

West of England Combined Authority Strategic Green Belt Assessment

West of England
Strategic Evidence Base
September 2022



Regional Strategic Evidence summary sheet

Document name

Strategic Green Belt Assessment

Why is this document required?

In order to plan for strategic growth in the West of England Combined Authority area, a technical and objective assessment of the Green Belt is required. This will help to inform the spatial strategy in the (SDS), alongside other important technical assessments.

The National Planning Policy Framework (NPPF) places ‘great importance’ to the Green Belt, which is designated around major urban areas to prevent urban sprawl and keep land permanently open. Strategic planning must therefore be informed by an up to date and robust assessment of the performance of Green Belt land against the purposes set out in national planning policy.

What is the purpose of the document?

The purpose of this document is to understand the strategic role and function of the Bristol & Bath Green Belt within the West of England Combined Authority area, which includes Bath & North East Somerset, Bristol, and South Gloucestershire authorities.

The strategic Green Belt assessment systematically considers parcels of land in an objective and consistent manner against the 5 Green Belt purposes defined in National Policy. The 5 purposes of the Green Belt are:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This assessment helps understand variations in the contribution of Green Belt land to these five purposes.

How will it be used?

The strategic Green Belt Assessment is part of a suite of technical evidence that will be used to inform plan making. Local Plans will need to develop and appraise different ways of meeting their plan objectives against a range of considerations including legal and policy requirements

set by government. The appraisal will include consideration of the impact on Green Belt, and this technical assessment will support that process.

Importantly, the Strategic Green Belt Assessment is not a decision-making document, nor does it propose where any release of Green Belt land will take place. It is a ‘stand-alone’ document that does not include impact assessment of the release of specific sites or locations for development in the Green Belt; also, it makes no recommendations for any areas of land for potential release.

However, the assessment does point to considerations of potential harm that the release of land from the Green Belt would have on the integrity of remaining Green Belt land. These considerations are useful to inform the preparation of the Local Plans.

Who was this document produced by?

This document has been jointly commissioned by the West of England Combined Authority and the Unitary Authorities of Bath and Northeast Somerset Council, Bristol City Council, and South Gloucestershire Council and has been prepared by LUC.

Engagement and consultation

To support the development of the assessment, a method statement was produced and published in March 2021 for consultation to stakeholders and local planning authorities with boundaries that adjoin those of the constituent authorities including:

- Historic England
- Natural England
- The Environment Agency
- Gloucestershire County Council
- Wiltshire Council
- North Somerset Council.

Their feedback and how it shaped the assessment methodology is documented in the main report.



Spatial Development Strategy

Strategic Green Belt Assessment

West of England Combined Authority

Final report

Prepared by LUC

November 2021

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1	Draft Final Report	J Allen R Swann	S Young	S Young	27.08.2021
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Spatial Development Strategy

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Chapter 1

Introduction

1.1 Atkins and LUC have been jointly commissioned by the West of England Combined Authority (WECA) to deliver a strategic assessment of the Green Belt within the administrative areas of Bath and North East Somerset Council, Bristol City Council and South Gloucestershire Council (the WECA authorities). This report sets out the context behind, methodology and findings of the assessment.

1.2 The methodology, assessment and report have all been delivered by LUC. Atkins have played a supporting role in a peer review capacity.

The West of England Strategic Development Strategy

1.3 This strategic Green Belt assessment is an important piece of evidence informing the emerging West of England Spatial Development Strategy (SDS).

1.4 The SDS will set out the vision for how people will live, work and play in the West of England over the next 20 years. It will influence where homes, jobs and infrastructure are provided, and will be important in shaping the future content of the WECA authorities' Local Plans.

1.5 The SDS can establish where strategic changes need to be made to the Green Belt if exceptional circumstances are demonstrated but it cannot make alterations to designated Green Belt boundaries. Alterations to Green Belt boundaries (if required) will be made through the Local Plan-making process following the successful demonstration of the necessary exceptional circumstances.

Study Aims and Scope

1.6 In light of the scope of the SDS and its influence on the WECA authorities' future Local Plans, this study aims to provide a proportionate, objective, transparent, comprehensive and consistent assessment of the strategic role and function of the Green Belt within the WECA authorities' boundaries.

1.7 This has been achieved by establishing variations in the strategic contribution of the WECA authorities' Green Belt land to the Green Belt purposes, as defined in the National Planning Policy Framework (NPPF). The assessment of strategic contribution identifies broad variations in the role of land in relation to each of the NPPF Green Belt purposes, defining parcels of land with ratings and supporting text. These purposes and associated NPPF policy are outlined in more detail in Chapter 2 of this report.

1.8 Legal case law, as established in *Calverton Parish Council v Greater Nottingham Councils and others* (2015) indicates that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent'. As a strategic assessment of contribution to the Green Belt purposes, this study has not considered the impact of the release of specific sites of Green Belt land on the Green Belt purposes, or recommended any areas of land for potential release.

1.9 However, it is recognised that an understanding of the key components of the consideration of harm to the Green Belt purposes, within different locations within the WECA area, will be useful to inform the preparation of the SDS. To this end, the study identifies any substantial areas of land within each contribution assessment parcel where harm to the Green Belt purposes resulting from the release may be less than in the parcel as a whole.

1.10 The key distinction between the concepts of contribution to the Green Belt purposes and harm to those purposes relates to the impact that release of land would have on the integrity of remaining Green Belt land. An assessment of contribution considers the role that land plays now, whereas an assessment of harm considers how the loss of contribution of released land, together with any weakening of the remaining Green Belt, would combine to diminish the strength of the Green Belt. In the development of a preferred spatial strategy, relative harm to Green Belt of releasing specific site options will need to be weighed against benefits and the availability of any other reasonable alternatives.

Method Statement Consultation

1.11 Local Planning Authorities have a duty to cooperate [See reference 1] with neighbouring authorities, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Paragraph 20 of the NPPF sets out the strategic topics for which Local Plan strategic policies should be prepared, including population and economic growth and associated development and infrastructure and facilities, climate change and the conservation and enhancement of the natural, built and historic environment. All these topics either have a direct or indirect link to land designated as Green Belt. Consequently, a method statement was prepared in March 2021 for consultation with the stakeholders with whom the Authorities have a duty to cooperate. These included:

- Historic England.
- Natural England.
- Environment Agency.
- Relevant neighbouring local planning authorities (that is those adjoining the administrative boundary of WECA) including Gloucestershire County Council, Cotswold District Council, Forest of Dean District Council, Stroud District Council, Wiltshire Council, Somerset County Council, Mendip District Council, North Somerset Council, Sedgemoor District Council, Monmouthshire Council and Newport Council.

1.12 The method statement consultation provided an opportunity for the Councils' duty to cooperate partners to review and comment on the proposed approach to the study, prior to the assessment being undertaken.

1.13 Consultation comments were reviewed and summarised in a consultation log for discussion with WECA and the WECA authorities. The consultation log was then used to update the methodology for the study where appropriate before any assessment work was undertaken. A summary of the consultation log, including details of how the methodology was updated in the light of the comments is included in Appendix A of this report.

Report Authors

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

1.15 The report has also been peer reviewed by Atkins.

Report Structure

1.16 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 the previous Green Belt studies that have been undertaken over the past 10 years in the Bristol and Bath Green Belt;
- Chapter 3 outlines the methodology used to undertake the strategic assessment of Green Belt;
- Chapter 4 summarises the strategic assessment findings; and

- Chapter 5 summarises the next steps to be considered by WECA and the WECA authorities in planning in the Bristol and Bath Green Belt.

1.17 The main body of the report is supported by supplementary appendices, including:

- Appendix A contains the consultation log recording the consultation comments and responses generated during consultation on the study method statement in early 2021.
- Appendix B contains the individual Green Belt assessment proforma – one for each Green Belt assessment parcel defined through the strategic assessment process. Each assessment proforma records, maps and justifies the judged performance of each defined area of Green Belt land, and any notable opportunities to minimise the harm of Green Belt release in each strategic location.

Chapter 2

Bristol and Bath Green Belt Policy and Context

2.1 This chapter summarises the national and local Green Belt policy, and sets out the evolution of the Bristol and Bath Green Belt. It also briefly summarises the previous Green Belt studies that have been produced for WECA and the individual WECA authorities.

Current Extent of Bristol and Bath Green Belt

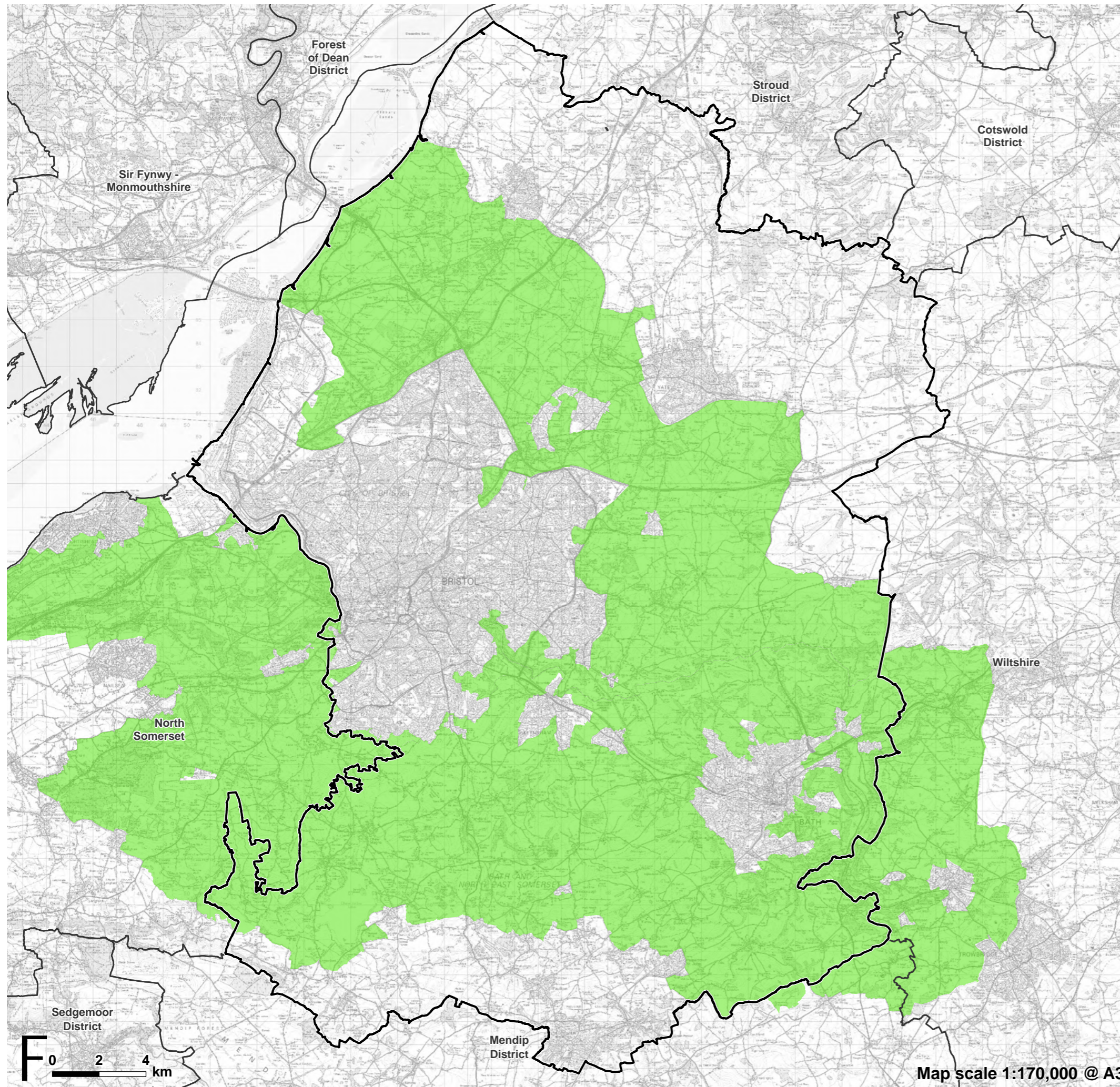
2.2 Figure 2.1 illustrates the extent of the Bristol and Bath Green Belt today and its relationship with the region's settlements and planning authority boundaries.




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 two thirds of the Bristol and Bath Green Belt (67.5%) falls within the WECA authorities' boundaries.

Figure 2.1: Existing Green Belt within the West of England Combined Authority



-  WECA boundary
-  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

Before the Publication of the National Planning Policy Framework (2012)

2.10 The essential characteristic of Green Belts as permanent, with boundaries only to be amended in exceptional circumstances, was established in 1984 through Government Circular 14/84.

2.11 In January 1988 PPG (Planning Policy Guidance Note) 2, Green Belts (subsequently replaced in 1995 and further amended in 2001) explicitly extended the original purposes of the Green Belt to add:

- To safeguard the surrounding countryside from further encroachment; and
- To assist in urban regeneration (subsequently replaced in 1995 and further amended in 2001).

2.12 PPG2 also formally emphasised the need for Local Planning Authorities to use Green Belt policy to promote sustainable patterns of development.

2.13 In 2012, the Government replaced PPG2 with Chapter 13 of a new National Planning Policy Framework (NPPF). This has since been periodically edited with the latest version being adopted in 2019 [See reference 2] and supplemented by relevant National Planning Policy Guidance (NPPG).

National Planning Policy Framework (2021)

2.14 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 137 of the NPPF indicates that the government attaches “great importance” to Green Belts and states “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”.

2.15 This is elaborated in NPPF paragraph 138, 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.

2.16 The NPPF emphasises in paragraphs 139 and 140 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”.

2.17 When defining Green Belt boundaries NPPF paragraph 143 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.

2.18 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 145).

2.19 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.

2.20 Paragraph 147 and 148 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”.

2.21 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 149 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.”

2.22 Paragraph 150 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 Green Belt. 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.”

2.23 Finally, paragraph 139 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

2.24 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 aspects [\[See reference 3\]](#). 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.

2.25 The guidance also elaborates on paragraph 142 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.”

2.26 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.

Planning Advisory Service Guidance

2.27 Neither the NPPF or NPPG provide guidance on how to undertake Green Belt assessments. However, the Planning Advisory Service (PAS) published an advice note (2015) [[See reference 4](#)] that discusses some of the key issues associated with assessing the Green Belt. Reference to the PAS guidance is included in the Methodology section in Chapter 3 where relevant.

Local Planning Policy

West of England Local Planning Authorities’ Green Belt Policy

2.28 The WECA authorities adopted Plans and accompanying Supplementary Planning Guidance make reference to and are consistent with the national Green Belt Policy and Guidance.

2.29 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.”

2.30 Policy CP8 of the adopted Bath and North East Somerset Core Strategy (2014) **[See reference 5]** 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.
6. To preserve the individual character, identity and setting of Keynsham and the villages and hamlets within the Green Belt.

2.31 Policy CS5 of the adopted South Gloucestershire Core Strategy (2013) **[See reference 6]** states that the extent of the Green Belt will remain

unchanged with the exception of land east of Harry Stoke/Stoke Gifford and at Cribbs Causeway where over 200ha were removed under exceptional circumstances.

Neighbouring Local Authorities' Green Belt Policy

2.32 Mendip District, North Somerset and Wiltshire's Plans also make reference to and are consistent with the national Green Belt Policy and Guidance. Similar to Bath and North East Somerset, the supporting text to Core Policy 51 of the Wiltshire Core Strategy adopted in 2015 applies the national Green Belt purposes to particular local Green Belt functions **[See reference 7]**:

- Maintain the open character of undeveloped land adjacent to Bath, Trowbridge and Bradford on Avon;
- Prevent the coalescence of Bradford on Avon with Trowbridge or the villages to the east of Bath;
- Limit the spread of development along the A4 between Batheaston and Corsham; and
- Protect the setting and historic character of Bradford on Avon.

Previous Green Belt Studies

2.33 Several Green Belt studies have been undertaken over the past ten years to inform iterations of the various Local Plans. These studies offer helpful insight into the application of national Green Belt policy to the assessment of the Bristol and Bath Green Belt. These studies include:

- North Somerset Green Belt Assessment (2011).
- South Gloucestershire Strategic Green Belt Assessment (2011).
- Bath and North East Somerset Green Belt Stage 1 and 2 Study (2013).

- West of England Stage 1 and 2 Green Belt Assessment (2015-2016).
- Bath and North East Somerset Further Green Belt Assessment work (2016-2017).

2.34 These are summarised below.

North Somerset Green Belt Assessment (2011)

[See reference 8]

2.35 This Green Belt Study was initially drafted in 2010 and was subsequently updated to inform the adopted North Somerset Core Strategy (2012).

2.36 The assessment focussed on the Green Belt adjacent to South West Bristol east and south of Long Ashton. This area of Green Belt land was broken up into 17 predefined parcels of land for assessment, delineated by readily recognisable boundaries, topographical features and land uses.

2.37 The five national Green Belt purposes 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: Bristol was defined as a 'large built-up area'.
- Purpose 2: Bristol and Long Ashton were defined as 'towns'.
- Purpose 3: 'Encroachment' was defined as built development and/or pressure from activities associated with the urban fringe, such as outdoor recreation.
- Purpose 4: Bristol and Long Ashton were defined as 'historic towns'. The assessment covered the role of the Green Belt in their setting and special character, including specific historic assets, gateways and approaches.
- Purpose 5: All Green Belt was considered to make a similar contribution to this purpose.

2.38 Each parcel was ranked against each national Green Belt purpose on the basis of their relative performance to one another, with one equalling less importance, two equal importance and three greater importance.

South Gloucestershire Strategic Green Belt Assessment – Stage 1 (2011) [See reference 9]

2.39 This Green Belt Study was prepared in response to questions raised by the Inspector examining the council's Core Strategy in 2011. The study contained two stages:

- Stage 1 represented a detailed analysis of the performance of the South Gloucestershire Green Belt against the Green Belt Purposes.
- Stage 2 focussed on the sustainability, environmental constraints, infrastructure and deliverability of specific Green Belt sites.

2.40 Given Stage 2 falls outside the scope of this commission, this summary focusses on the parameters and assumptions associated with the Stage 1 assessment against the Green Belt purposes.

2.41 The results of the Council's 2006 Strategic Green Belt Assessment were used to score the Green Belt against the five Green Belt purposes in Stage 1. The 2006 Study focussed on the assessment of 23 strategic assessment areas located adjacent to and/or in between urban areas within and adjacent to South Gloucestershire.

2.42 The key terms and concepts defined for the assessment of each purpose were as follows:

- Purpose 1: Bristol, Marshfield, Thornbury and Yate were defined as 'large built-up areas' by virtue of the fact that these were urban areas from which the 23 assessment parcels were defined.

- Purpose 2: Bath, Bristol, Thornbury, Yate and Chipping Sodbury were defined as ‘towns’.
- Purpose 3: Focussed on the contain influence of the urban areas and the role of landscape features as fundamental to the appreciation of the open countryside.
- Purpose 4: Bath, Chipping Sodbury and Thornbury were defined as ‘historic towns’. However, the setting and character of Conservation Areas and highly valued historic assets was also factored into the assessment.
- Purpose 5: All Green Belt was considered to make a contribution to this purpose.

Bath and North East Somerset Green Belt Stage 1 and 2 Study (2013) **[See reference 10]**

2.43 This Green Belt study was commissioned to inform the adopted Bath and North East Somerset Core Strategy (2014).

2.44 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.

2.45 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.

2.46 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.

2.47 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.
- 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.

2.48 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.

2.49 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.

2.50 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:

- 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.

West of England Stage 1 and 2 Green Belt Assessment (2015-2016) [See reference 11]

2.51 This study was commissioned in two stages to inform the West of England Joint Spatial Plan (now withdrawn), covering Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire.

2.52 The Stage 1 study divided the Green Belt up into 79 predetermined parcels of consistent landscape character and/or topography, using readily recognisable physical features as boundaries between parcels where possible. Smaller parcels were defined adjacent to large built-up areas compared to the open countryside.

2.53 The five national Green Belt purposes 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: The individual character, identity and setting of all settlements was considered under this purpose.
- Purpose 3: Focussed on existing use and topography.
- Purpose 4: Focussed on setting and special character of all historic settlements with a designation, such as the Bath City World Heritage Site and Conservation Areas.
- Purpose 5: All Green Belt was identified as assisting in urban regeneration.

2.54 No ratings were given at Stage 1: parcels were found to either contribute or not contribute to each purpose. The use of the word 'assist' in purposes 3 and 5 was interpreted to make these purposes more generally applicable to the Bristol and Bath Green Belt, whereas areas of contribution to purposes 1, 2 and 4 were found to be more focussed. Given that the Stage 1 study found almost all of the Green Belt to contribute to purposes 3 and 5 it was considered not feasible or informative to draw out detailed variations in contribution to these purposes as part of the Stage 2 study. Therefore, the Stage 2 study involved the subdivision of Stage 1 parcels found to contribute to purposes 1, 2 or 4 in Stage 1.

2.55 The assessment criteria for purposes 1, 2 and 4 were expanded to draw out more detailed variations in contribution within the subdivided locations: major contribution, contribution or limited contribution.

2.56 The following factors influenced judgements on contribution to Purpose 1:

- Size of sub-parcel.
- Degree of openness (openness not defined).
- Degree of containment by large built-up areas.
- Strength of our sub-parcels boundaries in inhibiting sprawl.
- Presence of rural settlements vulnerable to being subsumed by large built-up area.
- Role of roads in facilitating ribbon development.

2.57 The following factors influenced judgements on contribution to Purpose 2:

- Size of sub-parcel.
- Location of sub-parcel relative to neighbouring settlements.
- Size of gaps between neighbouring settlements.
- Presence of physical separating features between settlements.

2.58 Purpose 3 was assessed again but in less detail than purposes 1, 2 and 4, only drawing out areas of ‘contribution’ or ‘limited contribution’. The following factors influenced judgements on contribution to Purpose 3:

- Presence of agricultural or forestry uses and woodland.
- Presence of Public Rights of Way.
- Presence of open outdoor sport and recreation facilities.
- Presence of urbanising development (not defined).
- Connectivity with wider countryside.

2.59 The following factors influenced judgements on contribution to Purpose 4:

- Size of sub-parcel.
- Location of sub-parcel relative to Bath City World Heritage Site or a Bristol/Clifton Conservation Area and their settings.
- Presence of historic assets.

2.60 Purpose 5 was considered to apply equally to all Green Belt land in the study area and therefore was not assessed further.

2.61 Sub-parcels found to make a major contribution to one or more of purposes 1, 2 or 4 were considered to make an overall major contribution to the Green Belt purposes. Sub-parcels found to make a contribution to purposes 1, 2 and 4 were generally considered to make an overall contribution to the Green Belt purposes, although the scale and location of sub-parcels sometimes resulted in a major contribution rating being recorded overall. Sub-parcels were generally only found to make a limited contribution overall if limited contributions were identified for purposes 1, 2, 3 and 4 although again, the scale and location of the parcel sometimes resulted in such sub-parcels being judged to make contribution overall.

Bath and North East Somerset Further Green Belt Assessment Work (2016-2017) [See reference 12]

2.62 Bath and North East Somerset Council published additional Green Belt assessments of specific strategic development locations in 2017. This work was designed to inform the definition of alternative Green Belt boundaries for specific allocations in the then emerging Bath and North East Somerset Local Plan 2016-2036, relating to land at North Keynsham and Whitchurch in the context of the Joint Spatial Plan.

2.63 The assessment was based on the sub-parcels and assessment methodology used in Stage 2 of the West of England Green Belt Study (2016) described above. However, this further assessment work also assessed the strategic development locations contribution to the sixth local purpose previously used in the Bath and North East Somerset Green Belt Review Stage 1 Report: “to preserve the individual character, identity and setting of Keynsham and the villages and hamlets”.

2.64 The following factors influenced judgements on contribution to the local purpose 6:

- Role of development locations in maintaining separation between all settlements.
- Role of development locations in maintaining open setting of villages and hamlets, and Keynsham.

2.65 The predefined sub-parcels from the previous study were amended to take into account the potential areas of development to be assessed.

North Somerset Green Belt Assessment (2021)

[See reference 13]

2.66 North Somerset Council published a strategic assessment of the Green Belt across North Somerset in 2021. The assessment methodology is based on the methodology used in the West of England Stage 1 and 2 Green Belt Assessment in 2015 and 2016.

2.67 The assessment parcels defined in the earlier West of England assessment were broadly carried forward into this assessment, with the exception of the parcels that previously crossed into neighbouring Bath and North East Somerset were redrawn and renumbered to only cover the Green Belt in North Somerset, resulting in 24 assessment parcels in total.

2.68 The strategic assessment focussed exclusively on assessing the contribution of each of the 24 parcels to the five Green Belt purposes. Each parcel has been rated as either meeting a Green Belt purpose or not.

2.69 Bristol is defined as the large built-up area when assessing purpose 1. Bristol, Clevedon, Long Ashton, Nailsea and Portishead are defined as towns when assessing purpose 2. The role of the Green Belt in preserving the individual character of smaller villages and hamlets was also considered in the assessment of purpose 2, although this element did not influence purpose 2 ratings. Purpose 3 was assessed with consideration of the existing land uses and topography of the land within the Green Belt. Only one parcel was found to make a contribution to Purpose 4 (15) due to the role this area was found to play in preserving an open setting for the Gorge and Suspension Bridge and in preserving the setting of the conservation areas in Clifton, central Bristol and Leigh Woods. The presence of the Ashton Court Estate was also acknowledged. Other historic assets within and adjacent to the Green Belt in North Somerset were also acknowledged in the assessment of other parcels against Purpose 4, but these assets were not considered to influence the contribution of the Green Belt to purpose 4 in these locations. All parcels were

considered to make a contribution to purpose 5, with particular reference being given to urban regeneration areas in close proximity to parcels.

2.70 A second report was published alongside the strategic assessment focussing on the impact of the four growth options published in the Council's 'Choices for the Future document' on the five Green Belt purposes [See **reference 14**]. Consideration has also been given to the impact of each option on the overall integrity of the Green Belt to keep land permanently open. The assessment takes the form of a discursive exploration of the impact of each growth option on the general purposes and openness of the Green Belt – no detailed assessment criteria are set out.

2.71 North Somerset Council are now in the process of carrying out a more detailed review of the Green Belt for their new Local Plan, focussing on broad locations for growth. The study will also consider whether any villages currently washed over by the Green Belt designation should inset within it and whether there is justification for any amendments to Green Belt boundaries, including minor boundary adjustments and the designation of new areas of Green Belt.

Chapter 3

Green Belt Assessment Methodology

3.1 This chapter sets out the methodology used to undertake a Strategic Green Belt Assessment for the WECA area.

3.2 There is no defined approach set out in national planning policy or guidance as to how Green Belt studies should be undertaken. The approach applied in this study 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.

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

Overview of Assessment Approach

Outputs

3.4 The assessment provides a parcel by parcel analysis of all Green Belt land within the WECA area, split into two sections including:

1. A strategic assessment of the contribution of the parcel to the Green Belt purposes; and
2. An analysis of key considerations with regard to potential harm resulting from the release of land within the parcel.

3.5 Although the study also introduces the concept of Green Belt harm, i.e. the impact of Green Belt release on the purposes of the designation, it does not draw conclusions on the harm of releasing specific site options or recommend what land could be released for development. This requires consideration of a wider range of sustainability factors which the Councils will take into account in reaching a conclusion as to whether there are exceptional circumstances to justify the release of Green Belt land.

Geographical Scope

3.6 The assessment considers all Green Belt land within the WECA authority boundaries. It has not assessed land in neighbouring authorities, including Cotswold District Council, Forest of Dean District Council, Stroud District Council, Wiltshire Council, Somerset County Council, Mendip District Council, North Somerset Council and Sedgemoor District Council. It has, however, considered how adjacent land within these authorities affects the Green Belt performance of land within the WECA area, and how release within the WECA boundary might harm adjacent Green Belt land in neighbouring authorities.

3.7 Given the high-level strategic nature of the study, no land covered by statutory constraints to development – that is to say areas within which development would not be permitted – has been excluded from assessment parcels. However, areas subject to these constraints are indicated on the assessment maps, so that their presence and potential impact on development can be recognised, and they have not been assigned contribution ratings. Any significance in terms of strategic scale harm is also noted in each parcel assessment.

3.8 The following designations have been treated as statutory constraints, and are mapped on Figure 3.1 below:

- Flood zone 3b (the functional floodplain);
- Special Areas of Conservation;
- Sites of Special Scientific Interest;

- Ancient Woodland;
- Scheduled Monuments;
- Registered Parks and Gardens;
- Common Land; and
- Cemeteries.

Main Components of Contribution Assessment

3.9 As a strategic study, the Green Belt assessment does not include a fine-grained analysis of all variations in Green Belt performance. However, the core components both of this strategic assessment of contribution and any subsequent more detailed assessments are the same and require:

- An analysis of spatial variations in the function of the Green Belt, as set out in the NPPF purposes (see Paragraph 3.16 below);
- Consideration of the impact of existing development on Green Belt openness (see Paragraph 3.18 below); and
- Consideration of the relationship between urban areas and Green Belt land (see Paragraph 3.23 below). This could include land which is inset **[See reference 15]** from the Green Belt or located at its outer edge.

3.10 In this strategic study, contribution ratings have been given using a three-point scale of significant, moderate or limited/no contribution. Ratings typically reflect the fact that most parcels contain at least some open land which doesn't have a strong relationship with any urban area and therefore make a strong contribution to Purpose 3 (safeguarding the countryside from encroachment).

Main Components of Harm Analysis

3.11 The second part of the assessment process, the consideration of potential harm resulting from the release of land, takes the analysis of contribution a step

further by considering the implications of the release of land on the Green Belt purposes. Harm to the Green Belt purposes will result from the loss of contribution of land that is released, but also from any impact that release has on the contribution of the remaining Green Belt.

3.12 To provide meaningful ratings for harm to the Green Belt purposes requires a finer grain of analysis than is appropriate for a strategic study. However, the second part of each parcel assessment offers some consideration of the two principal factors that could influence the potential harm resulting from the release of land:

- The presence of areas within the parcel which, although still 'strategic' in scale (see Paragraph 3.15 below), make a weaker contribution to the Green Belt purposes than the parcel as a whole. Typically this will be because part of the parcel has a stronger relationship with the urban area.
- The existence of physical features within the parcel that could form a new Green Belt boundary that would limit the impact of release on the integrity of adjacent Green Belt land.

3.13 The consideration of harm makes the assumption that any release of land would represent either an expansion of an existing inset urban area, the inseting of a washed over settlement that lacks openness, or the expansion of the latter. The assessment process for considering potential harm is discussed at Paragraphs 3.83-3.87 below.

The Parcelling Process

3.14 Parcels were not predefined using promoted sites or existing boundaries, but were instead the outcome of a consistent, strategic assessment process:

- In the first instance, variations in openness and in Green Belt function with regard to each NPPF purpose were identified and overlaid.

- A guideline minimum parcel size of 30ha was applied. Where more localised variations in openness or Green Belt function were identified, these were merged with neighbouring area to form larger parcels.
- A guideline maximum parcel size of 500ha was applied for areas adjacent to inset settlements and a maximum 2000ha area for land remote from inset settlements. Logical landscape elements were used, where available, to subdivide areas.

3.15 Where settlements are closely spaced or have more of a complex form, the parcels typically are relatively small, but where there is less variation in function they are larger. Although areas of variation below 30ha were not defined as parcels, the discussion of potential harm that forms the second part of each parcel assessment has considered smaller variations – both variations in contribution to the Green Belt purposes and variations in the impact of release on retained Green Belt down to a size of 10ha. 10ha has been taken in the study as a minimum size for a release of land to be considered ‘strategic’ in scale.

3.16 It is important to draw a distinction between the boundaries of strategic assessment parcels and any potential future amendments to Green Belt boundaries. A finer grain of analysis, considering the harm of release of land (see Next Steps in Chapter 5), would need to be applied in order to identify potential new Green Belt boundaries, with further refinement after that in which potential enhancements to retained Green Belt land would be taken into consideration.

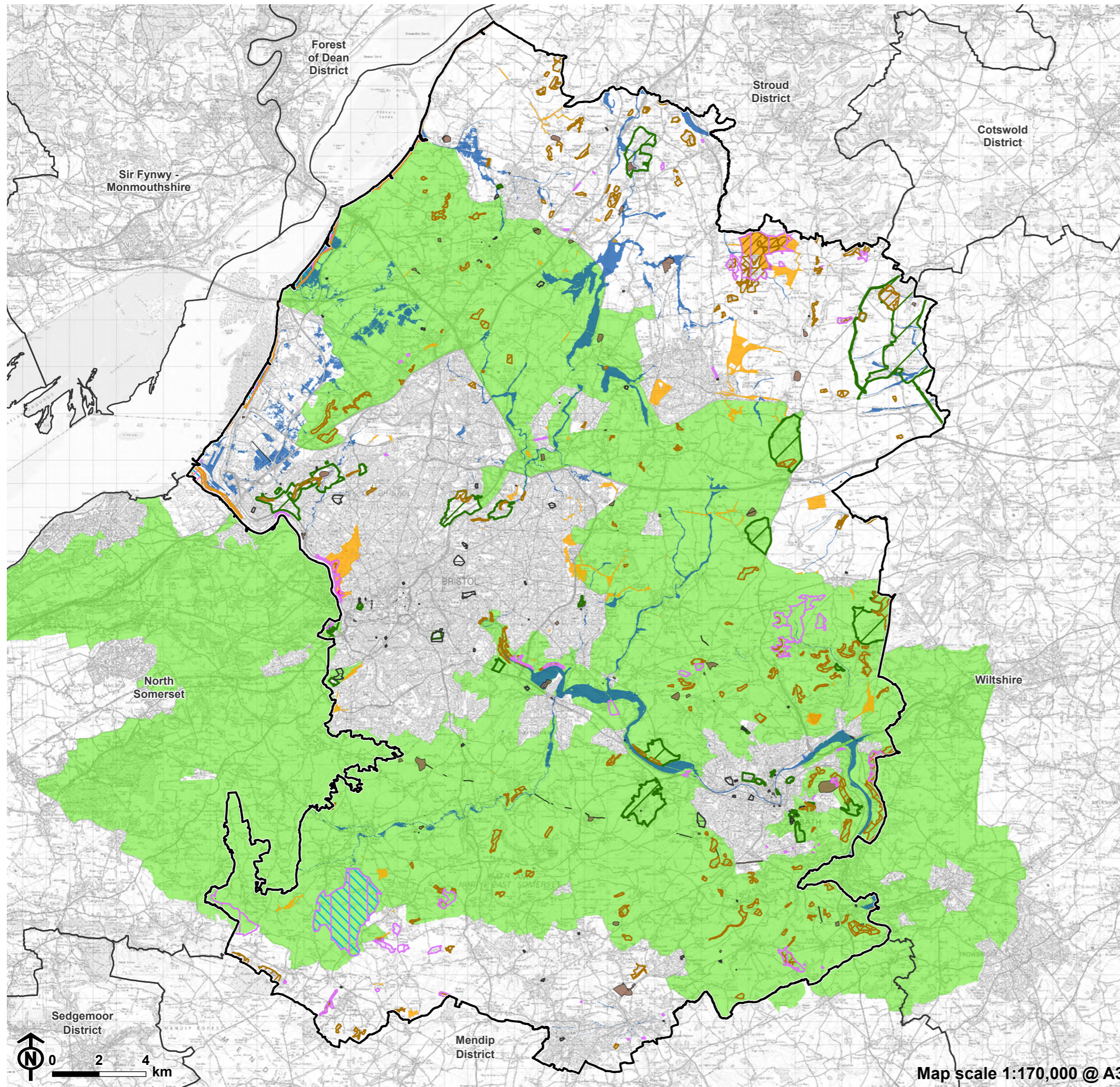
Spatial Variations in Green Belt Function

3.17 Each Green Belt purpose targets a different aspect of the relationship between urban areas and 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 planning policy.

3.18 For Purpose 1, prevention of the sprawl of large, built-up areas, it is necessary to define which settlements are 'large, built-up areas'. For Purpose 2, the prevention of the coalescence of towns, 'towns' have been defined. For Purpose 3, 'countryside' has been defined and for Purpose 4 we have named which settlements constitute 'historic towns' to which the Green Belt contributes to 'setting and special character'.

Figure 3.1: Statutory Constraints within Combined Authority area



- WECA boundary
- Neighbouring Local Authority Boundary
- Green Belt
- Statutory constraints**
- Ramsar
- Site of Special Scientific Interest
- Special Area of Conservation
- Special Protection Area
- Registered Parks and Gardens
- Cemeteries
- National Nature Reserve
- Ancient woodland
- Common land
- Scheduled monument
- Flood zone 3b

Green Belt Openness and Appropriate Development

3.19 The NPPF identifies openness as an ‘essential characteristic’ of Green Belts (along with their permanence) land, rather than a function or purpose.

3.20 The green box below sets out some explanation to understand the definition of openness, as arguments over this have informed case law. At this strategic scale of analysis it is typically the case that small-scale variations in openness will not be relevant, but there are some larger washed-over settlements [See reference 16], or areas of development in fragile gaps between settlements, that may have more of an impact on the Green Belt’s role.

Openness

The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included, at paragraph 20, reference to openness in relation to appropriate development:

“Implicit in the policy in paragraph 89 of the NPPF is a recognition that agriculture and forestry can only be carried on, and buildings for those activities will have to be constructed, in the countryside, including countryside in the Green Belt. Of course, as a matter of fact, the construction of such buildings in the Green Belt will reduce the amount of Green Belt land without built development upon it. But under NPPF policy, the physical presence of such buildings in the Green Belt is not, in itself, regarded as harmful to the openness of the Green Belt or to the purposes of including land in the Green Belt. This is not a matter of planning judgment. It is simply a matter of policy. Where the development proposed is an agricultural building, neither its status as appropriate development nor the deemed absence of harm to the openness of the Green Belt and to the

purposes of including land in the Green Belt depends on the judgment of the decision-maker. Both are inherent in the policy.” – Neutral Citation Number: [2016] EWCA Civ 404.

Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) involved a challenge to a planning permission for a 6 hectare quarry extension in the Green Belt. Although paragraph 90 of the 2012 NPPF states that “mineral extraction” is not “inappropriate development” in the Green Belt, it was found that the Council failed to take into account visual impacts when considering whether the proposal would “preserve the openness of the Green Belt” as required in paragraph 90 of the 2012 NPPF. Lord Justice Lindblom found that the council had limited its consideration of the effects of the proposed development on the openness of the Green Belt to spatial impact and nothing more, despite the fact that, on the council’s own assessment of the likely effects of the development on the landscape, visual impact on openness was “quite obviously” relevant to its effect on the openness of the Green Belt. This judgement was subsequently overturned in the Supreme Court (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3. Contrary to Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018), where visual impact was found not to be an obligatory consideration when assessing Green Belt. It was found that in “a proper reading of the NPPF in its proper historic context, visual quality of landscape is not in itself an essential part of openness for which the Green Belt is protected” “The concept of “openness” in paragraph 90 of the NPPF is a broad policy concept which is the counterpart of urban sprawl and is linked to the purposes to be served by the Green Belt. Openness is not necessarily a statement about the visual qualities of the land, nor does it imply freedom from all forms of development”.

3.21 The above case law makes it clear that Green Belt openness therefore relates to a lack of ‘inappropriate development’ rather than to visual openness; thus both undeveloped land which is screened from view by landscape elements (e.g. tree cover) and development which is not considered ‘inappropriate’, are still ‘open’ in Green Belt terms.

Absence of Urban Influence and Visual Impact

As noted by the Inspector at the Welwyn Hatfield Borough Council Local Plan Examination (2017), openness is not concerned with the character of the landscape, but instead relates to the “absence of built development and other dominant urban influences”. – Examination Document Reference EX38.

Turner v Secretary of State for Communities and Local Government and East Dorset District Council (2016) was an appeal heard in the High Court relating to a previous appeal judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The High Court appeal was dismissed, but the judgement concluded that:

“Openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built-up the Green Belt is now and how built-up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.

The question of visual impact is implicitly part of the concept of ‘openness of the Green Belt’ as a matter of the natural meaning of the language used in para. 89 of the NPPF... There is an important visual dimension to

checking ‘the unrestricted sprawl of large built-up areas’ and the merging of neighbouring towns...openness of aspect is a characteristic quality of the countryside, and ‘safeguarding the countryside from encroachment’ includes preservation of that quality of openness. The preservation of ‘the setting ... of historic towns’ obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields.” – Neutral Citation Number: [2016] EWCA Civ 466.

3.22 The visual impact of urban influence on openness is considered as part of the assessment of Green Belt land’s relationship with urban and open land set out below. The influence of inappropriate development on spatial openness depends on the extent, scale, form, density and location of the inappropriate development. While any inappropriate development can be considered to diminish openness, a strategic study focussed on drawing out high-level strategic variations in contribution to the Green Belt purposes can only recognise the influence of notably large pockets of inappropriate development, such as large and or densely compact villages washed over by the Green Belt designation.

Appropriate Development

Appropriate development within the Green Belt cannot, according to case law [[See reference 17](#)], be considered to have an urbanising influence and therefore harm Green Belt purposes. For the purposes of this study therefore, development deemed to be ‘appropriate’ within the Green Belt (as defined in the closed lists within paragraphs 149 and 150 of the NPPF) is not considered to constitute an urban land use, or an urban influence in the countryside. However, 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.

Caution is therefore exercised in the application of what is defined as an appropriate use. It is not possible within a strategic Green Belt study to review each form of development within the Green Belt 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 is taken on the extent to which the proposed land use has affected Green Belt purposes, for example by affecting openness, or encroaching on the perception of countryside i.e. the sense of distinction between the urban area and countryside. This is of relevance to the assessment approach for all of the Green Belt purposes.

The NPPF's Green Belt policies are supplemented by additional planning practice guidance that sets out some of the factors that can 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 born out through specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects. 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 equivalent, or an improved state of, openness, and the degree of activity likely to be generated by development, such as traffic **[See reference 18].**

3.23 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 cannot be considered 'open'.

Relationship Between Urban Areas and Open Land

3.24 The extent to which land can be considered to relate to an urban area or to the wider countryside (ie the degree of 'distinction' from the urban area) is the third component of the approach to this Green Belt assessment. At a localised level there are areas of land that have a stronger relationship with a settlement than other areas: clearly the distance from the urban edge is a factor here, but the nature of boundary features, landform and land use and extent of urbanising visual influence also affect this relationship.

3.25 Land that is related more strongly to urbanising development typically makes a more limited contribution to most of the Green Belt purposes, with development of it being likely to be perceived as being less significant sprawl (Purpose 1), as having less impact on narrowing the gap between towns (Purpose 2) and as having less encroachment on the countryside (Purpose 3).

3.26 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
- Urbanising visual influence.

3.27 These are discussed below.

Boundary Features

3.28 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. Stronger boundary features are also considered to have more permanence.

Strength of Boundary Features

Stronger Boundary

- Physical feature significantly restricts access and forms consistent edge.
- For example:
 - Motorway or dual-carriageway;
 - Railway;
 - River/floodplain; or
 - Sharp change in landform.

Moderate Boundary

- Clear physical feature and relatively consistent edge, but already breached or easily crossed.
- For example:
 - Linear tree cover;
 - Mature, well-treed hedgerow;
 - Main road;
 - Stream; or

- Moderate change in landform.

Weaker Boundary

- No significant physical definition – edge may be blurred.
- For example:
 - Regular garden/building boundaries or hedgerows;
 - Estate/access road; or
 - Some development crosses boundary.

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

Landform and Landcover

3.30 Landform and land cover may serve as boundary features, 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

3.31 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 countryside.

3.32 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 ‘urbanising development’ within the Green Belt can also increase the relationship between Green Belt and a nearby inset settlement.

3.33 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.

Bath and North East Somerset Local Green Belt Purpose

3.34 As set out in Chapter 2, 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”.

3.35 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’s Letter (M Middleton) 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 appropriate. For example, the following Inspectors’ correspondence:

- Inspector’s interim findings (H Stephens) to Durham City Council (November 2014).
- Inspectors’ Report (L Graham and A Wood) to South Cambridgeshire District (August 2018).

3.36 As this ‘local purpose’ applies only to one of the WECA unitary authorities it has not been considered in this assessment but will form part of any analysis of Green Belt specific to Bath and North East Somerset. However, it should be

noted that elements of its scope do overlap with the national Green Belt purposes:

- The Purpose 2 assessment recognises the role of smaller settlements in maintaining gaps between towns, and recognises that the gap between Bath and Bristol is fragile in relation to the size of those cities;
- The Purpose 3 assessment recognises that any encroachment on countryside will be harmful; and
- The Purpose 4 assessment considers the historic setting of Keynsham.

Green Belt Purpose 1 Definitions and Assessment Criteria

3.37 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.

3.38 For the purpose of this study, it is necessary to define what constitutes a ‘large built-up area’ within and in close proximity to the WECA authorities, and what is meant by the term ‘sprawl’.

Definition of the Large Built-Up Area

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.

Chapter 2 reports that the Bristol and Bath Green Belt was originally designated to check the substantial expansion of Bristol and Bath. Inset land contiguous with Bath and the Bristol conurbation are the only areas considered to constitute large built-up areas [See reference 19]. This is consistent with the approach taken in previous Green Belt assessments and studies.

3.39 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.

3.40 Land that, if developed, would clearly constitute an extension of a large built-up area make the strongest contribution to preventing its sprawl. However, it is recognised that a smaller inset settlement area close to a large built-up area can have a relationship with it such that expansion of the latter, particularly if it narrows the gap between the two, can also be considered detrimental to this purpose.

3.41 The greater the distance from a large built-up area the lower the likelihood Green Belt land is likely to fulfil the function of Purpose 1. However, when considering at the second stage of the assessment process the harm of releasing Green Belt land, it should be recognised that Purpose 1 is to some degree relevant to any expansion of a large built-up area, however far that extends.

Purpose 1 Strategic Contribution Assessment Criteria

3.42 A judgement has been made as to the extent of the zone around each large built-up area (ie the Bristol urban area [See reference 20] and Bath) within which any new development would be associated with the large built-up

area. This considers the strength of the relationship between urban areas and open land (ie degree of distinction), and distance from the large built-up area.

Significant Contribution Criteria

- Open land that is close enough to have a relationship with the large built-up area but is not contained by it, and which includes at least some land with strong distinction from it; or
- Open land that has some distinction from urban development, and which maintains separation between the large built-up area and a smaller settlement, preventing the latter from being perceived as part of the former.

Moderate Contribution Criteria

- Open land that is not contained by the large built-up area but which lacks strong distinction from it; or
- Open land which is largely contained by the extents of the large built-up area, but which retains a clear link to the wider Green Belt.

Limited/no Contribution Criteria

- Land which lacks a relationship with the large built-up area, where new development would not be associated with it; or
- Land which is wholly or largely contained within the large built-up area, and which lacks clear connectivity with the wider Green Belt; or
- Land that lacks openness.

Green Belt Purpose 2 Definitions and Assessment Criteria

3.43 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.

3.44 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 larger ‘towns’.

3.45 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 them. Assessments therefore usually consider both the physical and visual role that intervening Green Belt land plays in preventing the merging of settlements.

3.46 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.

3.47 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.

3.48 Having reviewed the WECA authorities settlement hierarchies, and the settlement hierarchies of the neighbouring planning authorities that share and abut the Green Belt, the following settlements are considered to be significant enough to be defined as Green Belt towns in the study area:

- Bath
- The Bristol urban area [See reference 21]
- Keynsham
- Midsomer Norton combined with Radstock
- Thornbury
- Yate combined with Chipping Sodbury

3.49 In addition, the following settlements outside the study are considered to be significant enough to be defined as Green Belt towns:

- Bradford-on-Avon
- Chippenham
- Corsham
- Trowbridge

3.50 There is no separate assessment of gaps between settlements that are not considered to be towns, although the role of smaller areas of urbanising development, including villages and hamlets, in reducing perceived rural separation between towns is considered. This captures the sentiments of the original reasons for designating the Bristol and Bath Green Belt (summarised in Chapter 2) and the 'local purpose' defined by Bath and North East Somerset Council. The notable smaller settlements that fall within and in close proximity to

gaps between towns in the study area include Almonsbury, Alveston, Bitton, Coalpit Heath and Winterbourne, Farmborough, Long Ashton, Peasedown St John, Pucklechurch, Rudgeway, Saltford, Westwood and Winsley, which are too small to be considered 'towns' in their own right.

3.51 As large urban areas both Bath and Bristol are large enough to be considered towns in Green Belt terms. Thornbury and Yate combined with Chipping Sodbury are defined as market towns in the South Gloucestershire Local Plan 2020: Phase 1 Consultation document [See reference 22]. The Bath and North East Somerset Core Strategy and Placemaking Plan [See reference 23] refer to Bath and Keynsham as the only towns in the authority area within or surrounded by the Green Belt. The Wiltshire Local Plan – Emerging Spatial Strategy Consultation document [See reference 24] refers to Chippenham and Trowbridge as principal settlements and Bradford on Avon and Corsham as market towns with the potential for significant development. Therefore, all four of these settlements are considered towns in Green Belt terms.

3.52 Midsomer Norton combined with Radstock in Bath and North East Somerset and Chippenham in Wiltshire are farther from the Bristol and Bath Green Belt than the other settlements defined as towns. However, Peasedown St John and Corsham diminish the gaps between them and the Green Belt does not cover the full extent of the gaps, increasing its significance in maintaining separation in the immediate vicinity of Bath.

3.53 For towns that are entirely contained by Green Belt – that is, where the intention is clearly to prevent their merger with other settlements – it is also relevant to consider the distance between the town and the outer edge of the Green Belt. This is because the Green Belt is playing a role in preventing merger with any future development that could take place outside of its confines. However, in the case of the WECA Green Belt, no towns are close enough to the Green Belt edge for intervening Green Belt land to be considered to make more than a negligible contribution to Purpose 2.

Purpose 2 Strategic Contribution Assessment Criteria

3.54 The criteria for the assessment of strategic contribution to Purpose 2 focus on the perceived size of the gap between towns, taking into consideration the presence of physical features which create separation and features which diminish it, including the presence of intervening urbanising development.

3.55 The size of the towns in question also forms part of the consideration of the Green Belt's role in maintaining separation. The Bristol urban area 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.

Significant Contribution Criteria

- Open land lies within a gap between towns which is narrow in relation to the size of the settlements; or
- Open land lies in a gap between towns which is moderate in relation to the size of the settlements, but which lacks significant separating features, or which is diminished by intervening development.

Moderate Contribution Criteria

- Open land lies in a gap which is moderate in relation to the size of the settlements, and which has significant separating features; or
- Open land lies in a wider gap between towns but which lacks significant separating features, or which is diminished by intervening development; or

- Open land lies in a narrow gap between towns, but the settlements are already connected to a degree that limits the role of Green Belt in preventing coalescence.

Limited/no Contribution Criteria

- Open land lies in a wide gap between towns, with significant separating features; or
- Open land is too contained by the built form of a town to be considered to lie within a gap between towns; or
- Land lacks openness.

Green Belt Purpose 3 Definitions and Assessment Criteria

3.56 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.

3.57 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.

3.58 Equally, land largely contained by urban development may nonetheless retain, as a result of its use and/or size, a countryside character. Also, contribution to Purpose 3 does not necessarily equate to extent of built development, as development that is rural in form may often not be considered to detract from countryside character.

3.59 Given this assessment is focussed on identifying strategic variations in contribution to the Green Belt purposes, the vast majority of minor variations in land use, particularly at the urban edges of the urban areas are too small to be recorded. However, notable pockets of semi-urban land uses are referenced as potential areas of greater variation in contribution in the parcel assessment proforma. This captures the reasons for designating the Bristol and Bath Green Belt (summarised in Chapter 2) and the 'local purpose' defined by Bath and North East Somerset Council.

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

Purpose 3 Strategic Contribution Assessment Criteria

3.61 The criteria for the assessment of strategic contribution to Purpose 3 consider whether land has uses which associate it more with the urban area than with countryside, or urbanising development which diminishes openness, or sufficient urbanising influence to limit the extent to which development would be perceived as encroachment on the countryside.

Significant Contribution Criteria

- Open land use is not associated with the urban area and urbanising development within the parcel, within inset settlements or beyond the Green Belt's outer edge does not have a significant influence.

Moderate Contribution Criteria

- Land use, although open, is associated with the urban area; or
- Urbanising development within the parcel has some impact on countryside character; or
- The parcel lacks strong distinction from inset settlements or settlements beyond the Green Belt's outer edge.

Limited/no Contribution Criteria

- Open land is too contained by built form, or too developed in its own right, to be considered part of the countryside; or
- Land that lacks openness.

Green Belt Purpose 4 Definitions and Assessment Criteria

3.62 Green Belt Purpose 4 is "to preserve the setting and special character of historic towns". This purpose makes specific reference to 'historic towns', not to individual historical assets or smaller settlements such as villages and hamlets.

3.63 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 Cambridge [See reference 25]. Durham has since been added to this list.

3.64 It has been LUC's experience through consultation with Historic England on several Green Belt study method statements, that Historic England do not

consider the list on towns quoted in Parliament to necessarily be exclusive, so this assessment takes the approach of identifying settlements classed as towns and considering whether any have settings or special character to which land within the Green Belt makes a contribution. Many towns have designated conservation areas, but these are commonly focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than key to special character.

3.65 On this basis, Bath, Bristol, Thornbury and Keynsham have been identified as settlements to which Green Belt Purpose 4 is applicable to some degree:

- The city of Bath is encompassed by a World Heritage site designation which includes its setting. The designation extends beyond the urban area in places, recognising the contribution of the surrounding countryside to its 'Outstanding Universal Value'.
- Bristol is a historic port city set largely within a strong landscape framework of river valleys and hills. It has a concentration of Conservation Areas at its historic core reflecting the survival of heritage assets and the topography also means that panoramic views beyond the urban area into the Green Belt contribute to the special character of a number of these designated areas.
- Thornbury is a planned medieval town with landscape elements in the Green Belt that relate directly to its historic core.
- Keynsham's historic setting is dominated by watercourses, with the town located to either side of the steep-sided valley of the River Chew just south of its confluence with the Avon.

3.66 Looking at other settlements considered to be towns:

- Chipping Sodbury has an important planned medieval layout, and a visual setting in which the Cotswold scarp to the east is prominent, but the Green Belt only extends up to the southern boundary of the town, marked by the railway line. The countryside to the south provides a rural setting but does not contribute to any particular distinction or special character. Modern development in Yate to the west removes any link between Chipping Sodbury and the Green Belt in that direction.

- Bradford-on-Avon lies over 2.25km from the nearest boundary of Bath and North East Somerset, with rising ground to the south and west of Winsley separating it visually from Green Belt land in the WECA area. The town's immediate river valley landscape, with a strong woodland component, are the principal Green Belt features contributing to its distinctive character, but these lie outside the study area in Wiltshire.
- Midsomer Norton and Radstock together form an area of settlement focused on the steep-sided valleys of the Wellow Brook and several tributaries which meet at the centre of Radstock, with but with some expansion up on to higher ground. This is a dramatic landscape, but the outer edge of the Green Belt is over 1.5km north-east of Radstock, with intervening rising ground and woodland blocks which preclude any significant Green Belt role in the settlement's setting.

3.67 The connection between a historic town's historic character and the wider countryside does not have to be physical; indeed, successive waves of development often isolate core historic areas from the surrounding countryside, meaning it is often more a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. The following paragraphs provide an overview of the characteristics of the settings of the four settlements considered in the study.

Setting and Special Character of Bath

3.68 Contribution to the historic setting and special character of Bath has been determined with particular reference to the City of Bath World Heritage Site Setting Supplementary Planning Document (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.

3.69 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.

3.70 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.

Setting and Special Character of Bristol

3.71 There has been no specific assessment of Bristol's historic setting, but the combination of sloping landform within the city and distinctive hills around it mean that Green Belt high ground to the west (outside of the WECA area), south and east of the city is cited with regard to panoramic views from a number of Conservation Areas, including:

- Clifton and Hotwells

- Cotham and Redland
- Kingsdown
- Montpelier
- Park Street and Brandon Hill
- St Michael's Hill and Christmas Steps

3.72 There are also historic approaches to the city in which distinctive landscape elements contribute to setting and special character, notably along the Avon Valley / A4 from Bath, along the Frome Valley and from the coastal plain to the north, but where these areas have a strong association with modern development the contribution to Purpose 4 is more limited.

Setting and Special Character of Thornbury

3.73 Most of the open land adjacent to Thornbury, including land that forms the immediate setting of the castle and parish church, two of the principal historic features of the town, is not protected by Green Belt designation. This suggests that the protection of setting and special character was not a primary reason for the designation of land in this area.

3.74 Thornbury's historic character is largely associated with its built environment, but Thornbury Conservation Area includes a band of Green Belt land along the western side of the town, south of Thornbury Castle and church. The Advice Note (2004) for the Conservation Area identifies this as a series of open closes, typically with stone wall boundaries, running down to a tree-lined stream, which have a strong association with the historic medieval street plots.

3.75 The Green Belt does not extend to the north or east of Thornbury, where modern development has anyway weakened historic character, but a sharp east-west ridge forms a distinct setting to the south of the town, precluding any intervisibility with the neighbouring village of Alveston.

Setting and Special Character of Keynsham

3.76 Keynsham's historic setting is dominated by watercourses, with the town located to either side of the steep-sided valley of the River Chew just south of its confluence with the Avon. Durley Hill forms a prominent setting to the western side of the town, including in views from the A4 and railway passing along the southern edge of the Avon Valley. However, Keynsham has expanded significantly over the course of the 20th century, such that its historic character is associated principally with its built environment.

3.77 Steep-sided tributary valleys in Stockwood Vale, with associated woodland, also form a distinctive setting to the west, but have a weaker relationship with the historic core of the settlement from which they are separated by mostly 20th century development.

3.78 The steep-sided Chew Valley bisects Keynsham, although the riverside parkland closer to the historic core at the northern end of the settlement is not designated as Green Belt. To the south of the town centre Green Belt along the valley forms a wedge that separates the southern parts of Keynsham, although these areas are mostly characterised by modern development.

Purpose 4 Strategic Contribution Assessment Criteria

3.79 The assessment criteria for Purpose 4 are concerned with the extent to which Green Belt land around each historic town contributes to the settlement's character, and to its visual appearance.

Significant Contribution Criteria

- The historic town's setting plays an important role in its character; and:

- Land contributes to the town's special character by forming a prominent part of the visual setting of its key historic elements; or
- Land contributes positively to key approach routes to the settlement, including roads, rivers, canals and long-distance footpaths, where modern development has not significantly affected historic character.

Moderate Contribution Criteria

- The town's setting plays an important role in its character. This land lacks a strong visual relationship with key elements of the historic town, but forms a prominent or characteristic part of its setting, as experienced on arrival or departure; or
- The town's setting plays a minor role in its special character, but the land has a strong physical relationship with the historic core, or forms a prominent element in its visual setting.

Limited/no Contribution Criteria

- Land has only a peripheral role in the visual setting of a historic town, or its role has been significantly diminished by development that weakens historic character; or
- Land lacks association with any historic town.

Green Belt Purpose 5 Definitions and Assessment Criteria

3.80 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.

Equal Contribution of Green Belt to Purpose

5

The PAS guidance states:

“...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.”

In other words, it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative impact of discrete parcels of Green Belt land on Purpose 5. – PAS Planning on the Doorstep.

The Inspector’s report (D Smith) to the London Borough of Redbridge (January 2018) notes that with regards to Purpose 5 “this purpose applies to most land” but that “it does not form a particularly useful means of evaluating sites ” – File reference: PINS/W5780/429/10.

However, the examination reports of some planning inspectors, e.g. Cheshire East Council’s Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting.

3.81 Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Assent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development. In addition, the NPPF requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development. Together, these evidence bases provide an accurate and up-to-date area of available brownfield land within individual settlements, which can be used to calculate the proportion of available brownfield land relative to the size of each settlement.

3.82 Using these evidence bases to inform meaningful judgements on the relative contribution of discrete parcels of land to Purpose 5 is dependent on the scale and form of the settlements within and around which Green Belt is defined. For example, it is harder to draw out differences in contribution between parcels around large conurbations containing merged settlements, such as the Bristol conurbation, than it is for land around different isolated settlements, such as Bath and Keynsham.

3.83 Collectively, the three WECA authorities contain a record of roughly 430ha of brownfield land. Only roughly 15ha of this registered brownfield land falls within the Green Belt. Unsurprisingly, the vast majority of the brownfield land, roughly 400ha, lies within the largest inset urban area: the Bristol conurbation. Although other inset settlements have relatively little brownfield land in comparison, such as Bath (21ha), their strong connection and close proximity to Bristol mean all the Green Belt within the WECA authorities' collective boundary are considered to contribute to assisting the urban regeneration and recycling of derelict and other urban land in Bristol. Therefore, a meaningful distinction between the availability of brownfield land across the study area cannot be determined.

3.84 In the absence of any clear guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or more limited, role in

encouraging urban regeneration, a uniform level of contribution to Purpose 5 has been determined for all areas of Green Belt.

Key Considerations with Regard to the Potential Harm of the Release of Green Belt Land

3.85 The assessment of levels of contribution made by strategic-scale land parcels identifies major spatial variations in the role of the Green Belt, but it is recognised that the parcels resulting from this analysis do not typically correspond with the areas that are likely to be considered for release from the Green Belt.

3.86 Some parcels contain smaller areas which if released would still be large enough to accommodate strategic development – defined for the purposes of this study as 10ha – and that could result in reduced harm. There are two factors which, separately or in combination, serve to limit harm to the Green Belt purposes:

- A stronger relationship with urban development, as a result of a combination of the factors discussed in Paragraphs 3.23 - 3.31 above (Green Belt boundary features, landform and land cover, and urbanising visual influence). This diminishes the harm associated with the loss of contribution of the released land.
- A stronger degree of separation from the wider Green Belt, as a result of the presence of landscape elements can minimise the impact of release on the relationship between remaining Green Belt land and a revised Green Belt boundary. The avoidance of significant impact on the Green Belt's function in relation to each purpose is also important.

3.87 Areas making a weaker contribution to the Green Belt purposes than the parcel as a whole have been identified by asking the following questions:

- Considering the combination of factors discussed in Paragraphs 3.23 - 3.31 above (Green Belt boundary features, landform and land cover, and urbanising visual influence), does land adjacent to any urban edges in the parcel have a less than strong distinction from the urban area?
- Would a release of land that did not encompass land that has a strong distinction from the urban edge amount to greater than 10ha? If so, what alternative Green Belt boundary features exist?
- Would an identified alternative Green Belt boundary result in either:
 - No significant weakening of the contribution of adjacent retained Green Belt land (eg land which currently has strong distinction from the urban edge would still have strong distinction); or
 - A knock-on weakening of the contribution of adjacent retained Green Belt land (eg land which currently has strong distinction from the urban edge would now only have moderate distinction); or
 - A major weakening of the contribution of adjacent retained Green Belt land (eg land which currently has strong distinction from the urban edge would now only have weak distinction; or a strong boundary which is consistent over a sizeable distance, such as a river or motorway, would be breached).
- Regardless of the above, would expansion of the urban area have an adverse impact on the function of a Green Belt purpose? For example, even if a strong alternative boundary feature exists, release of land out to it could result in a significant loss of separation between two towns (affecting the function of Purpose 2).

3.88 For example, land that has a degree of containment by urban development, whether inset or washed over, has more potential for release without significant impact on the integrity of adjacent Green Belt land than land which is uncontained. Similarly, an area of land which has a strong visual and physical boundary separating it from the wider Green Belt is more likely to be able to accommodate development without a significant knock-on weakening of the remaining Green Belt than is the case with land that has a weaker outer boundary.

3.89 This initial consideration of harm does not give assessment ratings. It provides commentary to:

- Summarise, with reference to the assessment of contribution, which Green Belt purposes are likely to be the most significant considerations when determining the potential for release of land for development; and
- Indicate whether there might be substantial areas within a parcel that make a weaker contribution to one of more purposes, or which could be released with less impact on the wider Green Belt, with reference to any key landscape elements that have a bearing on these judgements.

3.90 These findings do not constitute recommendations for release of Green Belt land, but will help to inform any discussions regarding areas that may need to be considered in a more detailed assessment of harm, should any release of land potentially be required (see Next Steps in Chapter 5).

Chapter 4

Green Belt Assessment Findings

4.1 This chapter summarises the findings of the Green Belt assessment.

Assessment Outputs

4.2 Variations in strategic contribution have been identified in accordance with the criteria set out in Chapter 3. The variations in relation to each Green Belt purpose have been overlaid to identify strategic parcels by which assessment outputs are organised.

4.3 Each parcel assessment includes:

- A map to show the parcel's context, and to identify any statutory constraints to development;
- Ratings and supporting analysis setting out the contribution to each of the five Green Belt purposes; and
- An overview of key considerations regarding potential harm to the Green Belt purposes associated with the strategic-scale release of land, identifying any particular physical features beyond which release might mark an increase in harm.

4.4 Where appropriate, reference points (labelled A, B, and so on) have been added the maps in order to aid understanding. These points are references in analysis text in order to identify stated locations, or to indicate areas where land might make a weaker contribution to one of more Green Belt purposes than the parcel as a whole, or which could potentially be released with reduced impact on the wider Green belt. They should not be interpreted as proposals for the release of Green Belt land.

4.5 Assessment proformas for each defined parcel are included in Appendix B.

Summary of Findings

4.6 Table 4.1 below lists the ratings for strategic contribution to the Green Belt purposes for each of the defined assessment parcels.

4.7 Figure 4.1 shows the parcels that were defined to reflect variations in strategic contribution. Overview maps Figures 4.2 to 4.5 illustrate strategic variations in contribution to each of the first four Green Belt purposes across the WECA area. As set out in the assessment methodology, all Green Belt land in the WECA area is considered to make an equal contribution to Green Belt Purpose 5, so this is not illustrated. Figure 4.6 combines the contribution ratings for Purposes 1-4 to illustrate how many Green Belt purposes each parcel contributes towards. The variations in contribution are summarised in the paragraphs below.

Summary of Contribution to Purpose 1

4.8 There is a very clear pattern of contribution to Purpose 1 – checking the unrestricted sprawl of a large, built-up area. The Bristol urban area and Bath are the large built-up areas which the Green Belt was designated to contain, and most Green Belt land adjacent to those cities has sufficient openness and distinction from the urban areas to make a significant contribution to this purpose. The exceptions are those parcels around the Bristol urban area where the function of the Green Belt in containing sprawl is diminished by the extent to which they are contained by the built-up area, and by the recent impact of the construction of transport infrastructure.

4.9 Beyond the parcels adjacent to Bristol and Bath, no land is assessed as contributing to Purpose 1 because development associated with other settlements would have sufficient separation from the two cities to not be considered sprawl of the large built-up areas. However, it should be recognised

that more substantial expansion of the Bristol urban area or Bath into parcels beyond those closest to the cities would have an impact on this purpose.

Purpose 2 Summary

4.10 Land making a significant contribution to Purpose 2 – preventing the merger of neighbouring towns – is limited to two areas: between the Bristol urban area and Bath and between Bristol and Yate. In both cases, intervening urban areas and transport links diminish separation and make the gaps more fragile. The sizes of the towns is also a relevant factor, rendering the gap between Bristol and Bath more fragile than would be the case if it was separating smaller towns.

4.11 Land peripheral to these gaps makes a moderate contribution to Purpose 2, as does land lying in the more substantial gaps between Bristol and Thornbury, between Bath and Midsomer Norton / Radstock, and between Bath and Corsham. All other parcels make limited or no contribution to this purpose.

Purpose 3 Summary

4.12 The fact that most of the Green Belt has only a weak relationship with urban development, meaning that there is a strong distinction between urban and open land, has resulted in almost all WECA Green Belt land making a significant contribution to Purpose 3 – protecting the countryside from encroachment. The only exceptions are sizeable areas with built development at Almondsbury (which retains sufficient openness to make a moderate contribution) and Alveston (which is more urban in form and so makes no contribution), and several areas on the fringes of the Bristol urban area that are largely surrounded by urban development: adjacent to Frenchay, Mangotsfield, Whitchurch and Ashton Vale.

Purpose 4 Summary

4.13 The largest focus of contribution to Purpose 4 – preserving the setting and special character of historic towns – is around the city of Bath, where all adjacent parcels include land within the World Heritage Site or its defined setting and make a significant contribution to this purpose. Only one area within the WECA Green Belt makes a significant contribution to the setting of Bristol – the high Dundry Hills to the south of the city.

4.14 Areas of high ground that are prominent in Bristol’s setting but which lack association with the historic core, such as the slopes to the northwest of the city beyond the M5, to the east of the city south of the M4 and, further to the east, the Cotswold escarpment, make a moderate contribution to this purpose.

4.15 Modern development on the urban fringe of Bristol, and development at Keynsham and Salford, have a significant impact on the character of the approach to Bristol along the Avon Valley, but the largely undeveloped and well-treed valley floor makes a moderate contribution to Bristol’s setting, particularly as viewed from high ground.

4.16 The corridor of Green Belt land that penetrates towards central Bristol from the north-eastern edge of the urban area at Hambrook also makes a moderate contribution. It connects the wider Green Belt to the prominent public open space of Pur Down, a prominent high point that is important in Bristol’s setting, but modern development means that it lacks any strong character.

4.17 Smaller areas adjacent to the other identified historic towns, Keynsham and Thornbury, make no more than a moderate contribution to Purpose 4.

Variations in Overall Contribution

4.18 Figure 4.6 combines the contribution ratings for Purposes 1-4 to illustrate how many Green belt purposes each parcel contributes towards. Whilst it is

recognised that land doesn't have to serve multiple Green Belt purposes to be playing a significant role in constraining development, it is reasonable to assume that land which makes a significant contribution to multiple purposes will often represent a stronger constraint. However, this will not necessarily be the case, and in some instances a parcel's significant contribution to a single Green Belt purpose may be strong enough for it to be considered more important than a parcel which makes a significant contribution to more than one purpose.

4.19 Considering Purposes 1-4 in combination only one area, on the western edge of Bath, makes a significant contribution to all four. Land around the Avon Valley on the approach to Bristol, high ground on the southern edge of Bristol, land separating the Bristol urban area from Winterbourne and land on all sides of Bath makes a significant contribution to three purposes.

4.20 Away from the fringes of Bristol and Bath, most parcels make a strong contribution to only one purpose, in almost all cases Purpose 3. The exception is land forming the gap between Bristol and Yate, where some land also makes a significant contribution to Purpose 2.

4.21 Only one parcel of largely open land, contained between the edge of the Bristol urban area and the A4174 at Mangotsfield, doesn't make a strong contribution to any of the purposes, and there is only one area of urbanising development, at Alveston, that is large enough to define as a strategic parcel. This parcel's lack of openness means that it makes no contribution to any of the Green Belt purposes.

Summary of Potential Harm

4.22 At a strategic scale there is little Green Belt land that doesn't make a strong contribution to at least one purpose, and in many cases there is also limited scope for strategic-scale release of sub-parcel areas without causing higher levels of harm to at least one Green Belt purpose. The principal areas where any strategic release is likely to cause the greatest harm are:

- Parcels lying in the more fragile settlement gaps;
- Parcels that are separated from the Bristol urban area by prominent topography and/or major roads; and
- Parcels adjacent to Bath, where landform creates strong physical distinction and contributes to the city's historic setting.

4.23 Although, as a strategic-scale assessment, the study has not considered the harm of Green Belt release in detail, the parcel assessments give some indication of the potential for releases that could demonstrate some limiting of harm. The individual parcel assessments have identified a number of areas where some degree of variation in harm, for areas greater than 10ha in size, can be found. Although typically the Bristol urban area is fairly well contained by major roads and sloping landforms, there are some locations adjacent to the urban area where weaker boundaries and urbanising visual influence mean that strategic-scale development could be limited to land that doesn't make a significant contribution to any Green Belt purpose. However, any such development will constitute sprawl of a large built-up area as well as encroachment on the countryside, and will typically cause a knock-on weakening of adjacent Green Belt land.

4.24 In a few instances there are urban fringe areas around Bristol that are largely contained by existing urban edges, and/or by strong boundary features, which would limit harm to the wider Green Belt even if it would still result in the loss of land which makes a significant contribution to Purpose 3. At Ashton Vale, for example, there is Green Belt land which is strongly associated with the urban area and so doesn't make a strong contribution to any purposes, and which is also contained by a strong boundary feature.

4.25 In terms of harm to the Green Belt purposes, the release of land adjacent to some of the smaller inset settlements, where narrow settlement gaps are not a concern, offers more scope for limiting impacts. In such instances, the prevention of encroachment on the countryside (Purpose 3) is the only purpose that would be affected, and there are several locations in which such a release could either be limited to land which lacks strong distinction from the settlement, or could be contained by a boundary feature that would limit the impact on the

contribution of adjacent Green Belt land to a minor level, or in a few cases both of these.

4.26 A number of washed-over settlements have been identified which are greater than 10ha and where openness is limited. These include Alveston, Olveston, Tockington, Almondsbury (in part), Wick and Pensford. There are only limited opportunities for strategic expansion of any of these settlements without either affecting land that makes a significant contribution to Purpose 3 or causing a knock-on weakening of the contribution of adjacent Green Belt.

Table 4.1: Ratings for strategic contribution to the Green Belt purposes

Parcel Ref	Purpose 1 Contribution	Parcel 2 Contribution	Parcel 3 Contribution	Parcel 4 Contribution	Parcel 5 Contribution	Highest Rating
P1	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P2	Limited / no contribution	Moderate contribution	Significant contribution	Moderate contribution	Equal contribution	One significant rating
P3	Limited / no contribution	Moderate contribution	Significant contribution	Moderate contribution	Equal contribution	One significant rating
P4	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P5	Limited / no contribution	Limited / no contribution	Limited / no contribution	Limited / no contribution	Equal contribution	Four limited / no contribution
P6	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P7	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P8	Significant contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P9	Significant contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P10	Significant contribution	Limited / no contribution	Significant contribution	Moderate contribution	Equal contribution	Two significant ratings
P11	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P12	Significant contribution	Limited / no contribution	Moderate contribution	Moderate contribution	Equal contribution	One significant rating
P13	Significant contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P14	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P15	Significant contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P16	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P17	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P18	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P19	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P20	Limited / no contribution	Significant contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P21	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P22	Limited / no contribution	Significant contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P23	Significant contribution	Significant contribution	Significant contribution	Limited / no contribution	Equal contribution	Three significant ratings

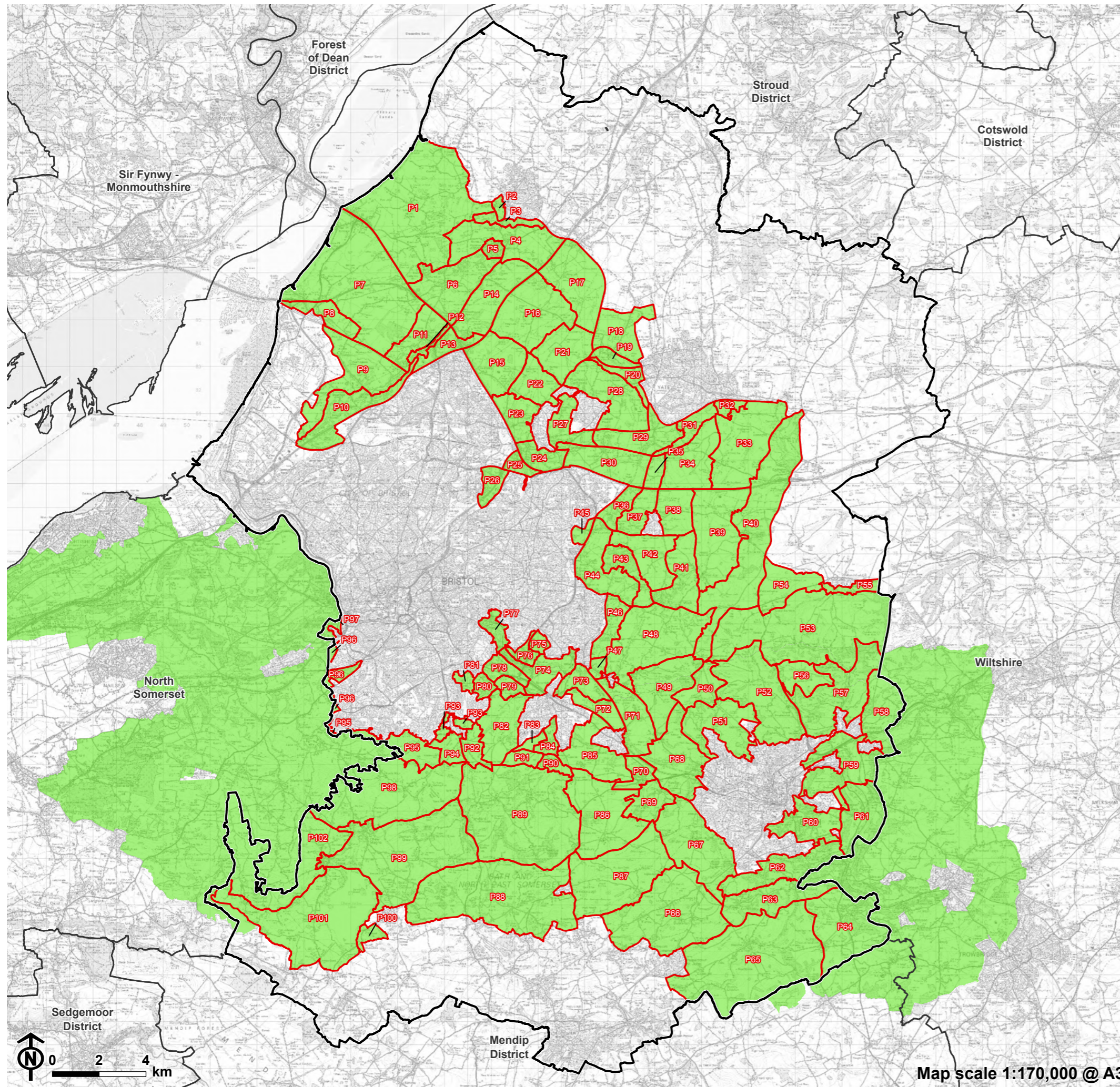
Parcel Ref	Purpose 1 Contribution	Parcel 2 Contribution	Parcel 3 Contribution	Parcel 4 Contribution	Parcel 5 Contribution	Highest Rating
P24	Significant contribution	Significant contribution	Significant contribution	Moderate contribution	Equal contribution	Three significant ratings
P25	Moderate contribution	Moderate contribution	Significant contribution	Moderate contribution		One significant rating
P26	Moderate contribution	Limited / no contribution	Moderate contribution	Moderate contribution		Three moderate ratings
P27	Limited / no contribution	Significant contribution	Significant contribution	Limited / no contribution		Two significant ratings
P28	Limited / no contribution	Significant contribution	Significant contribution	Limited / no contribution		Two significant ratings
P29	Limited / no contribution	Significant contribution	Significant contribution	Limited / no contribution		Two significant ratings
P30	Significant contribution	Significant contribution	Significant contribution	Limited / no contribution		Three significant ratings
P31	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution		One significant rating
P32	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution		One significant rating
P33	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution		One significant rating
P34	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution		One significant rating
P35	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution		One significant rating
P36	Significant contribution	Limited / no contribution	Significant contribution	Moderate contribution		Two significant ratings
P37	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution		One significant rating
P38	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution		One significant rating
P39	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution		One significant rating
P40	Limited / no contribution	Limited / no contribution	Significant contribution	Moderate contribution		One significant rating
P41	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution		One significant rating
P42	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution		One significant rating
P43	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution		Two significant ratings
P44	Significant contribution	Limited / no contribution	Significant contribution	Moderate contribution	Two significant ratings	
P45	Moderate contribution	Limited / no contribution	Moderate contribution	Limited / no contribution	Two moderate ratings	
P46	Significant contribution	Limited / no contribution	Significant contribution	Moderate contribution	Two significant ratings	
P47	Significant contribution	Limited / no contribution	Significant contribution	Moderate contribution	Two significant ratings	
P48	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	One significant rating	
P49	Limited / no contribution	Moderate contribution	Significant contribution	Moderate contribution	One significant rating	

Parcel Ref	Purpose 1 Contribution	Parcel 2 Contribution	Parcel 3 Contribution	Parcel 4 Contribution	Parcel 5 Contribution	Highest Rating
P76	Significant contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P77	Moderate contribution	Limited / no contribution	Significant contribution	Moderate contribution	Equal contribution	One significant rating
P78	Significant contribution	Significant contribution	Significant contribution	Limited / no contribution	Equal contribution	Three significant ratings
P79	Significant contribution	Significant contribution	Significant contribution	Moderate contribution	Equal contribution	Three significant ratings
P80	Significant contribution	Moderate contribution	Significant contribution	Moderate contribution	Equal contribution	Two significant ratings
P81	Moderate contribution	Limited / no contribution	Significant contribution	Moderate contribution	Equal contribution	One significant rating
P82	Significant contribution	Significant contribution	Significant contribution	Moderate contribution	Equal contribution	Three significant ratings
P83	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P84	Limited / no contribution	Limited / no contribution	Significant contribution	Moderate contribution	Equal contribution	One significant rating
P85	Limited / no contribution	Significant contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P86	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P87	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P88	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P89	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P90	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P91	Limited / no contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P92	Significant contribution	Moderate contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P93	Significant contribution	Limited / no contribution	Moderate contribution	Limited / no contribution	Equal contribution	One significant rating
P94	Significant contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	Two significant ratings
P95	Significant contribution	Limited / no contribution	Significant contribution	Significant contribution	Equal contribution	Three significant ratings
P96	Moderate contribution	Limited / no contribution	Significant contribution	Moderate contribution	Equal contribution	Two significant ratings
P97	Moderate contribution	Limited / no contribution	Moderate contribution	Moderate contribution	Equal contribution	Three moderate ratings
P98	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P99	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P100	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating
P101	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating

Chapter 4 Green Belt Assessment Findings

Parcel Ref	Purpose 1 Contribution	Parcel 2 Contribution	Parcel 3 Contribution	Parcel 4 Contribution	Parcel 5 Contribution	Highest Rating
P102	Limited / no contribution	Limited / no contribution	Significant contribution	Limited / no contribution	Equal contribution	One significant rating

Figure 4.1: Contribution assessment parcels

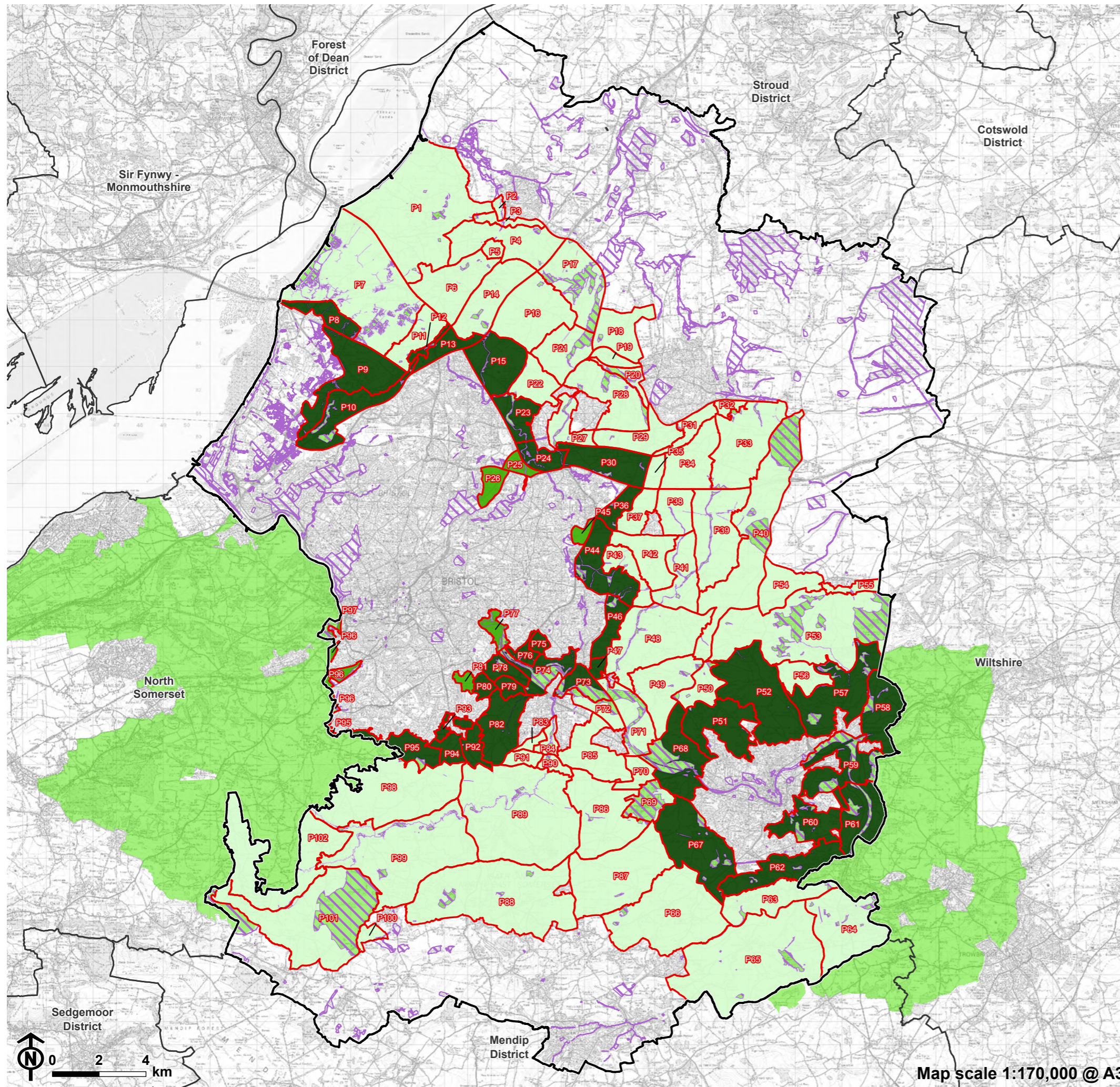


- WECA boundary
- Neighbouring Local Authority Boundary
- Parcel
- Green Belt

CB: SRD:EB:Danielis: S LUC FIGX_11444_GB_ContributionAssessment_20210824_A3L_30/09/2021
Source: OS, DCLG, HE, NE, LUC

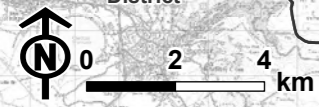
Map scale 1:170,000 @ A3

Figure 4.2: Contribution to Green Belt Purpose 1 - checking the unrestricted sprawl of large built-up areas



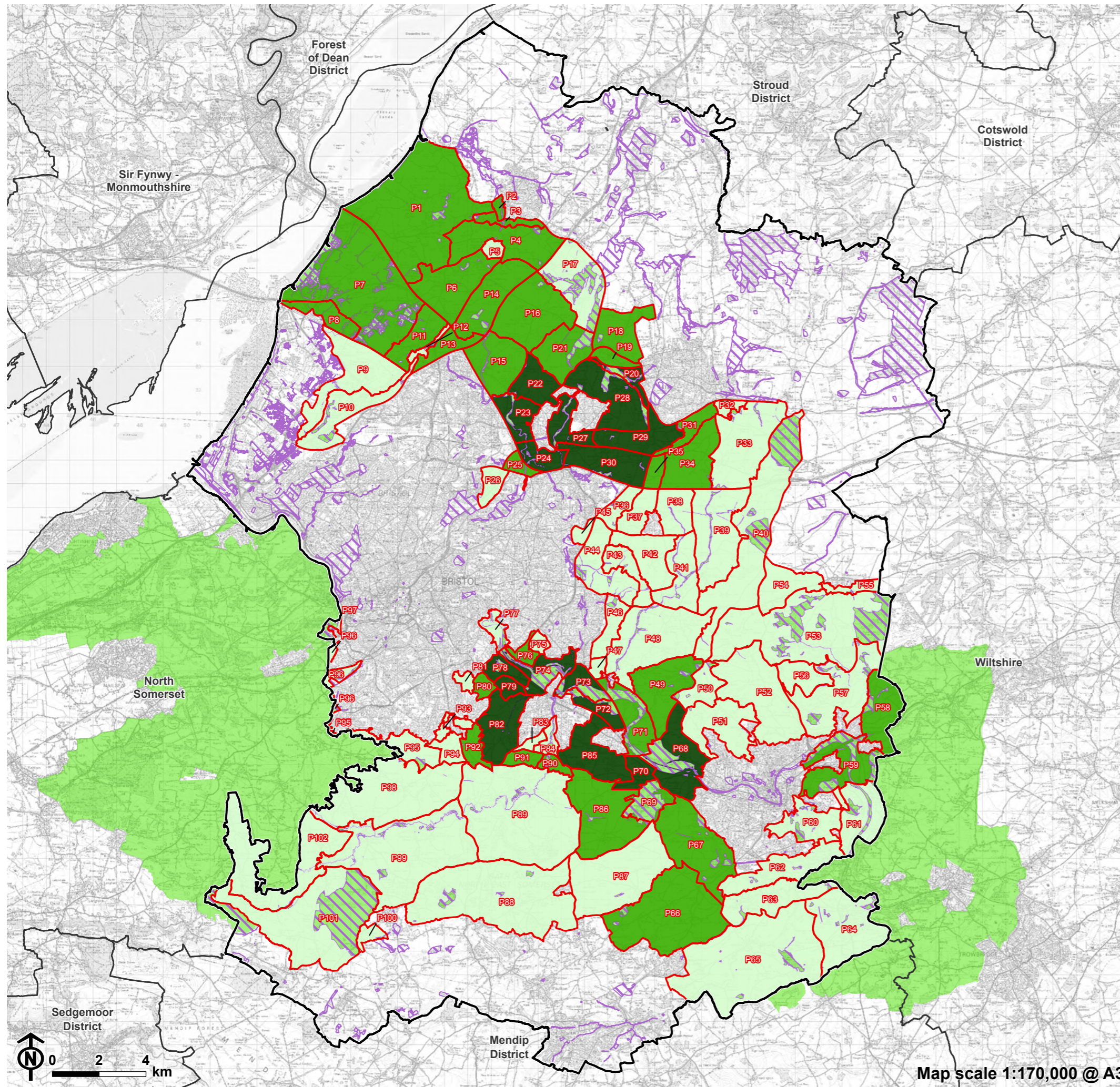
- WECA boundary
- Neighbouring Local Authority Boundary
- Parcel
- Statutory constraints
- Green Belt
- Purpose 1 contribution**
 - Significant
 - Moderate
 - Limited / no contribution

CB: SRD:EB:Danielis: S LUC FIGX_11444_GB_Purpose_1_20210824_A3L_30/09/2021
Source: OS, DCLG, HE, NE, LUC



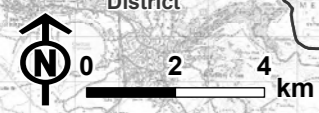
Map scale 1:170,000 @ A3

Figure 4.3: Contribution to Green Belt Purpose 2 - preventing the merger of neighbouring towns



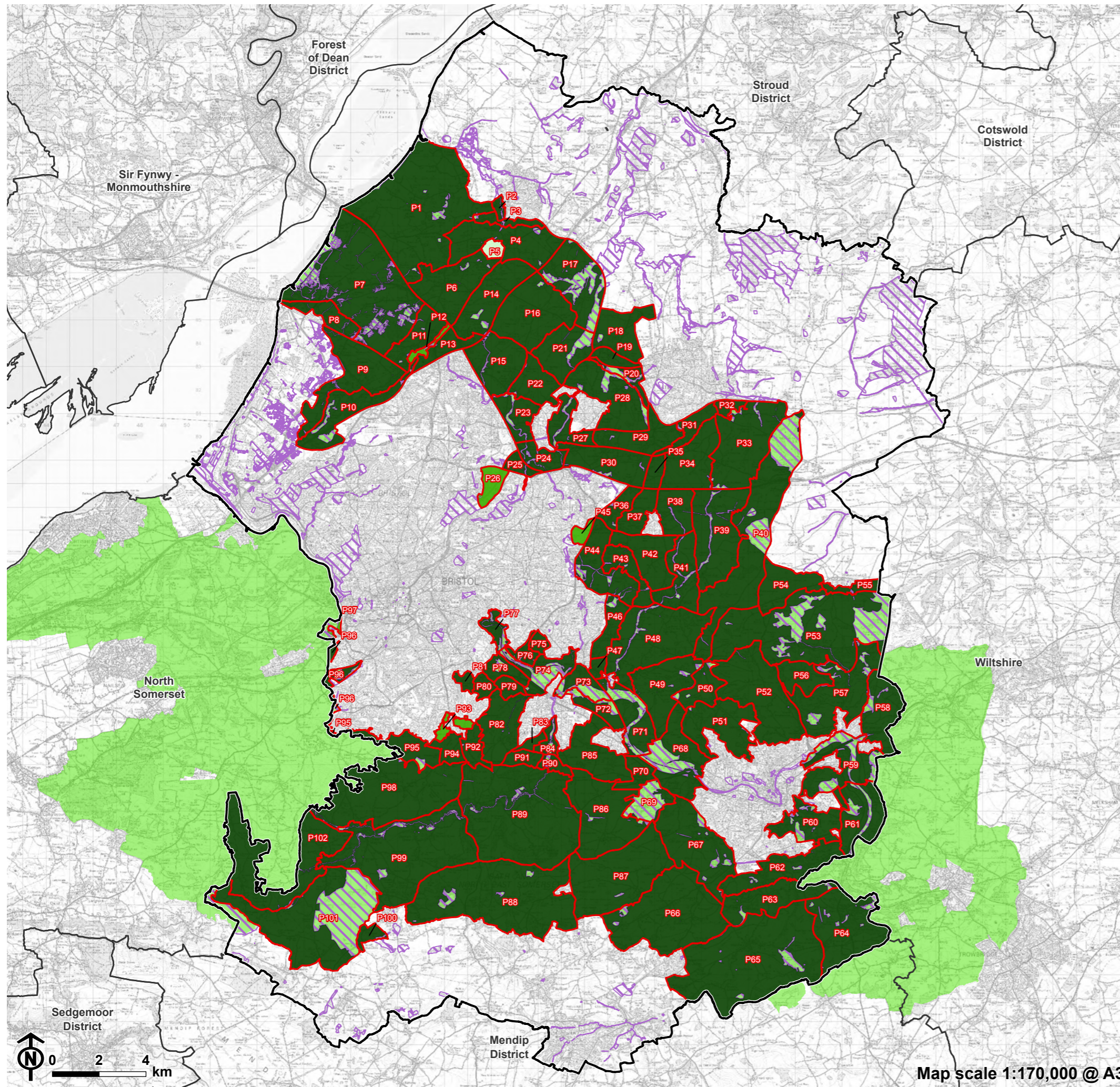
- WECA boundary
- Neighbouring Local Authority Boundary
- Parcel
- Statutory constraints
- Green Belt
- Purpose 2 contribution**
- Significant
- Moderate
- Limited / no contribution

CB: SRD:EB:Danielis, S LUC FIGX_11444_GB_Purpose_2_20210824_A3L_30/09/2021
 Source: OS, DCLG, HE, NE, LUC



Map scale 1:170,000 @ A3

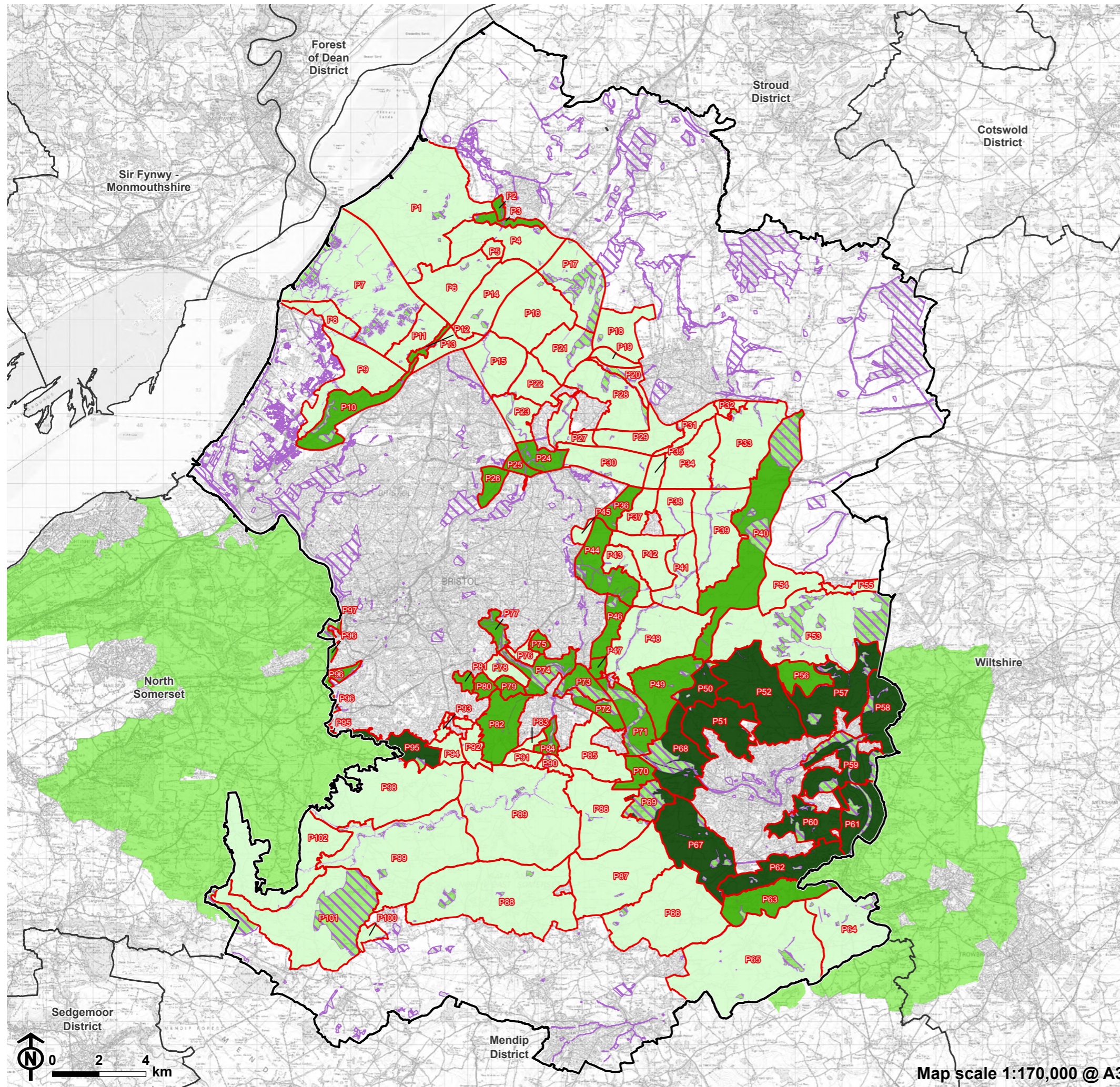
Figure 4.4: Contribution to Green Belt Purpose 3 - safeguarding the countryside from encroachment



- WECA boundary
- Neighbouring Local Authority Boundary
- Parcel
- Statutory constraints
- Green Belt
- Purpose 3 contribution**
 - Significant
 - Moderate
 - Limited / no contribution

CB: SRD:EB:Danielis: S LUC FIGX_11444_GB_Purpose_3_20210824_A3L_30/09/2021
Source: OS, DCLG, HE, NE, LUC

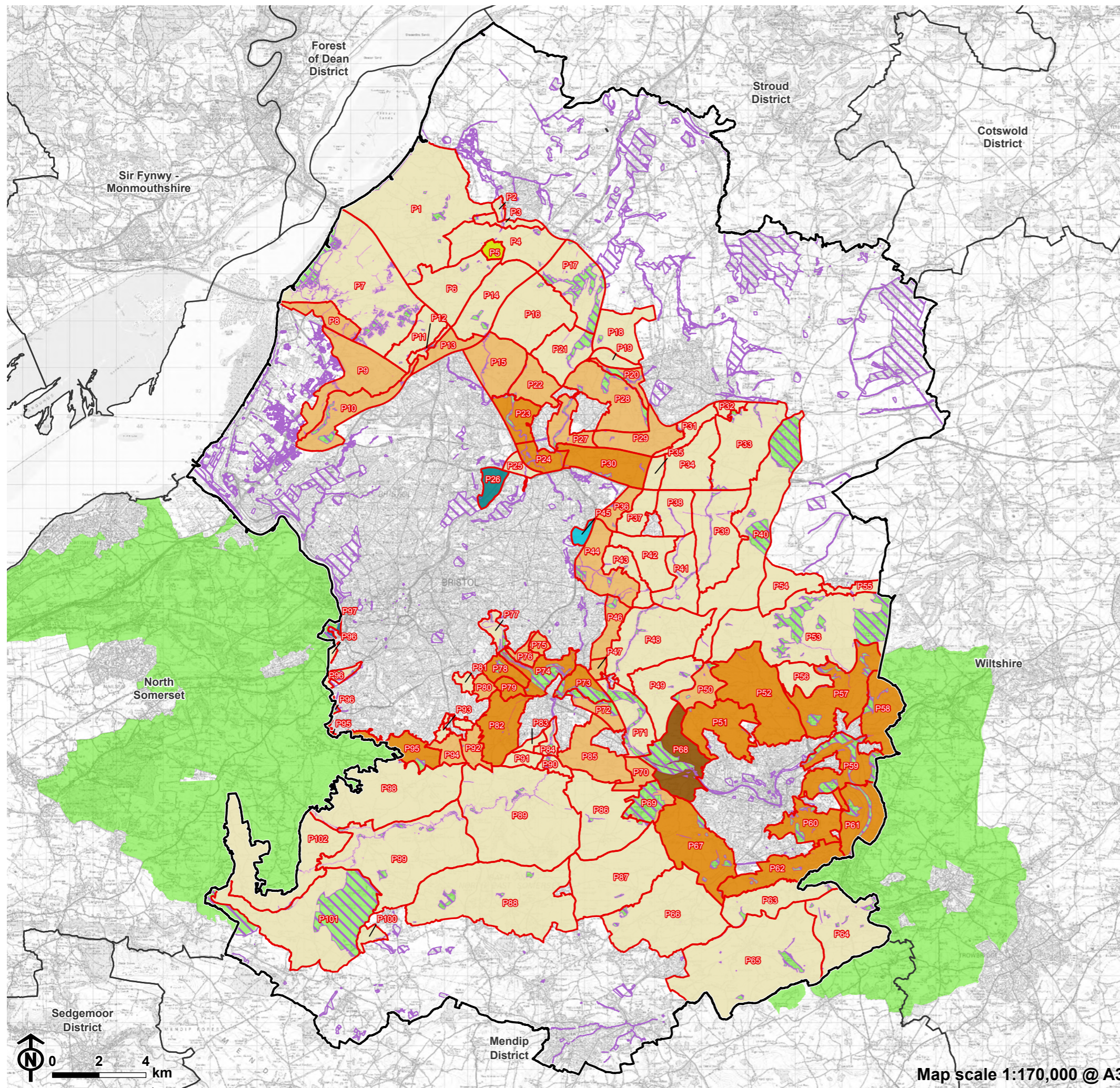
Figure 4.5: Contribution to Green Belt Purpose 4 - preserving the setting and special character of historic towns



- WECA boundary
- Neighbouring Local Authority Boundary
- Parcel
- Statutory constraints
- Green Belt
- Purpose 4 contribution**
- Significant
- Moderate
- Limited / no contribution

CB: SRD:EB:Danielis: S LUC FIGX_11444_GB_Purpose_4_20210824_A3L_30/09/2021
 Source: OS, DCLG, HE, NE, LUC

Figure 4.6: Highest contribution to Green Belt purposes (Purpose 1 - 4)



- WECA boundary
 - Neighbouring Local Authority Boundary
 - Parcel
 - Statutory constraints
 - Green Belt
- Highest Rating (Purpose 1 - 4)**
- Four significant ratings
 - Three significant ratings
 - Two significant ratings
 - One significant rating
 - Four moderate ratings
 - Three moderate ratings
 - Two moderate ratings
 - One moderate rating
 - Four limited / no contribution

Note: The number of purposes to which a parcel makes a particular level of contribution should not necessarily be taken as an indication of greater overall importance to the Green Belt purposes.

Chapter 5

Next Steps

Exceptional Circumstances

5.1 This study will be used by the WECA authorities alongside other pieces of evidence to establish the necessary exceptional circumstances for making alterations to the Green Belt's boundaries (if required) and to identify preferred site options and reasonable alternatives for release within the designation.

Green Belt Harm

5.2 The NPPF states in paragraphs 140 and 141 that "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans".

5.3 As noted in the introductory chapter, the Calverton case established the need to consider the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent'. Case law also indicates that establishing 'exceptional circumstances' is a matter for rational planning judgement as reiterated in *Compton / Ockham and Guildford Green Belt Group v Guildford Borough Council* (2019) and *Keep Bourne End Green v Buckinghamshire Council and the Secretary of State for Housing, Communities and Local Government* (June 2020).

5.4 The strategic contribution analysis and comments on potential harm of release of land provided in this 'Stage 1' assessment will form the basis of future detailed Green Belt assessment work assessing the harm of releasing

defined areas Green Belt land (ie sites or development search areas), and identifying ways that harm could be minimised.

5.5 The strategic and detailed Green Belt assessment work will then be used collectively with other important elements of the WECA authorities' Local Plan work to plan and refine sustainable patterns of development.

5.6 The more detailed 'Stage 2' assessment will apply the same basic assessment criteria, but at a finer grain in terms of both the size of areas of variation that are identified, and the ratings scale that is applied.

Green Belt Enhancement

5.7 Paragraph 142 of the NPPF states that local planning authorities should 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. Furthermore, paragraph 145 of the NPPF states local planning authorities should plan positively to enhance the beneficial uses of the Green Belt. These requirements are supported by additional planning practice guidance (PPG) which emphasises the need for Local Plans to include policies for compensatory improvements to the environmental quality and accessibility of the Green Belt. The PPG highlights the need for these improvements to be informed by appropriate evidence on issues such as green infrastructure, woodland planting, landscape, biodiversity, habitat connectivity and natural capital, access and recreation.

5.8 It is therefore important that if the decision is taken that land does need to be removed from the Green Belt, the local authorities consider where and how the Green Belt can be enhanced.

Appendix A

Method Statement Consultation Log

Post-Consultation Amendments to Methodology

A.1 Subsequent to the consultation process and receipt of the comments set out below, changes were made to the criteria used to assess contribution to Purpose 4 – preserving the setting and special character of historic towns. It was agreed, in discussion with the WECA authorities, that the assessment criteria for Purpose 4 should not be ‘bespoke’ to each historic settlement but should present common criteria against which all Green Belt parcels could be judged on a consistent basis.

Historic England

Comment

Historic England would like clarification that the assessment will not only consider the relationship of the Green Belt to certain Conservation Areas in the defined towns. Historic England do not wish to challenge the selection of historic towns to assess, but would guard against just considering the Conservation Areas in those settlements; the totality of a settlement, its history and character and setting can help to define its special interest and integrity. Much of our towns and cities, particularly the suburban and peripheral margins may be historic but undesignated and that interest may relate to the relationship to the Green Belt.

Response

Paragraph 3.56 of the method statement states: ‘this assessment takes the approach of identifying settlements classed as towns and considering whether any have settings or special character to which land within the Green Belt makes a contribution. Many towns have designated conservation areas, but these are commonly focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than key to special character’.

Consequently, the study has drawn on all publicly available historic evidence to record the setting and special character of the identified historic towns, such as setting evidence for the Bath World Heritage Site. The evidence available on the setting and special character of each identified historic town has then been used to assess the contribution of Green Belt land surrounding each historic town to Green Belt Purpose 4.

Natural England

Comment

Natural England consider the criteria proposed for judging the contribution of land parcels to each of the Green Belt purposes appear reasonable and locally relevant.

Response

Noted.

Environment Agency

Comment

It is noted that section 3.4 advises that: 'The assessment will provide a parcel by parcel analysis of all Green Belt land within the WECA area, split into two sections including:

1. A strategic assessment of the contribution of the parcel to the Green Belt purposes,
2. A consideration of the potential harm of release within the parcel resulting from the release of land'.

With regard to point 2, current and future flood risk, taking into account the projected impacts of climate change, must be viewed as a key consideration when assessing potential harm from the release of green belt land (section 3.81, point 3). The Agency would, therefore, advise that the respective Council's Strategic Flood Risk Assessment (SFRA) should inform the identification of constraints/harm in consideration of the potential release of land.

Response

Paragraph 3.6 of the method statement states: 'Although the study also introduces the concept of Green Belt harm, ie the impact of Green Belt release on the purposes of the designation, it will not draw conclusions on the harm of releasing specific site options with a view to recommending what land could be released for development. This would require consideration of a wider range of sustainability factors which the Councils will take into account in reaching a conclusion as to whether there are exceptional circumstances to justify the release of Green Belt land'.

Appendix A Method Statement Consultation Log

An assessment of harm in a Green Belt study is an assessment of the impacts of release on the Green Belt purposes. It is not an assessment of the environmental harm of development.

This is not to say that the potential for different types of environmental harm, such as implications for flood risk, are not a key considerations in the definition and appraisal of options for development in Plans. Flood risk will be covered by other studies supporting the development of the Strategic Development Strategy.

Gloucestershire County Council

Comment

Gloucestershire County Council confirm that we do not have any officer comments to make on this, but look forward to being kept informed on this matter.

Response

Noted.

North Somerset Council

Comment

Please note that North Somerset has updated the West of England Stage 1 Assessment for the North Somerset Area titled North Somerset Green Belt

Appendix A Method Statement Consultation Log

Assessment 2021. It has also carried out a high-level assessment of the impact on the Green Belt of the four approaches set out in the Choices consultation.

Both can be found on our website at:

- <https://www.n-somerset.gov.uk/sites/default/files/2021-04/North%20Somerset%20green%20belt%20assessment%20April%202021.pdf>
- <https://www.n-somerset.gov.uk/sites/default/files/2021-04/impact%20on%20green%20belt%20of%20the%20four%20approaches.pdf>

Response

North Somerset's recently published Green Belt Assessment for the North Somerset Local Plan 2038 (April 2020) will be reviewed and summarised in the final report. Please see Chapter 2 in the final report.

Comment

North Somerset Council will be carrying out a review of the Green Belt in our authority as part of the new Local Plan. We will share a scoping report for this shortly but it is likely to include a review of the Green Belt broad locations identified, look at whether villages should be inset, minor amendments and whether there is a justification for additional Green Belt designation.

Response

Noted. Reference to the Council's forthcoming Green Belt Review will be made in the final report.

Comment

We note that the methodology cites that land outside the WECA area will not be assessed but will consider how land in these authorities affects land in WECA, and how releases in WECA might harm adjacent neighbouring authorities (para 3.5). It would be helpful if we were able to see these comments and form an agreement over what is said regarding cross border issues in our area, prior to publication.

Response

Noted.

Comment

The definition of a large built-up area is 'inset land contiguous with the Bristol and Bath conurbation'. Could it be made clear that this include land in WECA at Avonmouth as this would be consistent with our thinking that land at Royal Portbury Dock would fall within this definition.

Response

The final report will clarify that Avonmouth is considered to form part of the Bristol conurbation in combination with Shirehampton and Lawrence Weston. See Chapter 3 of the final report.

Comment

The report sets out what it considers to be 'towns' in the context of the Green Belt it lists towns outside the study area in Wiltshire but fails to take into account Nailsea, Clevedon and Portishead. This needs to be amended.

Response

The WECA study only acknowledges settlements, including Green Belt towns, considered to be relevant to the assessment of the performance of Green Belt land within the WECA area. The location of Nailsea, Clevedon and Portishead are not judged capable of influencing the performance of WECA Green Belt to the Green Belt purposes.

Comment

It does not treat Long Ashton as a town in term of merger, listing it as too small to be considered in its own right. The original justification for the inner Green Belt boundary set out in the SW Avon Green Belt Local Plan was clear that the 'preservation of the coalescence of the urban area of Bristol with Keynsham, Long Ashton and other settlements' was one of the main factors in determining the inner boundary. The merger issue at Long Ashton is significant. This study should recognise this and it should not prejudge how we would classify Long Ashton in our Green Belt review. Similarly, as Nailsea is not listed as a town, the merger issue of land in the vicinity of Long Ashton contributing to merger with Nailsea/Backwell is not recognised.

Helpfully the study recognises that should the gap between smaller inset villages close to the built- up area be developed it could be detrimental to sprawl.

Response

Paragraph 3.43 of the method statement states: 'There is no separate assessment of gaps between settlements that are not considered to be towns, although the role of smaller areas of urbanising development, including villages and hamlets, in reducing perceived rural separation between towns is considered. This captures the sentiments of the original reasons for designating the Bristol and Bath Green Belt (summarised in Chapter 2) and the 'local purpose' defined by Bath and North East Somerset Council. The notable smaller settlements that fall within and in close proximity to gaps between towns in the study area include Almonsbury, Alveston, Bitton, Coalpit Heath and Winterbourne, Farmborough, Long Ashton, Peasedown St John, Pucklechurch, Rudgeway, Saltford, Westwood and Winsley, which are too small to be considered 'towns' in their own right'.

Comment

Regarding historic towns Bristol is listed including the panoramic views into the Green Belt from the designated heritage areas. Whilst just outside the WECA area, mention should be made of Ashton Court as well as the Avon Gorge. There should be a recognition that this also works the other way from the Green Belt into the city – views of the Suspension Bridge and Gorge from North Somerset.

Response

The WECA study is focussed on the aspects of historic Bristol's setting and special character considered to be relevant to the assessment of the performance of Green Belt land within the WECA area. The location of Ashton Court in North Somerset is not judged capable of influencing to performance of WECA Green Belt to the Green Belt purposes.

Comment

The assessment of harm is less clearly set out in the methodology. It focusses on two factors which would limit harm. But intends to give a commentary rather than assessment rating. This is limiting in that there is no assessment of any mitigation which could reduce the harm or any way in which comparisons could be made. Would the recommendation be that this would be done at a later stage?

Response

Paragraphs 1.8 and 1.9 of the method statement state: 'As a strategic assessment of contribution to the Green Belt purposes, this study will not consider the impact of the release of specific sites of Green Belt land on the Green Belt purposes, or recommend any areas of land for potential release.'

However, it is recognised that an understanding of the key components of the consideration of harm to the Green Belt purposes, within different locations within the WECA area, will be useful to inform the preparation of the SDS. To this end, the study will identify any substantial areas of land within each contribution assessment parcel where harm to the Green Belt purposes resulting from the release may be less than high'.

Paragraph 4.6 of the method statement states: 'The strategic contribution analysis and comments on potential harm of release of land provided in this 'Stage 1' assessment will form the basis of future detailed Green Belt assessment work assessing the harm of releasing defined areas Green Belt land (ie sites or development search areas), and identifying ways that harm could be minimised'.

Paragraph 4.8 of the method statement states: 'The more detailed 'Stage 2' assessment will apply the same basic assessment criteria, but at a finer grain in

terms of both the size of areas of variation that are identified, and the ratings scale that is applied – ie using a five-point harm scale’.

Wiltshire Council

Comment

The method says it will help to identify areas that have ‘less than high’ importance, but how will broad areas be defined? The method is clear that it will not look at fine grain parcels of land, but does not then say how broad an area might be and how it is defined. We’re particularly interested in the definition of broad areas that ‘adjoin’ the county boundary and these will relate to what could be an arbitrary administrative boundary.

The method distinguishes the intrinsic value of land in serving green belt purposes from the potential harm to those purposes if that green belt is released. The method here did not seem that clear on how the latter is measured/described. It refers to factors that might lessen or worsen harm and points to further work. It would be useful to know the whole process. This is important as the method recognises how harm may extend beyond WECA boundaries. Therefore, how is harm being assessed and how are you intending to involve us, where necessary?

It would be useful to have a clearer understanding of the study context: how this evidence will be used when taking account of the need to promote sustainable patterns of development, the relationship between strategic and local plan decision making; and what role it might play in justifying exceptional circumstances for any review of green belt boundaries. Finally, could you please let us know the likely timings for this and future steps?

Response

The findings of the harm assessment in the final report will be supported by appropriate justification for all judgements made. Consideration will be given to further detailed explanation of how harm judgements are made in preparing the final report.

Paragraph 3.8 and 3.9 of the method statement state: 'The variations in strategic contribution for each Green Belt purpose (as determined through the analysis...) will be overlaid to identify the strategic contribution of parcels. The parcels will therefore not be predefined using promoted sites or existing boundaries but will be an outcome of the consistent strategic assessment process. In some areas, typically where settlements are closely spaced or have more of a complex form, the parcels may be relatively small, but where there is less variation in function they may be larger.'

In this strategic study, contribution ratings will be given using a three-point scale of significant, moderate or limited contribution. Ratings will typically reflect the fact that larger parcels will often contain at least some open land which doesn't have a strong relationship with any urban area and therefore make a strong contribution to purpose 3 (safeguarding the countryside from encroachment). However, the second part of each parcel assessment, the consideration of potential harm resulting from release of land, will address the existence of any broad variations in contribution which might, dependent on how this would affect the strength of adjacent Green Belt land, offer potential opportunities to release land without causing high harm to the Green Belt purposes. The assessment process for considering potential harm is discussed at Paragraphs 3.76 - 3.79...'.

Paragraph 4.6-4.8 of the method statement state: 'The strategic contribution analysis and comments on potential harm of release of land provided in this 'Stage 1' assessment will form the basis of future detailed Green Belt assessment work assessing the harm of releasing defined areas Green Belt land (ie sites or development search areas), and identifying ways that harm could be minimised.'

Appendix A Method Statement Consultation Log

The strategic and detailed Green Belt assessment work will then be used collectively with other important elements of the WECA authorities' Local Plan work to plan and refine sustainable patterns of development.

The more detailed 'Stage 2' assessment will apply the same basic assessment criteria, but at a finer grain in terms of both the size of areas of variation that are identified, and the ratings scale that is applied – ie using a five-point harm scale'.

Duty-to-cooperate partners will continue to be consulted throughout the development of the SDS. Further details of the timeline for the SDS can be found at: <https://www.westofengland-ca.gov.uk/spatial-development-strategy/>.

Appendix B

Strategic Assessment Proforma

See separate Appendix B document.

References

- 1 Section 110 of the Localism Act (2011).
- 2 The Ministry of Housing, Communities and Local Government published an edited version of the National Planning Policy Framework for consultation on the 30th of January 2021 with minor edits. Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework and National Model Design Code: consultation proposals [online]. Available at: <https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals>
- 3 Two important Planning Appeal judgements (Heath and Hampstead Society v Camden LBC and Vlachos (2008) and Turner v Secretary of State for Communities and Local Government and 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.
- 4 Local Government Association and planning Advisory Service (2015) Planning on the Doorstep: The Big Issues – Green Belt [pdf]. Available at: <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>
- 5 Bath and North East Somerset Council (2020) Core Strategy and Placemaking Plan [online]. Available at: <https://beta.bathnes.gov.uk/policy-and-documents-library/core-strategy-and-placemaking-plan>
- 6 South Gloucestershire Council (2013) South Gloucestershire Local Plan Core Strategy [pdf]. Available at: <https://beta.southglos.gov.uk/wp-content/uploads/South-Gloucestershire-Core-Strategy-2006-2027.pdf>

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- 7** Wiltshire Council (2015) Wiltshire Core Strategy [pdf]. Available at: <https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wcs.pdf?m=637099399373530000>
- 8** North Somerset Council (2011) North Somerset Green Belt Assessment [pdf]. Available at: <https://www.n-somerset.gov.uk/sites/default/files/2020-03/SD%2050%20green%20belt%20assessment%20South%20West%20of%20Bristol.pdf>
- 9** South Gloucestershire Council (2011) South Gloucestershire Core Strategy: Strategic Green Belt Assessment.
- 10** Bath and North East Somerset Council (April 2013) Bath and North East Somerset Green Belt Review: Stage 1 Report [pdf]. Available at: https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Environment/gbr_stage1_report.pdf and Bath and North East Somerset Council (September 2013) Bath and North East Somerset Green Belt Review: Stage 2 Report [pdf]. Available at: <https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Environment/gbr-stage2.pdf>
- 11** This study has been referenced for context. Its contents however hold no planning weight and is no longer publicly available following the withdrawal of the West of England Joint Spatial Plan.
- 12** Bath and North East Somerset Council (2016-2017) Green Belt Assessments: North Keynsham Strategic Development Location [pdf]. Available at: https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_north_keynsham_sdl_green_belt_assessment.pdf
- 13** North Somerset Council (2021) North Somerset Green Belt Assessment [pdf]. Available at: <https://www.n-somerset.gov.uk/sites/default/files/2021-04/North%20Somerset%20green%20belt%20assessment%20April%202021.pdf>

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- 14** North Somerset Council (2021) Impact on Green Belt of the four approaches in the Choices for the Future document [pdf]. Available at: <https://www.n-somerset.gov.uk/sites/default/files/2021-04/impact%20on%20green%20belt%20of%20the%20four%20approaches.pdf>
- 15** The term ‘inset settlement’ is used throughout this report to refer to any settlement that is surrounded by Green Belt land.
- 16** The term ‘washed-over’ refers to development which lies within the Green Belt, rather than being inset from it.
- 17** This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404.
- 18** Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, updated 2021) Planning Practice Guidance [online]. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>
- 19** Although not contiguous with Bristol, Avonmouth is considered to form part of the Bristol conurbation in combination with Shirehampton and Lawrence Weston. This is because the three settlements have a strong connection to the city and are separated only by thin strips of open space not designated as Green Belt land.
- 20** The term ‘Bristol urban area’ is used in this study to refer to the city of Bristol together with contiguous urban development in South Gloucestershire.
- 21** The city of Bristol together with contiguous urban development in South Gloucestershire is treated as one ‘town’ for the assessment of Purpose 2.
- 22** South Gloucestershire Council(2013) South Gloucestershire Local Plan Core Strategy [pdf]. Available at: <https://beta.southglos.gov.uk/wp-content/uploads/South-Gloucestershire-Core-Strategy-2006-2027.pdf>
- 23** Bath and North East Somerset Council (2020) Core Strategy and Placemaking Plan [online]. Available at: <https://beta.bathnes.gov.uk/policy-and-documents-library/core-strategy-and-placemaking-plan>

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- 24** Wiltshire Council (2021) Wiltshire Council Local Plan: Looking to the future – Emerging Spatial Strategy [pdf]. Available at:
https://www.wiltshire.gov.uk/media/5623/Emerging-Spatial-Strategy/pdf/Wiltshire_Local_Plan_Emerging_Spatial_Strategy_FINAL.pdf?m=637471655274170000
- 25** 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.

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