would weaken the distinction of adjacent land from an urban area, it could affect its Green Belt function.

Potential impact on function varies from purpose to purpose, as described below.

Purpose 1: preventing the sprawl of large-built-up areas

3.68 As a large built-up area expands, any open land adjacent to it, to some degree, is helping to prevent further sprawl, but that in itself does not increase Green Belt harm. Theoretically the release of land could expand a settlement to an extent that it could be considered to constitute a 'large built-up area' where currently it does not, which would be a functional impact, but this is not a possibility for the sites being assessed.

3.69 It is, however, possible that release of land could weaken separation between a large built-up area and a smaller settlement such that the smaller settlement is perceived to have become part of the large built-up area. This would constitute additional harm.

Questions in relation to impact of release on the Purpose 1 function of adjacent Green Belt land	
Would an existing settlement, currently distinct from the large built-up area, be perceived as becoming part of the large built-up area?	
Higher potential harm to the purpose	A smaller settlement would be subsumed into the large built-up area.
Lower potential harm to the purpose	No existing development beyond the large built-up area would be perceived as becoming part of it.

Purpose 2: preventing the coalescence of towns

3.70 This purpose is generally most affected by settlement expansion or by new inset development. If a gap between towns is significantly diminished, all of the remaining Green Belt gap is generally considered more fragile. What constitutes a 'significant' reduction in a settlement gap depends the robustness of the current gap, and on whether or not the release of land would also cause the loss of important landscape features that strengthen current separation.

3.71 It is also theoretically possible that a settlement could be expanded such that it would be deemed a 'town' where that was not formerly the case. The introduction of a new town can affect the Green Belt's functional role, increasing harm to Purpose 2.

Questions in relation to impact of release on the Purpose 2 function of adjacent Green Belt land	
Would the physical distance between towns be significantly reduced?	
Would 'separating' features be lost?	
Would a smaller settlement become a town?	
Higher potential harm to the purpose	The perceived gap between towns would be significantly reduced, through loss of distance and/or separating features; or A smaller settlement would now be deemed a 'town'.
Lower potential harm to the purpose	There would be no significant reduction in separation between towns, in terms of either distance or loss of important separating features.

Purpose 3: preventing encroachment on the countryside

3.72 The countryside function of adjacent retained Green Belt land is rarely affected. The release of an assessment area does not change the use of adjacent land, preventing it from being considered countryside. However, release of land could result in adjacent retained Green Belt land becoming contained to the extent that it is too isolated from the wider Green Belt to be considered part of the countryside.

Questions in relation to impact of release on the Purpose 3 function of adjacent Green Belt land	
Would land currently considered as countryside lose this characteristic as a result of containment within an urban area?	
Higher potential harm to the purpose	Land that makes a stronger contribution to this purpose would be isolated by urban development.
Lower potential harm to the purpose	Land adjacent to the new Green Belt boundary would still constitute 'countryside'.

Purpose 4: preserving the setting and special character of historic towns

3.73 The role of adjacent retained Green Belt land in contributing to the setting or special character of a historic town could potentially be reduced by adjacent development, if that development changes the relationship between the contributing adjacent Green Belt land and the historic town. This is most likely to take the form of intervening development as a result of release of Green Belt land affecting important

views, which would subsequently diminish the function of the adjacent retained Green Belt land.

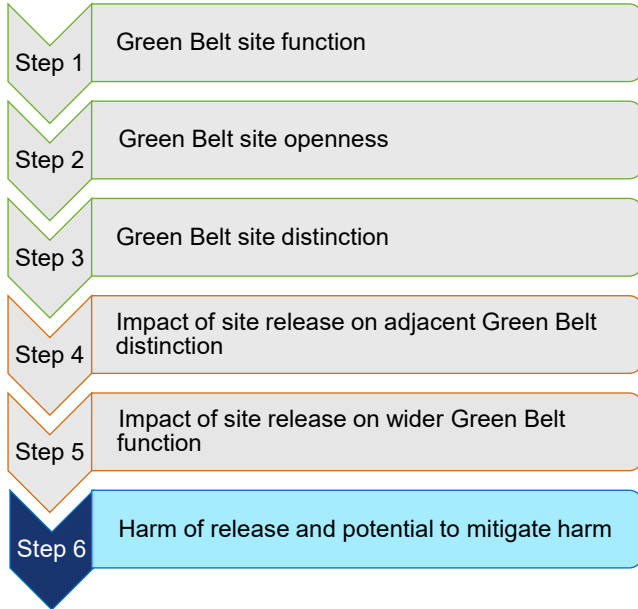
Questions in relation to impact of release on the Purpose 4 function of adjacent Green Belt land	
Would land which forms part of the setting of a historic town, or which has characteristics which contribute to special character, be diminished in this role as a result of development of the assessment site?	
Higher potential harm to the purpose	Other land would lose its value with regard to Purpose 4 – eg through loss of its visual relationship with the historic town.
Lower potential harm to the purpose	Other land's contribution to Purpose 4 would not be lessened.

Local Purpose: preserving the individual character, identity and setting of Keynsham and the villages and hamlets

3.74 If a gap between settlements is significantly diminished, all of the remaining Green Belt gap is generally considered more fragile. What constitutes a 'significant' reduction in a settlement gap depends on the size of the current gap, and on whether or not the release of land would also cause the loss of important landscape features that preserve a settlement's individual setting.

Questions in relation to impact of release on the Local Purpose function of adjacent Green Belt land	
Would the physical distance between settlements be significantly reduced?	
Would loss of key elements in a settlement's setting contribute to a perceived reduction in its separate identity?	
Higher potential harm to the purpose	The perceived gap between settlements would be significantly reduced, through loss of distance and/or features that form a key element in a settlement's setting.
Lower potential harm to the purpose	There would be no significant reduction in separation between settlements, in terms of either distance or loss of important setting features.

Step 6: determine harm of release and potential to mitigate harm



3.75 The assessments set out in Steps 1-5 have been combined to give a rating for harm to each of the first four Green Belt purposes that would result from release of the assessment site.

3.76 The harm ratings use a five-point scale from *low* through to *high*, but it should be noted that there are no absolute definitions associated with these stated levels of Green Belt harm. Instead the ratings provide a means of relative comparison, and whilst it is clearly desirable to minimise harm levels it may be that in some instances a site associated with a substantial level of Green Belt harm may still, taking other factors into consideration, represent the most sustainable development option (see NPPF paragraph 138).

3.77 The ratings for harm to each purpose have then be combined into an overall harm rating, using the same 5-point scale. The overall harm rating reflects the highest rating for harm to any single Green Belt purpose.

3.78 The table below provides indications as to how the different elements of contribution and assessment of impact on remaining Green Belt combine to give harm ratings, but different combinations result in different ratings. Professional judgement has been used in each individual case to consider how much weight to attach to each contributing element.

Clear and detailed justification is provided for all ratings given in relation to how the overall judgement of Green Belt harm is reached.

Indicators for different levels of harm	
Harm	Typical scenario
High	Release would remove land that makes a particularly significant contribution to the Green Belt purpose and would weaken the adjacent Green Belt land (its distinction and/or function). Or Release would remove land that makes a significant contribution to the Green Belt purpose, and would significantly weaken the adjacent Green Belt land (both its distinction and function).
Moderate-high	
Moderate	
Low-Moderate	
Low	
Low	Release would remove land that makes a weak contribution to the Green Belt purpose and its release would have only a very limited or no impact on the adjacent Green Belt.

Chapter 4

Bath Park and Ride Assessments

4.1 There are three Park and Ride sites in the Green Belt surrounding Bath:

- Lansdown;
- Newbridge; and
- Odd Down.

4.2 **Figure 4.1** shows the location of the sites.

4.3 The Council is considering diversifying the modes of transport available at each site both to Bath and the wider countryside, such as cycle storage and hire facilities, ridesharing, electric car charging and sharing and delivery hubs. Consideration is also being given to whether the Park and Ride sites might be compatible with other forms of sustainable infrastructure, notably solar panels on canopies above transport uses.

4.4 This chapter sets out the:

- Policy context behind this.
- Appropriateness of such land uses in the Green Belt.
- Green Belt harm of releasing the Park and Ride sites from the Green Belt.
- Green Belt harm of accommodating such land uses within the Green Belt.

4.5 Consideration is also given to the potential scope of the necessary exceptional circumstances case of making alterations to Green Belt boundaries and/or a very special circumstances case for permitting inappropriate land uses in the Green Belt at these locations.

Planning Context

4.6 The Park and Ride sites play an important role in reducing car traffic entering Bath and this is recognised in a suite of local and regional planning documents. In addition, other planning documents highlight the need invest in more sustainable forms of energy generation.

Joint Local Transport Plan 4¹¹

4.7 The Joint Local Transport Plan 4 confirms Park and Ride sites will play an important role and sets out aspirations for expanding the variety of uses for existing and new Park and Ride sites including park and rail and park and share facilities.

Complementary uses for existing and new Park & Ride sites will be explored, with opportunities for sites to provide Park & Cycle or Park & Stride, overnight lorry parking, coach parking, freight consolidation functions, community uses, renewable energy generation, or even acting as bus depots. Any complementary uses would need to consider potential impacts on local communities and the local environment. Operators would need to be involved, as some proposals may require a parking charge to be introduced.

In the longer-term, we will explore the potential of new and expanded Park & Ride sites linked to mass transit routes, as well as exploring the potential for sites to act as transport interchanges which could include improved links to public transport, substantial increases in cycle parking, cycle hire facilities, improved wayfinding infrastructure to facilitate walking, innovative last mile freight solutions and access to electric charging points.

West of England Bus Strategy¹²

4.8 This strategy highlights that Park and Ride sites will be designed to fit the emerging strategic network and operate as transfer locations for connecting bus services and key interchanges between other transport modes.

West of England Future Transport Zones Programme

4.9 WECA has received £28 million funding from the Department for Transport to create a West of England Future Transport Zone (FTZ). A key element of the FTZ will be the creation of new “Mobility Stations” which build on the aspirations of the JLTP4 to make better use of Park and Ride sites. Mobility Stations are physical multi-modal interchange points, integrating multiple modes and service offerings for users.

West of England Climate Emergency Action Plan¹³

4.10 The West of England has set an ambitious goal for tackling climate change with a target to achieve net zero carbon by 2030. The action plan includes work to

decarbonise the transport and energy systems, through local active travel and renewable energy generation.

Bath and North East Somerset Climate and Ecological Emergency Progress Report¹⁴

4.11 Bath and North East Somerset Council declared a Climate Emergency in March 2019 and pledged to provide the leadership to enable carbon neutrality in the district by 2030. Tackling the Climate Emergency means creating a different vision for all parts of Bath and North East Somerset, including the World Heritage Site of Bath itself. As part of this change in vision, a rapid and large-scale increase in local renewable energy generation is being pursued throughout the District.

Bath and North East Somerset Placemaking Plan

4.12 Policy CP3: Renewable Energy states renewable energy schemes will be encouraged through a range of mechanisms under the influence of the Council and its partners, including via Planning Services, information and advice services, community enabling and support projects.

4.13 Policy SCR3: Ground-mounted Solar Arrays states such proposals should be focused on non-agricultural land or land of lower agricultural quality and facilitate land diversification.

4.14 Policy SCR4: Community Renewable Energy Schemes states that where such schemes are proposed to meet the ‘very special circumstances’ test the following criteria will be considered:

- The contribution to achieving the targets set out in Policy CP3 of the Core Strategy to increase the level of renewable electricity and heat generation in the district;
- The contribution that will be made to local and national renewable energy and carbon reduction targets;
- Social and economic benefits. For example, local job creation opportunities; raising the quality of life in rural areas through diversification of agricultural land and generating an alternative income for farmers;
- The temporary nature of the renewable energy development and the ability to restore land to its original condition at the end of the project’s life;
- Contributions to improving the biodiversity, public amenity and soils in the vicinity of the scheme.

¹¹ Joint Local Transport Plan 4 2020-2036, Travel West. Available at: <https://travelwest.info/app/uploads/2020/05/JLTP4-Adopted-Joint-Local-Transport-Plan-4.pdf>

¹² West of England Bus Strategy 2020, Travel West. Available at: <https://travelwest.info/app/uploads/2020/02/West-of-England-Bus-Strategy.pdf>

¹³ West of England Climate Emergency Action Plan, West of England Local Enterprise Partnership, 2020. Available at:

[https://westofengland-](https://westofengland-ca.moderngov.co.uk/documents/s2200/CE%20Action%20Plan.pdf)

[ca.moderngov.co.uk/documents/s2200/CE%20Action%20Plan.pdf](https://westofengland-ca.moderngov.co.uk/documents/s2200/CE%20Action%20Plan.pdf)
¹⁴ Bath and North East Somerset Climate and Ecological Emergency Progress Report, Bath and North East Somerset Council, 2021.

Available at:

<https://democracy.bathnes.gov.uk/documents/s64092/Climate%20Ecological%20Emergency%20Progress%20Report.pdf>

4.15 Policy ST6: Park and Ride encourages the development of new or expansion of existing Park and Ride sites. The policy states that in the case of Park and Ride development in the Green Belt, it must be demonstrated that there is a requirement for a Green Belt location and it preserves the openness of the Green Belt and does not conflict with the purposes of including land in it.

Bath and North East Local Plan Partial Update

4.16 The Council are drafting a Partial Update to their Local Plan, with a particular focus on the need to update policies to address the Council's declaration of a Climate Emergency and an Ecological Emergency, as well as an update to specific policies to address short-term issues, such as transport policies.

4.17 Policy CP3: Renewable Energy is proposed to be updated to incorporate a need for development to contribute to the need to balance electricity demand and supply, in order to assist the transition to 100% renewable energy. It will also include policy wording relating to ground mounted solar arrays and wind turbines.

4.18 Policy SCR3: Ground-mounted Solar Arrays is proposed to be deleted and incorporated into CP3.

4.19 Policy SCR4: Community Renewable Energy Schemes is proposed to be retained with no amendments.

4.20 Policy ST6: Park and Ride is proposed to be updated to change the emphasis from 'traditional' park and rides to develop a new model of interchange. A new site allocation is also proposed relating to Odd Down, Newbridge and Lansdown Park and Ride sites, allocating them for use as multi-modal transport interchanges, and setting out policy requirements for each site.

Bath and North East Somerset Parking Strategy¹⁵

4.21 The strategy notes that Park and Ride facilities are key to providing access to the centre of Bath from rural parts of the authority area and beyond without resulting in large increases in traffic and air pollution in central Bath. The Parking Strategy promotes continued use of the existing sites around Bath and a review of their future operation.

Appropriateness of proposed uses

4.22 NPPF paragraph 146 sets out the forms of development that are '*not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.*' This includes '*local transport*

infrastructure which can demonstrate a requirement for a Green Belt location'.

4.23 Although the diversification of the Park and Ride sites for cycle storage and hire facilities, ridesharing, electric car charging and sharing and delivery hubs could broadly fall within this 'local transport infrastructure' category, the absence of existing buildings and infrastructure beyond parking bays would mean almost any additional infrastructure would impact the openness of the Green Belt. Furthermore, the NPPG cites the '*degree of activity likely to be generated, such as traffic generation*' as capable of affecting spatial and visual aspects of openness. Therefore, it is considered that almost all forms of development associated with the diversification of the transport facilities at the three Park and Ride sites are likely to be considered inappropriate development in Green Belt terms.

4.24 Renewable energy projects, such as the incorporation of solar canopies above the Park and Ride facilities would comprise inappropriate development in the Green Belt.

Exceptional circumstances for alterations to Green Belt boundaries

4.25 To avoid the development of inappropriate land uses in the Green Belt, the Council could seek to remove the Park and Ride sites from the Green Belt designation. NPPF paragraph 136 states that '*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.*' Other national planning policy and associated case law offers guidance on how exceptional circumstances cases should be constructed:

- Paragraph 137 requires demonstration that the local planning authority has examined fully all other reasonable options for meeting the identified need for development, including making as much use as possible of suitable brownfield sites and underutilised land.
- Paragraph 138 emphasises the need to promote sustainable patterns of development in reviewing Green Belt boundaries. It also states that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport.
- The Calverton case indicated that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries also require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent

¹⁵ Balancing Your Needs: A parking strategy for Bath & North East Somerset, 2018, ch2m. Available at:

https://beta.bathnes.gov.uk/sites/default/files/2018-07/parking_strategy_05.01.2018_summary.pdf

impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent’.

4.26 Where it has been concluded that it is necessary to release Green Belt land for development, NPPF paragraph 138 states that ‘*plans ... should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*’

4.27 National PPG elaborates on paragraph 138 by listing the following potential compensatory improvements:

- *‘New or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*
- *improved access to new, enhanced or existing recreational and playing field provision.’*

4.28 The policy context section outlined above clearly identifies a strategic need for new and improved Park and Ride and renewable facilities in Bath and North East Somerset. The sites are also brownfield locations (ie previously developed land) and are potentially underutilised. However, considering the above Green Belt policy and guidance in the round, an exceptional circumstances case for releasing one or all of the Park and Ride sites around Bath to deliver such facilities would also need to demonstrate the following:

- That the sites represent sustainable locations for the planned allocated uses relative to reasonable alternatives outside the Green Belt.
- That the Green Belt harm of release is outweighed by the benefits the release will facilitate in the long term, including:
 - a demonstration of how harm to the Green Belt will be minimised, and
 - compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

4.29 Given the presence of the existing Park and Ride facilities on each site, such a case is likely to be easier to demonstrate through the provision of similar land uses, such as multi-modal transport infrastructure. Such uses have

already been demonstrated to be sustainable in these locations. Furthermore, their diversification offers scope to promote the beneficial use of the Green Belt within their immediate vicinity through improved access and recreation routes, such as cycling and walking.

4.30 The installation of solar canopies over the parking bays would represent a sustainable use of the site in line with NPPF and local plan policies. Due to the unique opportunity to utilise an existing brownfield site for multiple uses, it is considered that the proposed use of the sites for solar electricity generation could provide a potentially more sustainable location for development compared with greenfield locations outside of the Green Belt. Furthermore, solar canopies above vehicle parking facilities could help to screen glare from windscreens where visible from outside the Park and Ride facilities.

4.31 Promoting multiple complimentary land uses such as transport and energy in combination could maximise the benefits of release in each location. However, the greater the scale and density of development of released Green Belt land the greater scope for harm to remaining adjacent Green Belt land through containment and/or visual urbanising influence. The release of the sites from the Green Belt as part of the Local Plan could raise the risk that, in the long term, the promoted uses could be replaced by denser, higher and more active development. National PPG highlights that the visual impacts of proposals may be relevant in evaluating the impact of development on the openness of Green Belt land. The NPPG also makes reference to the degree of activity likely to be generated, such as traffic generation, to be in an important factor in evaluating the implications of proposals in and around the Green Belt. It is therefore recommended that the Local Plan review be as explicit as possible in the allocation of further development at each Park and Ride site, setting out clear parameters to manage the height, visibility and degree and direction of activity in and around each Park and Ride site to guard against the inappropriate intensification of development that might be harmful to the wider Green Belt.

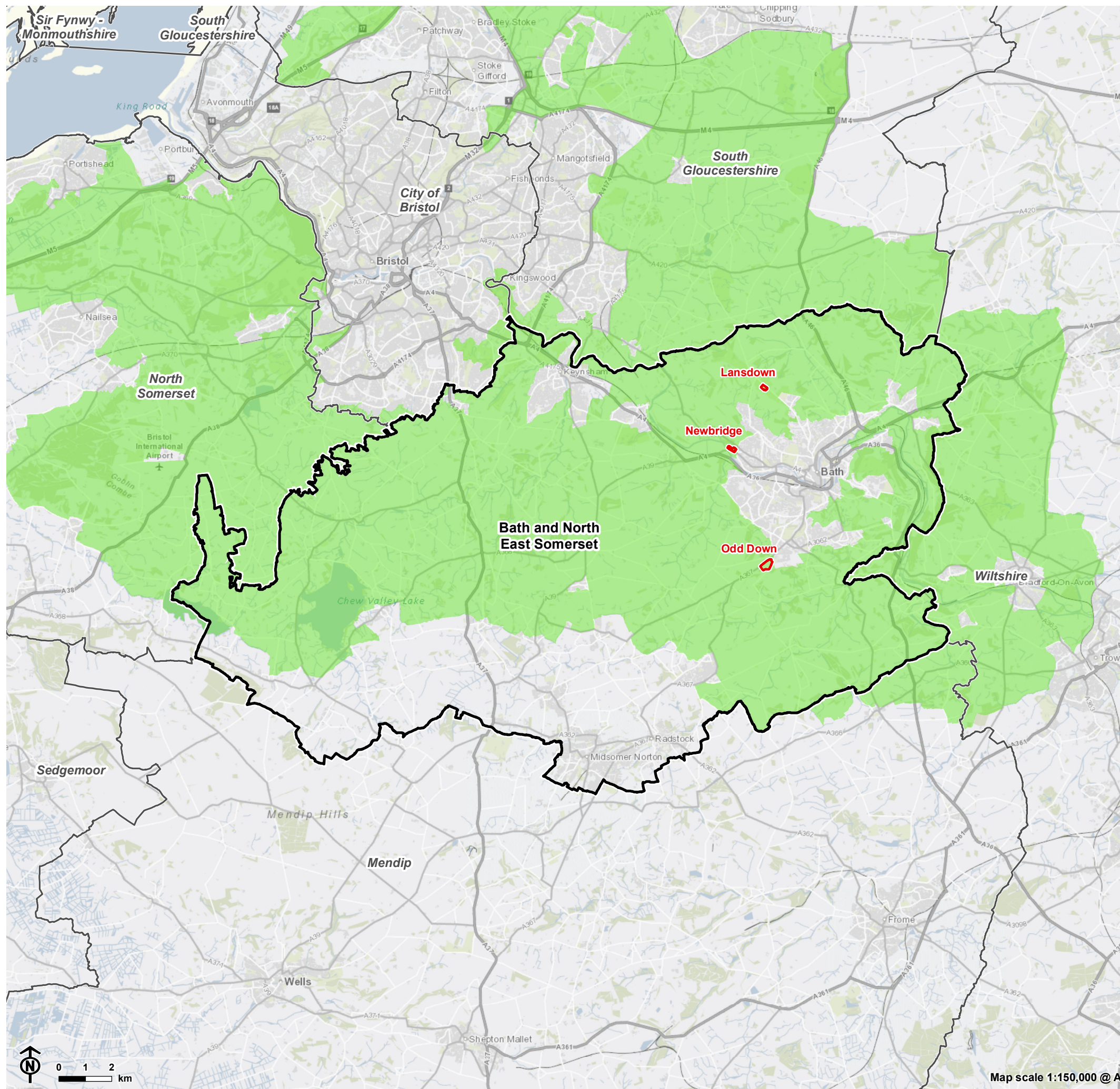
4.32 Work is underway to assess opportunities to connect, conserve and enhance the green infrastructure in and around the Park and Ride sites. This evidence will inform policy in the Local Plan Review.

Green Belt harm assessment

4.33 The assessment of the harm of release of each site for the development of Park and Ride facilities, and a concluding analysis of harm and potential mitigation for the proposed developments, are set out below.

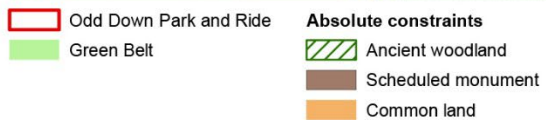


Figure 4.1: Location of the three Bath Park and Ride sites



- Bath and North East Somerset
- Neighbouring Local Authority boundary
- Green Belt
- Park and Ride site

Odd Down




CB:NC EB:Collins_N LUC 11454_r0_PandRContext_DDP_A4P 16/04/2021
 Source: OS, HE, EA, NE, B&NES
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The Odd Down Park and Ride site comprises open, hard-surfaced parking bays around a central building, adjacent to which the buses stop. Radial planting provides some visual subdivision, and the parking area is largely contained by mature tree cover, which is deepest alongside the A367. There is less separation from an area of grassland scrub to the south, which lies within the ownership boundary but which serves as an area for nature conservation, created in 2009 as mitigation for the partial loss of a Site of Nature Conservation Importance that resulted from expansion of the Newbridge Park and Ride.

Although a minor expansion of the parking area in 2009 was considered appropriate as it did not materially affect the openness of the Green Belt, the facility as a whole is considered to constitute inappropriate development in the Green Belt. Building, hard surfaces and parking usage (including vehicular movements) all have an impact on Green Belt openness. However, recognising that parking use is not constant and hard surfaces have a more limited impact on views than buildings, the site is considered partially rather than fully developed. The area of grassland is entirely undeveloped and open, and it is assumed that this would not be altered by the development proposals.



-  Odd Down Park and Ride
-  Green Belt

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Source: OS, HE, EA, NE, B&NES
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA,
USGS, AeroGRID, IGN, and the GIS User Community

Harm of release for the development of park and ride facilities

Purpose 1	Purpose 2	Purpose 3	Purpose 4	Local Purpose		Overall Harm
LM	L	LM	L	L		LM
<p>Purpose 1 – Checking the unrestricted sprawl of large, built-up areas</p> <p>The site is contiguous with the inset edge of Bath, so development here has the potential to be considered sprawl of the large built-up area. The stronger the distinction from the inset settlement the more land is considered to contribute to preventing sprawl, and this site does have a strong boundary tree belt, together with roads, which create a degree of separation from the urban area. Proximity to one of the main approaches to the city also increases the extent to which development could be perceived as urban sprawl. However, the degree to which the site is already developed reduces its distinction from the inset settlement, with the Park and Ride usage constituting an urbanising visual influence. Landform does not create any additional distinction between the site and the urban edge, as they both lie on the elevated Odd Down plateau, from which steep, wood-fringed coombes fall away to the north, west and south.</p> <p>The impact of release of the site on the integrity of the adjacent Green Belt is also limited by the fact that existing uses already have an urbanising impact, but in practice the site’s well-treed boundaries already minimise this influence. However, the fact that the existing Green Belt edge is regular and strongly defined means that some, albeit minor, weakening of the adjacent Green Belt could be considered to result were the site to be released. The A367 would form a strong alternative Green Belt boundary to the west, and Coombe Hay Lane and its adjacent tree cover form a clear boundary to the east, but the southern edge of the site is less strongly defined. The edge of the car park marks the edge of the developed part of the site, with land to the south remaining open and also more exposed to view from the A367, so a new Green Belt boundary would need to follow this weaker edge to avoid the release of land which makes a stronger contribution to Purpose 1.</p> <p>On the assumption that the proposed changes to the Park and Ride site would be limited to the area already developed, and would not be of a scale that would introduce any significant increase in urbanising visual influence on adjacent land, the release of the site would have only a minor impact on the contribution that adjacent land makes to checking the sprawl of Bath, and would not weaken its function with regard to this purpose. It is noted that, were the site to be released, the triangular field between the site and the inset (but as yet undeveloped) settlement edge to the east would be largely contained by the revised Green Belt boundary, but retention of the current boundary tree line would mean that in practice there would be no increased urbanising influence on that field, and therefore no adverse impact on its contribution to Purpose 1.</p> <p>Harm to Purpose 1 from releasing the site would therefore be low-moderate.</p>						
<p>Purpose 2 – Preventing neighbouring towns from merging into one another</p> <p>The nearest settlement south of Bath that is large enough to be considered a town is Radstock (combined with Midsomer Norton), which is over 7km away. Although Peasedown St John constitutes an intervening urban area, there are still large, open countryside gaps, with the valley of the Cam Brook forming a strong separating landscape feature in between.</p> <p>Land in this gap therefore makes only a weak contribution to preventing the coalescence of towns, and the harm to Purpose 2 of releasing the site, especially given its proximity to Bath and its existing urbanising influences (as discussed above), would be low.</p>						
<p>Purpose 3 – Safeguarding the countryside from encroachment</p> <p>There is sufficient distinction from the urban area, and sufficient remaining openness (see Purpose 1 assessment), for the site to retain some countryside characteristics, and therefore to make some contribution to preventing encroachment. However, for the same reasons as discussed in the Purpose 1 assessment, the impact of the release and development of land on the adjacent Green Belt would be minor, so harm to Purpose 3 would be low-moderate.</p>						
<p>Purpose 4 – Preserving the setting and special character of historic towns</p> <p>The Park and Ride site lies outside of the Bath World Heritage Site boundary but within the indicative extent of its setting (as defined in the City of Bath World Heritage Site SPD). However, its tree screening means that it is not visible from the City, and the extent of its development means that it makes only a very limited contribution to preserving Bath’s setting and special</p>						

character. Harm to Purpose 4, assuming development that has no significant urbanising visual impact beyond the site, would therefore be **low**.

Purpose 5 – Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt land is considered to make a significant contribution to this purpose. Although the site is already urbanised, the limited scale of development offers scope for it to be returned to open countryside.

Local Purpose – Preserving the individual character, identity and setting of Keynsham and the villages and hamlets

The site is located adjacent to Bath and does not have a relationship with any other settlements. Harm to the Local Purpose from releasing the site would therefore be **low**.

Overall summary and potential for mitigation

The assessment indicates that release and further limited development of the area occupied by the Park and Ride would result in **low-moderate** harm to two of the Green Belt purposes: the checking of unrestricted sprawl and the prevention of encroachment on the countryside.

The Fuller Earth Works to the south west of the site is brownfield land and its built structures would create weaker distinction from an adjacent inset area than would be the case if it were open farmland. Therefore, there would be value in retaining a greenfield gap between the two. Furthermore, planting to strengthen the southern boundary of the developed area within the site would in the longer term reduce the urbanising influence of the site on the open southern field (which was introduced as a habitat area when the number of parking spaces was increased in 2009), but planting would still be considered to form a slightly weaker boundary than the road and tree line that form the existing inset edge.

Although these harm ratings are limited by the extent of existing urbanising development, there is nonetheless a degree of distinction between the site and the urban area, with the former retaining some openness and with roads and tree cover limiting intervisibility. Although the proposed changes to the Park and Ride site will constitute further development, there will still potentially be enough distinction from the urban area to justify retention of Green Belt status. It is recognised that greater Green Belt harm could result were there to be larger scale development in the site, so the Green Belt designation serves to guard against this alongside local planning policies. Also, although the contribution to the Green Belt purposes of the field to the east would not be significantly changed by further development in the site, it is recognised that the release of the park and ride site would leave the field more physically contained by inset land. This could be seen as weakening the case for its retention in the Green Belt.



Newbridge



The Newbridge Park and Ride site comprises three 'cells' of hard-surfaced parking bays: two adjacent to the A4, to either side of the building adjacent to which the buses stop, and one to the north-east. The latter, and also the westernmost cell, are well contained by tree cover, and the central section, although closer to the main road, is still largely contained from passing views. The site as a whole occupies a little over half of an area of flat land just above the River Avon's floodplain that is hemmed in by the urban area to the east, the A4 and to the south, the river to the west and the steep, wooded slope of the Avon Valley to the north.

Although the expansion of the parking area to include the north-western cell (approved in 2013) was considered to meet the requirements of the then current local plan's policy on Park and Ride development, it was recognised that the openness of the Green Belt was inevitably affected by the creation of hardstanding for parking. The facility as a whole is considered to constitute inappropriate development in the Green Belt, with the building, hard surfaces and parking usage (including vehicular movements) all having an impact on Green Belt openness. However, recognising that parking use is not constant and hard surfaces have a more limited impact on views than buildings, the site is considered partially rather than fully developed.



 Newbridge Park and Ride
 Green Belt

CB:NC EB:Collins_N LUC 11454_r0_PandRContextAerial_DDP_A4P 16/04/2021
Source: OS, HE, EA, NE, B&NES
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA,
USGS, AeroGRID, IGN, and the GIS User Community

Harm of release for the development of park and ride facilities

Purpose 1	Purpose 2	Purpose 3	Purpose 4	Local Purpose	Overall Harm
L	L	L	L	L	L

Purpose 1 – Checking the unrestricted sprawl of large, built-up areas

The site is contiguous with the inset edge of Bath, so development here has the potential to be considered sprawl of the large built-up area. The stronger the distinction from the inset settlement the more land is considered to contribute to preventing sprawl, and this site does have strong boundary tree cover that creates a degree of separation from the urban area. Proximity to one of the main approaches to the city also increases the extent to which development could be perceived as urban sprawl. However, the degree to which the site is already developed is considered to reduce its distinction from the inset settlement, with the Park and Ride usage constituting an urbanising visual influence. Landform does not create any additional distinction between the site and the urban edge, as both are contained between the River Avon, the A4 and the wooded valley side to the north.

The impact of release of the site on the integrity of the adjacent Green Belt is also limited by the fact that existing uses already have an urbanising impact, but in practice the site's well-treed boundaries already minimise this influence. Although the existing Green Belt boundary to the east is clearly defined, a new Green Belt boundary along the site's outer edge would be similarly be defined by tree cover, so negligible weakening of the adjacent Green Belt would occur were the site to be released.

On the assumption that the proposed changes to the Park and Ride site would not be of a scale that would introduce any significant increase in urbanising visual influence on adjacent land, the release of the site would have a negligible impact on the contribution that adjacent land makes to checking the sprawl of Bath, and would not weaken its function with regard to this purpose. It is noted that, were the site to be released, the two fields to the north and the smaller field to the east would be more closely contained by the revised Green Belt boundary, but retention of the current boundary tree lines would mean that in practice there would be no increased urbanising influence on those fields, and therefore negligible adverse impact on its contribution to Purpose 1.

Harm to Purpose 1 from releasing the site would therefore be **low**.

Purpose 2 – Preventing neighbouring towns from merging into one another

The site lies between Bath and the town of Keynsham. Saltford forms an intervening urban area which reduces separation between the two, but the gap between Saltford and Bath is still relatively wide. Consideration also needs to be given to the gap between Bath and Bristol which, in the context of the size of those settlements, the presence of intervening urban areas and the role of the A4 and railway line in providing connectivity, can be considered relatively narrow. However, the River Avon and the steep-sided valley on Newton Brook to the south form a clear western limit to Bath, so any development to the east of this would not be perceived as significantly diminishing settlement separation. Added to this the assumption that the proposed changes to the Park and Ride site would not be of a scale that would introduce any significant increase in urbanising visual influence on adjacent land, the harm to Purpose 2 of releasing the site would be **low**.

Purpose 3 – Safeguarding the countryside from encroachment

There is sufficient distinction from the urban area, and sufficient remaining openness (see Purpose 1 assessment), for the site to retain some countryside characteristics, and therefore to make some contribution to preventing encroachment, but the proximity of the busy A4 does limit this. As noted in the Purpose 1 assessment, the impact of the release and development of land on the adjacent Green Belt would be negligible, so harm to Purpose 3 would be **low**.

Purpose 4 – Preserving the setting and special character of historic towns

The Park and Ride site lies within of the Bath World Heritage Site boundary, which in this area follows the River Avon, but the extent to which the site itself can be considered to contribute to preserving setting and special character is very much limited by its developed form. Park and Ride facilities have clear benefits for the historic city as a whole, in terms of reducing traffic in more sensitive locations, but that does not mean that land within any individual Park and Ride site necessarily has any special qualities or landscape elements which make a positive contribution to the City's setting. In the case of Newbridge, the

site's trees do make a positive contribution to the wooded landscape that presents itself on arrival to Bath along the A4. However, assuming that release would not result in any loss of vegetation, and assuming any additional development would not have significant urbanising visual impact beyond the site, the harm to Purpose 4 would be **low**.

Purpose 5 – Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt land is considered to make a significant contribution to this purpose. Although the site is already urbanised, the limited scale of development offers scope for it to be returned to open countryside.

Local Purpose – Preserving the individual character, identity and setting of Keynsham and the villages and hamlets

The site is located adjacent to Bath and does not have a relationship with any other settlements. Harm to the Local Purpose from releasing the site would therefore be **low**.

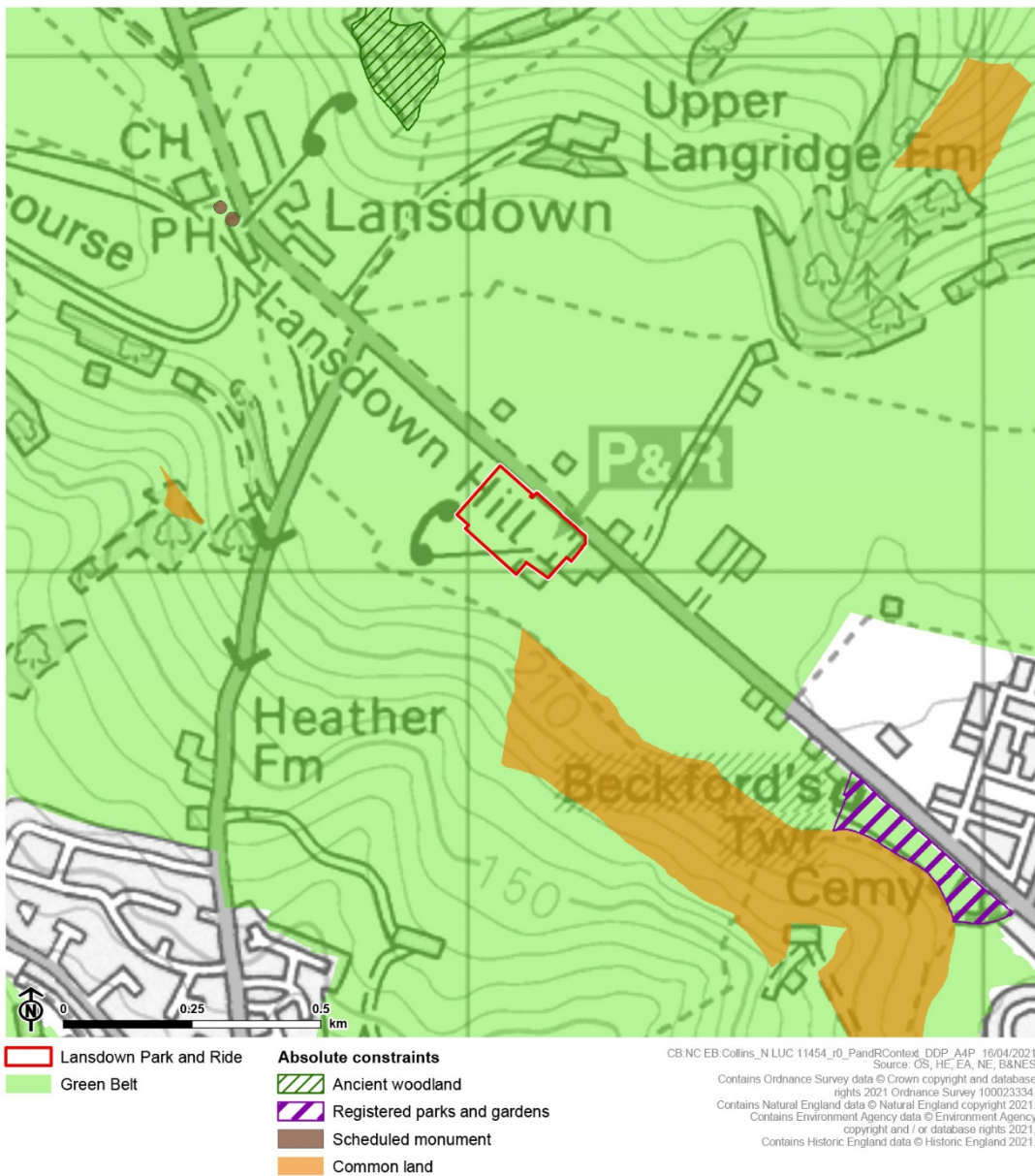
Overall summary and potential for mitigation

The assessment indicates that release and further development of the area occupied by the Park and Ride would result in **low** harm to all of the assessed Green Belt purposes. Retention of existing trees within the site, separating the two easternmost parking areas, would minimise harm.

Although these harm ratings are limited by the extent of existing urbanising development, there is nonetheless a degree of distinction between the site and the urban area, with the former retaining some openness and with roads and tree cover limiting intervisibility. Although the proposed changes to the Park and Ride will constitute further development, there will still potentially be enough distinction from the urban area to justify retention of Green Belt status. It is recognised that greater Green Belt harm could result were there to be larger scale development in the site, so the Green Belt designation serves to guard against this alongside local planning policies.

Consideration should also be given to the relationship between the site and the adjacent Green Belt fields to the north, the smaller field to the east and the land to the south of the A4. Although their contribution to the Green Belt purposes would not be significantly changed by further development in the site, it is recognised that the release of the Park and Ride site would leave them more physically contained by inset land. This could be seen as weakening the case for their retention in the Green Belt, particularly given that the River Avon offers a strong alternative boundary.



Lansdown



The Lansdown Park and Ride site is located over 500m to the north of the inset edge of Bath. Planted tree belts separate the parking area from playing fields to the south and west, and more mature trees line Lansdown Road. There is adjacent washed-over development to the east, comprising pavilions associated with the playing fields and several large, residential dwellings. Some tree and hedgerow planting adds a green element to the site, but it is mostly occupied by hard-surfaced parking bays. There are no buildings within the site.

Although a minor expansion of the parking area in 2009 was considered appropriate as it did not materially affect the openness of the Green Belt, the facility as a whole is considered to constitute inappropriate development in the Green Belt. Hard surfaces and parking usage (including vehicular movements) have an impact on Green Belt openness. However, recognising that parking use is not constant and hard surfaces have a more limited impact on views than buildings, the site is considered partially rather than fully developed.



 Lansdown Park and Ride
 Green Belt

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Source: OS, HE, EA, NE, B&NES
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA,
USGS, AeroGRID, IGN, and the GIS User Community

Harm of release for the development of park and ride facilities

Purpose 1	Purpose 2	Purpose 3	Purpose 4	Local Purpose	Overall Harm
L	L	LM	L	L	LM
<p>Purpose 1 – Checking the unrestricted sprawl of large, built-up areas</p> <p>The site is not directly contiguous with the inset edge of Bath. The large built-up area extends northwards upslope and onto the flat plateau of Lansdown Hill, so landform does not create distinction between the site and the urban area, but over 500m of open land lies in between. The inset area is yet to be developed up to the Green Belt edge, but there is sufficient vegetation between here and the Park and Ride for the former not to be considered likely to have a significant impact on the latter. In the context of the extent of existing development on the site, its release and further development as proposed would not constitute sprawl of Bath. Harm to Purpose 1 from releasing the site would therefore be low.</p>					
<p>Purpose 2 – Preventing neighbouring towns from merging into one another</p> <p>Bristol lies to the north-west of Bath, but there is a significant distance between the two in this area. Although the size of these cities relative to the size of the gap can be considered to reduce their separation, there is little intervening urbanising development and no main road or rail link in this direction. The plateau landform of Lansdown Hill, and the valley of the River Boyd, further strengthen separation. Land in this gap therefore makes only a weak contribution to preventing the coalescence of towns, and the harm to Purpose 2 of releasing the site, especially given its proximity to Bath and its existing urbanising influences, would be low.</p>					
<p>Purpose 3 – Safeguarding the countryside from encroachment</p> <p>There is sufficient distinction from the urban area, and sufficient remaining openness (see Purpose 1 assessment), for the site to retain some sense of being in the countryside, although the prevalence of playing fields and washed-over development in the surrounding area does limit this perception.</p> <p>Given the extent of vegetation around the site boundary, it is anticipated that the proposed changes to the Park and Ride site would not introduce any significant increase in urbanising visual influence on adjacent land, so harm to Purpose 3 would be low-moderate.</p>					
<p>Purpose 4 – Preserving the setting and special character of historic towns</p> <p>The Park and Ride site lies outside of the Bath World Heritage Site boundary but within the indicative extent of its setting (as defined in the City of Bath World Heritage Site SPD). However, its tree screening means that it is not visible from the City, and the extent of its development means that it makes only a very limited contribution to preserving Bath's setting and special character. Harm to Purpose 4, assuming development that has no significant urbanising visual impact beyond the site, would therefore be low.</p>					
<p>Purpose 5 – Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land</p> <p>All Green Belt land is considered to make a significant contribution to this purpose. Although the site is already urbanised, the limited scale of development offers scope for it to be returned to open countryside.</p>					
<p>Local Purpose – Preserving the individual character, identity and setting of Keynsham and the villages and hamlets</p> <p>The site is located midway between the inset edge of Bath and the hamlet of Lansdown, but does not have any significant relationship with the latter. Mature tree cover along Lansdown Road together with the hedgerow bounding the Park and Ride site mean that the Park and Ride site does not form part of the visual setting of Lansdown. Harm to the Local Purpose from releasing the site would therefore be low.</p>					

Overall summary and potential for mitigation

The assessment indicates that release and further development of the area occupied by the Park and Ride would result in **low-moderate** harm to one of the Green Belt purposes: the prevention of encroachment on the countryside.

Although harm ratings are limited by the extent of existing urbanising development, there is nonetheless a significant degree of distinction between the site and the urban area, with the former retaining some openness. Although the proposed changes to the Park and Ride will constitute further development, there will still potentially be enough openness to justify retention of Green Belt status. It is recognised that greater Green Belt harm could result were there to be larger scale development in the site, so the Green Belt designation serves to guard against this alongside local planning policies. The release of the Park and Ride site would also create a small, isolated inset area that could in the longer term be seen as weakening the integrity of the Green Belt.