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The selection of greenfield development areas

West of England Perspective

1. It is recognised by the West of England that additional strategic greenfield development areas beyond current settlement boundaries will need to be delivered in order to meet the housing required in the period up to 2026.

2. The overriding objective is to promote new strategic greenfield sites that support and contribute to realising the achievement of the West of England’s sub-regional vision and spatial objectives. It should not be considered simply as a housing delivery exercise. The options put forward must therefore be in accordance with the higher level spatial objectives of the City Region. Alongside this, the objectives of the review of the Green Belt are to ensure that it can continue to perform its fundamental strategic role and purposes in the sub region.

3. In this respect, the spatial strategy in the First Detailed Proposals (FDP), September 2005, developed from the Vision for the West of England, provides the strategic guiding principles to consider new greenfield development areas. Key considerations are the role that new greenfield development locations play in seeking to deliver economic prosperity to the area, promoting urban renaissance, regenerating areas of disadvantage particularly in South Bristol and Weston Super Mare, and promoting and enhancing prospects for sustainable development by delivering a step change in the quality of public transport, traffic management and addressing current infrastructure deficits.

4. The five strategic greenfield development locations in the sub-region, which were identified in the FDP, are included in the RSS. These are:

- Adjoining Bristol to the south west;
- Adjoining Bristol to the south east;
- Adjoining Emersons Green area to the north east of Bristol;
- Immediately to the north of Bristol;
- To the south of Bath.
Has a suitably systematic approach been taken to the identification of strategic green field development areas and in particular:

5. The draft RSS is based on ‘The West of England First Detailed Proposals, September 2005’ (FDP). The approach used for preparing the First Detailed Proposals essentially involved:

- An initial sieve technique approach to exclude areas of high environmental value, sensitivity or risk
- An assessment of the extent to which remaining alternative locations meet the purposes of PPG2
- A broad appraisal of the sustainability characteristics of alternative locations
- A more detailed appraisal of the sustainability of the preferred locational strategy

6. ‘The West of England Second Report, January 2007’ summarises the approach taken and the chronology of work. In addition further work has been undertaken by individual Unitary Authorities assessing the options for urban extensions primarily in the areas of search and assessing development capacities. Bath and North East Somerset Council has prepared the following: Stage 1 Review of Broad Areas of Search for Urban Extensions

- Urban Extension Environmental Capacity Appraisal (appraised south east Bristol and Bath Urban Extension options within draft RSS areas of search);
- Strategic Sustainability Assessment (SSA) of Potential Urban Extensions (assessed options within areas of search for urban extensions to both south east Bristol and Bath);
- Environmental Capacity Appraisal and SSA of urban extension to Bath (assessment of entire periphery of Bath).

In South Gloucestershire a Strategic Assessment of the Green Belt and further Sustainability Appraisal work has been undertaken in order to assess the suitability of the areas proposed for urban extensions to the north and east of Bristol.

7. There does not appear to be any consistency of approach to identifying green field urban extensions throughout the region; in particular, no guidelines on the approach to be used was issued by the Regional Assembly at the start of the process. The Regional Assembly has sought to address this through the recent South West Regional Spatial Strategy Urban Extension Evidence Base Review which has been undertaken by Ove Arup and Partners Ltd. The West of England authorities have had sight of on an initial draft of this study and have provided comments on it. It is a superficial study with a limited remit that has not been carried out to the same depth of detail as the work of the Local Authorities. The Partnership wish to reserve the right to provide further commentary to the Regional Assembly and the Panel when the final report is issued.
a) Is the importance of achieving sustainable development sufficiently emphasised?

8. The approach adopted in First Detailed Proposals embraces the principle that maximising urban development opportunities is the most sustainable development option. In the West of England, therefore, as much development as practicable is proposed within existing urban areas. Evidence for this is provided through the urban capacity studies carried out by each unitary authority.

9. The need to reduce both commuting distances and the need to travel has been a primary objective in selecting potential growth locations close to Bristol, Bath and Weston super Mare. The preferred locations for strategic greenfield development in the form of urban extensions have also been considered against sustainability objectives in terms of their environmental impact and economic and social implications. In the case of Bath, for example, the studies referred to above show that the urban extension will cause significant environmental harm to the setting/character of the internationally valued asset of the World Heritage Site of Bath, but, set against this, the SSA work demonstrated the potential economic and social benefits of such an extension.

10. To the south of Bristol the areas proposed for green field urban extensions will support regeneration of South Bristol and in Weston super Mare, and will also play a key role in regenerating and rebalancing adjacent communities within the existing adjoining urban area. They will also help to counterbalance recent large scale growth to the north of Bristol.

11. As the emphasis in the RSS appears to be on green field urban extensions the wider sustainability objective of regeneration appears to have been diluted. The RSS therefore needs to more clearly prioritise urban regeneration. This could be achieved by strengthening Development Policy A to read as follows:

12. ‘The primary focus for development in the South West will be those places which offer the greatest opportunities for employment and the greatest levels of accessibility by means other than the car to cultural, transport, health, education and other services. These SSCT’s identified on Map 3.1 and in Table 3.1 below, will have a regionally important function and potential both to add to regional prosperity and to deliver on regeneration priorities’ (Suggested changes are identified in bold)
b) To what extent should the 5 purposes of including land in Green Belts, set out in paragraph 1.5 of PPG2, contribute to the area selection process?

13. The assessment of how land performs against the purposes of the green belt is one aspect of the area selection process. An assessment of performance against the five purposes of the green belt set out in PPG2 should be taken into account, as well as consideration of the strategic role of Green Belt in the West of England of separating Bristol and Bath. Impact on all of these Green Belt purposes should be weighed alongside other issues such as sustainability, constraints to development, transport implications, deliverability and achieving the spatial vision for the West of England. In the West of England there are conflicts between the achievement of the five PPG2 purposes of green belt policy and its strategic role and meeting sustainability objectives. These conflicts are likely to be difficult to resolve.

14. In the light of the growing imperative to respond to climate change, considerable weight should be afforded to checking urban sprawl, assisting in urban regeneration and recycling urban land to create compact and sustainable urban forms. Giving priority to the purposes which are most closely aligned with meeting sustainability principles, provides a robust basis for selecting areas for strategic green-field development.

15. Green belt purposes therefore need to be given careful consideration, for example through a comparative exercise across the sub-region and through more detailed assessments in each unitary authority, if appropriate. This work was carried out in part by the West of England and reviewed in the Strategic Green Belt Review carried out by Colin Buchanan in February 2006. South Gloucestershire Council has also carried out a detailed assessment of current Green Belt land within its boundaries. These assessments should be considered alongside a range of other factors before reaching conclusions about the selection of areas for potential urban extensions.

c) Does the provision of a strategic 20 year land supply through the draft RSS meet the advice in PPG2 that consideration should be given to safeguarding land to ensure that Green Belt boundaries will not need to be altered at the end of the Plan period?

16. Two issues need to be addressed in the RSS. Firstly, where urban extensions are linked to significant regeneration initiatives, for example at South Bristol, the RSS should set out guidance on a phased release of land from the Green Belt, possibly using a safeguarded land approach. Secondly, where the RSS is proposing amendments to and extensions to the Green Belt (in Policy SR4 first and fourth bullet points) the RSS should not be so prescriptive about the definition of the inner boundary. This is a matter for Unitary and District authorities to consider in their Local Development Documents.