

Strategic Green Belt Review

Final Report

South West Regional Assembly

February 2006

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1. Introduction

1.1 Purpose of the report

1.1.1 Colin Buchanan (CB) has been appointed by the South West Regional Assembly (SWRA) to undertake a strategic review of Green Belts in the South West. This study will inform preparation of the new Regional Spatial Strategy (RSS) for the region that will cover the period to 2026.

1.1.2 The overall objectives of the study are to advise on a robust methodology for a strategic, consistent and independent review of the Green Belts across the South West and to undertake an assessment of the technical work on Green Belt review carried out by the appropriate Joint Study Areas. The Brief also provides more detailed objectives as follows:

- To prepare an apply an independent methodology for Green belt review that can be used in the region;
- To undertake a strategic review of the advice given by the Regulation 4/4 strategic planning authorities concerning each of the three Green belts and identify where more work would be needed to bring advice into line with the independent methodology established, including whether the advice looked at wider development needs, e.g. ports/airports;
- To set out in broad strategic terms the extent of Green Belt locations in the RSS (the identification of specific boundaries will be a matter for LDFs) identifying where the rationale for inclusion in Green Belt is relatively weak and where it is stronger; and,
- To identify other potential locations where extension of Green Belt could be justified in terms of the methodology in order to meet the requirement to identify new areas to compensate for loss of Green Belt due to strategic development needs.

1.1.3 The purpose of this report is to present our findings of a review of recent Green Belt Reviews undertaken by the three Joint Study Areas (JSAs) of West of England, South East Dorset and Cheltenham and Gloucester. The reviews that we have undertaken are made in comparison to a standard methodology drawn from best practice.

1.1.4 The recommendations from this review are intended to allow the Regional Planning Body to identify the general extent of Green Belts in the RSS and does not determine precise locations for review of Green Belt. This study uses data supplied by the relevant JSAs and provides a database and map of general areas for review that have been tested against Green Belt purposes and which can be used to develop and evaluate strategic spatial options using environmental capacity and sustainability criteria. It is the full extent of the

Green Belt area around each settlement that is most important because it is in this form that it fulfils the fundamental purpose of its conception- to prevent urban sprawl by keeping land permanently open. The reviews undertaken by the JSA's are not comprehensive in that they have not reviewed the principle for the establishment of the Green Belt in the first place, but have provided advice on potential release areas. The plans produced in this Report do not, and cannot be construed as identifying areas that do not fulfil Green Belt function; rather they are an examination of areas where land might be considered for release to accommodate an urban extension, given an indication of the potential harm that might arise as a consequence of that release.

- 1.1.5 This report concludes by considering whether the JSA reviews undertaken are sufficiently rigorous and robust so as to enable the RSS to make recommendations on the areas for addition to Green Belt or release from Green Belt in relation to the preferred strategy. It is a prime purpose to demonstrate how each of the JSA's can structure their reviews in a way that is broadly comparable and will stand up to the rigours of the Examination in Public.

1.2 Extent of review work

- 1.2.1 For clarification the extent of this study and the Green Belt reviews undertaken is limited to the JSAs and therefore does not entail the full extent of all Green Belts.

1.3 Documents

- 1.3.1 A list of the documents that have been supplied to us in respect of Green Belt review work undertaken by the JSA's is provided at Appendix 1.

1.4 Site visits and meetings

- 1.4.1 Meetings have been held with the planning officers of all the JSAs' and site visits have been undertaken.

1.5 Structure

- 1.5.1 This report is structured as follows:
- Context
 - Green Belt review method
 - Comparison methodology review
 - Identification of boundary review areas

- **Conclusions**

2. Context

2.1 Introduction

2.1.1 This section of the paper provides a summary of emerging strategy as provided in the First Detailed Proposals reports prepared by individual JSAs.

2.2 Need for Green Belt Review

2.2.1 This review is being carried out in connection with the new Regional Spatial Strategy for the South West. Policy SS4 of RPG 10 requires local authorities, in preparing their development plans to:

- Critically review the Green Belt to examine whether boundary alterations are needed to allow for long term sustainable development needs;
- Remove land from the Green Belt for development if, on balance, this would provide the most sustainable solution for accommodating future development requirements; and
- Include additional land within the Green Belt where clearly necessary for the purposes set out in PPG2

2.2.2 The RPG indicates that there is some evidence that development is leaping to settlements beyond the Green Belt leading to less sustainable patterns of development (paragraph 3.11). The review of the Green Belt is thus to ensure that not only does it serve the functions set out in PPG2 but is to be used as part of the strategic decision making process to enable sustainable forms of growth and expansion.

2.3 First Detailed proposals

2.3.1 The Section 4/4 (strategic planning) authorities, advising on sub-regional policies, and the Joint Study Area Steering Groups prepared statements of their strategies as contributions to the preparation of the RSS. The Section 4/4 statements are referred to as the First Detailed Proposals. The three JSAs with Green Belts submitted their First Detailed Proposals in August and September, 2005. These documents, in connection with technical evidence supplied by the Joint Study Area Steering Groups, help to set the context for the review of the Green Belts and led the Regional Assembly, with the support of GOSW, to require a consistency of approach in the review of the Green Belts.

2.3.2 The broad strategies contained within the First Detailed Proposals documents are summarised below:

Cheltenham / Gloucester Joint Study Area

- Cheltenham / Gloucester First Detailed Proposals (September 2005)
- Cheltenham and Gloucester JSA set out in its vision the objective to maintain the Green Belt, and strengthened its resolve both to protect and expand the Green Belt. The JSA supports the lowest level of housing growth, as identified from RPG 10.
- Urban areas of Cheltenham / Gloucester will be the focus for development
- Employment development focused in Gloucester Docks, Cheltenham Town Centre, together with Dursley, Sharpness Docks, Berkeley (BNFL site), Lydney and Cinderford. There is an acceptance of greenfield development.
- Up to 2016, 55% of the County housing requirement will be focused on the Cheltenham / Gloucester PUA (2,400 dwellings / annum, 2006-2016). The third alteration to the then structure plan (now abandoned) had proposed that 60 percent of the housing requirement should be focused on Cheltenham and Gloucester.
- There will be an increased focus upon the urban areas of Stroud/Stonehouse and Tewkesbury / Ashchurch (outside the Green Belt)
- For the period 2016-2026, it is likely that development at Cheltenham / Gloucester PUA will not be able to continue at the level for the period 2006-2016 without the need for urban extensions which, in most cases, would require a review of the Green Belt boundary. The Section 4/4 authority (Gloucestershire County Council) did not consider a Green Belt review appropriate.

South East Dorset JSA

- South East Dorset JSA acknowledged the relationship between pressures from new development and the conservation and enhancement of the environment.
- Five locations were identified for urban extensions of modest size that would entail development within the Green Belt.
- A total of 30,900 dwellings to be constructed in the wider study area of South East Dorset with over 90% built within existing urban areas between 2006 and 2026.

West of England JSA

- Urban areas of Bristol, Bath and Weston-super-Mare will be the focus for development
-

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- Allocate a further 120 to 180 hectares of industrial land and 190,000 to 250,000 square metres of office floorspace for the period 2006-2026 at the strategic locations which include (inter alia):
 - South Bristol (including Hengrove Park)
 - Avonmouth, Severnside and Royal Portbury
 - Emerson's Green (including the Science Park)
 - Built-up areas north of Bristol and south of the M4 Motorway
 - Bath city centre and Bath Western Riverside (regeneration area)
 - Urban Extensions under consideration that include employment potential:
 - South west of the Bristol Urban Area
 - South east of the Bristol Urban Area
 - North east of the Bristol Urban Area
 - Weston-super-Mare (Town Centre and urban extensions)
 - Provision will be made for a net increase of 92,500 dwellings in the West of England in the period 2006-26, averaging 4,625 dwellings per year. About 60% of new housing will be developed through the continuation of existing policies or planned commitments. This will include continued redevelopment and re-use of urban sites for housing, already planned urban extensions at Harry Stoke and Emerson's Green, implementation of the Weston-super-Mare Area Development Framework (which is under preparation), and smaller developments in rural settlements. The remaining housing will be provided through new urban extensions and limited development elsewhere in the sub region.
 - Five locations for possible extensions into Green Belt are proposed for further consideration:
 - Land adjoining Bristol to the south west
 - Land adjoining Bristol to the south east
 - Emerson's Green, adjoining existing commitments
 - North of Bristol between Harry Stoke and the M32
 - South of Bath
 - Extensions to the Green Belt are proposed for further consideration as follows:
 - North and east of Thornbury;
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- North of Yate / Chipping Sodbury;
 - South west of Nailsea / Backwell; and
 - Between Peasedown St John, Radstock and Midsomer Norton
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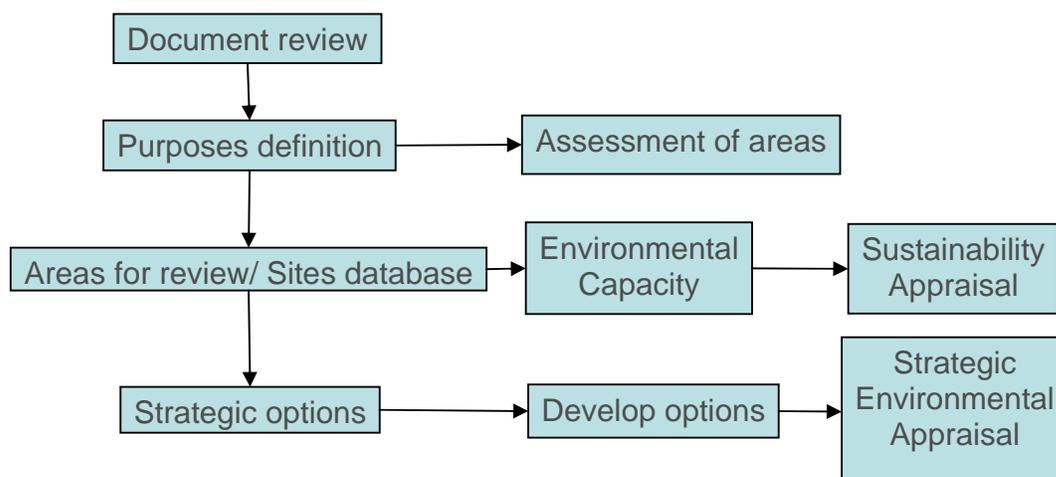
3. Green Belt review method

3.1 Towards a consistent approach

- 3.1.1 This section of the report provides a methodology for undertaking reviews of Green Belts which is based on best practice. The methodology outlined provides a basis for appraising Green Belt review work and for providing a consistent approach to using data available within reviews to provide a sequence for potential review locations, as identified in section 5.
- 3.1.2 The need for consistency of approach to the review of Green Belt is emphasised by GOSW in their letter to SWRA dated 14 November 2005 (copy attached as Appendix 2). There are certain aspects of the methodologies that have been applied by the JSAs which are common, for example, consideration of purpose, consideration of other criteria than those in PPG2 and reference to issues of sustainability. However, there is no common methodology which has been agreed or applied which would take the process of review through to the EiP. We are concerned that in some of the work to date, objectivity in developing and using the analysis has been lost by the arbitrary and apparently inconsistent application of local knowledge (good, excellent or otherwise). It also appears that there has been no rigorous or consistent approach to the identification of areas which might be added to the Green Belt.
- 3.1.3 We have reviewed the Cambridge Green Belt review and the Nottingham – Derby Green Belt reviews as examples of good practice in order to identify essential and desirable components of a Green Belt review. Notably the Cambridge Green Belt review has withstood the rigour of Examination in Public and comprised comprehensive and transparent assessment. It led to significant changes to the Green Belt including land releases for future development. The review is provided in Appendix 3.
- 3.1.4 Our approach is to establish a model which can be applied consistently to all three JSAs using, as far as possible, data already held. Different methodologies can be equally valid and rigorous. Nevertheless, there are four strands of work which need to be undertaken and would, together, form a satisfactory evidence base for the preparation of the RSS which would be able to withstand examination. They are:
- Document review
 - Definition of purpose
 - Establishment of sustainability criteria and search area database
 - Application of criteria to search area database
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3.2 Summary of the Methodology

3.2.1 The overall method, incorporating the strands of work identified above is summarised in the diagram below:



Document Review

3.2.2 Each Green Belt review should contain a document review including national, regional and local policy, assessment of good practice from other reviews, and an assessment of the effectiveness of existing Green Belt policies. In each case the review should include a summary of the original justification for Green Belt designation and of any significant alterations to Green Belt boundaries since designation.

Definition of purpose

3.2.3 The central justification for Green Belt designation comes from the five purposes set out in paragraph 1.5 of PPG 2, as follows

- - to check the unrestricted sprawl of large built-up areas;
- - to prevent neighbouring towns from merging into one another;
- - to assist in safeguarding the countryside from encroachment;
- - to preserve the setting and special character of historic towns; and

- - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.2.4 The starting point for review is to examine each part of the three Green Belts to determine the relative importance of each of the five criteria and identify a ranking of criteria for each Green Belt. This part of the exercise should consider an area wider than the existing Green Belt, so as to be able to determine whether or not the purpose for having Green Belt is justified in areas not currently designated.
- 3.2.5 To be able to make judgements on strength of purpose for Green Belt, a common method for assessing the relative strength of purpose should be employed. This might be done through a scoring system applied to each part of the Green Belts for each purpose, or by establishing sub-criteria against which each of the five purposes might be judged. For example the Cambridge Green Belt review identified the principal purposes of the Green Belt as being protecting historic setting and preventing coalescence with surrounding settlements. Elements of that green belt were considered against these two criteria first and the importance of each area contributing to them assessed. Thus whilst several locations may fulfil both main criteria of Green Belt, the sensitivity of each to accommodate development/be released without comprising those particular purposes will vary.
- 3.2.6 It is important that in this first part of the study, the Green Belts are appraised using only the five criteria from PPG2. The outputs from this part of the study will be an assessment of areas where the purpose of the Green Belt remains strong, areas where the justification has weakened, and areas where extension of the Green Belt might be justified.

Sustainability criteria and potential area of search database

- 3.2.7 The purpose of the third stage is to establish a search areas database and to establish the sustainability criteria that will be used in evaluating the areas within each Green Belt.
- 3.2.8 Before commencing the work, in order to reduce the scale of the task and to save time, it might be sensible to restrict the overall area of search for potential release to general locations that are likely to be more sustainable e.g. areas adjacent to PUA's and areas along principal transport corridors. This avoids the need to include within the analysis, peripheral parts of the Green Belt which are clearly inappropriate for development. In order for this process to be transparent, rigorous and defensible, clear reasons as to why search areas are being limited will need to be provided, based on robust strategy..
- 3.2.9 **The first step** is to develop what we have called an Environmental Capacity Framework . This is the assembly of information and analysis required to identify potential development locations and their capacity for development. Thus, it will include, for example, information on absolute and partial constraints, landscape character and quality. Absolute constraints are those which prevent or substantially constrain development from occurring, and include designations such as floodplain, Areas of Outstanding Natural Beauty
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and Site of Special Scientific Interest and also include European Habitat Designations.

- 3.2.10 Environmental capacity is the ability of a particular environment to perform, and continue to perform its various natural functions. The environmental capacity framework incorporating aspects of quality of life capital as advocated by the Countryside Agency, English Heritage, English Nature and the Environment Agency, will determine the capacity of the area to accommodate change. The sensitivity of a landscape and its capacity to accommodate development is dependant upon its landscape character as well as the values attributed to that landscape by society. The process of identifying environmental capacity allows informed environmentally sensitive decisions to be made. It is a measure of a landscapes ability to accommodate change or intervention without suffering unacceptable effects to its character and values.
- 3.2.11 The assessment of landscape character is pertinent to the review of Green Belts. This is because rural and Green Belt areas, if not carefully managed, will experience significant impact as a result of future growth. It is therefore important to understand the sensitivity of these areas to change, so that growth that takes place outside the larger urban centres can be directed to locations which are least sensitive to change and contribute towards achieving a sustainable pattern of development.
- 3.2.12 Before land is considered for removal from the Green Belt, it should have been subject to an analysis of suitability for development which includes landscape assessment. This method has been recommended within the CPRE Report 'Lie of the Land' (June 2003) as the most holistic approach to assessing the impact of development on the countryside and rural areas, since it considers the whole of the countryside rather than just specific parts that are protected by planning designations such as AONBs, SSSIs and nature reserves.
- 3.2.13 This baseline assessment analysing landscape character helps to define the sensitivity of landscapes to change. This will form an initial picture of potential areas for growth.
- 3.2.14 **The second step** establishes the sustainability criteria that need to be agreed between the three JSAs and applied consistently in all three areas in order to rank the search areas for development. The criteria should reflect the Government's sustainability objectives and those contained within the draft RSS. This process enables areas to be considered for release from Green Belt on the basis of sustainability. Using consistent criteria across all Green Belts means that selection of areas for boundary review occurs on the same basis, which is necessary for purposes of preparing RSS. However, care must be taken to ensure that areas for potential release / and subsequent allocation for development occurs on a competitive like for like basis between Green Belt areas.
- 3.2.15 **The third step** is to assemble a database of search areas within each Green Belt, bringing together both the outputs from the application of the Environmental Capacity Framework and the analysis of purpose. At this stage initial judgements can be made where areas identified as being potentially
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suitable for development conflict with areas with a strong justification for inclusion in the Green Belt. All areas should then be subjected to sustainability testing.

Application of the criteria and recommendations

- 3.2.16 The final stage of the process is to apply the sustainability criteria to the areas of search, and from this analysis to define areas which can then be introduced to the development of the spatial strategy for each JSA. This pool of potential locations for development would be drawn upon in the identification of the strategic options, which also has to reflect the estimates of demand. Agreement would also be needed on the time horizon for the review. PPG2 requires that Green Belt review looks beyond the timescale of the development plan.

4. Comparative methodology review

4.1 Introduction

- 4.1.1 A comparative review of the methodologies used in the studies has been undertaken using information provided by each of the JSAs. Documents that have been made available to this study are listed in Appendix 1 along with a summary of their scope. An analysis of data that has been used to undertake the Green Belt Reviews is also contained at Appendix 1. Findings from this summary are provided below.

4.2 Timing

- 4.2.1 **The Cheltenham and Gloucester JSA** undertook their Green Belt review work to support the 'Shaping the Future of Cheltenham and Gloucester to 2026' document prior to January 2005. The review document was prepared by the Steering Group comprising members of the County Council and District Councils, Gloucestershire First, Gloucestershire Strategic Partnership and the CPRE. Work commenced in 2004. The proposed methodology is contained in this paper.
- 4.2.2 **The South East Dorset JSA** undertook their Green Belt review work as part of a detailed examination of future growth prospects and options and as such included detailed examination of potential for development of previously developed land, identification of sustainable planned extensions to the urban core of the JSA and other main settlements and a review of the Green Belt. This documentation was prepared after the 'Look to the Future: South East Dorset in 2026' document and was prepared by Bournemouth, Dorset, Poole, Christchurch, East Dorset and West Dorset Councils.
- 4.2.3 **The West of England JSA** have taken the first steps of their Green Belt review but are awaiting the outcome of this study before taking the review further. They have reviewed purpose and identified potential areas for development, drawing on joint work on sustainability appraisal and Green Belt review and by individual authorities and this was taken forward in the First Detailed Proposals. A committee paper was prepared in October 2005 and outlined the key issues that would need to be appraised as part of the review work. The committee paper was prepared by Bath & North East Somerset, Bristol, North Somerset and South Gloucestershire Councils drawing on work undertaken by the JSA as a whole.
- 4.2.4 In summary all JSAs, apart from the West of England, undertook their Green Belt reviews prior to the publication of their consultation document on the long term options for each JSA area.
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4.3 Purposes of the Green Belt

- 4.3.1 The five purposes of Green Belt designation (outlined in PPG2) provide the starting point for all three reviews and are considered to be the key influences that need to be appraised. However, the ways in which they have been considered vary between the three areas.
- 4.3.2 **The Cheltenham and Gloucester JSA** first considered the applicability of the five purposes to the C&G Green Belt and then undertook a number of visits to areas within the Green Belt and to strategic viewing locations of the Green Belt. The issue of landscape character was included in the analysis of purpose, allowing for ridge lines and general topography. The JSA drew conclusions as to the applicability of the five purposes to parts of the Green Belt on an area by area basis, but limited to locations around the urban area and avoiding Areas of Outstanding Natural Beauty and the Flood Plain. The review scores each area according to purpose but provides no explanation as to how those conclusions are reached. The results of this exercise are summarised in Appendix 4.
- 4.3.3 The principal aims of the Cheltenham and Gloucester Green Belt is to protect Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve from merging and to define a limit to urban sprawl. In this connection the JSA has been able to identify a strategic area which, if lost, would fundamentally undermine the purpose of the Green Belt in respect of preventing Cheltenham coalescing with Gloucester. No such similar conclusion is available in respect of Cheltenham and Bishop's Cleeve. No plan is available showing the conclusions from this strategic assessment. There is concern that such a plan could be read as indicating areas where Green Belt areas contribute less to this purpose of the Green Belt and imply that such areas are suitable for development.
- 4.3.4 Protecting historic towns and regeneration purposes are identified as subsidiary purposes to the C&G Green Belt.
- 4.3.5 **The South East Dorset JSA** applied a wide range of criteria in addition to the five purposes, at a relatively fine scale, to assess the performance of the Green Belt. The purposes of 'sprawl' and 'merging' appear to have been combined and therefore not categorically assessed upon their own merits. Regeneration purposes are also not clearly appraised.
- 4.3.6 The principal aim of the South East Dorset Green Belt is understood to relate to the protection of settlements within the area from merging and to safeguard the countryside from encroachment. The historic setting of towns was also clearly identified. An extract from the Green Belt review report is attached as Appendix 5.
- 4.3.7 **The West of England JSA** have commenced their review based upon the five purposes of Green Belt. An initial assessment of the extent to which areas contribute more rather than less to Green Belt purposes has been undertaken by the JSA and has been shown diagrammatically, although it was emphasised that this is not a definitive view. We have interpreted this assessment onto our plans and this map is provided as Appendix 6.
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- 4.3.8 The aims of the West of England Green Belt are provided within the First Detailed Proposals with emphasis on protecting settlements within the area from merging by maintaining the physical separation and distinct identities of the Bristol urban area, Bath and other areas in the sub-region. The historic setting of towns, especially around Bath, and regeneration purposes are also justifications for the Green Belt.
- 4.3.9 Overall, all purposes of Green Belt by area, derived from the above reviews are listed at Appendix 7.

Additional criteria

- 4.3.10 In terms of justifying modifications to the Green Belt, only the five criteria set out in PPG2 are directly relevant. However, in determining the most appropriate areas for new development and the scale of review, other criteria must be considered. In this next section we review the ways in which these other criteria were identified and have been used in reviews.

4.4 Absolute and partial constraints

- 4.4.1 **The Cheltenham and Gloucester JSA** considered the following environmental constraints within a separate technical report:

- Floodplain
- Areas of Outstanding Natural Beauty
- Waste sites;
- Sites of Special Scientific Importance;
- Important local ridge lines; and,
- Critical landscape wedges.

- 4.4.2 These constraints were overlaid on the Green Belt but there is no indication as to how the two parts of the exercise were brought together to justify non-review of Green Belt in the areas covered by these constraints.

- 4.4.3 **The South East Dorset JSA** identifies constraints for the purposes of assessing potential development areas. In addition the Green Belt review has considered:

- Tranquil Areas (identified by the Countryside Agency and CPRE);
 - Light pollution (identified by the CPRE, 2000)
 - Conservation Areas and Listed Buildings;
-

- Country Parks;
- Forestry Commission land;
- Special Areas for Conservation (SACs); and,
- Special Protection Areas (SPAs).

4.4.4 These factors were included in the assessment of the Green Belt purposes that areas encompass. Whilst the matters considered appear relevant and can underpin the review of Green Belt, they need to be carefully justified using the original purposes of the Green Belt designation. Without this justification the manner in which they contribute towards or are part of purpose is unclear and so the weight and importance of each is not able to be understood.

4.4.5 **The West of England JSA** noted in their Green Belt review that substantial areas are protected from development by policies other than Green Belt, in particular national or international environmental designations such as AONBs or major areas of floodplain. The review of these otherwise protected areas was nevertheless undertaken.

4.4.6 In summary, the JSAs have approached the use of absolute and partial constraints in different ways, not always linked to the conclusions or recommendations on areas for potential review.

4.5 Landscape Character Assessment

4.5.1 It is not clear how the JSAs have used landscape character studies to identify the capacity of Green Belt land to accommodate development.

4.5.2 **The Cheltenham and Gloucester JSA** have identified key landscape features to provide a backcloth to views across the Severn Vale that are fundamental to the appreciation of the openness of countryside and form important functions in respect of coalition/merging. Development in these areas would result in the appearance of urban sprawl. A landscape character assessment study is being completed and will be published shortly.

4.5.3 **The South East Dorset JSA** considered nature conservation and landscape related factors as part of their review. This was undertaken to identify prominent hill slopes, defining views and landmark features within the Green Belt. These features were identified on illustrative maps. Therefore, elements of landscape character were assessed as part of the review work.

4.5.4 **The West of England JSA** have not considered landscape quality assessments as part of their work to date, although it is understood that some districts have carried out landscape character / quality assessment. It is not clear how these individual assessments have been used in the Green Belt review.

4.5.5 In summary, as with absolute and partial constraints, there is a broad variation in how landscape character has been applied in the reviews.

4.6 Sustainability

- 4.6.1 **The Cheltenham and Gloucester JSA** have undertaken a sustainability appraisal of potential strategic growth locations in order to identify strategic locations for growth. Development within the central area of the Green Belt may have sustainability advantages (in transport terms at least) in comparison to other potential locations.
- 4.6.2 **The South East Dorset JSA** considered access to the countryside and recreation issues as part of the Green Belt review. Wider sustainability issues do not appear to have been fully considered as part of the review process.
- 4.6.3 **The West of England JSA** include sustainability criteria within the First Detailed Proposals Report (August 2005), in that a sustainability appraisal of potential development options is undertaken. The Review of the Green Belt (October 2005) report includes a sustainability assessment of the objectives of Green Belt and also makes reference to certain key locations being preferred for reasons of their sustainability. However, there is no comparative evidence to explain why locations have been selected ahead of others in sustainability or other terms.
- 4.6.4 In summary, as part of a procedure based approach, sustainability needs to be considered as a key stage within the review process. Sustainability appraisal needs to be identified as part of the methodology for selecting areas for development (and thus for release from the Green Belt).

4.7 Locations for potential review/release

- 4.7.1 **The Cheltenham and Gloucester JSA** considered 13 locations around Cheltenham and Gloucester in terms of how they performed against the five purposes of Green Belt. The five purposes were then scored for each location (see scoring section below). The review identified potential scope for the removal of Green Belt north of Gloucester and north-west of Cheltenham. There were also areas suggested to be added to the Green Belt including east of Cheltenham and Gloucester; west of Gloucester; south of Gloucester; and north of Bishop's Cleeve. Our interpretation is provided in Appendix 4.
- 4.7.2 **The South East Dorset JSA** provide conclusions as to which parts of the Green Belt could be released without compromising the purposes of the Green Belt. The impacts of releasing these areas are specified. Maps delineating these areas as drawn by the JSA are reproduced as Appendix 5. The extent of areas that could not be released and those areas less sensitive to release need to be more clearly defined.
- 4.7.3 **The West of England JSA** proposed five locations for possible urban extensions within the Green Belt, subject to further consideration. These areas were first identified in the First Detailed Proposals report. They include land adjoining Bristol to the south west; south east; Emerson's Green; north of Bristol between Harry Stoke and the M32; and south of Bath. These locations for possible urban extensions appear to conflict with the analysis of the Green

Belt by purpose in that locations which would appear to cause more harm than other alternatives have been selected. We are advised that they are justified by a broad judgement of sustainability but have seen no evidence of any rigorous analysis. The JSA proposes general areas for consideration as Green Belt extensions to the north and east of Thornbury; north of Yate / Chipping Sodbury; south west of Nailsea / Backwell; and between Peasedown St John, Radstock and Midsomer Norton.

4.8 Scoring

- 4.8.1 **The Cheltenham and Gloucester JSA** aimed to differentiate the importance of protecting different areas of countryside by assigning different weights or scores to the areas. The officers undertook site visits to key areas within the Green Belt and these were then scored against the five purposes. A “0” implied little or no importance, a “1” implied some importance, and “2” implied high importance. These results are provided in Appendix 4.
- 4.8.2 **The South East Dorset JSA** provide comprehensive assessments of impacts of releasing areas of land, but only in respect of environmental and other sustainability objectives.
- 4.8.3 **The West of England JSA** have indicated areas which contribute more rather than less to Green Belt purposes. No objective scoring and weighting was used.

4.9 Summary and conclusions on review of methodology

- 4.9.1 Our interpretation of the documentation provided is that the three JSA's have considered their Green Belts in terms of the purposes provided within PPG2.
- 4.9.2 The Green Belt reviews that have been undertaken and the data used vary. Notably, the South East Dorset review has benefited from a detailed understanding of housing and employment land targets and a detailed site search (which ignored the Green Belt) and selection process based on sustainability criteria. The result of this assessment was the subject of a separate Green Belt review assessment which had only considered potential urban extensions. Cheltenham and Gloucester undertook a similar process and sequence of studies, but provide a clearer and simpler expression of site selection. This can be used to select next best sites (in terms of impact). The West of England review in contrast, does not explain how sites for potential release from the Green Belt have been selected ahead of alternatives.
- 4.9.3 The scoring system associated with the Cheltenham and Gloucester JSA work provides a methodical and sound approach in respect of the review of area by Green Belt purpose, although more explanation is required. This approach enables clear evaluation of identified areas of each Green Belt and will provide a consistent and rational basis for review across the three areas.

- 4.9.4 Within the three reviews, the methodologies employed do not provide a transparent and clear analysis of Green Belt by purpose and thereby provide a link between potential for change (within the Green Belt) and capacity and demand. Reviews must be objective. The identification of Green Belt by purpose and merits of purpose will provide the basis for developers to submit planning applications to test Green Belt policy. It must be made clear in any review documentation, that all Green Belt serves an important purpose which, irrespective of any strengthening or weakening, does not mean that its purpose ceases to be valid. Instead, the purpose of the exercise is to establish if a release is possible and what harm to the Green Belt would be caused by such a release.
- 4.9.5 The emphasis of reviews has been on the potential release of areas for development and there needs to be a consistent approach to considering areas for addition to the Green Belt. To date this appears to have been done on a somewhat arbitrary basis.
- 4.9.6 We provide a broad methodology as to how a Green Belt Review should be undertaken in section 3. Below, based on information that we have received, we identify broad areas where improvements to existing reviews are needed.

Document Review

- 4.9.7 None of the available Green Belt reviews provide a comprehensive document review that succinctly sets out national and regional policy, considers best practice or outlines the original purpose of the Green Belt or reviews effectiveness of the Green Belt.
- 4.9.8 Whilst not expressed in any single document, it is possible to develop such a section from available data. Anecdotal information indicates that Green Belts are effective. This will need to be verified with each JSA.

Environmental Capacity

- 4.9.9 **West of England** have considered landscape character but have not published or made available their work on environmental capacity. The rationale for selecting the five areas (and the alternatives considered) needs to be provided.
- 4.9.10 **South East Dorset** have undertaken a much more rigorous assessment identifying parts of the Green Belt by purpose and providing supporting maps by purpose. Prior to this a separate exercise of site search (for development areas) has been undertaken which has then been subjected to a variety of tests, which included sustainability issues/objectives. Purposes of Green Belt have been overlain on the site search process to identify areas that could be developed. This process means that strategic choices are able to be made, taking into account purpose of Green Belt and other relevant strategic implications of growth.

- 4.9.11 **Cheltenham and Gloucester** have provided a landscape structure map and also a map of environmental constraints. Documentation does not provide clear advice as to how these relate to Green Belt purpose or whether they have been used to help define sensitivity of areas to change. The use of environmental constraints has assisted in identifying what areas are to be considered for future development, for example, there is no point in identifying land within the flood plain.

Sustainability

- 4.9.12 References are made to sustainable locations for urban growth, but there is no evidence within documentation provided by West of England that there has been any analysis to support the view that these areas are more or less sustainable than other alternatives.
- 4.9.13 Cheltenham and Gloucester have undertaken a sustainability appraisal of strategic options for growth.
- 4.9.14 Documentation supplied by South East Dorset does provide detailed analysis of growth options and different strategies which incorporate sustainability principles. Sustainability appraisal of spatial options / vision was undertaken.

Green Belt purpose, assessment and delineation of sites/areas

- 4.9.15 Whilst not expressed in any single document it is possible to ascertain the main strategic purposes of individual Green Belts. That is to say, it is possible to identify the reasons why Green Belts were originally designated and also to identify where new reasons have materialised.
- 4.9.16 The West of England Green Belt review does consider the original reasons for Green Belt designation. An explanation of why areas delineated as contributing more than less to Green Belt purposes is needed from West of England. No weight has been attributed to particular purposes of Green Belt. The process of selecting areas (ahead of alternatives) is not transparent and thus, the purpose of the analysis undertaken is not apparent.
- 4.9.17 For Cheltenham and Gloucester a detailed explanation as to why particular purposes are attributed to areas /parts of the Green Belt including sensitivity to change needs to be provided. Cheltenham and Gloucester need to examine our interpretation of delineation (Appendix 4) and clarify extent of zones and provide details as to rationale for site area selection (locations were selected on the basis of examining the purposes of the Green Belt, taking into account the constraints, sustainability criteria, transport modelling and economic data). From available information, there appear to be areas of the Green Belt that have not been assessed or considered for release. Parts of these can be explained by environmental constraints, where it is considered that development could not occur in any event, which is reasonable.

4.9.18 South East Dorset provide maps/diagrams that illustrate individually and cumulatively Green Belt purposes. These are clearly explained and described. No weighting of importance of purpose is provided, nor assessment of the sensitivity or contribution of particular areas of Green Belt to that purpose.

5. Identification of boundary area reviews

5.1 Introduction

- 5.1.1 The previous sections of the report provide our understanding of reviews undertaken by the JSA's and the data that has underpinned them. This section of the report summarises data on Green Belt purpose and areas identified within individual Green Belts where boundaries could be reviewed.
- 5.1.2 It is important to recognise that maps / figures provided within this report provide our current understanding of purposes of parts of Green Belt derived from available information. Although not all areas within the Green Belt are annotated (notably in South East Dorset) this does not mean that those areas do not fulfil any Green Belt function or that the loss of all or parts of these areas would be acceptable. Reviews and identification of potential areas for release have concentrated on areas where urban extensions/development could logically occur.
- 5.1.3 It is the full extent of the Green Belt area that is important because it is in this form that it fulfils the purpose of its conception. The reviews undertaken by the JSAs are not comprehensive in that they have not reviewed the principle for the establishment of the Green Belt in the first place, but have provided advice on potential release areas. The plans produced in this Report must not, and cannot be construed as identifying areas that do not fulfil Green Belt function; rather they are an examination of areas where land might be considered for release to accommodate an urban extension given an indication of the potential harm that might arise as a consequence of that release.

5.2 Approach

- 5.2.1 In order to understand results from the Green Belt reviews undertaken and to identify potential areas for release/expansion of boundary, the following sequence was followed:
1. Absolute constraints which prevent or significantly constrain development from occurring restrict the areas of search within the Green Belt. These included European Habitat Designations. A consistent set of constraints have been applied to all three areas, as follows:
 - Floodplain
 - Area of Outstanding Natural Beauty
 - National Park (including proposed extension areas)
 - Ancient woodland
 - RAMSAR
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Special Protection Area

Site of Special Scientific Interest

National Nature Reserve

Special Area of Conservation

2. Using available information from reviews, following site visits and discussions with officers of relevant JSAs, purpose has been attributed to areas of the Green Belt. These areas are generally contiguous with settlements (as information has mostly been collected in respect of potential urban extension areas), and avoid absolute constraints listed above (in most instances).

5.2.2 Results of the above are mapped and provided at Appendix 8.

3. Identification of areas where Green Belt boundaries are proposed by JSAs to be released and where boundaries are proposed to be expanded. For Cheltenham and Gloucester locations where harm caused to Green Belt appears to be least, based on available information and following discussions with officers of the JSA, have been estimated. These potential locations are provided at Appendix 9. With regards Cheltenham and Gloucester, the JSA review work only provides for two potential extension locations, to the north of Gloucester and north-west of Cheltenham.
4. All potential boundary review sites are assessed given available information on Green Belt purpose in a table, firstly identifying the amount of purposes fulfilled by each, and, secondly, by weighting the main purposes of Green Belt ahead of other purposes (which is based on the reasons why Green Belt was originally established). Results of these analyses are provided at Appendix 10.

5.3 Ranking of harm

5.3.1 Ranking of harm caused to Green Belt, described in paragraph 5.2.2 above, is based on the number of purposes that areas of Green Belt fulfil. It does not consider the sensitivity of areas to change, as in this connection further work needs to be undertaken. This is important because areas of Green Belt might only fulfil a single purpose and yet have no capacity to accommodate development, that is without undermining the very purpose of the Green Belt itself. Furthermore, some locations that fulfil more or the same number of purposes as other areas, may have capacity to accommodate development without undue harm being caused to Green Belt as compared to other apparently similar, less or more sensitive areas.

5.3.2 Nevertheless, weighting the purposes for the Green Belts so as to achieve a cumulative ranking does provide a rationale basis for identifying areas where boundaries might be reviewed. However, this analysis should be considered in combination with the consideration of landscape character and environmental

capacity to absorb development (see section 4.5 and paragraph 3.2.7 to 3.2.12).

5.3.3 The results of the ranking analysis are provided graphically in Appendix 11. Whilst it is not anticipated that results will match the advice provided by the JSAs exactly, because the JSAs have taken into consideration sustainability criteria and environmental capacity (albeit it seems to be on an arbitrary basis (see section 4.5)), we comment as follows:

- **Cheltenham and Gloucester** – areas identified as causing least harm to Green Belt (should sites be released) match those identified within the Green Belt review work undertaken by the JSAs. Their review work provides for two potential extension locations, to the north of Gloucester and north west of Cheltenham.
- **West of England** – areas identified as causing least harm do not match those identified by the JSAs. The manner in which potential sites for release /review have been identified need to be carefully explained given ranking results as two areas that are identified as most sensitive to change are proposed to be potentially reviewed and locations which are less or least sensitive are not all used. It is assumed that locations in the open countryside could not be used, as development of a new settlement is not appropriate, albeit that it would be helpful if such an explanation was provided.
- **South East Dorset** – areas identified for release largely match ranking, and differences can be explained by examining the absolute constraints maps (see Technical Report Development Options, prepared by the JSA) and from examination of assessments of individual sites.

5.3.4 In respect of airports and ports, from examination of purpose provided and information available from JSAs:

- **Gloucester Airport** – located in most sensitive part of the Green Belt so that release will need detailed assessment of landscape capacity but is likely to cause substantial harm.
- **Bristol Airport** – ranked second least harm caused to Green Belt, indicating that some potential for Green Belt to be reviewed. Landscape capacity assessment will need to be undertaken to establish scope and scale of release that can be achieved. An extract from the Inspectors Report in respect of the examination of the North Somerset Replacement Local Plan was published in advance of the main report which is due out in March 2006. The Inspector's report is not binding. The extract handles the future of the Airport and advises that the northern side of the operational area of the airport be released from the Green Belt. The report states that should additional development be required located outside of the released area then very special circumstances would need to be demonstrated that clearly outweigh the harm to the Green Belt and any other harm.
- **Bristol Port** – located outside of the Green Belt. It is understood that the proximity of Portishead to the Port and Gordano means that any extension of

Port could lead to narrowing of the gap between adjacent settlements. The impact of the Port proposals may mean that the gap between settlements becomes critical so that the case for extending the Green Belt into this location would need to be considered. The Somerset County Development Plan First Review (1972) indicates that this area was not included within the original Green Belt because of its potential for dock development. However, the area between Portishead and Royal Portbury Dock is proposed for inclusion in Green Belt within the draft Joint Replacement Structure Plan (2002) and draft North Somerset Local Plan. The Inspector's Interim Report (January 2006) recommends that the Green Belt extension between the Docks and Portishead be confirmed and that the area between the Docks and M5 be removed from the Green Belt and safeguarded for port uses as well as an area of search for a park & ride / station facility.

- **Bournemouth Airport** – not specifically reviewed by the JSA although land adjoining nearby settlements is identified and considered as being likely to cause third least harm and fifth least harm. This seems to indicate that land surrounding the airport is sensitive to change.

5.4 Conclusions

- 5.4.1 This section provides a comparative analysis of Green Belt by purpose and of the harm that would be caused to Green Belt should land be released. Ranking of harm demonstrates that analysis undertaken by Cheltenham and Gloucester and South East Dorset JSAs is explainable but only by using background material and reports. However, proposed areas for review / release within West of England are not.
- 5.4.2 Landscape capacity analysis within all areas is not documented, although in many instances officers of JSAs have clearly considered the landscape and its ability to absorb development. This needs to be rectified.

6. Conclusions

- 6.1.1 Across all three green belts there are a limited numbers of locations where urban expansion could be achieved without significantly and adversely affecting the purpose of the Green Belts.
 - 6.1.2 All three Joint Study teams have analysed their Green Belt by purpose. On its own this analysis is an insufficient basis on which to identify potential locations for development. This is recognised in all three areas. Fundamentally, an assessment of the Green Belt based on an understanding of their original purposes has not been undertaken in all cases. There is an understanding of the need to assess development potential / capacity taking into account absolute / partial constraints / landscape character and quality as well as sustainability issues. Two of the Joint Study teams have applied this approach (but in different ways). The third, West of England, recognises the need to adopt this approach but has not yet applied it.
 - 6.1.3 A key issue in the review of the Green Belts is the selection of general areas of search. In order to demonstrate objectivity there is a need to adopt a standard approach to the areas which are to be the subject of detailed analysis of development potential. West of England, in particular, has identified five potential areas of release (in effect, search areas) without providing a clear method or rationale as to why areas have been selected ahead of alternatives. Any method used needs to be able to withstand examination and so there must be a rigour and commonality of approach in the selection of areas of search that can be defended.
 - 6.1.4 There is a need for more careful analysis of the areas of search in order to assess capacity in relation to quality of landscape and general issues of sustainability. We have identified a lack of transparency in the ways in which landscape character assessments have been used to identify the potential locations for development and then the capacity of sites to accommodate development. Whilst officers clearly are very knowledgeable about their areas and do appreciate the landscape and its character, there is a lack of clarity in the ways this understanding is brought together with the analysis of Green Belt purpose.
 - 6.1.5 With regards to the time horizon of the Green Belt reviews undertaken, because selection of areas of search has been limited to examination of potential peripheral expansions (of urban areas), the reviews of Green Belt undertaken will probably not be able to provide for the period beyond the time horizon of the emerging RSS. For the reviews to have endured for longer, all potential development options would need to have been considered, including more radical, and possibly, more sustainable strategic options. This is particularly important in looking at longer term strategy, beyond the time horizon of the current round of development planning.
 - 6.1.6 These conclusions lead us to recommend a methodology which involves identification of potential development capacities and then drawing upon that pool of development capacities to develop and evaluate alternative strategies.
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6.2 Next Steps / further work

- 6.2.1 The methodological sequence in Chapter 5 provides a rational and comparative basis for green belt review, and draws largely on information and analysis already held by the Joint Study teams. The significant gap is the lack of a common basis for assessing landscape quality and capacity for development. Additional work to fill this gap would need to be undertaken.
- 6.2.2 Impartial and common landscape character assessment of the Green Belts to ascertain capacity of all potential expansion locations to absorb development would benefit the preparation of the RSS and provide a rigorous basis for defending proposed changes to the Green Belts at the forthcoming public examination.
- 6.2.3 In summary the following areas of work need to be undertaken:

OVERVIEW OF ADDITIONAL WORK REQUIRED

Work	Gap / Additional work areas
Document Review	Information exists but not provided in single location
Definition of purpose	Relative importance of each Green Belt purpose not defined. Judgement possible based on policy documents.
Establishment of sustainability criteria and search area database	Environmental capacity assessments of areas of Green Belt need to be undertaken.
Application of criteria to search areas database	Where information exists an overall comparative table of development options based on sustainability considerations should be assembled. Where this information is lacking steps should be taken to obtain it