

Bath and North East Somerset Council

Stage 2 Green Belt Assessment

Final Report

Reference: Final Report

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1. Executive Summary

Bath and North East Somerset Council (B&NES) is preparing a new Local Plan under the transitional arrangements associated with the previous plan-making system. The emerging Plan is progressing under the legacy system and will be assessed against the National Planning Policy Framework (NPPF) December 2024. The 2024 NPPF introduced significant changes to national Green Belt policy, including consideration of grey belt and the requirement to consider whether the release of Green Belt land would fundamentally undermine the purpose of the remaining Green Belt. In response, B&NES commissioned a Green Belt Assessment (GBA) to provide an up-to-date evidence base to inform plan preparation and support decisions relating to the future role of Green Belt land within the authority area.

A Green Belt assessment typically comprises two stages. A Stage 1 Strategic Green Belt Assessment was undertaken by the West of England Combined Authority and reviewed the contribution made by parcels of land across the Bristol and Bath Green Belt against the five Green Belt purposes set out in national policy. Building on this work, the B&NES Stage 2 Green Belt Assessment undertook a more granular assessment of proposed site allocations within their administrative area, considering their contribution to Green Belt Purposes.

34 sites were assessed across B&NES, with site boundaries refined where necessary. Sites were identified through the Council's wider Local Plan process, representing locations that are being considered for allocation. Each site was assessed through a combination of GIS analysis and site visits, providing a detailed understanding of character, openness and settlement relationships. Of the sites assessed, 5 sites were found to make a strong overall contribution to Green Belt purposes, 14 sites make a moderate contribution, and 15 sites make a weak contribution.

The assessment identifies a varied pattern of Green Belt performance across the authority area. Sites located on the edge of Bath, within the World Heritage Site and Setting, or within gaps between towns generally make stronger contributions to Green Belt purposes, reflecting their role in containing urban sprawl, maintaining large built-up area/town separation and protecting important landscape settings associated with a historic town.

In response to updated national policy, the study also considers areas of fundamental importance and the application of the NPPF's 'fundamentally undermine' test. While some areas perform an important function at a strategic level, the assessment concludes that sites proposed for release must be considered within the context of the wider Green Belt and do not automatically result in fundamental harm to the remaining Green Belt. No sites are deemed to fundamentally undermined the remaining Green Belt purposes (taken together).

The Green Belt Assessment does not allocate sites, determine Green Belt releases or establish a development strategy. Instead, it provides evidence to inform Local Plan decision making and future policy. Any potential release of Green Belt land will need to be considered alongside wider evidence relating to sustainability, infrastructure, environmental constraints and national policy requirements.

Overall, the assessment provides an updated understanding of Green Belt performance across B&NES, identifies areas of potential grey belt and establishes a consistent approach for considering the implications of future Green Belt release in support of the emerging Local Plan.

2. Introduction

Ove Arup and Partners Limited (Arup) has been appointed by Bath and North East Somerset Council (B&NES) to undertake a Stage 2 Green Belt Assessment (Stage 2 GBA).

The B&NES Green Belt extent covers the local planning authority (LPA) area of B&NES, with the wider Green Belt extending into neighbouring authorities of South Gloucestershire, Wiltshire, Bristol and North Somerset. The scope of the Stage 2 GBA is within the B&NES authority area only.

2.1 Study purpose and context

A GBA forms an important part of the Local Plan evidence base. It helps the LPA determine the manner and degree to which change in the Green Belt could be considered without undermining the purposes for including land in the Green Belt and the degree to which harm to the Green Belt would result if development were to take place. The emerging B&NES Local Plan 2025-2043 is being prepared as a ‘legacy plan’, reflecting the transitional period in national planning reform and the council’s decision to progress plan-making under the existing Local Plan system. It is therefore being prepared within the context of and will be examined against the NPPF as published in December 2024.

This Stage 2 GBA builds on the Strategic Green Belt Assessment (SGBA) Update (2026), which assessed the Bristol and Bath Green Belt at a strategic scale across the five constituent LPAs.

2.2 Role of the Green Belt Assessment

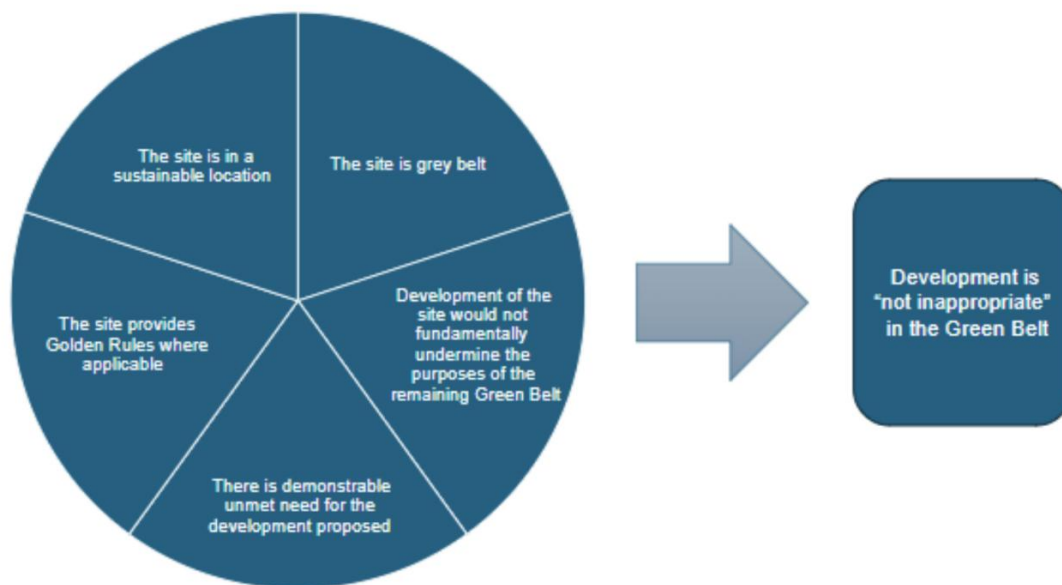
The purpose of a Green Belt Assessment (GBA) is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes as set out in the NPPF (2024). This evidence is used by the Local Planning Authority (LPA) to inform plan-making, including the consideration of spatial strategy options, site allocations and potential alterations to Green Belt boundaries.

The Stage 2 GBA also provisionally identifies grey belt land, a sub-category of Green Belt land introduced following NPPF changes in 2024. While grey belt land is provisionally identified based on whether or not a site scores strongly against purposes (a), (b) or (d) and is not restricted by the application of policies relating to NPPF footnote 7 constraints, it is stressed that this level of identification is high-level and subject to further analysis by the Council on a case-by-case basis to determine whether or not development within the Green Belt is appropriate. The key steps required to identify grey belt are:

- Identify the sites to be assessed
- Evaluate contribution to purposes (a), (b) and (d)
- Consider if any of footnote 7 restrictions apply
- Identify provisional grey belt
- Consider whether the release of Green Belt will fundamentally undermine the five Green Belt purposes taken together

Confirmation of grey belt status will not necessarily equate to land being allocated for development or released from the Green Belt, and the Council will undertake further consideration of wider planning factors, and balance these against one another as part of the plan-making process. This includes determining whether or not development is ‘not inappropriate’ in the Green Belt as outlined in paragraph 155 of the NPPF and a number of further criteria to be considered as outlined in Figure 1-1 below.

Figure 2-1 When development in the Green Belt is 'not inappropriate' (NPPF paragraph 155)



A GBA is not a policy or decision-making document that proposes any release of Green Belt land, as this is for the LPA to determine as part of the wider plan making process. Green Belt is not the only consideration when assessing the suitability and deliverability of sites. LPAs are not precluded from allocating Green Belt sites for development if other factors in favour of the site outweigh this consideration, and an ‘exceptional circumstances’ case can be made. Such factors might include:

- Housing or employment need and a lack of supply of more preferential sites (i.e. those that the NPPF directs towards before considering Green Belt).
- Adverse implications for the sustainable development strategy within the borough/authority area.
- Inherent sustainability of directing growth in a particular direction.
- Tightly drawn Green Belt boundaries and constraints on alternative sites.
- The opportunity to deliver social infrastructure, which would bring about long-term benefits for local residents.
- Boosting housing delivery in areas with past issues of deliverability to increase the supply of affordable housing.

Whilst the outcomes from a GBA will form part of any exceptional circumstances case presented to support Green Belt alterations, the GBA itself does not set out exceptional circumstances arguments, which are necessary if an LPA proposes release of land from the Green Belt. Any future boundary refinements will be undertaken by Council as part of the Local Plan process. In addition, permissions, allocations and strategic decisions made after the assessment fall outside the scope of the report.

2.3 Report structure

This report is structured as follows:

Section 3 presents the history and development of the Bristol and Bath Green Belt and the relevant local planning policy context

- **Section 4** summarises relevant national Green Belt policy and guidance and the key principles arising from recent appeal decisions
- **Section 5** sets out the approach to defining and assessing sites, including their contribution to the five Green Belt purposes, potential harm, boundary considerations and provisional grey belt status

- **Section 6** identified strategically important Green Belt areas and considers how the Stage 2 sites relate to them
- **Section 7** presents the overall findings, including site performance against the Green Belt purposes, provisional green belt identification and boundary considerations
- **Section 8** summarises the assessment conclusions and the implications of the Local Plan process

3. Bath Green Belt context

3.1 Overview of the history of Green Belt policy and the Bristol and Bath Green Belt

3.1.1 The development of National Green Belt policy

Circular 42/55¹, released by the government in 1955, encouraged local authorities to establish their own Green Belts. The 1955 Circular set out three main functions of the Green Belt:

- To check the growth of large built-up areas;
- To prevent neighbouring settlements from merging into one another; and
- To preserve the special character of a town.

Circular 50/57, published in 1957, distinguished between the inner and outer boundaries of Green Belts and established the importance of defined and detailed permanent boundaries.

In 1984, Circular 14/84 was published and introduced two new Green Belt objectives: assisting in urban regeneration and safeguarding the countryside from encroachment. In January 1988, the Government introduced a series of policy statements known as Planning Policy Guidance (PPGs) Notes. PPG2 on Green Belts was first published in 1988 and reiterated the advice contained in previous Green Belt Circulars.

In 2012, the NPPF replaced all previous PPGs and consolidated the Green Belt purposes into a list of five purposes, now in paragraph 143 of the 2024 NPPF. The NPPF also reiterated that the fundamental and overarching aim of the Green Belt was to prevent urban sprawl by keeping land permanently open and that hence the two main characteristics of Green Belt land was its openness and permanence (NPPF 2024, paragraph 142).

3.1.2 History and context of the Bristol and Bath Green Belt

The Bristol and Bath Green Belt was first drafted in the 1950s through the preparation of the Somerset, Gloucestershire, and Wiltshire County Development Plans and was formally designated through their adoption in 1965 and 1966 via Ministerial Approval. The general extent of the Green Belt has been periodically altered since the 1970s through a combination of separate releases including around Bath, Bristol and Keynsham, and extensions such as into the Gordano Valley west of Bristol.

Somerset County Development Plan Report of Survey First Review (1964) and Amendment (1966)

Applying to the North Somerset, south of Bristol and south of Bath area, the 1966 Amendment No. 12 to the Somerset County Council Development Plan, sealed by the Minister of Housing on 6 July 1966, noted that the purpose of the GB was to check any substantial expansion around Bristol and Bath. A written account of Amendment No. 12 to the adopted Somerset County Development Plan (1966) provides the most definitive explanation for the designation and defined boundaries of the Bristol and Bath Green Belt:

“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.”

¹ Ministry of Housing and Local Government (1955). Circular 42/55.

This designation text within the Somerset County Development Plan has guided Green Belt Assessments since. In 2007 B&NES introduced a sixth local Green Belt purpose through their 2007 B&NES Local Plan for maintaining gaps between the ‘chain’ of urban areas – Bristol, Keynsham, Saltford and Bath. This sixth local purpose was re-affirmed in the currently adopted 2014 Core Strategy as follows: *‘to preserve the individual character, identity and setting of Keynsham and the villages and hamlets within the Green Belt’*².

It should be noted that Saltford is considered a village and has been treated as such within this Green Belt Assessment. Whilst the reasons for the green belt set out above include preventing the merging of Saltford with the surrounding towns, current policy set out in PPG explicitly states that villages should not be considered when assessing purposes (a), (b) or (d).

County of Wiltshire Development Plan Amendment (1966)³

The Minister of Housing and Local Government amended the Development Plan for Wiltshire (via Amendment No. 6) by adding Green Belt proposals, County Maps and inset maps in respect of the inner boundary of the Green Belt at Limpley Stoke, Winsley, Bradford-on-Avon and Westwood in the West Wiltshire Green Belt. The Green Belt was defined as approximately 25 square miles of land, and was deemed necessary:

- (a) *“To prevent the coalescence of Bradford-on-Avon and Trowbridge and of Bradford with the outlying villages to the east of Bath.*
- (b) *To limit the spread of development along the trunk road A4 between Batheaston and Corsham; and*
- (c) *To maintain the open character of the land adjacent to Bath City.”*

County of Gloucestershire Development Plan (1965) and First Quinquennial Review (1968)

In the South Gloucestershire and north of Bristol area, the County of Gloucestershire Development Plan First Quinquennial Review (1968) set the original case for the Green Belt, by highlighting two areas considered to be vulnerable to encroachment by urban sprawl from built-up areas. This included the area around Bristol City and its environs, and the area between Cheltenham and Gloucester. It was considered that the reason for the Bristol Green Belt was such that:

‘Any substantial expansion of the built-up area of Bristol and the built-up northern and eastern fringes in Gloucestershire should be checked and it is also considered essential to preserve the open character of the land between the urban areas of Bristol and Bath and to prevent these communities from merging into one another. Land between and adjoining these areas has therefore been defined in the Development Plan as a Green Belt, in which new development will be severely restricted to the uses listed in paragraph (5) [agriculture and forestry, sport, cemeteries, institutions standing in large grounds, or other uses appropriate to rural areas]’.

Avon County Structure Plan (1985)

The Avon County Structure Plan (1985) defined the general extent of the Green Belt at that time with detailed boundaries then to be defined in Local Plans. These included the South West Avon Green Belt Local Plan (adopted in 1988) which set out the justification for the Green Belt boundaries.

Joint Replacement Structure Plan (2002)⁴

The most recent adopted strategic plan to cover the entire plan area was the Joint Replacement Structure Plan 2002 which has now been superseded. The Joint Replacement Structure Plan defined the continued general extent of the Green Belt and showed it on a key diagram. Policy 16 set out its purpose:

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

² B&NES (2014) Core Strategy and Placemaking Plan

³ Town and Country Planning Act (1962). County of Wiltshire Development Plan Amendment No.6 (1966). West Wiltshire Green Belt.

⁴ West of England Joint Replacement Structure Plan (2002).

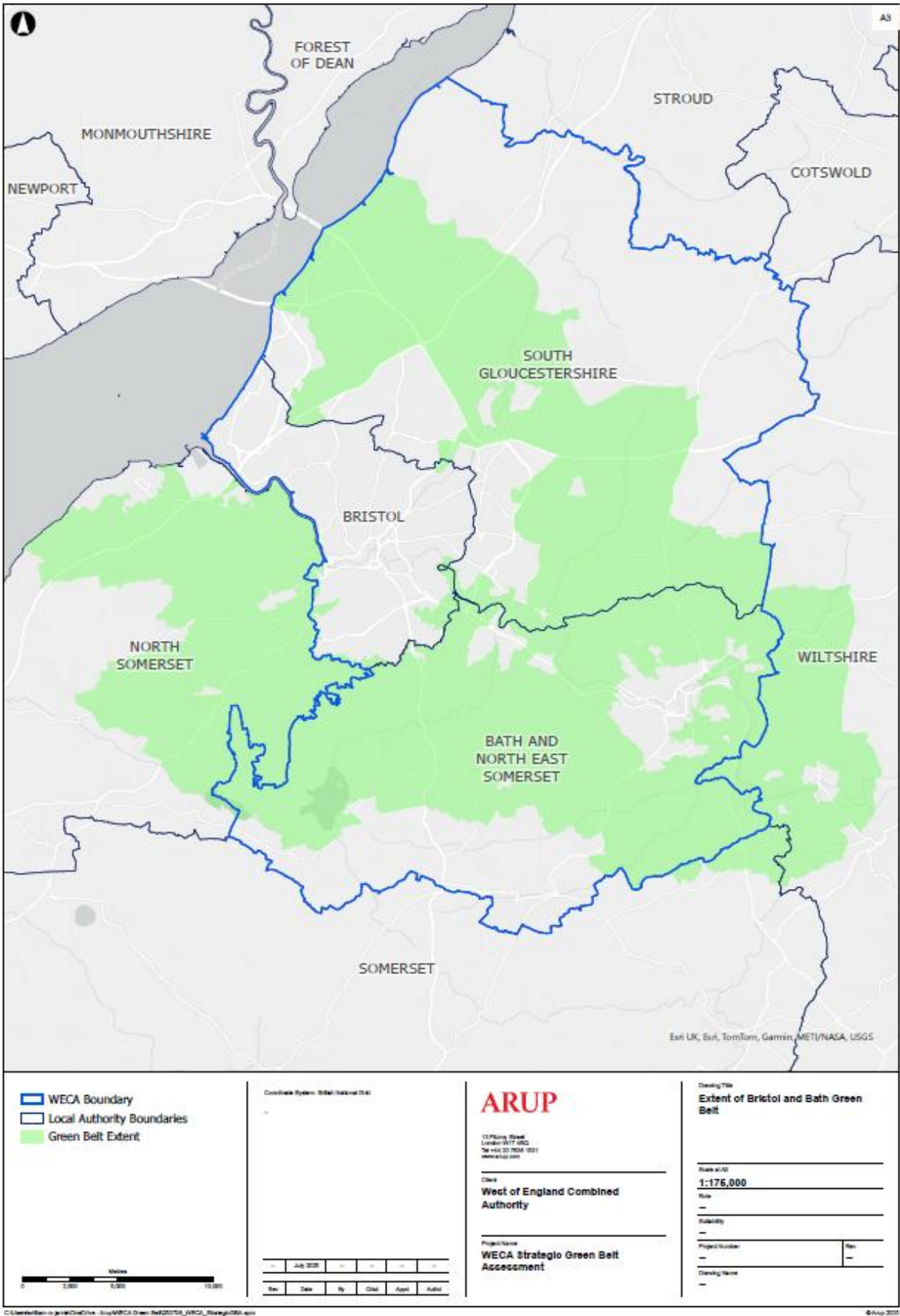
- *check the unrestricted sprawl of the Bristol conurbation and Bath;*
- *assist in safeguarding the surrounding countryside from encroachment;*
- *prevent neighbouring towns merging into one another;*
- *preserve the setting and special character of villages, towns and historic cities; and*
- *assist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

The Bristol and Bath Green Belt today

24,750 hectares of the Bristol and Bath Green Belt falls within B&NES boundaries⁵. The current extent of the entire Bristol and Bath Green Belt is shown in Figure 3-1.

⁵ LUC (2022) WECA Strategic Green Belt Assessment 2022

Figure 3-1 Bristol and Bath Green Belt Extent



3.2 Local Planning Policy Context

3.2.1 Local Planning Policy Context

The current Local Plan for B&NES was adopted in stages, with the Core Strategy adopted in July 2014, and the Placemaking Plan adopted in July 2017. A subsequent Local Plan Partial Update was adopted on 19 January 2022.

The Spatial Strategy set out in the adopted Core Strategy (2014) identifies the following strategic sites on land to be released from the Green Belt:

- Land adjoining Odd Down;
- Land adjoining East Keynsham; through the Local Plan Partial Update, this site now incorporates the allocation of land previously safeguarded for development, and is allocated for housing
- Land adjoining South West Keynsham;
- Land at Whitchurch

The Local Plan Partial Update identified three new sites to be released from the Green Belt. These are Odd Down, Newbridge and Lansdown Park and Ride sites which are allocated as transport interchanges. The Local Plan Partial Update states these sites would be transformed into multi-modal transport interchanges, with the aim to co-locate sustainable transport opportunities to create choice and opportunities for lower emission travel.

B&NES is in the process of updating the Local Plan. Following the publication of the NPPF in December 2024, which fundamentally changed Green Belt policy, and re-introduced mandatory housing targets (and increased the overall national housing target), B&NES commenced a reset of their emerging Local Plan. The increased housing need required reassessment of the Spatial Strategy to understand how best to meet additional housing requirements, including further consideration of sites within the Green Belt.

Prior to the Local Plan reset, an option was tested in the sustainability appraisal for the protection of the Green Belt. However, the December 2024 NPPF states all options, and relevant steps should be considered and taken before a lowering of housing requirement below the standard method is considered. As such, the Local Plan reset includes a Stage 2 Green Belt Assessment which has been undertaken to assess the performance of the Green Belt Boundaries against the five Green Belt Purposes set out in the NPPF and understand the harm removing sites from the Green Belt would have on its performance. In addition, the revised NPPF introduced the concept of Grey Belt defined as land in the Green Belt which is previously developed and/or does not strongly contribute to Purposes (a), (b) or (d). The Stage 2 Green Belt assessment therefore considers whether land could be considered as grey belt to assist in meeting the increased housing need.

As a result of the national policy updates and revised housing need, B&NES undertook further evidence base work and have assessed locations for additional development. Regulation 18 local plan reset Options Consultation took place between 3rd October- 14th November 2025, and the Regulation 19 Draft Local Plan is due to go out for consultation in Autumn 2026.

The emerging B&NES Local Plan 2025-2043 is being prepared as a 'legacy plan', reflecting the transitional period in national planning reform and the council's decision to progress plan-making under the existing Local Plan system. It is therefore being prepared within the context of and will be examined against the NPPF as published in December 2024. As such, references to the 2026 NPPF are included here for information only. While the proposed changes to plan-making policies are not directly relevant to the preparation or examination of this Local Plan, it is recognised that any updated decision-making policies may still constitute material considerations in the determination of planning applications. It is also noted that the revised NPPF is anticipated to be published imminently, and the relevant sections of this report may require updating to reflect any final changes to national policy.

In addition to every LPA having an up-to-date local plan in conformity with the transitional arrangements of the NPPF (2024), there is now a national drive towards universal coverage of strategic spatial plans in England. This was proposed originally through the English Devolution White Paper in December 2024 and taken forward through the chapter two of Part 2 of the Planning and Infrastructure Bill (PIB) which was

enacted on December 18, 2025. As a result of these changes, Strategic Authorities are required to produce Spatial Development Strategies (SDSs) that set the overall pattern and scale of growth. This will require a cross-authority approach to housing targets, infrastructure provision and spatial priorities, with future local plans needing to align with (and be in general conformity with) the SDS. B&NES is within the West of England Combined Authority area and future reviews of the local plan will need to align with the future Spatial Development Strategy (SDS). The evidence base to support the SDS is in the early stages of preparation, with the Stage 1 Green Belt Assessment forming part of this evidence base.

4. National policy, guidance, and appeals

4.1 Overview

This section provides:

- A summary of the relevant national Green Belt policy (NPPF 2024) and guidance (PPG 2025);
- An analysis of how Inspectors have been interpreting the new policy and guidance in recent planning appeal decisions (up to date as of September 2026);
- A summary of where the 2026 NPPF changes Green Belt policy
- Highlights experience in other authorities and insights from Independent Examinations on the topic; and
- The implications of this for the Stage 2 GBA.

4.2 National Planning Policy Framework (2024)

Although there have been some key changes in relation to Green Belt policy since the NPPF was first published in 2012, the majority of the policies in relation to Green Belt and plan making have been retained and remain unchanged before and since the first NPPF. These include:

- The fundamental aim of Green Belt policy to “*prevent urban sprawl by keeping land permanently open*”⁶.
- The five main purposes of Green Belt⁷:
 - 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.*
- The intended permanence of the Green Belt 59F⁸
- Alterations to Green Belt only to be undertaken in exceptional circumstances 60F⁹
- The need to consider sustainable patterns of development 61F¹⁰
- Green Belt boundary definition requirements 62F¹¹
- Considerations as to whether villages should be included or excluded from the Green Belt 63F¹²
- Need for positive planning in the use of Green Belt land 64F¹³.

Notwithstanding the above, the 2024 version of the NPPF included a number of significant changes for both decision taking and plan-making relating to exceptional circumstances, grey belt and sequential release of Green Belt land, these are discussed in turn below.

⁶ National Planning Policy Framework (NPPF) 2024, para 142

⁷ National Planning Policy Framework (NPPF) 2024, para 143

⁸ National Planning Policy Framework (NPPF) 2024, paras 144, 145

⁹ National Planning Policy Framework (NPPF) 2024, para 145

¹⁰ National Planning Policy Framework (NPPF) 2024, para 148

¹¹ National Planning Policy Framework (NPPF) 2024, para 149

¹² National Planning Policy Framework (NPPF) 2024, para 150

¹³ National Planning Policy Framework (NPPF) 2024, para 151

4.2.1 Exceptional circumstances

The 2024 NPPF confirms that exceptional circumstances include but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. It stipulates: *‘If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alternations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan’¹⁴.*

This confirmation in national policy of the requirement to consider Green Belt land to meet housing and other requirements means that in all cases a Green Belt review will be required. It does not mean that in all cases the identified need must be met in the Green Belt or land to be released from the Green Belt. Land can only be released from the Green Belt where it is demonstrated that exceptional circumstances exist. Exceptional circumstances will not exist where altering Green Belt boundaries would *‘fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan’¹⁴.*

4.2.2 Grey belt

The NPPF 2024 introduced a sub-category of Green Belt land called ‘grey belt’. Grey belt is defined as:

‘land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development’¹⁵.

The Planning Practice Guidance makes clear that land which does not strongly contribute to Green Belt purposes (a), (b) or (d) may be identified as grey belt. However, this is subject to the caveat that land should not be regarded as grey belt where the application of policies relating to protected areas or assets referenced in NPPF footnote 7 would provide a strong reason for refusing or restricting development.

Footnote 7 identifies a number of constraints which may preclude land from being considered as grey belt. The PPG provides further guidance on how Footnote 7 should be applied when identifying land as grey belt, including that authorities should consider where areas of grey belt would be covered by or affect other designations in Footnote 7. As the PPG notes, identifying land as grey belt is a key step in a Green Belt Assessment¹⁶.

4.2.3 Sequential release of Green Belt land

NPPF 2024 paragraph 148 introduces a sequential approach to the release of Green Belt land: *“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”* This means that plan making authorities need to identify parcels of grey belt land in order to demonstrate compliance with the sequential test when releasing land from the Green Belt. As the PPG advises¹⁷ when grey belt land is identified it does not automatically follow that it should be allocated for development, released from the Green Belt or development approved in all circumstances.

As in the previous versions of the NPPF, when applying this approach and the release of Green Belt is proposed, consideration still needs to be given to promoting sustainable patterns of development. The NPPF further states that it is necessary to consider whether *‘the site’s location is appropriate with particular*

¹⁴ National Planning Policy Framework (NPPF) 2024, para 146

¹⁵ NPPF (2024) Glossary

¹⁷ ID: 64-001-20250225

reference to paragraphs 110 and 115 of this Framework'¹⁰. Paragraphs 110 and 115 focus on sustainable development locations and sustainable transport solutions.

4.2.4 Golden Rules' for Green Belt release

NPPF paragraph 156 sets out that where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:

- a. *affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b. *necessary improvements to local or national infrastructure; and*
- c. *the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.*

Paragraph 157 stipulates the affordable housing provision relating to 156(a), requiring provision of 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.

Paragraph 159 details the green space improvements required as part of the Golden Rules, including that such improvements should '*contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan*'. In the absence of locally specific standards, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). It further sets out that '*where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.*'

4.3 Planning Practice Guidance (2025)

The below summary focuses on the key updates to the Green Belt PPG of relevance to plan-making.

4.3.1 Grey belt

The guidance makes it clear that the identification of grey belt land does not necessarily mean that the land should be allocated for development or released from the Green Belt. The contribution of the land to the Green Belt purposes needs to be considered alongside wider NPPF policies in making any decisions about Green Belt land.

Green Belt Assessments, and the identification of grey belt, should be part of the plan making process, with the expectation that the identification of grey belt land will allow for the prioritisation of brownfield land detailed in paragraphs 147 and 148 of the NPPF¹⁸.

Assessing Green Belt to identify grey belt land

LPAs should produce a Green Belt Assessment in order to identify grey belt land. When updating or preparing plans, authorities will need to consider whether any existing Green Belt assessment remains up to date.¹⁹

Key steps in a Green Belt Assessment to identify grey belt land²⁰

The key steps of a Green Belt Assessments used to identify grey belt are as follows:

¹⁸ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 001 Reference ID: 64-001-20250225

¹⁹ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 002 Reference ID: 64-002-20250225

²⁰ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 003 Reference ID: 64-003-20250225

- 1) Identify the location and appropriate scale of the area to be assessed;
- 2) Evaluate contribution to purposes (a), (b) and (d);
- 3) Consider if any of the footnote 7 restrictions apply;
- 4) Identify provisional grey belt; and
- 5) Identify if the release or development of the assessment area(s) would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan.

4.3.2 Spatial scope of Green Belt Assessments²¹

The PPG advises that in most cases it will likely be necessary for the Green Belt parcels to be divided into separate assessment areas for the purpose of identifying grey belt. The number and size of assessment areas can be defined at local level and should respond to local circumstances. The whole Green Belt should be considered in the first instance with sufficient granularity (i.e. by dividing it into assessment areas) to enable conclusions to be drawn on the variable contribution of different parts of the Green Belt to the purposes.

It further states that a small number of large assessment areas will not be appropriate in most circumstances and authorities should consider whether there are opportunities to better identify grey belt by further subdividing assessment areas. Finer grained assessment may be appropriate in specific locations, such as around existing settlements or public transport hubs or corridors.

Consideration of wider Green Belt

The guidance sets out that a GBA should also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole. It sets out that to reach this judgement, relevant authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving **all five** of the Green Belt purposes in a ‘meaningful way’²².

4.3.3 Definition of large built-up areas and towns

The definition of towns and large built-up areas for the purpose of assessing purposes (a), (b) and (d) has been clarified. Villages should not be included for the purpose of assessing these purposes. This includes Saltford Village and Whitchurch Village.

4.3.4 Approach to purposes assessment

The PPG provides explicit guidance on how to conduct a GBA to identify provisional grey belt in relation to purposes (a), (b) and (d)²³. It is silent on purposes (c) and (e) as they are not included within the grey belt definition, although an approach has been defined as part of the methodology for this Green Belt assessment.

To check the unrestricted sprawl of large built-up areas (purpose a)

The PPG sets out illustrative factors that should be considered when assessing performance against purpose (a):

- Adjacency to large built-up area(s);
- Extent of existing development in assessment area and impact of other urbanising influences;
- Presence, or otherwise, of physical feature(s) in reasonable proximity that could restrict and contain development; and

²¹ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 004 Reference ID: 64-004-20250225

²² National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph 008 Reference ID: 64-008-20250225

²³ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph: 005 Reference ID: 64-005-20250225

- Shape of development if released, with degree of enclosure and incongruous patterns of development considered.

To prevent neighbouring towns merging into one another (purpose b)

The PPG sets out illustrative factors that should be considered when assessing performance against purpose (b):

- Location of assessment area in relation to defined towns;
- Extent of existing development in assessment area
- Scale to which the assessment area forms part of the gap between towns; and
- Degree to which the development of the assessment area would result in loss of visual separation of towns, including whether there are any physical or natural features that might preserve visual separation.

To preserve the setting and special character of historic towns (purpose d)

The PPG notes that if there are no historic towns, a detailed assessment may not be necessary. It sets out illustrative factors that should be considered when assessing performance against purpose (d):

- Extent of existing development in assessment area.
- Role that the assessment area plays in the setting of the historic town;
- Contribution that the assessment area makes to the special character of the historic town. This should consider physical, visual and experiential links between the assessment area and the historic aspects of the town; and
- Degree of separation of assessment area from the historic aspects of the town by existing development or topography.

4.3.5 Application of footnote 7

The grey belt definition excludes land where the constraints identified in NPPF footnote 7 would provide a strong reason for refusing or restricting development. Designations listed as effective constraints in footnote 7 include: habitat sites, Sites of Special Scientific Interest (SSSI); Local Green Space, National Landscapes, National Parks or Heritage Coasts; irreplaceable habitats; designated heritage assets; and areas that are at risk of flooding or coastal change.

The PPG makes it clear that authorities need to consider not only areas where grey belt would be covered by these designations but also whether it would affect these definitions. The application of Footnote 7 considerations does not necessarily mean that they would provide strong reasons for refusal. Where these constraints are present within a local authority area, the PPG advises that it is likely to only be possible to provisionally identify such land as grey belt in advance of more detailed specified proposals and impact assessment²⁴. At the plan making stage, one would expect ‘showstopper Footnote 7’ considerations to be identified but that is not a task for the Stage 1 or 2 GBAs.

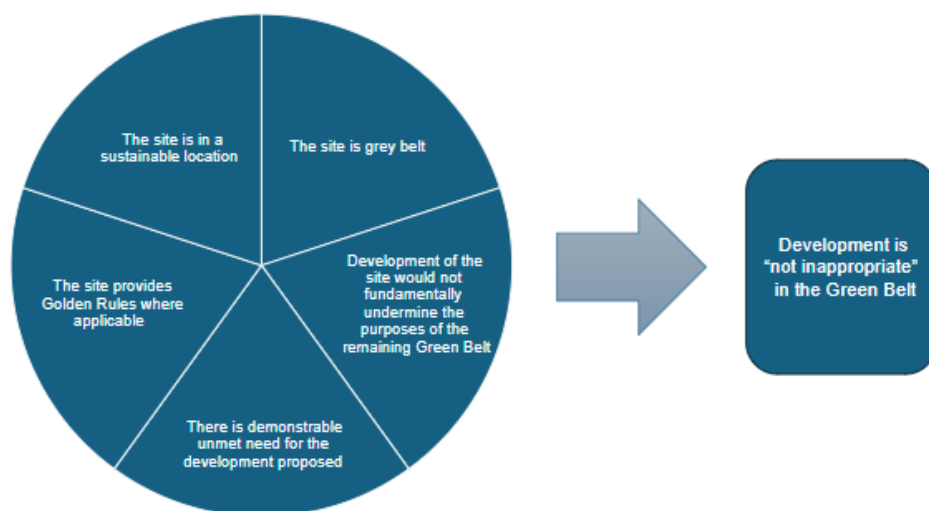
4.3.6 Assessing whether land is grey belt

Green Belt land judged not to strongly contribute to any one of the purposes (a), (b) and (d) and subject to the footnote 7 exclusions, can be provisionally identified as grey belt. However, there are further ‘tests’ that need to be passed before this land can be identified as a location where development is not inappropriate, as summarised in Figure 4²⁵.

²⁴ National Planning Practice Guidance (PPG) (2025). Paragraph: 006 Reference ID: 64-006-20250225

²⁵ National Planning Practice Guidance (PPG) (2025). Paragraph: 010 Reference ID: 64-010-20250225

Figure 4-1 When development in the Green Belt is 'not inappropriate' (NPPF paragraph 155)



Source: UK Government Planning Practice Guidance, Green Belt, 2025

4.3.7 Assessing the impact of Green Belt release on the remaining Green Belt in the plan area

The PPG provides guidance of the application of the new NPPF paragraph 146 test of: *“whether the release of Green Belt land would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.”*

The PPG explains that *“in reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.”*²⁶

4.3.8 Identifying sustainable locations

The PPG highlights that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a location is appropriate for development. Where grey belt land is not in a location that is or can be made sustainable, then development of that land is inappropriate. The PPG elaborates that the definition of sustainable locations should be determined for the local context, taking into account opportunities to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115.²⁷

4.4 National Planning Policy Framework (2026)

An updated NPPF has now been published in 2026, which includes amendments to Green Belt policy. The revised NPPF (Policies GB1-GB8) builds upon the Government's ongoing Green Belt reforms and further embeds the concept of grey belt land within national planning policy. Whilst the fundamental purposes of the Green Belt remain unchanged, the revised framework seeks to ensure that development opportunities are not unnecessarily restricted where land makes only a limited contribution to Green Belt purposes and can support sustainable development objectives. The revised framework places greater emphasis on directing growth towards sustainable and accessible locations, including areas served by well-connected stations and public transport corridors.

The revised NPPF also removes the former Footnote 7 test from the grey belt assessment. Designated assets and areas of particular importance, including matters such as heritage, protected landscapes and flood risk, continue to be safeguarded through separate national policies rather than forming part of the grey belt assessment itself. The 2026 NPPF does not apply to the preparation and examination of the Local Plan which is being prepared under the legacy system and against the 2024 NPPF.

²⁶ National Planning Practice Guidance (PPG) (2025). Green Belt Paragraph 008 Reference ID: 64-008-20250225

²⁷ National Planning Practice Guidance (PPG) (2025). Paragraph: 011 Reference ID: 64-011-20250225

4.5 Review of recent appeal decisions

As the NPPF and Green Belt PPG have only relatively recently been published, they have yet to be tested at any Local Plan Examinations. This Section details a number of appeal decisions, but it needs to be acknowledged that most relate to planning applications which predated the NPPF (2024) and many predate the subsequent PPG advice (2025). None relate directly to plan making.

A detailed review of appeal decisions can be found in Annex A. However, a summary of the key principles identified through the review can be found below.

Scale and granularity of the Green Belt Assessment; Recent appeal decisions indicate a clear shift toward more site-specific and proportionate approaches to Green Belt assessment, with consistent themes emerging across inspectors' reasoning. In respect of the scale and granularity of assessment, inspectors have emphasised that while large parcels may be appropriate for strategic plan-making, decision-making should focus on the individual site, as larger areas can obscure how land actually performs. This was demonstrated in APP/H1515/W/24/3341474-79 (16 January 2025).

Interpretation of sprawl and the large build up areas: Appeal decisions confirm there is limited interpretation of the definition of 'sprawl', applying only to the unrestricted sprawl of large built-up areas, rather than to all forms of outward growth. In APP/H2265/W/24/3347410 (13 Feb 2025), the Inspector found that ribbon development associated with a village did not meet this definition and instead identified London as the relevant large built-up area. Furthermore, APP/P0119/W/24/3357956 (4 July 2025) demonstrates that the absence of development on a site does not automatically mean it performs strongly against Purpose (a); containment, defensible boundaries, and physical relationship to settlements are also key considerations.

Definition of towns vs villages: One consistent theme in these appeal cases is the need to correctly identify the settlement hierarchy, with inspectors giving weight to adopted development plan evidence than Green Belt studies. In APP/D3640/W/24/3347530 (12 March 2025) and APP/M1520/W/24/3351658 (15 April 2025), settlements classified as towns in Green Belt assessments were instead judged to be villages based on their limited scale and services, meaning the appeal sites did not contribute to preventing town merging. Similarly, APP/G5180/W/24/3354266 (31 March 2025) found that already coalesced suburban areas lacked the characteristics of distinct towns, further reducing the relevance of Purpose (b).

Openness and encroachment: Appeal cases confirmed that openness is considered to encompass both the physical and visual relation to the Green Belt. In APP/M3645/W/24/3354630 (14 March 2025), the Inspector concluded that an intensively used storage site made only a limited contribution to openness, particularly given its enclosure by hedgerows. By contrast, in APP/C4615/W/24/3345744 (2 April 2025), insufficient screening meant that development would appear visually intrusive in a rural setting. Encroachment is frequently acknowledged but often judged to be localised and limited, especially where sites are small, contained, or influenced by existing development, as demonstrated in APP/H2265/W/24/3347410 (13 Feb 2025) and APP/P0119/W/24/3357956 (4 July 2025).

Fundamentally undermine test; In this appeal inspectors assess whether development would fundamentally undermine the Green Belt by considering the scale of the site relative to the wider Green Belt designation. In APP/H2265/W/24/3347410 (13 Feb 2025), the release of a small parcel within a borough that is predominantly Green Belt was not considered to undermine its overall function, demonstrating a clear distinction between localised impacts and strategic harm.

Grey Belt decision making principles; Post-2025 appeals show that while grey belt is an important material consideration, it is not determinative of acceptability. Proposals must still meet sustainability criteria and comply with the NPPF "Golden Rules". Appeals have been dismissed where these tests were not met, including APP/C3620/W/24/3347843 (16 Apr 2025) and APP/T2215/W/24/3354290 (26 Feb 2025), particularly in cases involving unsustainable locations or lack of identified need. Conversely, proposals delivering clear benefits, such as affordable housing or economic development, have been allowed, as in APP/K3605/W/24/3352866 (24 Apr 2025). Case law has also confirmed that footnote 7 should be applied to the specific proposal rather than the site in principle, and that refusal requires a strong planning reason, as established in AC-2025-LON-000898 (30 Jan 2026). Overall, these appeals show a consistent move toward site led, evidence-based decisions, with an emphasis on containment, functional relationships, and site context rather than reliance on broad parcels or settlement classifications.

5. Methodology

5.1 Overview

The following section set out the methodology used to undertake the Bath and North East Somerset (B&NES) Stage 2 GBA.

Using the Stage 1 Strategic Green Belt Assessment methodology, parcels and proformas as a starting point, the following sections therefore set out the finer grained Stage 2 assessment.

The assessment of Green Belt purposes were undertaken using a combination of desktop analysis (including GIS mapping and Google Earth/Maps) and a site visit of each site in order to corroborate the findings. Prior to undertaking the assessments, site assessors were fully briefed on the methodology in order to ensure a comprehensive understanding of the approach and consistency in assessments.

5.2 Assumptions

- This Stage 2 Green Belt Review assumes that the final point of the Stage 1 Strategic Green Belt Assessment is the Strategic Green Belt Assessment Update 2026 parcels and associated proformas. It assumes that both the methodology and outcomes of proformas were accepted and signed off by WECA and each of the constituent LPAs that were party to and had oversight of the assessment.
- The more detailed Stage 2 Green Belt Review applies the same basic assessment criteria as the Stage 1 assessment, but at a finer grain in terms of both the areas of variation and rating scale. This does mean that in some instances, the outcomes of the Stage 2 assessment may differ and will not be directly comparable to the outcomes of the Stage 1 assessment in all instances.

5.3 Definition of sites for assessment at Stage 2

The Stage 1 SGBA assessed the entirety of the Bristol and Bath Green Belt across the five constituent authorities against the NPPF purposes. Given the Stage 2 GBA provides a finer grain assessment to feed directly into decision making on suitable amendments to the Green Belt boundary and release of any land within, it was appropriate to undertake a more spatially focussed piece of work. The following section outlines the approach and process to defining Stage 2 sites. Due to the timing of changes to the NPPF and the stage of Local Plan preparation at the time that further guidance on the concept of grey belt was published in the PPG in February 2025, the Stage 2 Green Belt assessment has taken a focused approach assessing the sites considered suitable for allocation, rather than assessing all land surrounding sustainable settlements to inform the NPPF sequential approach.

To ensure that the assessment is proportionate and assesses available locations for growth, Stage 2 provides an assessment of sites which have been filtered initially by the Council and are proposed for allocation. This is in support of the NPPF paragraph 72, a requirement that planning policies should identify a supply of “specific, deliverable sites for five years following the intended date of adoption”, and paragraph 72.b “specific, developable sites or broad locations for growth, for subsequent years 6-10, and where possible, for years 11-15 of the remaining plan period”.

The Council’s approach to filtering sites so far is as follows:

1. The Council has applied an initial sift of sites and excluded those with a size below the Local Plan threshold for consideration.
2. Sites which passed step 1 above were then assessed using the Housing and Economic Land Availability Assessment (HELAA) methodology, considering suitability, availability, and achievability.
3. Sites were then assessed for their sustainability, focusing on those in or adjacent to the most sustainable settlements, those with good access to employment, services, and sustainable transport options.

4. Following step 3, the remaining sites were assessed against the Local Plan's spatial strategy principles, including on impact on Green Belt, sustainable transport connectivity and existing land use.

These sites have then been provided to Arup by the Council and further refined using the following principles:

- Where absolute constraints cross part of the site, these have been removed and site boundaries re-drawn or reduced accordingly to avoid this site area. These constraints include Gas Pipelines and Flood Zones.
- Other site constraints as judged by B&NES officers have also been applied to some sites and have resulted in altered boundaries and site extents, these include impacts on landscape and heritage assets and their settings.
- For some sites, areas of strategic scale on-site green infrastructure and land for nature recovery have been identified which are where built development would not be suitable but mitigation is required to make development acceptable on the remainder of the land within the site. In such situations a smaller site boundary has been assessed than the full site promotion as no development or Green Belt release is being considered for the strategic green infrastructure, open space and nature recovery land, which remains 'appropriate' development within the Green Belt.

Each site was then assigned a unique reference number, with 34 sites in total. Figure Figure 5-1 presents the final sites assessed in Stage 2.

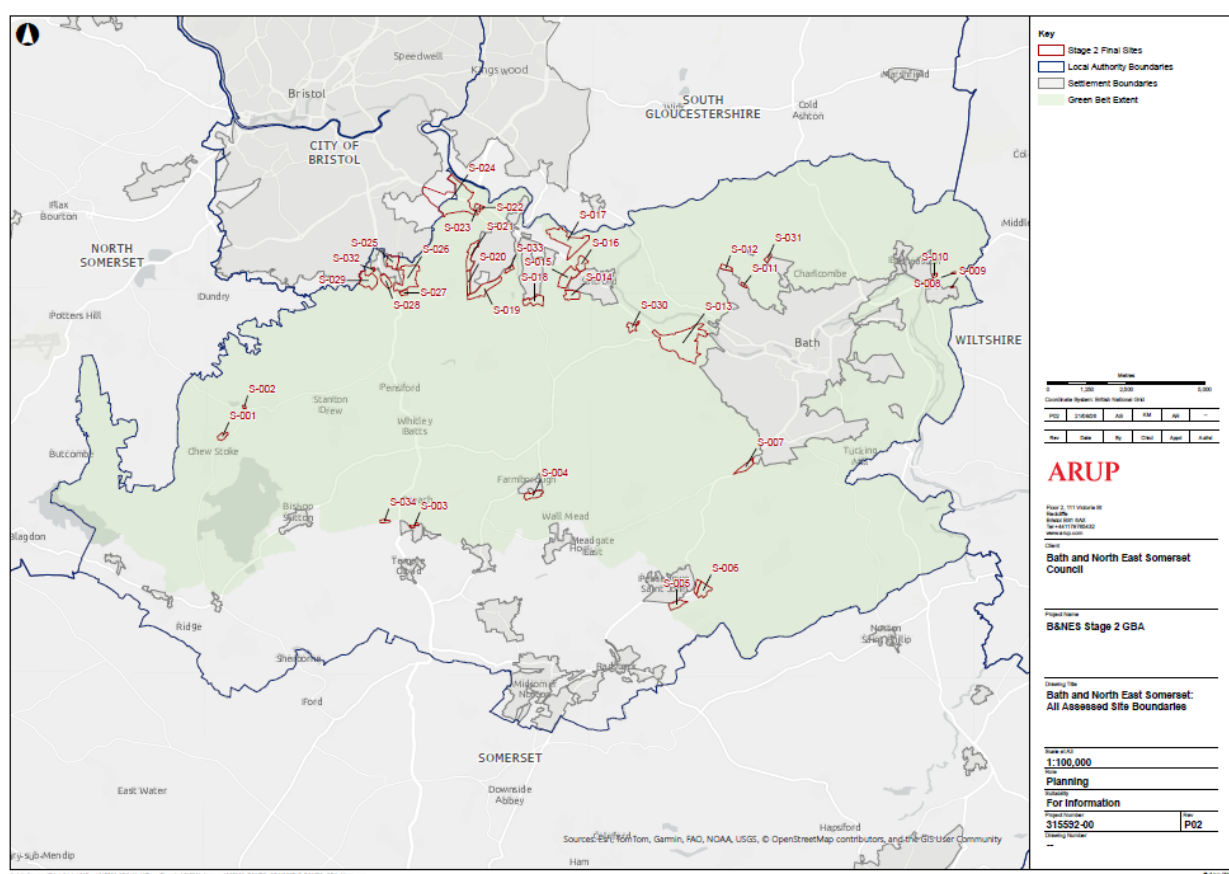


Figure 5-1 Map of sites assessed for the Stage 2 GBA

Following confirmation of the sites and their respective boundaries, an assessment of individual boundary strength for each site was undertaken. As the boundary of any site may, in time, become the new boundary of the Green Belt itself, if that site is released, boundary definition should align with NPPF paragraph 149 (f),

which requires Green Belt boundaries to be defined ‘clearly, using physical features that are readily recognisable and likely to be permanent’.

Therefore, a boundary assessment was undertaken as part of each site assessment, commenting on the relative strength of the boundary features and making recommendations either for alternative boundaries to be used to align with NPPF requirements or new boundaries to be created. Following the completion of the boundary assessment as part of the Stage 2 GBA, it will be later reviewed and updated following refinement by the Council.

This assessment forms part of the Council local plan evidence base and will inform their decisions on site allocations.

Table 5-1 NPPF compliant boundary features used for site assessments

Permanent Man-made and Natural Features	Additional Boundary Features
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and/or hedgerows
Natural ‘buffer’ features such as ridgelines	

Note: Below-ground permanent man-made features, such as pipelines, are present within several of the sites considered which prevent development within a prescribed area and will effectively create a boundary for any future development. While these features are permanent infrastructure, they are not considered “readily recognisable” boundaries under the NPPF definition given they are below ground. As such, they do not provide defensible boundaries and would require strengthening through the introduction of planting and vegetation within an appropriate buffer to create a defensible Green Belt boundary if the sites were to be released.

5.4 Site Visits

All sites were visited to understand their immediate context, character and boundary features, and to refine the initial analysis. Photographs of all sites were taken (where access and views permitted) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider Green Belt and adjacent settlement(s). The photographs were used as an aide-memoir for assessors/illustrate context for readers rather than for assessment purposes *per se*. If it was not possible to obtain site photographs, or only limited photographs could be acquired, aerial photography was used as supplementary illustration. Pro-forma for each site were used to record the assessments.

5.5 Assessment against NPPF purposes

This stage of the assessment aims to establish any differentiation in how the existing Green Belt functions and fulfils the five NPPF Green Belt purposes.

Each site has been assessed against the purposes of the Green Belt as set out in the NPPF (2024). The PPG (2025) provides guidance on how to assess purposes (a), (b) and (d), and provides illustrative features to assess contribution of the Green Belt to these purposes. These illustrative features have informed the criteria that have been applied. No national guidance exists for purposes (c) and (e), as such, the assessment criteria for these purposes is based on previous experience, best practice and recent examples. Where possible, consideration has been given to the need to respect local circumstances and the unique characteristics that affect the way the NPPF Green Belt purposes are appraised.

Openness and permanence remain essential characteristics of Green Belt in the NPPF; and are therefore integral to the assessment of Green Belt across all purposes. Openness is considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’.

For each purpose, one or more criteria draw on both qualitative and quantitative measures. A score is attributed to each purpose as shown in Table 5-2. A composite judgement across the purpose criterion was required to judge whether the site meets each Green Belt purposes strongly or weakly. Given the various size of the sites, it may be that parts of the site perform variably across the site for any given purpose. The part of the site with the highest score dictates the score applied to the whole site, although the variable contribution of the site will be noted qualitatively within the assessment.

The following sections examine the definition of each of the five Green Belt purposes in relation to local context; and set out the criteria and scoring that has been applied through the Stage 2 GBA.

Table 5-2 Purpose ratings used in the Green Belt Assessment

Scores	Equivalent wording
Strong	Contributes strongly to Green Belt purpose(s)
Moderate	Contributes moderately to Green Belt purpose(s)
Weak	Contributes weakly to Green Belt purpose(s)
No contribution	No contribution to Green Belt purpose(s)

5.5.1 Purpose (a)

Purpose (a): To check the unrestricted sprawl of large built-up areas

The original purpose of the Bristol and Bath Green Belt was to “*check the unrestricted sprawl of the Bristol conurbation and Bath*”²⁸. This assessment therefore considers the role of the Green Belt in preventing the sprawl of the urban areas of Bath and Bristol as the large built-up areas for this Green Belt assessment.

National policy provides some guidance over what might constitute ‘large built-up areas’ by stating that ‘*villages should not be considered large built-up areas*’²⁸. To ensure a robust and comparable definition of large built-up areas, ONS data provides a helpful classification of built-up areas based on population range (Table 3). This provides a useful ‘sense check’ of the definition of settlements to compare against locally prepared adopted settlement hierarchies and/or adopted Local Plan classification of settlements within B&NES.

Table 5-3 Built-up are (BUA) size classification

Population range (usual resident population)	BUA size classification	Approximate settlement type
0 – 4,999	Minor	hamlet or village

²⁸ [National Planning Practice Guidance \(PPG\) \(2025\). Green Belt. Paragraph: 005Reference ID: 64-005-20250225.](#)

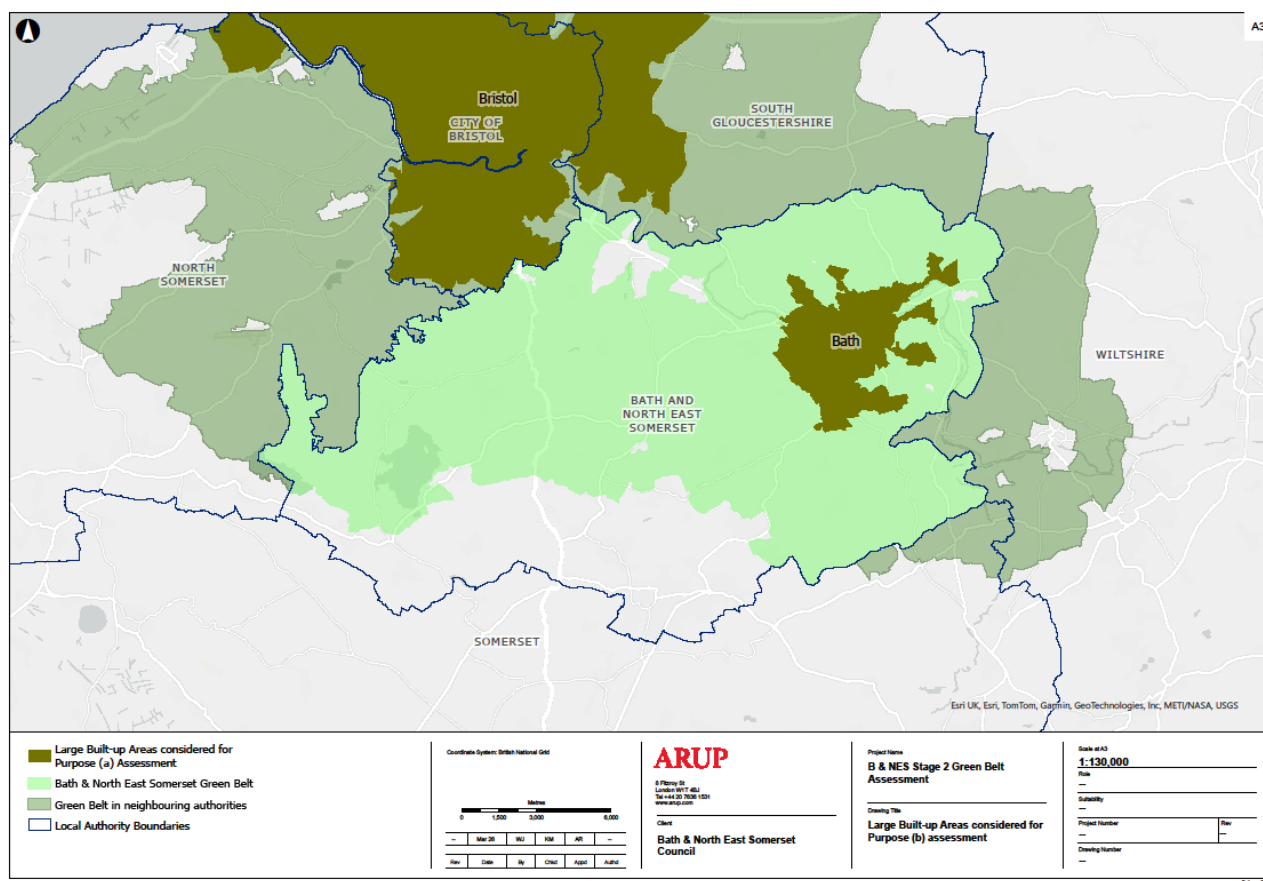
5,000 – 19,999	Small	larger village /small town
20,000 –74,999	Medium	medium towns
75,000 –199,999	Large	large towns /smaller cities
200,000+	Major	cities

Source: ONS²⁹

Bristol and Bath have historically been considered the large built-up areas for the Bristol and Bath Green Belt; and there is clear rationale, based on original Green Belt purposes for checking unrestricted sprawl of these cities, that they remain classified as the large built-up areas. The estimated population of the Bristol Urban Area (BUA) is estimated to be around 667,500³⁰, and Bath is 94,092³¹, which therefore aligns with the ‘large’ and ‘major’ classes in the ONS built-up area data above.

For the purposes of this study, inset land contiguous with Bath and the Bristol conurbation are the only areas considered to constitute large built-up areas, as depicted in Figure 2 overleaf. Pertinent to sites located in proximity to Bristol, the definition of the Bristol’s large built-up area used in this study refers to the City of Bristol inclusive of urban areas in the south east of Bristol, extending Brislington, Hanham, Stockwood and Hartcliffe .

Figure 2 Large built-up areas for the purposes of the B&NES Stage 2 GBA



²⁹ Office for National Statistics (2021). Towns and cities, characteristics of built-up areas, England and Wales.

³⁰ Bristol City Council (2025). The Population of Bristol (July 2025) [Mid 2022 Census Estimates].

³¹ Office for National Statistics (ONS) 2021 Census Data.

Although ‘sprawl’ is a multi-faceted concept and thus has a variety of different definitions, this Stage 2 GBA has adopted a simple definition of sprawl as the ‘*spreading out of built form over a large area in an untidy or irregular way*’³².

Subject to strategic policies establishing the need for any changes to Green Belt boundaries, Green Belt should function to protect open land at the edge of large built-up areas. Informed by the PPG (2025) illustrative features, the extent to which a site checks unrestricted sprawl is dependent on:

- Whether it is adjacent or near to the large built-up area. Consideration should be given to whether it is physically, visually or functionally linked to a large built-up area. Where a site is not physically, visually or functionally located near a large built-up area, it will not meet purpose (a). For the purpose of this GBA, the term ‘perceptual’ is used in assessments and captures both visual and functional links to the large built-up area.
- If it was to be developed, the extent to which it would result in an incongruous pattern of development (such as an extended ‘finger’ of development into the Green Belt).
- Presence of physical feature(s) in reasonable proximity that could restrict and contain development. Consideration should be given to whether there are prominent man-made or natural physical features (i.e. Motorway, A-road, railway line, major river) that might restrict the scale of outward growth of the settlement and regularise potential development form.
- Its relationship with the respective large built-up area(s), in particular the degree / nature of containment by built form. Sites that are almost entirely surrounded by built development as part of a large single built-up area (enclosed) do not prevent sprawl, rather potential development could be classified as infill and/or rounding off; whereas sites between two large built-up areas (contiguous) or on the edge of a built-up area (connected) have a role in preventing sprawl. This is illustrated in Figure 3 below (noting that this is purely illustrative and not representative of the study area for this Green Belt Assessment).
- Degree of openness, i.e. the extent to which a site already contains built development. If the site is fully developed, it does not meet the basic aim of Green Belt³³.
- Whether the site is subject to other urbanising influences, existing development such as residential or commercial development, however not including development that falls within one of the exception categories in paragraph 154 NPPF (2024) (i.e. it is not deemed to be inappropriate development in the Green Belt, for example buildings for agriculture and forestry).

³² Oxford English Dictionary definition

³³ [National Planning Policy Framework \(2024\). Paragraph 142.](#)

Figure 3 Illustration of connected, contiguous and enclosed within the context of Green Belt purpose (a)

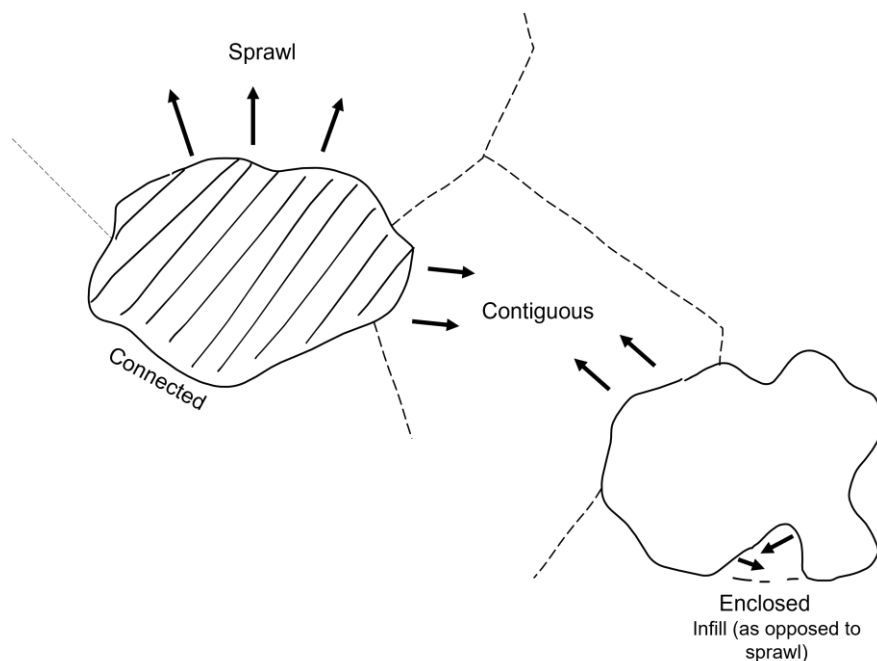


Table 5-4 Purpose (a) assessment criterion

Criterion	Score	Description
Site is located at the edge of a large built-up area	Yes	The site is located at the edge of a large built-up area with physical or perceptual connections to it. Perceptual includes visual or functional links to the large built-up area.
Site is located at the edge of a large built-up area	No	The site is not located at the edge of a large built-up area in physical or perceptual terms.
Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another defensible boundary	Strong	Site is connected to a large built-up area. The site is likely to be free of existing development and / or other urbanising influences. There are no prominent physical features along the edge of the existing settlement and in reasonable proximity to the outer edge of the site to prevent a disproportionate / incongruous pattern of development.
Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another defensible boundary	Moderate	Site is connected to a large built-up area. The site is likely to be free of existing development and / or other urbanising influences. There are some prominent physical features in reasonable proximity to the outer edge of the site to prevent a disproportionate / incongruous pattern of development, and / or the inner edge of the existing large built-up area comprises some prominent physical features.
Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another defensible boundary	Weak	Site is enclosed or partially enclosed by a large built-up area. The site is likely to contain some existing development and / or other urbanising influences. There are prominent physical features in reasonable proximity to the outer edge of the site and along the edge of the existing settlement to prevent a disproportionate / incongruous pattern of development.
Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another defensible boundary	No Contribution	Site is not at the edge of a large built-up area, in physical or perceptual terms, and does not meet purpose (a). OR Site contains significant existing development.

5.5.2 Purpose (b)

Purpose (b): To prevent neighbouring towns merging into one another

Purpose (b) considers the role that the Green Belt plays in preventing neighbouring towns from merging into one another. The assessment will consider gaps between towns identified below.

National policy provides some guidance over what might constitute ‘towns’ by stating that *‘this purpose relates to the merging of towns, not villages’*³⁴.

As such, a definition for ‘towns’ for the purposes of this assessment was necessary. This definition accounts for a number of relevant factors, including: the adopted settlement hierarchy within the adopted Local Plan for B&NES, neighbouring authorities and /or references to settlements within adopted Local Plans, a ‘sense check’ against ONS built-up area data (2021); and professional judgement and local knowledge of B&NES. In all cases, settlements categorised as villages within settlement hierarchies and/or Local Plans reviewed have not been included as towns for purpose (b)³⁵. This includes the village of Saltford, which although cited within designation text within the Somerset County Development Plan is not assessed under purpose (b) within this GBA. This is in consideration of updated policy and guidance, and recent case law is clear that purpose (b) relates only to the merging of ‘towns’ (i.e. not villages).

All large built-up areas identified for purpose (a) assessment (i.e. Bristol and Bath) have been additionally identified as towns. Large built-up areas have not been subdivided into constituent towns for purpose (b) assessment purposes, as it is considered that the official boundaries between contiguous settlements are not generally identifiable on the ground.

Only neighbouring towns within close proximity of the B&NES boundary and which could form a gap with Bristol or Bath conurbation or towns within the study area are included in the assessment. These have been assessed insofar as they relate to sites within the study area. Proximity to the B&NES boundary is not based on a prescribed distance rather based on local context and professional judgement. The list of towns is set out in Table 5 and provided in Figure 4 overleaf.

The purpose (b) assessment criterion (set out in Table 6) considers the extent to which sites protect a gap and prevent towns from merging through sprawl or ribbon development. The extent to which a site prevents towns merging is dependent on:

- Its relationship with towns and whether it lies within a gap between neighbouring towns.
- Degree to which development of a site would reduce the perceived or physical distance between towns.
- Presence of physical feature(s) in reasonable proximity that would visually or physically prevent the coalescence of neighbouring towns. Consideration should be given to whether there are prominent man-made or natural physical features (i.e. motorway, A-road, railway line, major river) that will influence the degree to which visual separation will be maintained.
- Degree of openness, i.e., the extent to which a site already contains built development or is subject to other urbanising influences. If the site is fully developed, it does not meet the basic aim of Green Belt³⁶.

Care is taken to ensure that the whole site is assessed against the relevant criteria, and any variations explained qualitatively within assessments.

³⁴ [National Planning Practice Guidance \(PPG\) \(2025\). Green Belt. Paragraph: 005 Reference ID: 64-005-20250225.](#)

³⁵ As set out in Section 3.1.2, whilst Saltford was included within the original purpose of the Green Belt in the Somerset County Development Plan Report of Survey First Review (1964) and Amendment (1966), it is not fall within the definition of a town for the purposes of this assessment, and is therefore not considered under purpose (b).

³⁶ [National Planning Policy Framework \(2024\). Paragraph 142.](#)

Figure 4 Towns for consideration under Purpose (b) assessment

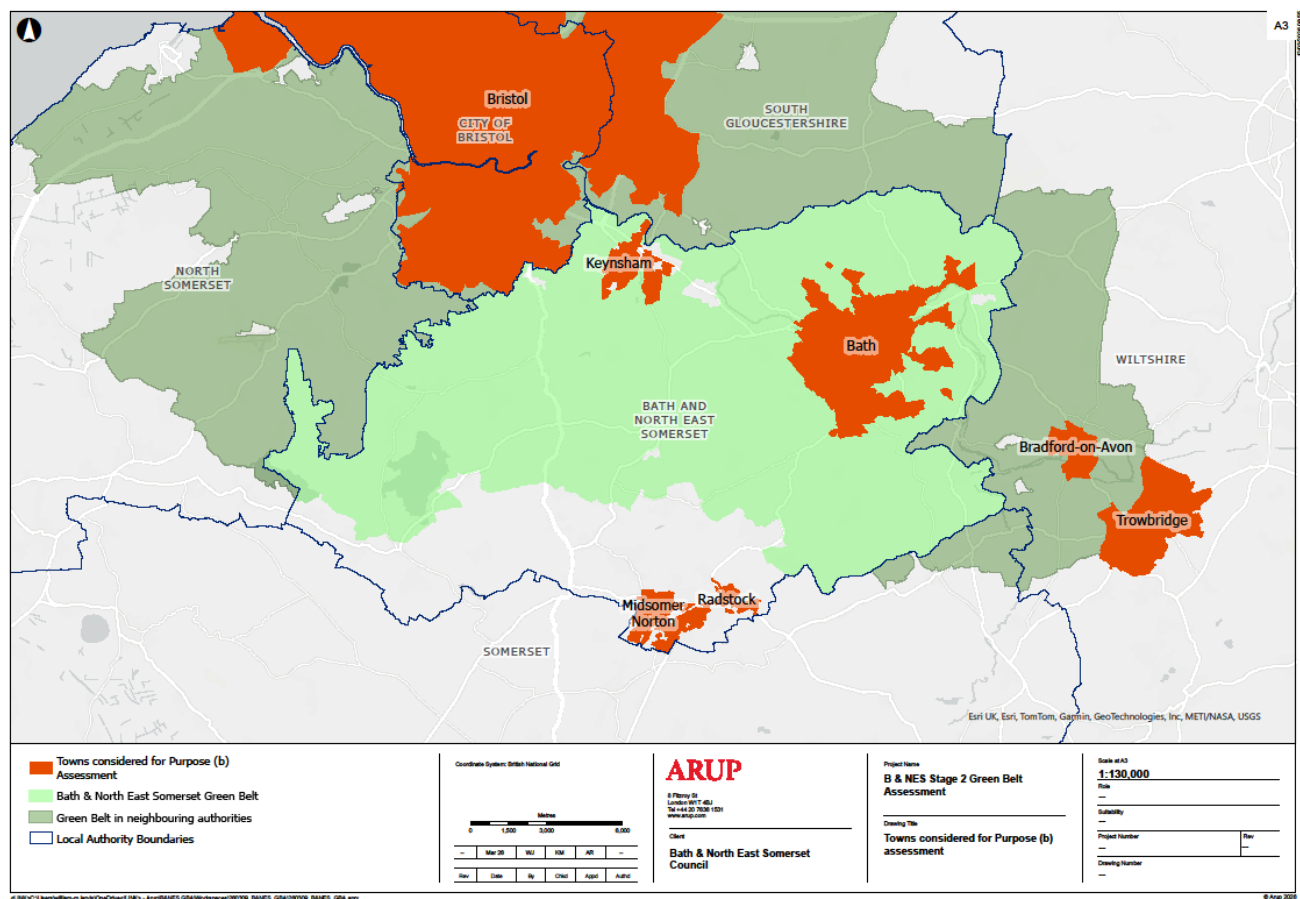


Table 5-5 Towns considered in Purpose (b) assessment

LPA	Neighbouring authority (outside the study area) ³⁷				
B&NES	BCC	NSC	SC	SGC	WC
Bath Keynsham ³⁸ Midsomer Norton ³⁹ Radstock ⁴⁰	Bristol	N/A (Clevedon, Nailsea and Portishead ⁴¹ considered too far away)	N/A	N/A (Yate with Chipping Sodbury ⁴² and Thornbury ⁴³ considered too far away)	Bradford-on-Avon and Trowbridge ⁴⁴

Table 5-6 Purpose (b) Assessment criterion

Criterion	Score	Description
Restricts development that would result in merging of or significant erosion of the gap between neighbouring towns.	Strong	Site forms a substantial part of a gap, where development would significantly visually or physically reduce the perceived or physical distance between towns.
Restricts development that would result in merging of or significant erosion of the gap between neighbouring towns.	Moderate	Site forms a small part of a gap, where there is scope for some development without visually or physically reducing the perceived or physical distance between towns.
Restricts development that would result in merging of or significant erosion of the gap between neighbouring towns.	Weak	Site forms a very small part of a gap where development would not visually or physically reduce the perceived or physical distance between towns.
Restricts development that would result in merging of or significant erosion of the gap between neighbouring towns.	No contribution	Site does not form part of a gap between towns.

³⁷ Settlements are only considered in regard to their contribution to sites within the Study Area via purpose (b).

³⁸ Bath and North East Somerset Council Local Plan (Core Strategy and Placemaking Plan) Partial Update (adopted 2023). 'The land removed from the Green Belt and safeguarded for development at East Keynsham is allocated for housing through the Local Plan Partial Update. These changes do not undermine the Core Strategy objective to maintain the town's separate identity.'

³⁹ Bath and North East Somerset Council Local Plan (Core Strategy and Placemaking Plan) Partial Update (adopted 2023). See: Policy SV2 Midsomer Norton Town Centre Strategic Policy.

⁴⁰ Bath and North East Somerset Council Local Plan (Core Strategy and Placemaking Plan) Partial Update (adopted 2023). See: Policy SV3 Radstock Town Centre Strategic Policy.

⁴¹ North Somerset Council Core Strategy (adopted 2012, 2015 and 2017). See: Policy CS21: Retail hierarchy and provision.

⁴² South Gloucestershire Local Plan: Core Strategy (adopted 2013). See Policy CS30: Yate and Chipping Sodbury.

⁴³ South Gloucestershire Local Plan: Core Strategy (adopted 2013). See Policy CS32: Yate and Chipping Sodbury.

⁴⁴ Wiltshire Council Core Strategy (adopted 2015).

5.5.3 Purpose (c)

Purpose (c): To assist in safeguarding the countryside from encroachment

The approach to purpose (c) considers the extent to which Green Belt has maintained the openness and character of the countryside and conversely resisted urbanising influences (thus broadly reflecting the term ‘encroachment’⁴⁵). It should be noted that assessment of purpose (c) does not form part of the grey belt assessment.

The term ‘countryside’ typically refers to land beyond a defined settlement boundary and which does not comprise built development (other than for rural uses such as buildings for agriculture and forestry). For purpose (c), the assessment considers the degree to which a site can be characterised as having a rural (as opposed to urban) character.

When drawing conclusions on the character of site, the following will be considered:

- Development (other than for agriculture and forestry) reducing the openness of land, as set out in the OS MasterMap-defined built form;
- Whether there were any urban influences or managed uses in addition to those identified in the OS Mastermap defined built form, such as other areas of paving and urban or suburban-style gardens, allotments, motorways, playing fields and golf courses. Such development is not considered inappropriate in the Green Belt by national policy, because it does not reduce openness. However, it nevertheless constitutes an urbanising influence relative to more rural land uses such as agriculture and forestry. The percentage of built form from the Mastermap data will therefore be validated and moderated on a case-by-case basis using professional judgement.
- Morphology, including the shape, scale, distribution and regularity of any built form and the pattern of development within the site. Typically, a more dispersed built form contributed to a more rural character while a denser built form contributed to a more urban character.
- Sense of openness and containment based on urbanising influences on neighbouring land, whether inside or outside the Green Belt.
- Topography of the site and its influence on visual perceptions.

The methodology adopts the following categorisation of assessment character:

- ‘Strongly rural character’ - land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.
- ‘Largely rural character’ - land largely characterised by rural land uses and landscapes but with limited and dispersed built development and man-made structures, such as detached residential buildings and gardens.
- ‘Largely urban character’ - land dominated by built development or other land uses with limited or dispersed pockets of land characterised by rural land uses and landscapes.
- ‘Strongly urban character’ - land that is dominated by built development or other urban land uses. The land does not have any characteristics of rural land uses or landscapes.

Table 5-7 Purpose (c) assessment criterion

Criterion	Score	Description
Protects the openness of the countryside and is least covered by development.	Strong	Site contains less than 3% built form and/or possesses strongly rural character.

Criterion	Score	Description
Protects the openness of the countryside and is least covered by development.	Moderate	Site contains less than 10% built form and/or possesses largely rural character.
Protects the openness of the countryside and is least covered by development.	Weak	Site contains between 10- 15% built form and/or possesses largely urban character.
Protects the openness of the countryside and is least covered by development.	No contribution	Site contains more than 20% built form and/or possesses a strongly urban character.

5.5.4 Purpose (d)

Purpose (d): To preserve the setting and special character of historic towns

Purpose (d) considers the extent to which a site preserves the setting and special character of a historic town.

National policy provides some guidance over what might constitute ‘historic towns’ by stating that ‘*this purpose relates to historic towns, not villages*’⁴⁶. The list of towns for consideration under purpose (b) was the starting point for determining whether these would also be classified as ‘historic towns’ under purpose (d) assessment, owing to their historic significance.

Historic significance of towns has been defined initially based on a review of published evidence or studies and supplemented by professional judgement and local knowledge from B&NES, where relevant. The relative importance of particular landforms or landscape features to the setting and special character of a historic town are judged using publicly available previously prepared evidence or studies.

For the towns identified as such under purpose (b), the first step was the identification of Conservation Area(s) and where available, Conservation Area Appraisal(s) related to the towns. This evidence was supplemented by (in no particular order):

- Historic / heritage policies within adopted Local Plans, where towns were referred to for their distinctive or special character.
- Presence of designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75 of the NPPF (2024), which includes ‘non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments’) within the town boundary, such as Scheduled Monuments and Registered Historic Parks and Gardens.
- Publication of adopted Supplementary Planning Documents (SPD) relating to the Conservation Area or heritage of a town.

To align with the Strategic GBA Update (2026), the commentary used to inform the inclusion or exclusion of historic towns (which were also identified as town under purpose (b)) relevant to B&NES has been included below. This commentary was prepared on the basis of previous evidence to understand the broad contribution of the Green Belt designation in preserving the setting and special character of these towns, with Table 8 below summarising the outcomes of this. It includes a brief justification as to whether or not the Green Belt is likely to contribute to the setting and special character of the town for assessment under purpose (d) and is therefore included or excluded. Whilst settlements within Wiltshire, including Bradford-on-Avon and Trowbridge, have been considered under purpose (b) due to their role in assessing the separation of neighbouring towns, they have not been included in this consideration for purpose (d) as the Stage 2 assessment sites are not considered to have a meaningful relationship with, or reasonably be expected to contribute to, the setting and special character of their historic cores.

Table 5-8 includes the final list of historic towns considered for purpose (d) assessment.

⁴⁶ National Planning Practice Guidance (PPG) (2025). Green Belt. Paragraph: 005 Reference ID: 64-005-20250225.

Table 5-8 Consideration of historic towns within B&NES

Town	Summary of local evidence	Initial Commentary ('included' as Historic Town or 'excluded, but checked through assessment')
Bath	– UNESCO World Heritage Site status (1987) – Second UNESCO inscription as one of the Great Spa Towns of Europe⁴⁷. – Multiple SPDs, such as the City of Bath World Heritage Site Setting (2013)⁴⁸.	Include – World Heritage Site status is the highest tier of historic designation applicable to an area. The extent of the WHS covers the entire city of Bath (including its suburbs), with the WHS setting extending to cover several surrounding villages and landscapes, recognising the contribution of the surrounding countryside to its 'Outstanding Universal Value'. Green Belt sites will therefore be appraised based on their contribution to both the WHS and its setting.
Keynsham	– Conservation Area (designated in 2016). – Keynsham is recognised within B&NES as a historic town with special interest through evidence including the Keynsham Conservation Area Appraisal (2016)⁴⁹ and Management Plan⁵⁰. – Keynsham Conservation Area Appraisal sets out that '<i>Significant history and nationally important nearby Roman settlement of Traiectus...[and] despite [development] changes there remains a heritage legacy which has both historical and some significant architectural interest</i>'. – Conservation SPD⁵¹ that sets out guidance for development within the Conservation Area of Keynsham.	Include – the Keynsham Conservation Area extends linearly across the town centre and is in close proximity to the existing Green Belt boundary. Green Belt sites will therefore be appraised based on their contribution to Keynsham's 'historic core', defined as Keynsham Conservation Area.
Midsomer Norton	– Conservation Area (designated in 2004). – The B&NES Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update Volume 4 Somer Valley (2023)⁵² states that '<i>Midsomer Norton is a market town dating back to medieval times...its historic core runs along the River Somer which remains an attractive feature in the High Street</i>' and '<i>the qualities of this</i>'	Exclude, checked through assessment – The Green Belt boundary at its closest point is >3km in relation to Midsomer Norton. The orientation of the Conservation Area of Midsomer Norton is such that areas of historic significance within the town remain enclosed by surrounding development outside the Green Belt. As outlined in the SGBA Update 2026, it is not considered that Green Belt sites for this B&NES Stage 2 GBA would contribute to the setting and special character of this town. This has been checked through assessment.

⁴⁷ Bath and North East Somerset Council (2024). UNESCO World Heritage in Bath - The story so far.

⁴⁸ Bath and North East Somerset Council (2013). City of Bath World Heritage Site Setting SPD.

⁴⁹ Bath and North East Somerset Council (2016). Keynsham Conservation Area Appraisal.

⁵⁰ Bath and North East Somerset Council (2016). Keynsham Conservation Area Management Plan.

⁵¹ Bath and North East Somerset Council (2020). Keynsham shopfront and facade survey and conservation guidance.

⁵² Bath and North East Somerset Council (2023). Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update Volume 4 Somer Valley.

Town	Summary of local evidence	Initial Commentary ('included' as Historic Town or 'excluded, but checked through assessment')
	<i>area are recognised through the Conservation Area designation which extends the length of the High Street and into Welton'.</i>	
Radstock	– Conservation Area (designated in 1999). – The B&NES Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update Volume 4 Somer Valley (2023) ⁵³ states that ‘<i>Radstock is one of the best preserved coal mining towns in England, with many features well preserved, set in the largely agricultural Somerset countryside.</i>’	Include – The extent of Radstock’s Conservation Area covers the town centre and extends eastwards following the Wellow Brook and towards Lower Writhlington, southwards along the Kilmersdon Brook, northwest towards Clandown and west along the Wellow Brook. The Conservation Area boundary is within ~300m of the surrounding Green Belt at its closest point at Shoscombe. Green Belt sites will therefore be appraised based on their contribution to Radstock’s ‘historic core’, defined as Radstock Conservation Area.

⁵³ Bath and North East Somerset Council (2023). Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update Volume 4 Somer Valley.

Table 5-9 Historic towns considered in purpose (d) assessment

Within B&NES	Neighbouring Local Authorities
Bath Keynsham Radstock	Bristol (BCC)

The following aspects are of particular importance with regard to assessment of Green Belt against purpose (d):

- The role of the site in providing a setting for the historic town, including the presence of historic features within the site itself.
- The extent of other existing development within the site.
- Contribution to the special character of a historic town, as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town.
- Consideration of the visual, physical and experiential relationship to historic aspects of the town, including views or vistas between the historic town and the surrounding countryside.
- Whether there is any separation from historic aspects of the town by existing development or topography.

Table 5-10 Purpose (d) assessment criterion

Criterion	Score	Description
Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	Strong	Site contributes strongly to the setting of a historic town and/or makes a considerable contribution to the special character of a historic town (for example, due to important views between the site and the historic core). Site is located within/adjacent to a historic town. OR Site provides important views of the surrounding countryside from within the town / provides unbroken views into prominent features of the historic core of the town from afar and the site protects open land which has a strong immediate connection with the historic core. For sites located within/in proximity to Bath and the World Heritage Site: Site is located within or adjacent to the World Heritage Site and is physically connected at one or more boundaries. AND/OR Site does not directly adjoin the World Heritage Site; however, it is located within or partly within its setting.

Criterion	Score	Description
Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	Moderate	Site forms part of the setting of a historic town and/or makes a contribution to the special character of a historic town. The sites contribution may be impacted by separation from the historic core as a result of existing development or topography and/or views between the site and the historic core being broken and/or constrained by development or topography and/or existing development located within the site. Site is located adjacent to a historic town. OR Site does not directly adjoin a historic town however it is located in proximity and provides views into/of the historic town. Site provides views of the surrounding countryside from within the town / views towards prominent features of the historic core of the town from afar. OR Site protects open land which has a connection with the historic core and is only separated from the historic core by natural features / historic development which pre-dates the designation of the Green Belt. For sites located within/in proximity to Bath and the World Heritage Site: Site is not located in the World Heritage Site or its setting but includes prominent features of landscape setting which contribute to the character of, and views from the World Heritage Site.
Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	Weak	Site forms a limited part of the setting of a historic town and/or it has no visual, physical, or experiential connection to the historic core (for example, due to it being a significant distance away) and/or the site contains significant existing development. Site is located adjacent to a historic town; however, it does not form part of the setting of the historic town (e.g. because it is a significant distance away). OR Site has no visual, physical, or experiential connection to the historic aspects of the town (e.g. as a result of intervening development that obscures views /connection with the historic core or because it is a significant distance away). For sites located within/in proximity to Bath and the World Heritage Site: Site has no visual, physical, or experiential connection to the World Heritage Site or its setting (e.g. intervening development that obscures views /connection with the historic core, or because it is a significant distance away).
Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	No contribution	Site does not adjoin a historic town or provide views into/out of a historic town. Site does not form part of the setting of a historic town and makes no contribution to the special character of a historic town.

5.5.5 Purpose (e)

Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Purpose (e) focuses on assisting urban regeneration through the recycling of derelict and other urban land.

Assessment of areas against purpose (e) is unlikely to lead to a differentiation between areas as it is difficult to attribute regeneration and brownfield land development to a particular area of Green Belt. Rather, it is the designation of all the areas collectively as Green Belt which encourages the recycling of derelict and other urban land. As such, it is not possible to differentiate the assessment of purpose (e) for individual sites.

Previous Strategic Green Belt Assessments published prior to the latest versions of the NPPF (2024) and PPG (2025) (e.g. the Greater Manchester Green Belt Assessment⁵⁴) do not provide an assessment against Purpose (e). However, the introduction of the ‘fundamentally undermine’ test in the updated NPPF (2024) now means that purpose (e) cannot be scoped out as it has been done previously. In consideration of this, an appropriate and proportionate methodology for assessing the performance of the Bristol and Bath Green Belt as a whole was considered.

Following on from the SGBA approach, the most appropriate dataset to use in the assessment of purpose (e) across the Bristol and Bath Green Belt as part of this Stage 2 GBA was considered to be the percentage of new dwellings on Green Belt land. This is a national dataset published by MHCLG and therefore is consistent across each local authority area⁵⁵, it covers a period between 2014 and 2022 and takes a three-year average to minimise outlier figures⁵⁶. The data is presented in Table 11 below.

Table 5-11 Percentage of new dwellings on Green Belt land across B&NES and all Green Belt authorities from 2014-2022

Geography	2014	2015	2016	2017	2018	2019	2020	2021	2022
B&NES	6.0	6.0	6.0	5.0	5.0	5.0	10	10	10
England Green Belt Authorities	3.2	2.9	2.3	2.6	2.8	2.5	2.8	2.3	2.5

Source: MHCLG

To note, the above data does not distinguish between new dwellings on brownfield or greenfield land within the Green Belt, and the MCHLG data does not provide this detail at a local authority level. Table 11 also includes the average percentage of new dwellings on Green Belt land across all England Green Belt authorities over the same period which can be compared to the average figure for B&NES.

Looking at the average figures, whilst overall B&NES have experienced higher proportions of new dwellings being built on the Green Belt, compared to the England average, this is not particularly significant and, in most years, there has been less than 5 percentage point between the figures. The most recent data (2021 and 2022) indicates a potentially growing disparity between B&NES and other Green Belt authorities across England, however in the absence of further consistently held data it is not appropriate to speculate further.

To apply a score for purpose (e) in as robust a way as possible it was considered reasonable to assign the same score for the whole of the Bristol and Bath Green Belt. Overall based on the above figures, it is possible to conclude that the Bristol and Bath Green Belt is playing a role in encouraging the recycling of derelict and other urban land and the Green Belt (i.e. all sites) and on this basis has been assigned a ‘moderate’ score against purpose (e). This is because the evidence used indicates that, relative to Green Belt authorities elsewhere in England, the Bristol and Bath Green Belt is not playing a strong role in encouraging the recycling of derelict and other urban land (i.e. where the percentages would be significantly lower than the England average), and nor is it playing a weak role (i.e. where the percentages would be significantly higher than the England average) – its role is broadly aligned with the average across England.

It is important to note that it is a snapshot in time and might change in future.

5.5.6 Overall Assessment

The purpose of the overall assessment is to consider the outcomes of each of the five purposes and then make a judgement on the overall contribution the site makes to the Green Belt. The same quantitative and qualitative scoring system as applied to each of the five purposes has been applied to the overall assessment.

In order to ensure a consistent and transparent approach, guidance has been set out below that has been used in determining the overall assessment. To note, this is hypothetical example guidance that has been followed

⁵⁴ LUC (2016) Greater Manchester Green Belt Assessment

⁵⁵ MHCLG (2022) Land Use Change Statistics

⁵⁶ Consistent data for years outside this range does not appear to be available. While it could be collated for more recent years from the AMRs across the five authorities there could be inconsistencies, and the England Green Belt authorities’ average figure would not be available as a benchmark.

when completing the overall assessment and does not reflect any specific scenarios presented within the Stage 2 GBA.

- 1) Where there is a 4 / 1 split – the majority contribution has been applied, unless the majority is ‘no contribution’ in which case, the overall has been assessed as ‘weak’.

Example:

Moderate	Moderate	Moderate	No contribution	Moderate	Moderate
----------	----------	----------	-----------------	----------	----------

Exception:

No contribution	No contribution	No contribution	No contribution	Moderate	Weak
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- 2) Where there is a 3 / 2 split – the majority contribution has been applied unless the ‘2’ contributions are ‘strong’. In this case, the overall would be ‘strong’. The exception to this would be if the majority was ‘no contribution’ in this case the overall would be the minority, or if the ‘2’ was moderate, the contribution would be weak given this is between the two levels (see the ‘Exception’ example below which illustrates this).

Example:

Moderate	Moderate	Weak	Weak	Moderate	Moderate
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Exception:

Strong	Strong	Moderate	Moderate	Moderate	Strong
No contribution	No contribution	No contribution	Moderate	Moderate	Weak

- 3) Where there is a 3 / 1 / 1 split – the majority contribution has been applied unless one of the minority contributions is ‘strong’. In this case, professional judgement has been applied (see below). Where the majority is ‘no contribution’, the middle category should be the overall. E.g. in the ‘Exception’ example below, the overall would be ‘weak’ as this is in the middle of ‘no contribution’ and ‘moderate’.

Example:

Weak	No contribution	Moderate	Moderate	Moderate	Moderate
------	-----------------	----------	----------	----------	----------

Exception:

No contribution	No contribution	Strong	No contribution	Moderate	Apply professional judgement
Strong	Moderate	Moderate	No contribution	Moderate	Apply professional judgement
No contribution	No contribution	Weak	No contribution	Moderate	Weak

- 4) Where there is a 2 / 2 / 1 split – the contribution to be applied depends on what the split and the minority leans towards. For example, where the minority contribution is ‘no contribution’, the lower contribution of the split has been applied. The exception to this is where the minority contribution is ‘strong’, in which case professional judgement has been applied.

Example:

No contribution	Weak	Weak	Moderate	Moderate	Weak
No contribution	No contribution	Weak	Weak	Moderate	Weak
No contribution	No contribution	Moderate	Weak	Moderate	Weak

Exception:

Moderate	No contribution	Strong	No contribution	Moderate	Apply professional judgement
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5) Where there is a 2 / 1 / 1 / 1 split, professional judgement should always be applied.

Example:

No contribution	Weak	Strong	No contribution	Moderate	Apply professional judgement
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Whilst all five Green Belt purposes should be given equal weighting, the overall assessment is not intended to be a number balancing exercise, and a certain level of professional judgement must be applied to the guidance set out above. Where this applies, it is set out on a case-by-case basis in each proforma. In order to do this, it is necessary to refer back to the overall aim and purpose of Green Belt as set out in paragraph 142 of the NPPF (2024’):

The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and permanence’.

5.6 Comparison of Stage 1 and Stage 2 conclusions

Following completion of each sites purpose assessment, a comparison of the overall conclusions from the relevant Stage 1 parcel will be made with the Stage 2 site conclusions. The purpose of this comparison is to understand the relative importance of a site’s role in relation to the larger strategic Green Belt area.

5.7 Assessment of harm of removing sites from the Green Belt

The second part of the assessment involved consideration of the potential impact (harm) of the release of Green Belt land. This initial consideration of harm does not give assessment ratings and instead provides commentary to indicate whether certain areas of a site could be released with less impact on the wider Green Belt.

The approach to assessing harm has been informed by a review of practice undertaken by other local planning authorities and is intended to achieve consistency with approaches applied elsewhere within the Bristol and Bath Green Belt.

As such, in addition to considering a site’s existing contribution to Green Belt purposes, the assessment considers the impact of removing the site on Green Belt function and purposes, alongside any potential cumulative impacts arising from the release of multiple sites. Furthermore, it considers whether the resultant Green Belt boundary (both the submitted Call for Sites boundary and any emerging local plan indicative masterplan boundary where applicable) would be readily recognisable and likely to be permanent.

There is no established approach as to how this should be assessed, and the comparative review demonstrated that most authorities simply applied a brief commentary referencing Green Belt purposes. Table 12 below therefore sets out the qualitative criteria to be used in the assessment.

Table 5-12 Qualitative assessment criteria and considerations for assessing Green Belt harm

Qualitative assessment criteria to consider Green Belt harm Key Question to Consider	How will this be assessed?
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	Consider findings from Green Belt purpose assessment: • What was the overall assessment? • Did the site make a significant contribution to any purposes? • Would development represent unrestricted sprawl of the large built-up area? • Would development result in the merging of ‘neighbouring towns’ or increase the potential for merging? • Would development represent an encroachment into the countryside? • Would development impact upon the setting or character of a historic town?
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Consider the following: • Would the surrounding Green Belt continue to perform the same Green Belt function and purposes? (e.g. where the surrounding Green Belt becomes isolated or islanded as a result of the site being removed it would no longer perform the same Green Belt function and purposes). • Has the removal of the site increased or decreased the importance of the surrounding Green Belt to certain purposes? (e.g. where the site in question forms part of a gap between neighbouring towns, the importance of the surrounding Green Belt may be increased if that site is removed).
Are there any cumulative impacts (due to release of adjacent sites)?	• This was only be relevant if a number of sites in the same area are being assessed. • The cumulative impacts should apply the same considerations as above taking all sites together.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	Description of the resultant Green Belt boundary: • If the resultant boundary features are not recognisable and permanent, is there an alternative boundary which could be used? • If no alternative boundary, it is recommended that if the site is taken forward, the accompanying policy would need to specifically state that a recognisable and permanent new Green Belt boundary must be provided or the existing boundary requires strengthening.
Conclusion	A summary is provided which draws conclusions on Green Belt harm as follows: • Removal of the site (or sites, if cumulative) is likely to result in significant harm to Green Belt function and purposes. • Removal of the site (or sites, if cumulative) is likely to result in moderate harm to Green Belt function and purposes. • Removal of the site (or sites, if cumulative) is likely to result in limited harm to Green Belt function and purposes. • Removal of the site is not likely to harm Green Belt function and purposes. • Whether removal will ‘fundamentally undermine’ the purposes of Green Belt taken together.

5.8 Grey Belt

Following the SGBA Update which identified broad areas of search for potential grey belt through a Stage 1 Green Belt Assessment, this Stage 2 Green Belt Assessment provides a site-specific assessment of whether land constitutes grey belt land.

The Stage 1 and Stage 2 Green Belt Assessments serve different roles and operate at different geographical scales. Stage 1, at the WECA scale, identifies broad locations with potential to contain grey belt, based on strategic-scale parcels and a proportionate level of information. However, the identification of grey belt is not confirmed at this stage. Stage 2, at the B&NES scale, provides a finer grained assessment of more granular parcels, where individual sites are assessed in detail. Therefore, the areas of search within the Stage 1 assessment are informative rather than conclusive.

The Stage 2 Assessment draws on Stage 1 findings alongside other evidence, including the spatial strategy and site availability work, to reach a final, evidence-based conclusion.

Considering this, differences between the Stage 1 and Stage 2 grey belt are a result of a number of factors including;

- 1) Stage 1 assesses large parcels of land, whereas Stage 2 considers smaller, individual sites. This can materially affect how land performs against Green Belt purposes a, b and d.
- 2) Stage 2 integrates Stage 1 findings with wider additional evidence, particularly the Local Plan spatial strategy and site selection work.
- 3) The Stage 2 grey belt assessment focuses on sites that are being taken forward for allocation, rather than using the areas of search identified at Stage 1 as a starting point. This is due to the timing of the Stage 1 study in relation to Local Plan preparation. While the Stage 1 grey belt assessment has informed the process, it has been considered as one of several inputs rather than the primary source informing the focus of the study. The Council's spatial approach prioritises development in the most sustainable locations, taking into account assessment of site availability and suitability through the HELAA. As a result, some sites within Stage 1 areas of search have not been progressed where it was concluded there are not suitable or sustainable locations, while other sites not within the Stage 1 area of search have been brought forward as they considered to be sustainable locations for growth reflecting the outcomes of the spatial strategy and site selection process.

Approach:

Both the Stage 1 and Stage 2 grey belt assessments consider the principles set out in the NPPF, however the Stage 2 assessment considers these principles at a site specific level. The approach is as follows;

- Consider the Stage 1 SGBA findings, including whether the site lies within an identified 'area of search', as contextual evidence rather than a starting point
- Assess the site's contribution to Green Belt purposes. Where a site makes a strong contribution to Purposes a, b or d it is not considered potential grey belt and is not progressed further.
- Where the site does not strongly contribute to these purposes, consider the presence of any footnote 7 constraints that may affect development potential. These are recorded in the site proformas.
- On completion of the above steps, reach a conclusion as to whether the site constitutes grey belt.

5.9 Identifying areas of fundamental importance

Following the assessment of all sites, results were gathered and examined to understand whether any areas of Green Belt land within the Bristol and Bath Green Belt were of 'fundamental importance' with regards to the five Green Belt purposes. This is based on the areas of fundamental importance identified in the SGBA Update and considered further as part of this Stage 2 GBA.

Once assessment of all sites was complete, results were examined further to compare Stage 1 conclusions in the context of areas of fundamental importance to B&NES and understand implications for this Stage 2, along with commentary on the differences and similarities between Stage 1 and 2 findings. This assessment is undertaken in Section 6 of this report.

The purpose of this further analysis was to identify emerging areas of fundamental importance relevant to B&NES. Such areas can be defined as parts of the Green Belt – whether a single site or a cluster of two or more adjoining sites – performing particularly strongly either overall or against a specific purpose.

The overall purpose of this final exercise was to provide relevant evidence supporting B&NES when it comes to performing the ‘fundamentally undermine’ test⁵⁷ for the purposes of demonstrating exceptional circumstances for the alteration of Green Belt boundaries and for guiding development management decisions as detailed in paragraph 155a of the NPPF (2024). This test is then outlined in Section 8, considering each site’s performance overall, alongside whether it falls within a ‘fundamentally important’ area identified in Section 6. A table in Annex C outlines each individual site’s assessment in relation to this test, if released.

⁵⁷ NPPF paragraph 146

6. Areas of fundamental importance to the Green Belt

6.1 Overview

The NPPF (2024) and PPG now includes a requirement for planning authorities to consider when reviewing Green Belt boundaries whether alterations would *‘fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan’*⁵⁸. The PPG sets out that when coming to this judgement, authorities should consider “...whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way” (Green Belt PPG, paragraph 008). This can only take place when a Council has identified which land would be released from the Green Belt.

Therefore, this section identifies areas of ‘fundamental importance’ across the Green Belt in B&NES, taking a high-level strategic view of the Green Belt as a whole. This analysis is intended to provide evidence for the Council to underpin any future ‘fundamentally undermine’ test that will need to be set out as part of an exceptional circumstances case when reviewing Green Belt boundaries.

Areas of ‘fundamental importance’ are those which perform a strategically important role against the Green Belt purposes within the context of the wider Green Belt across the plan area and are therefore considered the most sensitive to change. It should be noted that the areas do not necessarily align with boundaries used in the GBA.

6.2 Analysis and identification of areas of fundamental importance

The 2024 NPPF and the PPG require consideration of whether the release of Green Belt land “...would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.” (NPPF, paragraph 146). The PPG sets out that when coming to this judgement, authorities should consider “...whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way” (Green Belt PPG, paragraph 008). This can only take place when a Council has identified which land would be released from the Green Belt.

The Stage 1 GBA (also referred to as the SGBA Update) in response to this, identified areas of ‘fundamental importance’ across the Bristol and Bath Green Belt. As a starting point, only parcels which had an overall assessment of ‘strong’ were considered. Land within these parcels was then considered in more detail to determine areas of fundamental importance, based on a combination of contribution to Green Belt purposes and strategic role of parcels/multiple parcels considered together. Professional judgement was also applied in determining which areas were deemed fundamentally important.

As part of this Stage 2 GBA, these areas of fundamental importance are summarised, and high-level commentary provided outlining how the more granular Stage 2 sites assessed perform in relation / relate to these areas.

Summary of Stage 1 Areas of Fundamental Importance

Below is an outline of the areas identified at Stage 1, and commentary on those Stage 2 sites which fall within these areas and their impact on them.

Area 1 – Land South West of Bath

This area of Green Belt is located between Bath and the edge of the Bristol and Bath Green Belt designation adjoining land surrounding the village of Timsbury. This area was deemed to be of fundamental importance to the Green Belt as it plays a key role in checking the unrestricted sprawl of the large built-up area of Bath (purpose a), its strong contribution to safeguarding the countryside from encroachment (purpose c) given it is

⁵⁸ NPPF (2024), Paragraph 146

largely free of development, and its important role in preserving the setting and special character of Bath (purpose d) given it includes land within the World Heritage Setting.

There are no Stage 2 sites which fall within this area.

Area 2 – Land South of Bristol and to the South West of Keynsham

This area of the Green Belt is located to the south of Bristol adjoining it along its northern boundary, overlapping the boundaries of BCC, NSC and B&NES. This area was deemed to be of fundamental importance to the Green Belt as it plays a key role in checking the unrestricted sprawl of Bristol into open countryside (purpose a), and it provides a strong contribution to safeguarding the countryside from encroachment (purpose c) as it is largely free of development, possesses a strongly rural character with long distance views to Bristol and the Mendip Hills National Landscape.

Sites S-028 and S-029 are within this area. Site S-029 adjoins the large built-up area of Bristol to the north and west. While S-029 scores strongly overall, S-028 scores moderately overall. As both sites are enclosed by development to the north, east and west their impacts on the wider strategic parcel are limited, and S-029 could be seen to ‘round off’ the edge of Bristol, while S-028 adjoins Whitchurch and would function as an extension this settlement.

Area 3 – Land between Bath and Keynsham

This area of the Green Belt is located to the west of Bath and east of Keynsham, with the village of Saltford adjoining parcels also located to the east of Bath. This area was deemed to be of fundamental importance to the Green Belt as it plays a key role in checking the unrestricted sprawl of Bath into open countryside (purpose a), and it plays a major role in preventing the merging of Bristol and Keynsham given this area comprises the entire gap between neighbouring towns (purpose b). In relation to purpose d, the area plays an important role in preserving the setting of and special character of the historic town of Bath given it includes land within the World Heritage Site and Setting.

Sites S-013, S-014, S-015, S-016, S-017, S-018 and S-030 fall within this area. Sites S-014, S-015, S-016, S-017 are located between the village of Saltford and Keynsham, while S-030 adjoins Corston and is between Bath and Saltford and S-013 is closer to the western edge of Bath. Only S-013 scores strongly overall, with most scoring weak or moderately due to their level of enclosure by built form, urbanising influences from adjacent built form or relatively small size. In addition, S-030 adjoins the settlement of Corston, and would function as an extension of it.

Due to these reasons, all sites except for S-013 have a limited impact on the wider strategic area. S-013 is considered to make a major contribution to the Stage 1 area of fundamental importance, due to its larger size and strong overall contribution to Green Belt purposes.

Area 4 – Land along the North West edge of Bath

This area adjoins the north west edge of Bath. This area was deemed to be of fundamental importance to the Green Belt as it plays a key role in checking the unrestricted sprawl of the large built-up area of Bath, and it plays an important role in preserving the setting of and special character of the historic town of Bath given it includes land within the World Heritage Site and Setting.

Sites S-011 and S-012 fall within this area. They all adjoin the edge of Bath, close to Weston. Site S-012 scores strongly overall, while S-011 scores moderately. While one site scores strongly, in relation to the strategic area identified in Stage 1, both sites make a limited overall contribution given their relatively small sizes, and the fact that they all adjoin Bath and would function as part of Bath. For these reasons, they are deemed to have a limited impact on the wider strategic area.

These areas of fundamental importance are used as part of the basis for the ‘fundamentally undermine’ test, which is outlined further in Section 8 of this report, supported by Annex C which contains a table undertaking a site-by-site analysis against the test if released from the Green Belt.

7. Summary of Assessment Findings

7.1 Overview

This section draws together the findings of the Stage 2 Green Belt Assessment, synthesising the outcomes of the detailed site assessments undertaken in accordance with the methodology set out in Section 5. The detailed proformas setting out the assessment for each site can be found in Annex B.

The findings presented are intended to:

- Summarise how the sites perform against each of the NPPF Green Belt purposes and the spatial distribution of this;
- Summarise the overall NPPF performance classifications across sites (strong, moderate, weak or no contribution) and their spatial distribution;
- Summarise the number and distribution of sites identified as provisional grey belt;
- Summarise the performance of Green Belt land based on a high-level comparison of Stage 1 and Stage 2 findings (including areas of fundamental importance);
- Summarise the considerations relating to site boundaries to be taken forward by the council.

7.2 Purpose (a)

To check the Unrestricted sprawl of large built-up areas.

The findings of the purpose (a) assessment are presented in Figure 7-1, The summary of scores is presented below:

Purpose (a) Score	No. of Sites
No contribution	22
Weak	5
Moderate	3
Strong	4

A significant proportion of sites did not contribute to purpose (a). This can be attributed to their distance from either of the large built-up areas (the urban areas of Bath and Bristol). Sites which scored weakly did so due to their relatively small size or limited perceptual links to the large built-up area.

For those with strong scores, this was due to a combination of:

- The connection with the large built-up area (3 were connected to Bath, 2 were connected to Bristol), with each being noted as abutting the respective urban area on one or more boundary;
- The presence of less defensible inner and outer boundaries, and;
- Absent or limited extent of existing development relative to the total area of the site.

Sites with moderate scores reflect similar assessment reasoning, but are distinguished by either a higher presence of inappropriate Green Belt development or a degree of enclosure from surrounding built form, meaning their release would be less likely to result in an incongruous pattern of development.

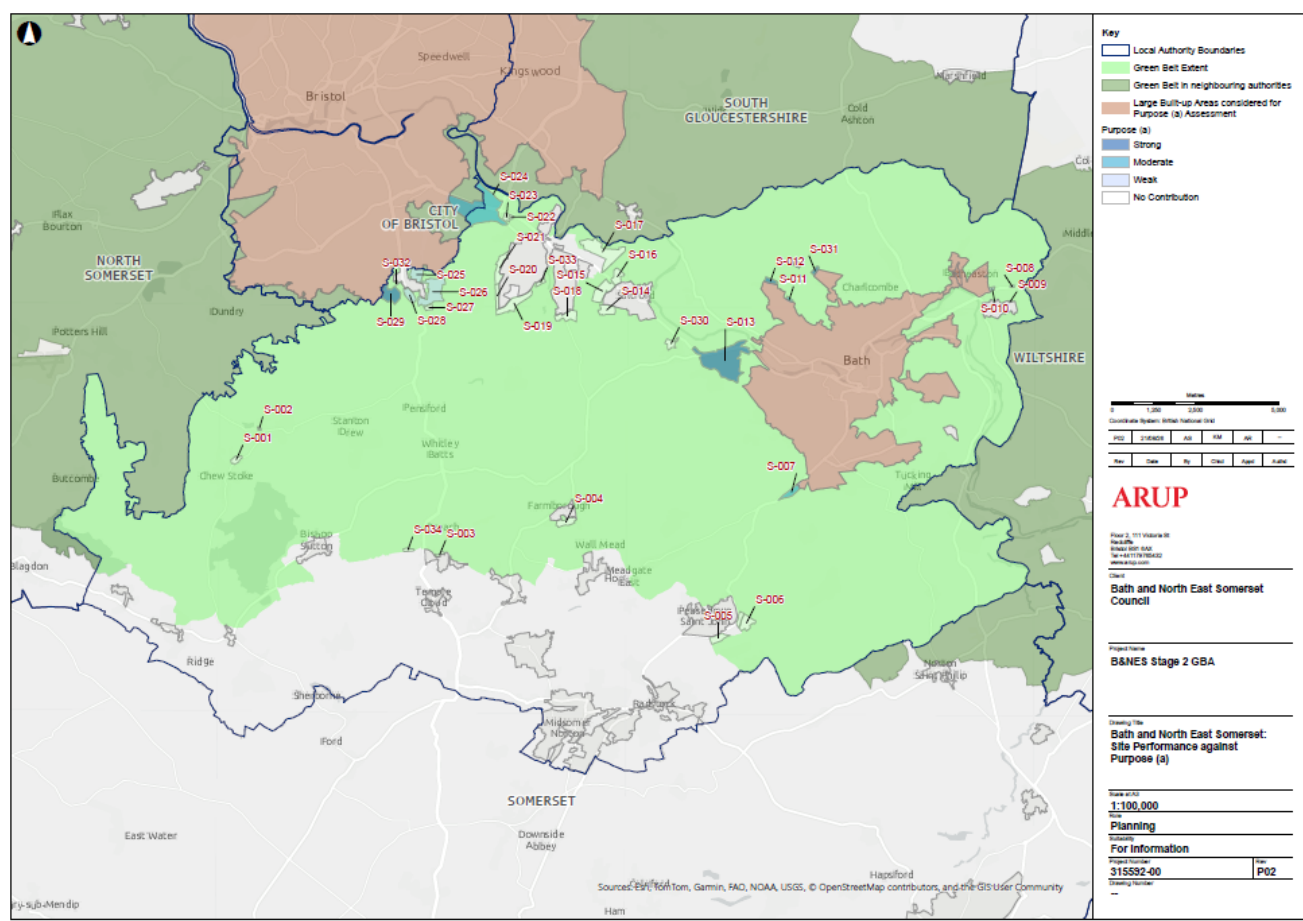


Figure 7-1 Map of site performance against purpose (a)

7.3 Purpose (b)

To prevent neighbouring towns from merging.

The findings of the purpose (b) assessment are presented in Figure 7-2, The summary of scores is presented below:

Purpose (b) Score	No. of Sites
No contribution	13
Weak	17
Moderate	1
Strong	3

The majority of sites either had no contribution or a weak contribution to purpose (b). This reflects the fact that many sites do not lie within a gap between two settlements, and therefore make no contribution, while others relate to only a small portion of a wider gap, resulting in a weak contribution. Among sites with no contribution to this purpose, many also made no contribution to purpose (a), while others showed varying levels of contribution linked to their connection with the large built-up area of Bath. All sites that had a connection with the large built-up area of Bristol contributed to purpose (b) due to being situated between the neighbouring towns of Bristol and Bath.

Those with strong contributions comprised large parts of the gaps between Keynsham, Bath and Bristol. One site scored moderately as, although it comprised part of the gap between Keynsham and Bath and Keynsham and Bristol, it formed a relatively small part of these gaps.

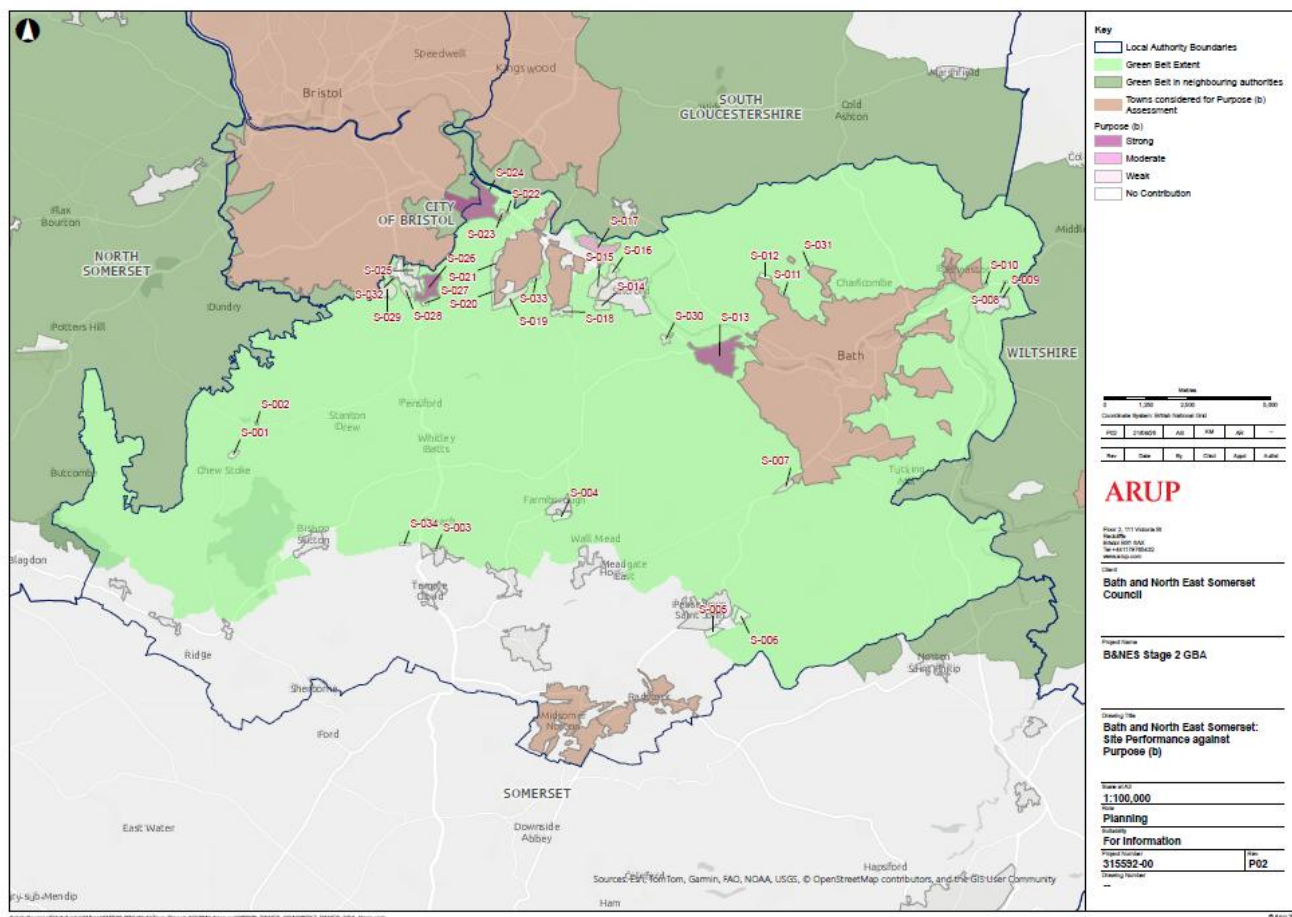


Figure 7-2 Map of site performance against purpose (b)

7.4 Purpose (c)

To assist in safeguarding the countryside from encroachment.

The findings of the purpose (c) assessment are presented in Figure 7-3, The summary of scores is presented below:

Purpose (c) Score	No. of Sites
No contribution	1
Weak	2
Moderate	18
Strong	13

The majority of the sites had either a moderate or strong contribution to purpose (c). This is due to many of these sites comprising open fields as well as an absence of or limited coverage of development that is inappropriate in the Green Belt. Within this subset, sites that contributed strongly represent a smaller share, reflecting the larger number of sites which have limitations to long-distance views and/or nearby urbanising influences.

Of the remaining sites, those that made a weak contribution did so due to their largely urban character. This resulted from the proportion of the site covered by existing development and the sense of enclosure created by surrounding features and land-uses, including roads, built form and dense vegetation. One site made no contribution, and did so due to its strongly urban character, deemed as a result of it containing more than 20% built form.

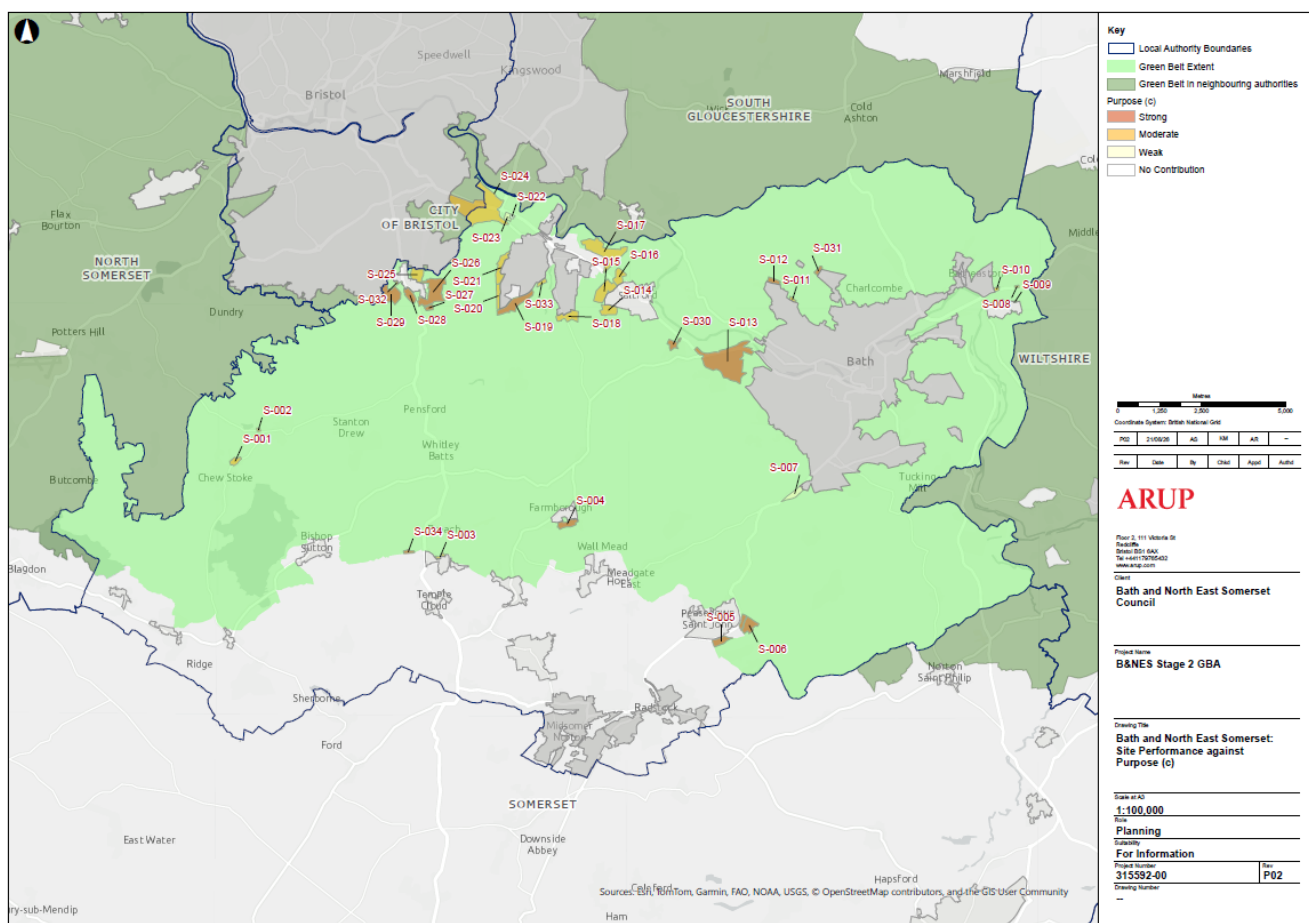


Figure 7-3 Map of site performance against purpose (c)

7.5 Purpose (d)

To preserve the setting and special character of historic towns.

The findings of the purpose (d) assessment are presented in Figure 7-4, The summary of scores is presented below:

Purpose (d) Score	No. of Sites
No contribution	17
Weak	6
Moderate	1
Strong	10

The majority of sites had either no contribution or a strong contribution to purpose (d). This reflects a clear distinction between sites that are sufficiently distant from, or lack a meaningful connection with, historic towns, and those that form part of their immediate setting. Within this distribution, sites that contributed strongly represent a notable proportion. This can be attributed to the large number of sites which directly contribute to the character of and views from a Historic Towns (namely Bath, Bristol or Keynsham), and also due to the fact that many of the sites fall within the World Heritage Site and its Setting. Whilst not all sites assessed against their relationship to the Bath World Heritage Site contained prominent features of landscape setting, many were assigned a strong contribution due to their location within its defined Setting. This reflects the broad extent of the WHS setting, which includes surrounding villages and landscapes in recognition of the contribution of the countryside to its ‘Outstanding Universal Value’.

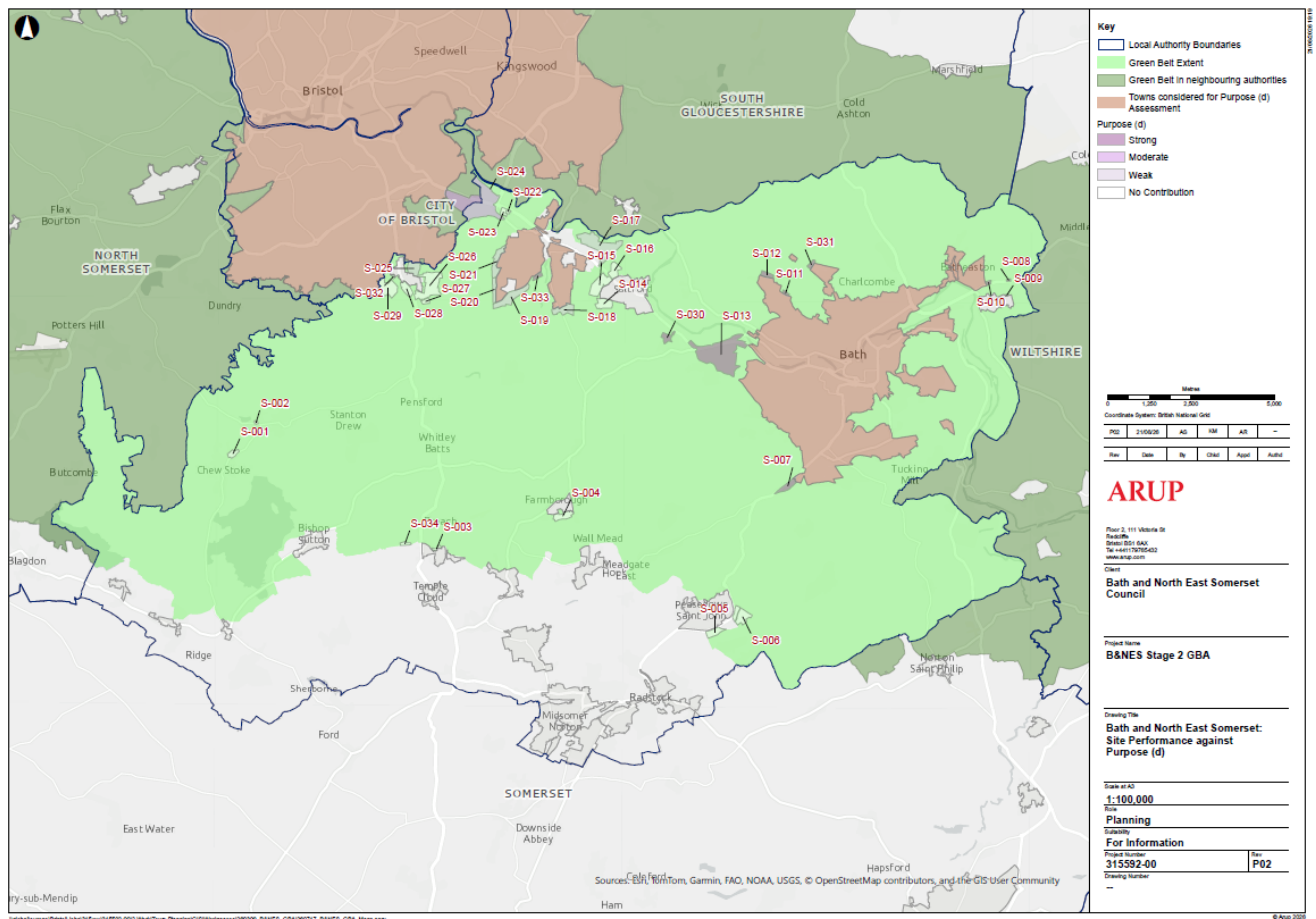
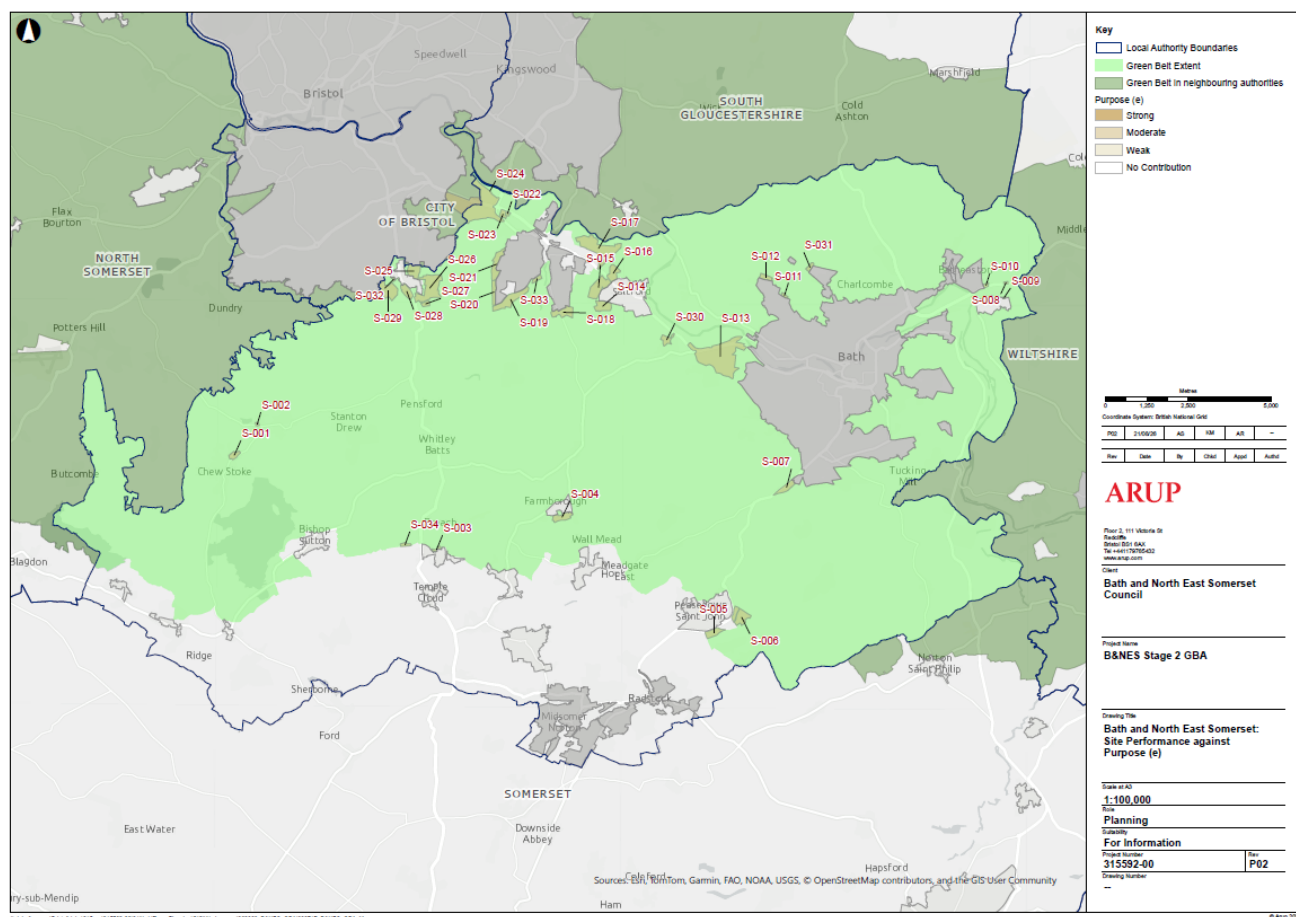


Figure 7-4 Map of site performance against purpose (d)

7.6 Purpose (e)

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

As set out in section 5.5.5, purpose (e) was assessed at a strategic level rather than on a site-by-site basis due to the inability to differentiate how individual sites contribute to this purpose. The findings indicate that the Bristol and Bath Green Belt, including within Bath and North East Somerset, performs a moderate role in supporting urban regeneration by encouraging the recycling of derelict and other urban land. As such, all sites assessed have been assigned a consistent ‘moderate’ contribution against purpose (e). This is illustrated in Figure 7-5.



7.7 Overall NPPF performance

Out of the 34 sites, 5 performed strongly, 14 performed moderately and 15 performed weakly.

NPPF Score	No. of Stage 2 Green Belt Sites	Sites (unique ID: name)
Weak	15	S-001: Hedgehogs and Hedgehogs further S-002: Old Tennis Courts S-003: Maypole, Clutton S-009: Ashley Road S-014: South Saltford S-015: West Saltford S-016: North West Saltford S-018: South East Keynsham S-020: West Keynsham S-021: West Keynsham (North) S-022: Devonport House S-023: Durley Farm S-025: North Whitchurch (north of Staunton Lane) S-027: East Whitchurch 2 S-032: Taylor Wimpey 2

Moderate	14	S-004: South Farmborough, Timsbury Road (Phase 1 and 2) S-005: West of BP S-006: East of BP S-007: Odd Down Employment Site S-008: Box Road S-010: Bathford Nurseries (South) S-011: Bath Equestrian Centre S-017: North Keynsham S-019: South Keynsham S-024: Hicks Gate S-028: West Whitchurch S-030: Land west of Corston Lane (Corston site 1) S-033: South Keynsham 2 S-034: West of Clutton
Strong	5	S-012: North of Napier Road, Weston S-013: West of Bath Option 3 - housing S-026: East Whitchurch S-029: Taylor Wimpey (Whitchurch Additional) Site S-031: Kingswood School Playing Fields

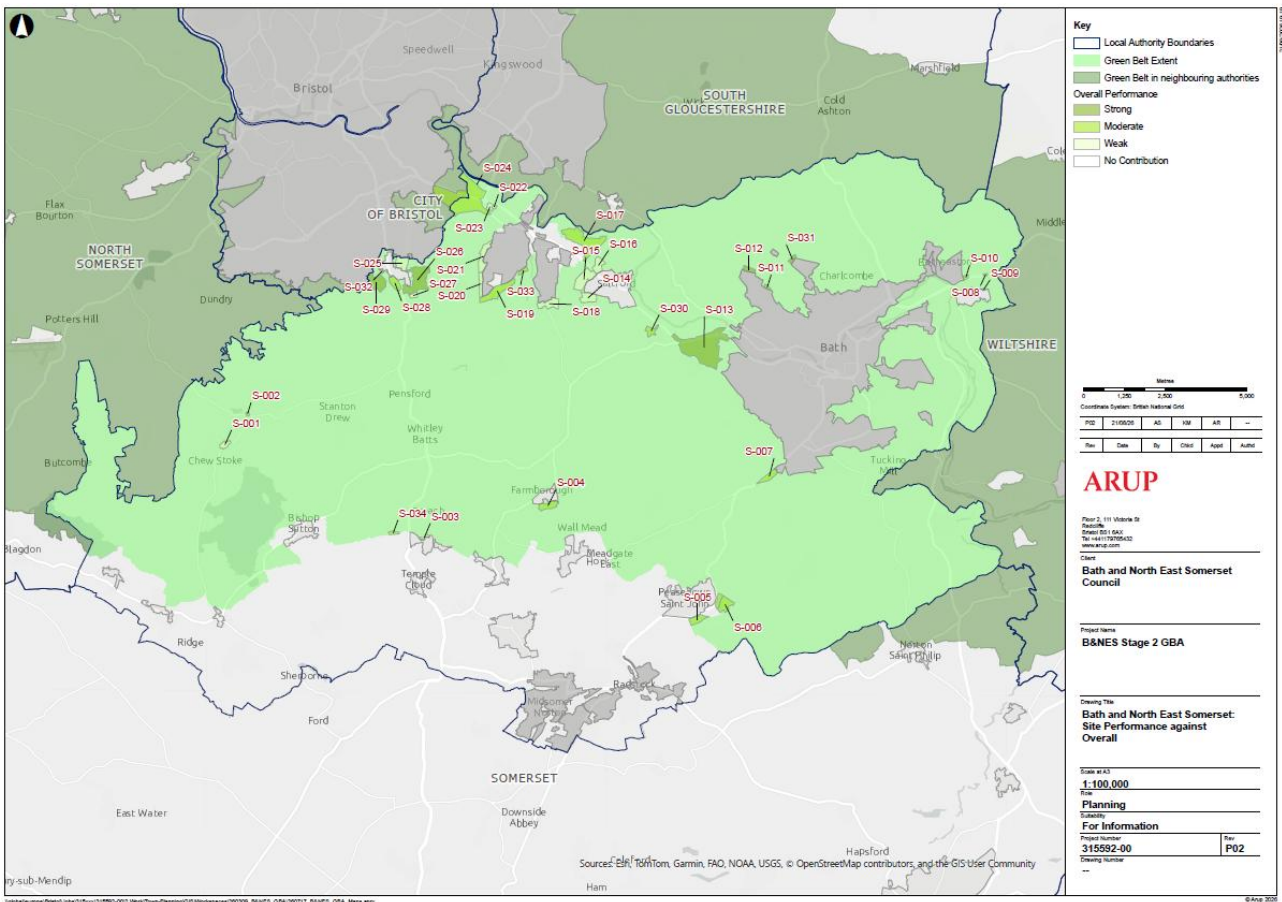


Figure 7-6 Map of overall performance of sites against NPPF purposes

7.8 Provisional Grey Belt identification (including scores and findings)

For the purposes of plan-making, grey belt is identified as any land that is not judged to strongly contribute to any one of purposes (a), (b), or (d) and that is not restricted by the application of policies in NPPF footnote 7. Within a GBA it is only possible to provisionally identify grey belt based on the purpose scores, while final confirmation of grey belt status will be achieved through wider plan-making or through development management processes when NPPF footnote 7 can be taken fully into account. This section provides an overview of the provisional grey belt identification exercise undertaken for B&NES.

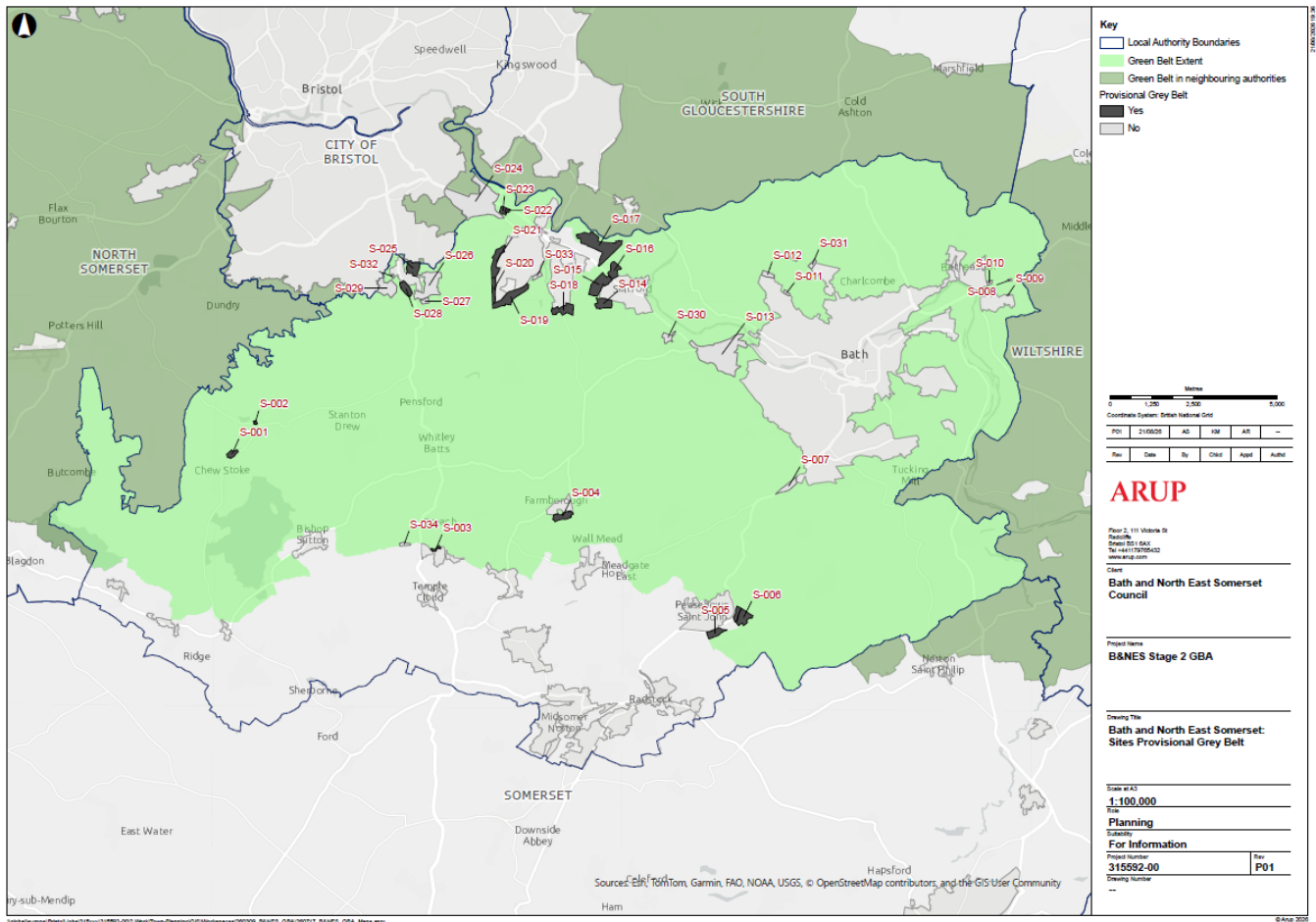


Figure 7 Provisional Grey Belt

7.8.1 Grey belt scores and findings

The results of the Stage 2 GBA purposes assessment were filtered to isolate parcels which do not contribute strongly to any one of purposes (a), (b), or (d). The score values from the Stage 2 GBA were matched to the PPG's weak, moderate and strong contribution scale. Thus, parcels identified within the Stage 2 GBA as not having a relatively significant or significant impact were identified as provisional grey belt.

Provisional grey belt findings are presented in Table 7-2 and illustrated spatially in Figure 11. Based on the purpose assessments, each sub-area has been identified as a 'yes' or a 'no' for provisional grey belt, judged by whether a site scores 'strongly' against purposes (a), (b) or (d).

Of the 34 sites assessed, 21 are provisionally identified as grey belt.

Table 7-2 Provisional grey belt status of Stage 2 GBA sites

Provisional grey belt status	No. of Stage 2 Green Belt Sites	Sites (unique ID: name)
Provisional grey belt	21	S-001: Hedgehogs and Hedgehogs further S-002: Old Tennis Courts S-003: Maypole, Clutton S-004: South Farmborough, Timsbury Road (Phase 1 and 2) S-005: West of BP S-006: East of BP S-014: South Saltford S-015: West Saltford S-016: North West Saltford S-017: North Keynsham S-018: South East Keynsham S-019: South Keynsham S-020: West Keynsham S-021: West Keynsham (North) S-022: Devonport House S-023: Durley Farm S-025: North Whitchurch (north of Staunton Lane) S-027: East Whitchurch 2 S-028: West Whitchurch S-032: Taylor Wimpey 2 S-036: South Keynsham 2
Not grey belt	13	S-007: Odd Down Employment Site S-008: Box Road S-009: Ashley Road S-010: Bathford Nurseries (South) S-011: Bath Equestrian Centre S-012: North of Napier Road, Weston S-013: West of Bath Option 3 - housing S-024: Hicks Gate S-026: East Whitchurch S-029: Taylor Wimpey (Whitchurch Additional) Site S-030: Land west of Corston Lane (Corston site 1) S-031: Kingswood School Playing Fields S-034: West of Clutton

7.8.2 Next steps

As previously mentioned, purpose scores only form part of the determination of grey belt status. Thus, the Council should review whether the application of policies relating to NPPF footnote 7 would provide a strong reason for refusing or restricting development, once more detail is known for parcels or sites either through plan-making or the development management process. In reaching this judgement, the PPG states that authorities should consider both where areas of grey belt would be covered by or affect designations in NPPF footnote 7.

Confirmation of grey belt status will not necessarily equate to land being allocated for development or released from the Green Belt. As part of the plan-making process the Council will need to consider the balance of wider planning factors, including whether the release of Green Belt sites (including but not limited to grey belt land) would contribute to a sustainable pattern of development. In addition, they will also need to apply the ‘fundamentally undermine’ test (NPPF 2024, paragraph 146) for any proposed Green Belt release. This test has been assessed under section 8 of this report in support of this, reviewing areas of fundamental importance discussed in Section 6 and considering the impact on the performance of surrounding Green Belt against the five purposes (taken together) if released.

It should be noted that for the purposes of decision-making, if a site is judged to be grey belt and its release would not fundamentally undermine Green Belt purposes, then it will still be necessary to consider whether development would not be inappropriate in the Green Belt, in line with the NPPF (paragraph 155).

This includes the following:

- The site is in a sustainable location
- The site is grey belt
- Development of the site would not fundamentally undermine the purposes of the remaining Green Belt
- There is demonstrable unmet need for the development proposed
- The site provides Golden Rules where applicable.

7.9 Boundary considerations (commenting at a high level and in general on boundary strength and what needs to be done for sites with weak boundaries).

The assessment has considered the strength of site boundaries, in line with NPPF requirements, to determine whether they are suitable to form revised Green Belt boundaries (either in whole or in part) depending on the assessment outcomes. Where boundary weaknesses have been identified, mitigation may be required, such as strengthening existing features or introducing new boundary features.

Further detail on boundary considerations for each site is provided within the assessment proformas. The findings presented are for information only and do not constitute recommendations. Any boundary refinements will be undertaken by the Council as part of the Local Plan process and set out in site allocation policy requirements.

8. Conclusion and Next Steps

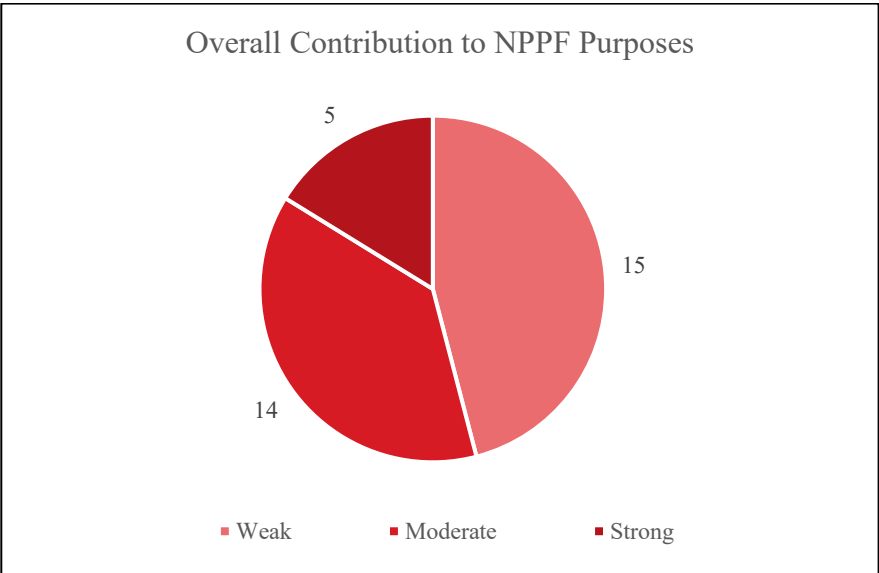
8.1.1 Green Belt Assessment

This study has examined the performance of the Green Belt within the B&NES authority area against the Green Belt purposes, as set out in the NPPF (2024). A total of 34 sites were assessed.

The sites were defined using a proportionate and spatially focussed approach that reflects the stage of Local Plan preparation and changes to national policy. To ensure that the sites assessed reflect locations which are available for growth, the initial filtering undertaken by the Council comprised sites which are proposed for allocation. These were further refined based on a series of principles relating to significant constraints or characteristics which would restrict development in particular parts of the site. Section 5.3 of this report provides further details of the process through which the Stage 2 sites were defined.

Of the 34 sites assessed, all were found to contribute to NPPF purposes to some extent. Overall performance varied, with 5 sites contributing strongly, 14 sites contributing moderately and 15 sites demonstrating a weak contribution.

Figure 8-1 Pie chart showing number of sites and their overall NPPF contributions (strong, moderate and weak)



Performance across the individual purposes was highly variable, with the assessments for purposes (a) to (d) each revealing sites that span the full range of performance, from no contribution to strong contribution. The purpose (a) assessment recorded the highest proportion of sites making no contribution, while the purpose (c) assessment recorded the highest proportion of sites making the upper levels of contribution (moderate or strong, with 18 and 13 sites making these contributions respectively).

Table 8-1 Number of sites making each level of contribution across the five NPPF purposes

Contribution	Purpose (a)	Purpose (b)	Purpose (c)	Purpose (d)	Purpose (e)
No contribution	22	13	1	17	-
Weak	5	17	2	6	-
Moderate	3	1	18	1	34
Strong	4	3	13	10	-

A summary of the findings and the primary observations noted for each of the purpose assessments are provided below.

Purpose (a)

A significant proportion of sites gave no contribution to purpose (a). This can be attributed to their distance from either of the large built-up areas (the urban areas of Bath and Bristol).

Purpose (b)

A large majority of the sites either gave no contribution or a weak contribution to purpose (b). This can be attributed to the fact that many did not sit within a gap between two towns, while others represented only a minor part of the gap.

Purpose (c)

A large majority of the sites either gave a moderate or strong contribution to purpose (c). This is due to many of the sites comprising open fields as well as an absence of or limited coverage of development that is inappropriate in the Green Belt. Within this subset, sites that contributed strongly represent a smaller share, reflecting the larger number of sites which have limitations to long-distance views and/or nearby urbanising influences.

Purpose (d)

A majority of the sites either gave no contribution or a strong contribution to purpose (d). This reflects a clear distinction between sites that are sufficiently distant from, or lack a meaningful connection with, historic towns, and those that form part of their immediate setting. Within this distribution, sites that contributed strongly represent a notable proportion. This can be attributed to the large number of sites which directly contribute to the character of and views from a Historic Towns (namely Bath, Bristol or Keynsham).

Purpose (e)

As set out in this report, purpose (e) was assessed at a strategic level rather than on a site-by-site basis, and as such all sites were assigned a consistent ‘moderate’ contribution.

8.1.2 Grey belt Assessment

Taking the results of the purposes assessment, a total of 21 sites which do not contribute strongly to any one of purposes (a), (b) or (d) have been identified as provisional grey belt. As defined in the NPPF, grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. As set out in the methodology section, the analysis contained within the GBA only forms part of the evidence for the footnote 7 judgement. Therefore, the Council should review whether the application of policies relating to footnote 7 would provide a strong reason for refusing or restricting development in any of these locations, once more detail is known for sites and the nature and extent of proposed development later in the plan making or decision-making processes. Once this final exercise has been completed, the Council will be able to confirm grey belt status.

8.1.3 Potential amendments to the Green Belt

NPPF 2024 paragraph 148 introduces a sequential approach to the release of Green Belt land: “Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” When applying this approach through proposed release of Green Belt, consideration still needs to be given to promoting sustainable patterns of development. The NPPF further states that it is necessary to consider whether “the site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework” (NPPF 2024, paragraph 148). Paragraphs 110 and 115 focus on sustainable development locations and sustainable transport solutions.

In this Green Belt assessment, once the methodology excluded areas which are wholly or predominantly affected by major constraints, all recommendations were made based on the performance of sites against NPPF purposes, and their performance in the context of the wider Green Belt. Suitability in terms of sustainability, deliverability, infrastructure and wider site-specific or strategic planning considerations has not been taken into account in the recommendations. Rather, it falls to B&NES to assess the sustainability and deliverability of areas of land assessed through the Stage 2 GBA as part of the wider plan-making

process. Should further work demonstrate that sites are not sustainable or deliverable, the Council may decide that the sites should be retained within the Green Belt.

As previously noted, a boundary assessment was undertaken for each site, commenting on the relative strength of the boundary features and making recommendations either for alternative boundaries to be used to align with NPPF requirements or new boundaries to be created. While this assessment notes where this might be required, the decision on the necessity to strengthen existing, or create new boundaries, will be for the Council to take, taking into account how such mitigation might be secured.

8.1.4 ‘Fundamentally undermine’ test of the remaining Green Belt

As noted in section 5.9 above, paragraph 146 of the 2024 NPPF additionally requires authorities, as part of their review of Green Belt boundaries, to provide clear evidence of whether doing so would ‘fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.’ This has become known as the ‘fundamentally undermine’ test.

In the case of B&NES, an assessment of fundamentally important areas of Green Belt across all purposes was carried out as evidence to inform the Council’s decision-making process with respect to this test within the WECA Stage 1 Green Belt Assessment.

In that Stage 1 assessment, the term ‘fundamentally important’ was used rather than ‘fundamentally undermine’ to reflect the fact that the assessment was performed before the Council had decided on specific allocations to release from the Green Belt, and therefore, at the time, it was too early to assess the extent to which such allocations would or would not fundamentally undermine the purposes (taken together) of the remaining Green Belt.

As part of this Stage 2 Assessment, the Stage 1 assessment areas of fundamental importance have been reviewed to determine if the Stage 2 sites overlap to a significant extent with Stage 1 fundamentally important areas of Green Belt across all purposes, to assess the risk or otherwise of ‘fundamental undermining’.

The Stage 1 assessment noted that the performance of the Green Belt in B&NES as a whole against purpose (e) is deemed to contribute equally moderately to that purpose. On this basis, no areas of the Green Belt are considered to be of fundamental importance in respect of purpose (e). The assessment therefore focuses on whether the release of sites would fundamentally undermine the purposes of the remaining Green Belt across the other four purposes- a), b), c) and d)- subject to the exact combination and/or number of sites to be released from the Green Belt.⁵⁹

In addition, in Annex C, a table has been prepared summarising each site’s impact on the function and purposes of the surrounding Green Belt if released, cumulative impacts and ultimately if releasing of the site is likely to fundamentally undermine the four purposes of the remaining Green Belt. The findings of the assessment conclude that no site (if released), would undermine the role of the remaining Green Belt against the purposes (taken together).

Table 8-1 below summarises the proportional loss of Green Belt in relation to proposed allocations, in relation to the totality of the Green Belt within B&NES. It demonstrates that the land proposed for Green Belt release would not fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.

Table 8-8-2 Net change proposed to Green Belt through site allocations

Currently adopted Green Belt and proposed amendments	Net change, hectares
Currently adopted Green Belt	24,725.83ha
Total in the Green Belt allocations	-536.65ha
Total net change	-536.65ha

⁵⁹ The assessment of Green Belt performance against purposes a) to d) was also necessary to cover multiple possible interpretations of the paragraph 146 wording ‘taken together’- for example, either ‘in combination’ or ‘sequential’, which at the time had not been tested through case law. In a subsequent appeal decision (APP/T3725/W/25/3368738, January 2026) the Inspector took a sequential approach (see Annex A for further details).

The total net loss of 536.65 hectares represents a two per cent loss of Green Belt land. It is considered that this scale of loss is not likely to fundamentally undermine the purposes (taken together) of the remaining Green Belt.

The Stage 1 assessment also noted, importantly, that identification of an area of fundamental importance does not necessarily mean that these areas cannot accommodate any development at all, and that this is a matter of balanced judgement for the Council based on the scale and location of the proposed land for release.

8.1.5 Exceptional circumstances

The Council will also need to carefully consider whether, in accordance with the NPPF, there are any exceptional circumstances that justify Green Belt boundaries being altered through the Local Plan. While the outcomes of the GBA will form part of any exceptional circumstances case presented to support Green Belt alterations, the GBA itself does not set out exceptional circumstances arguments.

The findings of this Stage 2 GBA should therefore be read as one part of the wider Local Plan evidence base. Decisions on site allocations and any proposed Green Belt boundary amendments will be made by the Council through the Local Plan process, having regard to national requirements and the need to demonstrate exceptional circumstances.

Annex A Review of recent appeal decisions

Assessment parcels

Recent appeal decisions relevant to Green Belt assessment parcels highlight that parcels are useful in a strategic sense to inform plan-making and in particular for future development growth within an authority area. Within a group of appeal decisions in the London Borough of Brentwood (Ref: APP/H1515/W/24/3341474-79)⁶⁰, the Inspector considered that a site-specific level is more relevant for determining grey belt land, rather than a larger strategic Green Belt assessment parcel. This is due to the potential for ‘skewed’ assessment effects that could be introduced by parcel variation. It is noted that larger sites do not easily lend themselves to the identification of grey belt land. It is acknowledged that this particular appeal pre-dates publication of the PPG in 2025, however given the recent publication of updated national policy and guidance, and therefore limited appeals/case law, this is considered to be helpful.

Table 8-3 Recent appeal decision: scale / granularity of Green Belt assessment parcels

Theme	Appeal Ref	Date	Summary
Scale / granularity of Green Belt parcels	APP/H1515/W/24/3341474-79.	16 January 2025	The inspector stated the following: <i>“Looking at parcels is helpful in a strategic sense to inform plan making and future development growth. However, for decision making, it seems more relevant to look at a site-specific level for determining grey belt land, otherwise the scale could be too large and skewed by land some distance from the actual site”</i>. Whilst this appeal pre-dates the PPG updates for Green Belt, this aligns with PPG which indicates that, when identifying grey belt land, using a small number of large parcels will generally not be an appropriate approach and assessment areas should be sufficiently granular to enable their varied contributions to the Green Belt purposes to be functionally determined⁶¹.

Definition of large built-up areas and sprawl

The judgment made in APP/H2265/W/24/3347410 considers the definition of the ‘large built-up area’ and how sprawl is considered in the context of determining whether a site should be ‘grey belt’. A recent judgment made in South Gloucestershire, sets out a number of key points in relation to assessment of contribution to purpose (a). This is summarised below.

⁶⁰ Planning Inspectorate (2025). Appeal Decisions against Brentwood Borough Council.

⁶¹ National Planning Practice Guidance (2025). Green Belt Paragraph: 004 Reference ID: 64-004-20250225.

Table 8-4 Recent appeal decisions: Definition of sprawl and purpose (a) criteria

Theme	Appeal Ref	Date	Summary
Definition of sprawl	APP/H2265/W/24/3347410 ⁶²	13 February 2025	This appeal provides guidance on the interpretation of Green Belt purposes with regard to preventing urban sprawl and the merging of neighbouring towns. The appellant's site was argued by the council to play a role in preventing urban sprawl as the proposals would contribute to ribbon development along the A20, however the inspector judged that paragraph 143(a) only refers to the unrestricted sprawl of large built-up areas. The nearest settlement (Wrotham) was judged to be a village and therefore not of relevance to this purpose, so the inspector determined that although the site would contribute to ribbon development, this did not amount to the sprawl of a large built-up area. The same appeal judgement also stated that London is the most relevant large built-up area with respect to paragraph 143(a), and that the site in question therefore did not perform strongly against this purpose.
Purpose (a) criteria in the PPG	APP/P0119/W/24/3357956 ⁶³	4 July 2025	This appeal is a recent example of a decision made in respect of grey belt. The Inspector sets out that <i>"the PPG makes clear that [a site being free from existing development] is not the only relevant consideration. The presence of development is one example of a feature that potentially weakens the land's contribution to purpose (a)"</i> . The SGC Stage 2 Green Belt Assessment was referred to in the Appeal Decision as 'comprehensive and robust' despite it pre-dating the concept of grey belt as defined in 2024 NPPF and updated PPG. It was noted that whilst the site was free of existing sprawl, was 'physically connected' to the large built-up area of Bristol. In the assessment's review of site boundaries that these were 'mixed', being defined by ancient woodland, residential curtilages and a road, but 'on the whole consists of a defensible boundary which would prevent unrestricted sprawl'.

Definition of towns

The way in which 'towns' and 'villages' have been defined in GBAs has been the subject of many appeals, including recent appeals set out below. In particular, these appeals highlight that settlement hierarchy should be considered when identifying towns for the purposes of GBA (APP/D3640/W/24/3347530).

⁶² [Planning Inspectorate \(2025\). Appeal Ref: APP/H2265/W/24/3347410 Land part of Wrotham Water Farm, off London Road, Wrotham, Sevenoaks, Kent.](#)

⁶³ [Planning Inspectorate \(2025\). Appeal Ref: APP/P0119/W/24/3357956 Land south of Hencliffe Way and west of Castle Farm Road, Hanham](#)

Table 8-5 Recent appeal decisions: Definition of towns

Theme	Appeal Ref	Date	Summary
Definition of towns	APP/D3640/W/24/3347530. ⁶⁴	12 March 2025	An inspector ruled that the settlements of Bagshot and Windlesham did not constitute towns, being instead “villages of varying scales”, and that the appellant’s site which fell in between the two settlements did not play a role with respect to paragraph 143(b). Both Bagshot and Windlesham had been defined as towns in the LPA’s Green Belt Review, but the Inspector ruled that this carried less weight than the council’s Core Strategy, in which the settlement hierarchy defined Bagshot as a large village and Windlesham as a smaller village. The Inspector also opined that even if both settlements were considered towns, that the parcel of land in their view would not materially erode the gap between them if released for development. Given that the site did not play a role with regards to paragraph 143(b), the Inspector determined that it constituted grey belt land.
Definition of towns Role of Green Belt in preventing merging between towns	APP/G5180/W/24/3354266. ⁶⁵	31 March 2025	In this appeal, the Inspector judged that neighbouring settlements of Chislehurst, Bickley and Petts Wood had the character of local centres rather than distinct towns as they have significantly merged, and that therefore the appellant’s site had an essentially suburban setting and could not be considered to play a role with regards to preventing neighbouring towns from merging. Given this context, the Inspector additionally judged that the site could not play a role in preserving the setting or special character of historic towns and the site did not fulfil the purposes set out in paragraphs 143(b) or (d).
Definitions of towns and villages	APP/M1520/W/24/3351658. ⁶⁶	15 April 2025	The Inspector acknowledged that the settlement of Daws Heath in Essex had been classed as a town in the latest Green Belt review and a village in other development plan documents. The Inspector deemed Daws Heath to be a village for the purposes of judging an appeal site close to the settlement on the basis stated that as services and facilities are limited and Daws Heath is not of a large scale, it must be considered a village. The Inspector reiterated that the appeal site could not, therefore, contribute to Purposes (a) or (b) given this relates to large built-up areas and towns and not villages.

Openness and encroachment

Before looking at recent appeals, it is helpful to reflect on more historic appeals and court judgements which have established some key points in relation to openness. These are still considered relevant for Green Belt assessment on the basis that openness remains a fundamental principle of the role of Green Belt within the NPPF (2024) and that updated PPG (2025) does not introduce new requirements specific for purpose (c) assessment.

Key points established through historic appeals are as follows:

- Openness is generally considered to be ‘land free from built development’, which should be assessed on an individual area basis as well as in terms of the cumulative impact on adjacent areas.⁶⁷
- Openness should be considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’ (for example, visual linkages between settlements in relation to purpose b, or functional character and linkages to the wider Green Belt in relation to purpose (c)).⁶⁸

⁶⁴ Planning Inspectorate (2025). Appeal Ref: APP/D3640/W/24/3347530 Land at Grove End, Bagshot.

⁶⁵ Planning Inspectorate (2025). Appeal Ref: APP/G5180/W/24/3354266 Bickley Manor Hotel, Thornet Wood Road, Bickley, Bromley BR1 2LW

⁶⁶ Planning Inspectorate (2025). Appeal Ref: APP/M1520/W/24/3351658 Land adjoining 451-469 Daws Heath Road, Hadleigh, Essex SS7 2UG

⁶⁷ The Planning Inspectorate (2017). Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust.

⁶⁸ Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin).

- While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, is not a mandatory determinative factor of openness.⁶⁹.

Recent case law on the subject of openness and encroachment as it relates to purpose (c) is set out below. It is noted that recent decisions consider openness in a visual sense, with development activity cited as a factor that can impact a parcel's contribution to openness. This aligns with the criteria used in the MCA 2022 Strategic GBA, considering the effects of urbanising development within the parcel on countryside character and level of containment by existing built form. Whilst it is apparent that there are alternative views as to the strength of natural boundary features in creating containment of Green Belt parcels within recent appeals (Ref: APP/M3645/W/24/3354630 and APP/C4615/W/24/3345744), it is considered that this is indicative of the need to apply a contextual approach to such matters.

Table 8-6 Recent appeal decisions: Openness and encroachment

Theme	Appeal Ref	Date	Summary
Openness	APP/M3645/W/24/3354630 ⁷⁰	14 March 2025	The appellant's site was in use as a storage yard for construction materials, equipment and machinery and the inspector judged that the intensity of activity and use meant that the site's existing state made a limited contribution to Green Belt openness. In addition, the inspector noted that hedgerows around the site formed a defensible boundary which screened views of the storage yard, resulting in negligible impacts on visual openness.
Openness	APP/C4615/W/24/3345744 ⁷¹	2 April 2025	In contrast to the above, this appeal was dismissed by the Inspector as it was judged that existing mature planting around the site perimeter was insufficient to screen the proposed development from adjacent rights of way, and that the proposed Battery Storage System would therefore be visually intrusive in its rural location.
Encroachment	APP/H2265/W/24/3347410 ⁷²	13 February 2025	The Inspector noted that the proposal for a secure 24-hr truck facility for HGVs incorporating a fuel station and amenity building and new access to A20, would represent an irreversible encroachment of built form into open and undeveloped countryside. However, it was judged that the site's area would be small in relation to the totality of the Green Belt within the Borough, and that it would therefore not fundamentally undermine the purposes of the Green Belt across the local authority area. The local authority in this instance (Tonbridge & Malling) was covered by over 70% Green Belt by total area, resulting in the impact of the release of a small land parcel being judged to be proportionally much less significant.
Encroachment	APP/P0119/W/24/3357956 ⁷³	4 July 2025	The Inspector acknowledged that whilst the development of the appeal site (for residential development) would run counter to the aim of purpose (c), and there would be some encroachment, the effects of the proposal would be limited in the wider context. Factors taken into account included the enclosure of the site by defensible boundaries, its limited site area and the scale of the scheme. The Inspector determined that its <i>"effect would be localised: the site cannot be said to have a strategic role in the functioning of the green Belt, meaning its development would not undermine any strategic role"</i> .

⁶⁹ Supreme Court Judgment (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3.

⁷⁰ Planning Inspectorate (2025). Appeal Ref: APP/M3645/W/24/3354630 Redeham Hall Industrial Yard, Redeham Road, Smallfield, Surrey RH6 9RJ

⁷¹ Planning Inspectorate (2025). Appeal Ref: APP/C4615/W/24/3345744 Land at Illeybrook Farm, Illey Lane, Halesowen B62 0HE

⁷² Planning Inspectorate (2025). Appeal Ref: APP/H2265/W/24/3347410 Land part of Wrotham Water Farm, off London Road, Wrotham, Sevenoaks, Kent

⁷³ Planning Inspectorate (2025). Appeal Ref: APP/P0119/W/24/3357956 Land south of Hencliffe Way and west of Castle Farm Road, Hanham.

Green Belt release – the fundamentally undermine test

The judgement made within Tonbridge and Malling Borough Council (Ref: APP/H2265/W/24/3347410), factored the size of the Green Belt parcel proposed for release (relative to the wider Green Belt) in the consideration of whether its release would fundamentally undermine the purposes of the Green Belt within the local authority area. This decision is summarised in below.

Table 8-7 Recent appeal decision: ‘fundamentally undermine’ test

Theme	Appeal Ref	Date	Summary
Fundamentally undermine test	APP/H2265/W/24/334741036F ⁷⁴	13 February 2025	The inspector noted that the proposal for a secure 24-hr truck facility for HGVs incorporating a fuel station and amenity building and new access to A20, would represent an irreversible encroachment of built form into open and undeveloped countryside would represent an irreversible encroachment of built form into open and undeveloped countryside. However, it was judged that the site’s area would be small in relation to the totality of the Green Belt within the borough, and that it would therefore not fundamentally undermine the purposes of the Green Belt across the local authority area. The local authority in this instance (Tonbridge & Malling) was covered by over 70% Green Belt by total area, resulting in the impact of the release of a small land parcel being judged to be proportionally much less significant.
Fundamentally undermine test	APP/T3725/W/25/3368738	22 January 2026	In Warwick, an application for three dwellings on Green Belt land was dismissed after the Inspector concluded that while the site is grey belt, having not met purposes (a), (b) or (d) strongly, the site’s encroachment into currently undeveloped countryside amounted to a fundamental undermining of purpose (c). Thus, an assessment of all five purposes for the land in question must be undertaken sequentially in order to determine whether the proposal meets the threshold of fundamentally undermining the purposes (taken together) of the remaining Green Belt across the area of the plan.
Fundamentally undermine test	APP/C3620/W/25/3369415	31 October 2025	Scale should be considered when determining fundamental importance. In Mole Valley, the appeal decision stated that “the appeal site is small in scale in relation to the size of the Green Belt in Mole Valley, and consequently developing the site as proposed would not fundamentally undermine the purposes, taken together, of the remaining Green Belt land across the area of the plan. The proposal therefore satisfies criterion (a) of paragraph 155 of the Framework.”
Fundamentally undermine test	APP/B3438/W/25/3371499	18 December 2025	In the district of Staffordshire Moorlands the Inspector similarly concluded that the small size of the site, in comparison to the wider Green Belt area, means that its development would not affect the “ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way”.

⁷⁴ Planning Inspectorate (2025). Appeal Ref: APP/H2265/W/24/3347410 Land part of Wrotham Water Farm, off London Road, Wrotham, Sevenoaks, Kent

Theme	Appeal Ref	Date	Summary
Fundamentally undermine test	APP/H1515/W/24/3341474-79	16 January 2025	In determining a series of six appeals (in Brentwood) the Inspector noted that all parties to the appeals agreed that the six parcels of land in question would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area. The reasoning behind this was that the parcels were small in size compared to the ‘considerable extent’ of the Green Belt across the borough. The Inspector judged that the sites’ scale caused them to make no more than a limited contribution to checking the unrestricted sprawl of large built-up areas.
Fundamentally undermine test	APP/H2265/W/24/3347410	13 February 2025	In an appeal at Wrotham – the Inspector noted that the proposal would represent an irreversible encroachment of built form into open and undeveloped countryside. However, it was adjudged that the site’s area would be small in relation to the totality of the Green Belt within the borough, and that it would therefore not fundamentally undermine the purposes of the Green Belt across the local authority area. As in the Brentwood example, the local authority (Tonbridge and Malling) was covered by over 70% Green Belt by total area, resulting in the impact of the release of a small land parcel being judged to be proportionally much less significant.

Grey belt

Summary of appeal lessons in relation to grey belt (since publication of revised PPG in February 2025):

- A site may be grey belt but if it is not in a sustainable location or fails to meet the ‘Golden Rules’, development of it would be classed as inappropriate development in the Green Belt.
- The footnote 7 designation does not automatically mean that a site fails the grey belt test; there needs to be a strong reason for refusal.
- Looking at parcels within a GBA is helpful at a strategic level for plan making. However, when considering the identification of grey belt in decision making, it is more relevant to assess at a site-specific level to ensure the assessment outcomes reflect the site itself and is not skewed by the characteristics of land potentially some distance from the actual site.

Grey belt appeals indicate high success rate for major residential applications (~80%), with Inspectors focusing on on-the-ground realities (e.g. levels of containment, enclosure and settlement services) over rigid settlement designations. Since publication of PPG (2025), to date there has been a high volume of grey belt appeals in South East applications (~65% of total as of November 2025); however, it is expected that LPAs within the South West and other regions will experience increasing grey belt applications and subsequent appeals.

Table 8-8 Extract of recent appeal decisions in relation to grey belt

Sub-theme	Appeal Ref	Date	Summary
Assessment area	<u>APP/H1515/W/24/3341474-79</u>	16 Jan 2025	Retrospective change of use of land to Gypsy/Traveller pitch (temporary or permanent). The Inspector stated the following: <i>“Looking at parcels is helpful in a strategic sense to inform plan making and future development growth. However, for decision making, it seems more relevant to look at a site specific level for determining grey belt land, otherwise the scale could be too large and skewed by land some distance from the actual site”</i> . Appeal allowed.

Sub-theme	Appeal Ref	Date	Summary
Golden Rules	<u>APP/C362 0/W/24/33 47843</u>	16 Apr 2025	Proposal for 23 new dwellings. Site considered to be grey belt, however not considered to meet para 155 criteria as no demonstrable unmet need for housing and failure to meet golden rules including affordable housing. <i>Appeal dismissed.</i>
Golden Rules	<u>APP/K360 5/W/24/33 52866</u>	24 Apr 2025	Proposal for 40 affordable homes and commercial development. Land identified as grey belt and complies with golden rules therefore not inappropriate development. Significant weight given to provision of affordable housing plus significant economic benefits associated with commercial/industrial development. On balance, potential impacts were considered to be outweighed by benefits. <i>Appeal allowed.</i>
Settlement classification	<u>APP/M15 20/W/24/3 351658</u>	15 Apr 2025	Proposal for 173 new dwellings. The proposal is considered not inappropriate in the Green Belt as Daws Heath is a village, and therefore the site is grey belt, not contributing to preventing neighbouring towns from merging or preventing the sprawl of large built-up areas. <i>Appeal allowed.</i>
Fundamentally undermine test	<u>APP/C362 0/W/24/33 52137</u>	8 May 2025	Proposal for 3 new dwellings. The site is grey belt as it does not meet purposes (a), (b) or (d). As the site is bounded by development on three sides, the site would not encroach on the countryside or impact openness, therefore not fundamentally undermining the wider Green Belt. Although the Inspector concluded that the site qualifies as grey belt, the proposal still failed to meet the policy tests required to avoid being treated as inappropriate development in the Green Belt. <i>Appeal dismissed.</i>
Sustainable locations	<u>APP/T221 5/W/24/33 54290</u>	26 Feb 2025	Proposal for part demolition and part conversion of existing agricultural buildings to form 4 residential dwellings. Proposed site considered an unsustainable location, despite the site being identified as grey belt land. The Inspector judged that the site did not contribute to purposes (a), (b) or (d), and additionally that as it was contained within the boundary of an existing farm which included existing buildings and hardstanding, it made a limited contribution to openness thus not fundamentally undermining the performance of the wider Green Belt. Being in an unsustainable location due to distance from local services and public transport options however was determined to override the grey belt status, making development inappropriate. <i>Appeal dismissed.</i>
Sustainable locations	<u>APP/Z011 6/W/24/33 42877</u>	26 Mar 2025	Outline application for the demolition of existing buildings, removal of surface parking, and erection of buildings to accommodate 4,765 sq.m of commercial buildings. Proposed site was not in a sustainable location and moreover was not in a location that could be made sustainable. Although the site was agreed by all parties to be grey belt land, not performing strongly against any of the purposes (a), (b) or (d), the unsustainability of the location was determined to render the proposal inappropriate development within the Green Belt. <i>Appeal dismissed.</i>
Sustainable locations	<u>APP/C362 0/W/24/33 49122</u>	24 April 2025	Proposal for 1no. dwelling and carport. The site is grey belt and PDL. The site is considered sustainable for the proposal, as it consists of a single dwelling and is within reasonable walking and cycling distance of services and public transport. The Inspector concluded that the proposed development would not undermine Green Belt purposes and met the para 155 tests of the NPPF, and therefore did not justify refusal on Green Belt grounds. However, the appeal failed on ecological grounds due to insufficient evidence in the submitted Preliminary Ecological Appraisal and conflicts with the Local Plan policies in relation to biodiversity and protected species. <i>Appeal dismissed.</i>

Sub-theme	Appeal Ref	Date	Summary
Sustainable locations	<u>APP/C3620/W/24/3356265</u>	2 May 2025	Change of use to Class E commercial units. Proposal judged to be inappropriate development in the Green Belt due to not being in a sustainable location, although it is on Grey Belt land and PDL. Proposal would impact openness of the Green Belt, but this is not the same as constituting sprawl. <i>Appeal dismissed.</i>
Footnote 7 constraints and inappropriate development in the Green Belt	AC-2025-LON-000898	30 Jan 2026	Proposal for a 24-hour truck stop (HGV facility, fuel station and associated works) on Green Belt land in Kent. The Inspector allowed the appeal and granted outline planning permission, finding the site to be grey belt and that impacts, including on the Kent Downs National Landscape, were limited. The Parish Council challenged the decision, arguing the Inspector had misinterpreted the NPPF by assessing whether footnote 7 policies provided a strong reason to refuse the specific development, rather than development of the site generally, and had erred in assessing need. The Court held that the Inspector's approach was lawful, confirming that grey belt and footnote 7 are to be applied to the proposal in question, and that the assessment of need was a matter of planning judgment. <i>Claim dismissed</i>

Annex B Site Assessment Proformas

S-001 Hedgehogs and Hedgehogs Further, Chew Stoke



S-001 A: Looking south east from Pagans Hill with views of open countryside



S-001 B: Looking east from western site boundary off Pagans Hill with views of open countryside



S-001 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026]).

Site Name	Hedgehogs and Hedgehogs Further, Chew Stoke
Site Size	5 ha
Stage 1 Parcel Reference	P-033
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	North of Chew Stoke village, site comprises a sports fields associated with Chew Stoke Cricket Club and an open agricultural field.
Boundary Features	The sub-area is bounded by hedgerow, treeline and the regular backs of residential properties to the north, by a treeline to the east, by Chew Lane to the south and by the regular backs of residential properties and Pagans Hill Road to the west. Inner boundary: none. Outer boundaries: north, east, south and west.

Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution Site is not at the edge of a large built-up area, in physical or perceptual terms, and makes no contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to Purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate Site contains no built form. The site comprises open fields, including a sports field and an agricultural field. The site is partly enclosed by the settlement of Chew Stoke along some of its boundaries (south and west) impacting the sense of openness. The site topography is predominantly flat, and longer distance views across open fields are interrupted by hedge rows and treelines. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a moderate contribution to two purposes, and no contribution to three purposes. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area (the Bristol urban area or Bath). Purpose (b): The site does not protect a gap between neighbouring towns. Purpose (c): The site is 5 ha and development of the site would entail a small incursion into undeveloped countryside relative to the size of Chew Magna. Purpose (d): The site does not impact upon the setting or character of a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The removal of the site will result in a 'hole' in the Green Belt, potentially undermining the surrounding Green Belt's function and purposes. However, any potential harm to the integrity of the wider green belt arising from development of the site would be limited given the site is partly enclosed by development in the washed over village of Chew Stoke.
Are there any cumulative impacts (due to release of adjacent sites)?	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary would not be defensible as it would consist of tree lines and hedgerow, except for the southern boundary which comprises Chew Lane and would be considered readily recognisable and likely to be permanent. The remainder of the existing boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	No.
Are there any Footnote 7 constraints present within the parcel?	No, however the site abuts Chew Stoke Conservation Area.
Does the parcel have the potential to be considered grey belt?	Yes.

Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.
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S-002 Old Tennis Courts, Chew Magna



S-002 A: Looking west from Dark Lane with views of open countryside including shrubland



S-002 B: Looking east from Broadcroft beyond the site boundary with views of open countryside



S-002 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026]).

Site Name	Old Tennis Courts, Chew Magna
Site Size	0.93 ha
Stage 1 Parcel Reference	P-036
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	To the west of Chew Magna (washed over village); site comprises an open field, pockets of shrubland and tree lines.
Boundary Features	The sub-area is bounded by treelines to the north and east, by Winford Road (the B3130) to the south, and by the rear garden boundaries of properties on Broadcroft and Winford Road to the west. Inner boundary: none. Outer boundary: north, east, south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution Site is not at the edge of a large built-up area, in physical or perceptual terms, and makes no contribution to purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to Purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate Site contains no built form. The site comprises open fields, pockets of shrubland and treelines. The site is largely enclosed by the settlement of Chew Magna along some of its boundaries (south and west) impacting the sense of openness and introducing urbanising influences into it. The site topography is predominantly flat, and longer distance views across the site is interrupted by hedge rows and treelines. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a moderate contribution to two purposes, and no contribution to three purposes. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area (the Bristol urban area or Bath). Purpose (b): The site does not protect a gap between neighbouring towns. Purpose (c): The site is 0.93 ha and development of the site would entail a small incursion into undeveloped countryside relative to the size of Chew Magna. Purpose (d): The site does not impact upon the setting or character of a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The removal of the site would result in a 'hole' in the Green Belt, should it be released from the Green Belt. The site contains previously developed land where development may be "not inappropriate" in line with NPPF 154 (2024). However, its development would not harm the integrity of the wider green belt given the site is largely enclosed by development in the washed over village of Chew Magna and not connected to the wider Green Belt.
Are there any cumulative impacts (due to release of adjacent sites)?	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The southern boundary comprises Winford Road and would be considered readily recognisable and likely to be permanent, and while the remaining boundaries consist of tree lines and rear garden boundaries (and would not be defensible), the site is somewhat enclosed by development in the washed over village of Chew Magna. The extent of enclosure minimises the impact of boundaries being less defensible.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	No, however the site abuts Chew Magna Conservation Area

Does the parcel have the potential to be considered grey belt?	Yes
Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-003 Maypole Clutton



S-003 A: Looking south east from footpath in centre of site over open countryside towards houses on Maypole Close



S-003 B: Looking west from Lower Bristol Road with views of open countryside



S-003 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026]).

Site Name	Maypole Clutton
Site Size	1.8 ha
Stage 1 Parcel Reference	P-039
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	North of Clutton, site comprises a mixture of open fields and dispersed vegetation.
Boundary Features	The site is bounded to the north by a treeline, to the east by a treeline and part of Lower Bristol Road, by a dispersed treeline and the regular backs of residential properties to the south, and Broomhill Lane to the west. Inner boundary: South, east and west. Outer boundary: North.
Green Belt Purposes	Contribution

Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution Site is not at the edge of a large built-up area, in physical or perceptual terms, and makes no contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to Purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate Site contains no built form and comprises an open field. The site is partly enclosed by the settlement of Clutton along some of its boundaries (east, south and west) and is also surrounded along the same boundaries by mature hedgerows, impacting the sense of openness. The site topography is undulating, and longer distance views across open fields are interrupted by topography as well as hedge rows and treelines. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose.
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a moderate contribution to two purposes and no contribution to three purposes. Overall, the site makes a weak contribution to Green Belt purposes.

Assessment of Green Belt Harm

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes. The site does not impact upon the setting or character of a historic town. Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to a large built-up area (the Bristol urban area or Bath). Development of the site would have no impact on preventing neighbouring towns from merging as the site does not protect a gap between neighbouring towns. The site is 1.8 ha and development of the site would entail a small/modest incursion into undeveloped countryside relative to the size of Clutton.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The site's existing outer boundaries are less defensible consisting of a dispersed treeline/hedgerow to the north. This existing boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	No.
Are there any Footnote 7 constraints present within the parcel?	No
Does the parcel have the potential to be considered grey belt?	Yes.

Summary: The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-004 South Farmborough and Timsbury Road (Phases 1 and 2)



S-004 A: Looking south west from north east corner with views of open countryside and house on Tilley Lane



S-004 B: Looking south east from boundary to north with views of open countryside



S-004 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026]).

Site Name	South Farmborough, Timsbury Road (Phases 1 and 2)
Site Size	10.6 ha
Stage 1 Parcel Reference	P-040
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	South of Farmborough, sites consist of open countryside.
Boundary Features	The site is bounded to the north by the regular backs of residential properties and hedgerows/treeline, by Little Lane to the east, by Tilley Lane to the south, and by the Temple Cloud Cricket Club to the west. Inner boundary: north and east. Outer boundary: south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution Site is not at the edge of a large built-up area, in physical or perceptual terms, and makes no contribution to purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to Purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains no built form and comprises open fields. The site topography is predominantly flat, and longer distance views across open fields are interrupted by hedge rows and treelines. Neighbouring development within Farmborough is visible towards the north across the site. This introduces an urbanising influence to the site, though it does not create a sense enclosure. Rather, the site retains its sense of openness due to the large parcel of undeveloped land sitting between the site and development to the north, in conjunction with the long distance and open views to the south. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose.
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to one purpose and no contribution to three purposes. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. While the site makes no contribution to three purposes, it is still deemed to make a strong contribution to purpose (c) as well as a moderate contribution to purpose (e) and on balance makes a moderate contribution to Green Belt purposes as a result.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes. The site does not impact upon the setting or character of a historic town. Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to a large built-up area (the Bristol urban area or Bath). Development of the site would have no impact on preventing neighbouring towns from merging as the site does not protect a gap between neighbouring towns. The site is 10.6 ha and development of the site would entail a large incursion into undeveloped countryside relative to the size of Farmborough.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the importance of certain purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new boundary would be Tilley Lane, a minor public road to the south, which is considered to be a defensible boundary, albeit less strong due to its classification. The site's western boundary is less defensible comprising of a field boundary, its eastern boundary is defensible comprising of residential properties and the northern boundary is mixed comprising of residential properties and a field boundary. The site's less defensible boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	No.
Are there any Footnote 7 constraints present within the parcel?	No

Does the parcel have the potential to be considered grey belt?	Yes.
Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-005 West of BP, Peasedown St John



S-005 A: Looking north east from Braysdown Lane with views of open countryside



S-005 B: Looking west from Wellow Lane with views of open countryside



S-005 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	West of BP
Site Size	9.5 ha
Stage 1 Parcel Reference	P-066
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	South of Peasedown St John, site comprises open agricultural fields.
Boundary Features	The site is bounded to the north east by the A367 Road and Wellow Lane, to the south by a hedgerow and unformed driveway, and to the west by Braysdown Lane. Inner boundary: North east. Outer boundary: South and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution Site is not at the edge of a large built-up area, in physical or perceptual terms, and makes no contribution to purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains no built form and comprises an open field. The site is predominantly flat, with open views to the south east. Neighbouring development to the north is visible. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore makes no contribution to this purpose.
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to one purpose and no contribution to three purposes. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. While the site makes no contribution to three purposes, it is still deemed to make a strong contribution to purpose (c) as well as a moderate contribution to purpose (e) and on balance makes a moderate contribution to Green Belt purposes as a result.

Assessment of Green Belt Harm

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes. The site does not impact upon the setting or character of a historic town. Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to a large built-up area (the Bristol urban area or Bath). Development of the site would have no impact on preventing neighbouring towns from merging as the site does not protect a gap between neighbouring towns. The site is 9.5 ha and development of the site would entail a small/modest incursion into undeveloped countryside relative to the size of Peasedown St John.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the Site from the Green Belt would not increase or decrease the importance of certain purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There would be cumulative impacts if S-006 (East of BP) was also released from the Green Belt, leading to increased perception of urban sprawl and encroachment into the countryside relative to the size of Peasedown St John. However, this is somewhat limited by the fact that Bath business park sits within the gap with this other sites.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The site's existing outer boundaries are less defensible consisting of a hedgerow to the south. This existing boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	No.
Are there any Footnote 7 constraints present within the parcel?	No

Does the parcel have the potential to be considered grey belt?	Yes.
Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-006 East of BP



S-006 A: Looking north from lane north of Wellow Road with views of views of open countryside (S-011)



S-006 B: Looking north east from lane north of Wellow Road with views of views of open countryside (S-012)



S-006 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	East of BP and East of BO (two sites combined)
Site Size	18.6 ha
Stage 1 Parcel Reference	P-066
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	South east of Peasedown St John, site comprises open fields.
Boundary Features	The site is bounded to the north east by a hedgerow and driveway, to the south east by a combination of the irregular back of neighbouring residential properties, site allocation boundary and Wellow Road, to the south west by Eckweek Lane and to the north west by the A367 Road. Inner boundary: north and west. Outer boundary: north east and south.

Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution Site is not at the edge of a large built-up area, in physical or perceptual terms, and makes no contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains no built form and comprises an open field. The site is predominantly flat, with open views to the east. Peasedown St John to the west is not visible due to high hedgerows along A367 and Eckweek Lane. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not contribute to this purpose.
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to one purpose and no contribution to three purposes. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. While the site makes no contribution to three purposes, it is still deemed to make a strong contribution to purpose (c) as well as a moderate contribution to purpose (e) and on balance makes a moderate contribution to Green Belt purposes as a result.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes. The site does not impact upon the setting or character of a historic town. Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to a large built-up area (the Bristol urban area or Bath). Development of the site would have no impact on preventing neighbouring towns from merging as the site does not protect a gap between neighbouring towns. The site is 18.6 ha and development of the site would entail a small/modest incursion into undeveloped countryside relative to the size of Peasedown St John.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There would be cumulative impacts if S-005 (West of BP) was also released from the Green Belt, leading to increased perception of urban sprawl and encroachment into the countryside relative to the size of Peasedown St John. However, this is somewhat limited by the fact that Bath business park sits within the gap with these other sites.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The site's existing outer boundaries to the north east are less defensible consisting of a hedgerow, although the boundary to the south is Wellow Road, which is considered defensible. This existing boundary to the north east would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	No.
Are there any Footnote 7 constraints present within the parcel?	No

Does the parcel have the potential to be considered grey belt?	Yes.
Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-007 Odd Down



S-007 A: Looking south from northern boundary with Odd Down Park & Ride with views of open countryside and shrubland



S-007 B: Looking west from eastern boundary along Combe Hay Lane with views of shrubland



S-007 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	Odd Down
Site Size	9.6 ha
Stage 1 Parcel Reference	P-065
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	South of Bath and the Odd Down Park and Ride. Site comprises scrub and some industrial development.
Boundary Features	The site is bounded to the north by the Odd Down Park and Ride, to the east by an unmarked boundary and to the south by hedgerow and a ridgeline in the landscape, and to the west to A367 Roman Road. The boundary to the south is also demarcated by a ridgeline in the landscape. Inner boundary: north. Outer boundary: east, south and west.

Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	Moderate The site is located at the edge of the large built up area (the Bath urban area). The site is open and contains existing washed over development within the site to the southwest comprising of Fosseway Environment Park and Bath Recycling Skips. The site is physically connected to the large built up area along the site's northern boundary. The remaining boundaries are open and connected to the surrounding Green Belt. The inner boundary to the north is defined by hedgerows and dispersed treeline, which is not a defensible boundary. Therefore, the inner Green Belt edge of the large built up area has a boundary which lacks durability in order to prevent unrestricted sprawl. The outer boundary of the site is defined by an unmarked boundary to the east, a hedgerow and a ridgeline to the south and the A367 Roman Road to the northwest. While the A367 Road is a defensible boundary feature, the other boundaries to the south and west are less defensible, and may not prevent the unrestricted sprawl of Bath, particularly to the east and south. Overall, the site makes a moderate contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the Bath urban area and the neighbouring town of Radstock. The village of Peasedown St John is in between the site and Radstock. The existing gap between Bath and Radstock is approximately 7.04km across the site. Development of the site would reduce the gap to approximately 6.49km. The gap consists of open countryside and the village of Peasedown St John. The site forms a very small part of the gap between Bath and Radstock, which is of sufficient scale and character that development of the site is unlikely to cause merging, There is intervening development between the Bath and Radstock consisting of the washed over village of Peasedown St John. Although development of the site would reduce the gap between Radstock and village of Peasedown St John, this does not influence the assessment of purpose (b) as it is not defined as a town for this assessment. Overall, the site makes a weak contribution to purpose (b).

Purpose (c): To assist in safeguarding the countryside from encroachment	Weak The site contains some built form, comprising of industrial warehousing and hardstanding. The north of the site is an open field. The site is predominantly flat, though its boundaries to the south and east comprise ridgeline, where the topography slopes down steeply beyond the site. There are dense shrubs and brambles along the southern boundary. The site is enclosed due to established trees and hedges throughout, but particularly along the southern boundaries which impacts the sense of openness. The western boundary of the A367 also impacts the openness of the site. Overall, the site possesses a largely urban character and makes a weak contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Strong The site does not directly adjoin the World Heritage Site, however, it is located within its setting. The site includes prominent features of landscape setting including an important green hillside within the east of the site. The site therefore plays a role in maintaining the immediate context and setting of the World Heritage Site. Overall, the site makes a strong contribution to Purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to two purposes and a weak contribution to two purposes. Overall, the site makes a moderate contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes with the site making a strong contribution to purpose (d), a moderate contribution to purpose (a) and (e) and a weak contribution to purpose (b) and (c). Due to existing development on the site, it makes a weak contribution to purpose (c). The site is located within the setting of the World Heritage Site, and plays an important role in maintaining the immediate context and setting of the World Heritage Site due to the site including prominent features of landscape setting including an important green hillside within the east of the site. The removal of the site from the Green Belt would result in a finger of development extending into the countryside, however the distance between Bath and Radstock would remain sufficient to maintain a gap between the settlements. As such, the site only makes a weak contribution to purpose (b).
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. It would result in an increased importance for the remaining Green Belt in preventing urban sprawl and preventing neighbouring towns from merging into one another.
Are there any cumulative impacts (due to release of adjacent sites)?	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary would not be defensible as it would primarily consist of a ridgeline and unmarked boundary in combination with dispersed tree and hedge lines and a lane along the south and east, and the western boundary, A367 Bath Road, would be defensible.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes
Are there any Footnote 7 constraints present within the parcel?	Yes, the southeastern corner of the site is located within the Cotswold National Landscape
Does the parcel have the potential to be considered grey belt?	No.

Summary:	The site scores strongly against purpose (d) and as such has not been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.
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S-008 Box Road



S-008 A: Looking north from Box Road with limited views of site beyond tree line



S-008 B: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	Box Road
Site Size	0.73 ha
Stage 1 Parcel Reference	P-079
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	East of Bath, along A4 Box Road. Site comprises of open field.
Boundary Features	The site is bounded to the north by open fields, to the east by a farm, to the south by the A4 Box Road, and to the west by industrial premises. Inner boundary: none. Outer boundary: north, east, south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	Weak The site is not located at the edge of the large built up area (the Bath urban area), however it is perceptually linked to the Bath urban area due to ribbon development along the A4 Box Road. While site is an open field, it is enclosed by development on its east and west boundaries. Due to the sites relatively small size and its level of enclosure, development would not result in unrestricted sprawl. All of the site's boundaries adjoin the Green Belt. The boundaries of the site are defined by open fields to the north, a farm to the east, and industrial development to the west, which are not considered defensible boundaries. However, the southern boundary is the A4 Box Road, which is considered defensible. Therefore, the site has a boundary which lacks durability in order to prevent unrestricted sprawl. Overall, the site makes a weak contribution to purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains no built form, only hardstanding along its southeast boundary. Otherwise, it comprises an open field. The site is partly enclosed by existing development along its east and west boundaries impacting the sense of openness. The site to the west contains residential buildings and the site to the east contains a fruit farm and associated buildings, with vegetation along the respective boundaries also impacting on the sense of openness. The site slopes uphill to the north, with limited views to the wider Green Belt due to trees and topography impacting openness. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Strong The site does not directly adjoin the World Heritage Site, however it is located within its setting. While the site does not contain prominent features of landscape setting and there is intervening development of Batheaston and Bathford which disrupts views, the World Heritage Site Setting SPD confirms that the defined setting (which includes these settlements) is integral to the World Heritage Site as it helps to protect its integrity, significance and authenticity. Overall, the site makes a strong contribution to Purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to two purposes, a weak contribution to one purpose, and no contribution to one purpose. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. While the site makes no contribution to purpose (b), it makes a strong contribution to purpose (d), a moderate contribution to purpose (c), and also contributes to purpose (a), albeit to a weak degree. Overall, the site makes a moderate contribution to Green Belt purposes.

Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a strong overall contribution to Green Belt purposes with the site making a strong contribution to purpose (d), a moderate contribution to purpose (c) and (e) and a weak contribution to purpose (a). Despite not being located at the edge of a built up area, the removal of the site from the Green Belt would further contribute to ribbon development extending into the countryside along Box Road. The site is not located adjacent to the World Heritage Site but is located within its setting. While the site does not contain prominent features of landscape setting and there is intervening development of Batheaston and Bathford which disrupts views, its location within the defined setting is such that it could play a role in maintaining the integrity, significance and authenticity of the World Heritage Site. The site makes a weak contribution to purpose (c) due to its relative enclosure by existing development and limited openness due to topography and vegetation, and no contribution to purpose (b) due to its location.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. It would result in an increased importance for the remaining Green Belt in preventing urban sprawl.
Are there any cumulative impacts (due to release of adjacent sites)?	There would be cumulative impacts if Bathford Nurseries (South) (S-010) were also released from the Green Belt, leading to increased perception of urban sprawl and encroachment into the countryside due to the ribbon of development along A4 Box Road. This is somewhat limited though, due to the fact that the Bathford Nurseries site already contains development and both sites are enclosed to the east and west by existing development on neighbouring sites.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary to the north, east and west would not be defensible as it would primarily consist of dispersed tree and hedge lines and the edge of residential property. The boundary to the south would be defensible as it is Box Road. The remainder of the existing boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes

Are there any Footnote 7 constraints present within the parcel?	Yes- the site is located within the Cotswolds National Landscape.
Does the parcel have the potential to be considered grey belt?	No.
Summary:	The site scores strongly against purpose (d) and as such has been not considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-009 Ashley Road



S-009 A: Looking north west from site boundary on Ashley Road with views of open field, neighbouring residential development and landscape beyond



S-009 B: Looking north from site boundary on Ashley Road with views of open field and landscape beyond



S-009 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	Ashley Road
Site Size	0.34 ha
Stage 1 Parcel Reference	P-078
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	North east of Bathford. Site comprises of open field.
Boundary Features	The site is bounded to the north by open fields, to the east and west by the regular backs of residential properties and gardens, and to the south by Ashley Road. Inner boundary: south and west. Outer boundary: north and east.
Green Belt Purposes	Contribution

Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bath urban area). The site is not considered to have any connection with the large built-up area due to the absence of ribbon development, the relatively small size of the site in relation to the extent of the gap between it and the edge of the Bath urban area, and intervening development consisting of Bathford paper mill in addition to the railway line which restrict views. As such, the site is not at the edge of a large built-up area, in physical or perceptual terms, and makes no contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate Site contains no built form. The site comprises open fields. The site is partly enclosed by the settlement edge of Bathford along some of its boundaries impacting the sense of openness. The site has open views to the north. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Strong The site does not directly adjoin the World Heritage Site, however it is located within its setting. While the site does not contain prominent features of landscape setting and there is intervening development of Bathford which disrupts views, the World Heritage Site Setting SPD confirms that the defined setting (which includes Bathford) is integral to the World Heritage Site as it helps to protect its integrity, significance and authenticity. Overall, the site makes a strong contribution to Purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak

Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to two purposes, and no contribution to two purposes. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. The site makes a strong contribution to purpose (d) and a moderate contribution to purpose (c), but makes no contribution to either purpose (a) or (b). Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes. The site is not located adjacent to the World Heritage Site but is located within its setting. While the site does not contain prominent features of landscape setting and there is intervening development of Batheaston and Bathford which disrupts views, its location within the defined setting is such that it could play a role in maintaining the integrity, significance and authenticity of the World Heritage Site. The removal of the site from the Green Belt would result in site which performs weakly against the Green Belt's functions and purposes being removed, and the remaining Green Belt to the north being strengthened as it would now be at the settlement edge.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would largely continue to perform its function and against relevant purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary would be more defensible as it would consist of the settlement edge.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes

Are there any Footnote 7 constraints present within the parcel?	Yes- the site is located within the Cotswolds National Landscape
Does the parcel have the potential to be considered grey belt?	No.
Summary:	The site scores strongly against purpose (d) and as such has been not considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-010 Bathford Nurseries (South)



S-010 A: Looking north east from Box Road with views of open field adjacent to Bathford Nurseries



S-010 B: Looking north from Bathford Nurseries car park with views of Bathford Nurseries and trees beyond



S-010 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	Bathford Nurseries (South)
Site Size	1.54 ha
Stage 1 Parcel Reference	P-079
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	South of Batheaston. Site comprises of a plant nursery, hardstanding, and open fields.
Boundary Features	The site is bounded to the north by open fields, to the east by industrial premises, to the south by A4 Box Road and to the west by the regular backs of residential properties and gardens. Inner boundary: west. Outer boundary: north, east and south.

Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	Weak The site is located at the edge of the large built up area (the Bath urban area). The site is open and there is some evidence of existing development within the site comprising of a plant nursery and associated buildings and structures. The site is physically connected to the large built up area along the eastern boundary. The remaining boundaries are connected to the surrounding Green Belt, however this includes the A4 Box Road to the south and existing industrial development to the east. If developed, the site would effectively extend the Bath urban area and connect it with the industrial development to the east, further contributing to the ribbon of development along the A4 Bath Road into the Green Belt. This could lead to perceived urban sprawl, although as there is development to the east and further along Box Road, the site does not play a strong role in containing sprawl currently. Residential development also sprawls to the northeast of the site along Sherwick Lane and Bannerdown Road and to the south across Box Road and the railway line with a large industrial complex located adjacent to the railway The inner boundary is defined by the regular backs of residential properties and gardens, which is not a defensible boundary. Therefore, the inner Green Belt edge of the large built up area has a boundary which lacks durability in order to prevent unrestricted sprawl. The outer boundary of the site is defined by dispersed hedges and trees to the north, and industrial development to the east, which are not defensible boundaries. However, the southern boundary is the A4 Box Road, which is considered defensible. Therefore, the outer boundary of the site is generally not considered defensible and may not be able to prevent unrestricted sprawl. Overall, the site makes a weak contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to purpose (b).

Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains less than 5 percent built form, comprising of a plant nursery and associated buildings/structures. The site otherwise contains fields and scattered shrubs and trees The site rises uphill to the north. Due to the topography of the field, existing development, and vegetation, the site has a limited sense of openness. There is existing residential development to the west at the edge of the Bath built form, and to the south beyond A4 Bath Road, with a railway line and industrial development, however due to dense vegetation these do not have a strong urbanising influence on the site. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Strong The site does not directly adjoin the World Heritage Site, however it is located within its setting. While the site does not contain any prominent features of landscape setting and there is intervening development of Batheaston and Bathford which disrupts views, the World Heritage Site Setting SPD confirms that the defined setting (which includes these settlements) is integral to the World Heritage Site as it helps to protect its integrity, significance and authenticity. Overall, the site makes a strong moderate contribution to Purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to two purposes, a weak contribution to one purpose, and no contribution to one purpose. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. While the site makes no contribution to purpose (b), it makes a strong contribution to purpose (d) and a moderate contribution to purpose (c). Overall, the site makes a moderate contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes. The removal of the site from the Green Belt would result in a ribbon of development extending into the countryside, although a large part of the site is already somewhat developed and contains a plant nursery and associated structures. The site is not located adjacent to the World Heritage Site but is located within its setting. While the site does not contain prominent features of landscape setting and there is intervening development of Batheaston and Bathford which disrupts views, its location within the defined setting is such that it could play a role in maintaining the integrity, significance and authenticity of the World Heritage Site. The site makes no contribution to purpose (b) due to its location. It only makes a moderate contribution to purpose (c) due to its more enclosed setting and limited existing development and a weak contribution to purpose (a) given development exists to the east already, and the site plays a limited role in containing the sprawl of Bath.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. Its removal would result in an increased importance for the remaining Green Belt in preventing urban sprawl.
Are there any cumulative impacts (due to release of adjacent sites)?	There would be cumulative impacts if Box Road (S-008) was also released from the Green Belt, leading to an increased perception of urban sprawl and encroachment into the countryside as it would further contribute to the ribbon of development along A4 Box Road. This is somewhat limited though, due to the fact that the site already contains development and both sites are enclosed to the east and west by existing development on neighbouring sites.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary to the north and east would not be defensible as it would primarily consist of dispersed tree and hedge lines, although the boundary to the south would be defensible as it is an A Road. The remainder of the existing boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes

Are there any Footnote 7 constraints present within the parcel?	No, however the site abuts the Cotswolds National Landscape to the north and east.
Does the parcel have the potential to be considered grey belt?	No.
Summary:	The site scores strongly against purpose (d) and as such has been not considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-011 Bath Equestrian Centre



S-011 A: Looking north west from Weston Farm Lane within site with views of road and agricultural buildings



S-011 B: Looking south west from Weston Farm Lane within site with views of residential property and undeveloped residential curtilage



S-011 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	Bath Equestrian Centre
Site Size	1.82 ha
Stage 1 Parcel Reference	P-083
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	Northeast of Weston. Site comprises of agricultural buildings, access tracks, hardstanding, a residential property, trees and scrub.
Boundary Features	The site is bounded to the north by open fields, to the east and west by dispersed hedges and trees, and to the south by the regular backs of residential properties and gardens. Inner boundary: south. Outer boundary: north, east and west.
Green Belt Purposes	Contribution

Purpose (a): To check the unrestricted sprawl of large built-up areas	Moderate The site is located at the edge of the large built up area (the Bath urban area). The site contains existing development across it comprising of several agricultural buildings and hardstanding associated with an access track and parking areas. The site is physically connected to the large built up area along the southern boundary. The remaining boundaries are open and connected to the surrounding Green Belt. The inner boundary is defined by the regular backs of residential properties and gardens, which is not considered a defensible boundary. Therefore, the inner Green Belt edge of the large built up area has a boundary which lacks durability in order to prevent unrestricted sprawl. The outer boundary of the site is defined by dispersed hedges and trees. Therefore, the outer boundary of the site is also not considered defensible and may not be able to prevent unrestricted sprawl. Overall, the site makes a moderate contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains more than ten percent built form, comprising of some agricultural buildings and a residential property. The agricultural buildings would not be considered inappropriate development in the Green Belt, however the residential property would be. The site otherwise contains grassed areas along with trees and scrub across it. The site has a generally undulating topography, rising to the north. Due to the topography of the field and dense tree and scrub planting, the site has a limited sense of openness. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Strong The site is located entirely within the World Heritage Site and includes prominent features of landscape setting including an important green hillside throughout the site. The site therefore plays a role in maintaining the immediate context and setting of the World Heritage Site. Overall, the site makes a strong contribution to Purpose (d).

Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a moderate contribution to three purposes, a strong contribution to one purpose, and no contribution to one purpose. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. While the site makes a strong contribution to purpose (d), it makes a moderate contribution to purpose (a), (c) and (e) and no contribution to purpose (b). Overall, the site makes a moderate contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes. It makes no contribution to purpose (b) due to its location. It only makes a moderate contribution to purpose (c) due to its more enclosed setting and existing development, and a moderate contribution to purpose (a) for similar reasons. Removal from the Green Belt would therefore not have a significant impact on the purposes of the Green Belt. The site is located within the World Heritage Site and plays an important role in maintaining the immediate context and setting of the World Heritage Site due to the site including prominent features of landscape setting including an important green hillside throughout the site. Development of the site would therefore have a significant impact upon the setting or character of the World Heritage Site. This is reflected in its strong contribution rating against purpose (d).
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. The removal of the site from Green Belt would result in an increased importance for the remaining Green Belt in preventing urban sprawl.
Are there any cumulative impacts (due to release of adjacent sites)?	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary would not be defensible as it would primarily consist of dispersed tree and hedge lines. As such, the existing boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes
Are there any Footnote 7 constraints present within the parcel?	Yes - the site is located within the Cotswolds National Landscape and the Bath World Heritage Site.
Does the parcel have the potential to be considered grey belt?	No
Summary:	The site scores strongly against purpose (d) and as such has been not considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-012 North of Napier Road, Weston



S-012 A: Looking west from beyond site boundary on Lansdown Lane with limited views of the majority of the site beyond treeline



S-012 B: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	North of Napier Road, Weston
Site Size	4.95 ha
Stage 1 Parcel Reference	P-083
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	NOTE: Unable to access site. This assessment has been completed largely from aerial photography. North of Weston. Site comprises open fields.
Boundary Features	The site is bounded to the north, east and west by dispersed hedges and trees, and to the south by the regular backs of residential properties and gardens. Inner boundary: south. Outer boundary: north, east and west.
Green Belt Purposes	Contribution

Purpose (a): To check the unrestricted sprawl of large built-up areas	Strong The site is located at the edge of the large built up area (the Bath urban area). The site is open and there is no evidence of existing development within the site, although there is development adjoining the northern boundary comprising industrial buildings and a residential property. The site is physically connected to the large built up area along the southern boundary. The remaining boundaries are open and connected to the surrounding Green Belt. The inner boundary is defined by the regular backs of residential properties and gardens, which is not considered a defensible boundary. Therefore, the inner Green Belt edge of the large built up area has a boundary which lacks durability in order to prevent unrestricted sprawl. The outer boundary of the site is defined by dispersed hedges and trees. Therefore, the outer boundary of the site is also not considered defensible and may not be able to prevent unrestricted sprawl. Overall, the site makes a strong contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains no built form. The site comprises open fields. The site was viewed from the road, but the hedgerow obscured a clear view of the site. The site appears to slope towards the west, with open views out to the wider Green Belt northwest, although views to the south are limited due to the site adjoining the backs of residential properties and gardens in this direction. These properties also introduce urbanising influences to the site, although they are screen to an extent by existing vegetation. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Strong The site is located entirely within the World Heritage Site and includes prominent features of landscape setting including an important green hillside throughout the site. The site therefore plays a role in maintaining the immediate context and setting of the World Heritage Site. Overall, the site makes a strong contribution to purpose (d).

Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Strong
Reason for Overall Assessment:	The site makes a strong contribution to three purposes, a moderate contribution to one purpose, and no contribution to one purpose. Overall, the site makes a strong contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a strong overall contribution to Green Belt purposes with the site making a significant contribution to purposes (a) and (c), and no contribution to purpose (b) due to its location. The site is located within the World Heritage Site and plays an important role in maintaining the immediate context and setting of the World Heritage Site due to it including prominent features of landscape setting including an important green hillside throughout the site. Development of the site would therefore have a significant impact upon the setting or character of the World Heritage Site. This is reflected in its strong contribution rating against purpose (d).
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. Its removal would result in an increased importance for the remaining Green Belt in preventing urban sprawl and preventing neighbouring towns from merging into one another.
Are there any cumulative impacts (due to release of adjacent sites)?	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary to the north and west would not be defensible as it would primarily consist of dispersed tree and hedge lines. The boundary to the east would be defensible as it comprises Lansdown Lane. The remainder of the existing boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes
Are there any Footnote 7 constraints present within the parcel?	Yes- the site is located within the Cotswold National Landscape
Does the parcel have the potential to be considered grey belt?	No.
Summary:	The site scores strongly against purpose (a) and purpose (d) and as such cannot be considered as potential grey belt for this Stage 2 Green Belt Assessment.

S-013 West of Bath Option 3



S-013 A: Looking north east from Pennyquick Lane (southern boundary) with views of open countryside



S-013 B: Looking south from Bristol Road (within site boundary to the north) with views of open countryside



S-013 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	West of Bath Option 3
Site Size	100.7 ha
Stage 1 Parcel Reference	P-062 and P-061 (predominantly within P-062 located south of the A4)
Stage 1 Parcel Findings	P-062 overall assessment: Strong P-061 overall assessment: Strong
Site Description	The site is located west of Bath, towards Corston. The site comprises open fields and woodland, with the A4 Bristol Road running through it to the north and Bath Spa University Sports Ground and industrial development to the east.

Boundary Features	The site is bounded by open fields/the edge of the promoted site boundary to the north, by established trees and the regular backs of properties and gardens to the east, by Pennyquick Road to the south, and by open fields/the promoted site boundary, part of Pennyquick Road and the Globe Roundabout to the west. Inner boundary: east. Outer boundary: north, south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	Strong The site is located at the edge of the large built up area (the Bath urban area) along its north eastern corner. The site is open, though there is some existing development within the site consisting of Bath Spa University Sports Ground, Kellaway Building Supplies and Marden Removals & Storage to the east. There is a small amount of Green Belt between the site and the large built up area, however it is connected by the sites north eastern corner and the site appears to be perceptually linked to Bath due to washed over development which makes the two areas appear to be connected. The inner boundary is defined by dispersed hedges, and regular backs of residential properties and gardens. Therefore, the inner Green Belt edge of the large built up area has a less defensible boundary which may not be able to prevent unrestricted sprawl. The outer boundary of the site is defined by open fields to the north and Pennyquick Road to the south. There are open fields and the Globe Roundabout to the west. Therefore, the outer boundary of the site has a less defensible boundary which may not be able to prevent unrestricted sprawl. Overall, the site makes a strong contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Strong The site is located between the Bath urban area and neighbouring town of Keynsham. The villages of Corston and Saltford are in between the site and Keynsham. The existing gap between the neighbouring towns/inset settlement is approximately 5.68km across the site. Development of the site would reduce the gap to approximately 3.86km. The gap consists of open countryside and the villages of Corston and Saltford. The site forms a large part of the gap, where development would significantly reduce the actual distance and visual separation between Keynsham and the Bath urban area. Overall, the site makes a strong contribution to purpose (b).

Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains less than 1 percent built form, comprising of the Bath Spa University Sports Ground playing fields, and some industrial development. Facilities for outdoor sport are not inappropriate development in the Green Belt, although the industrial development would be considered inappropriate. The majority of the site is open fields with woodland in the middle. The site is large, with a generally undulating topography, rising to the south. There are open views to the north and west. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Strong The site is located adjacent to the World Heritage Site and is physically connected at the eastern boundary, the site is also entirely located within its setting. The site includes prominent features of landscape setting including a plateau area and an important green hillside within the east of the site. The site therefore plays a role in maintaining the immediate context and setting of the world heritage site. Overall, the site makes a strong contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Strong
Reason for Overall Assessment:	The site makes a strong contribution to four purposes, and a moderate contribution to one purpose. Overall, the site makes a strong contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a strong overall contribution to Green Belt purposes with the site making a strong contribution to purposes (a), (b) and (c). Purpose (a): Development of the site, which is located at the edge of the large built up area (the Bath urban area), may represent unrestricted sprawl due to its large size and the extent of openness available. While there is some evidence of development on the site, consisting of Bath Spa University Sports Ground, Kellaway Building Supplies and Marden Removals & Storage to the east, it is nonetheless largely open and remains connected to the Bath urban area at the sites north eastern corner, appearing to be perceptually linked to Bath due to washed over development which makes the two areas appear to be connected. The inner boundary (defined by dispersed hedges, and regular backs of residential properties and gardens) and the outer boundary (defined by open fields to the north and Pennyquick Road to the south) are less defensible, and may not be able to prevent unrestricted sprawl. Purpose (b): Development of the site would significantly reduce the gap between the Bath urban area and the neighbouring town of Keynsham, which may result in perceived merging, in part due to the villages of Corston and Saltford sitting in between the site and Keynsham, although it would not result in the actual merging of the Bath urban area and Keynsham. Purpose (c): The site contains limited built form, comprising of the Bath Spa University Sports Ground playing fields, and some industrial development. The majority of the site is open fields with woodland in the middle. Due to the large size of the site balanced with the size of the Bath urban area, development of it would likely entail a modest to large incursion into predominantly undeveloped countryside. Purpose (d): The site is located adjacent to the Bath World Heritage Site, The site plays an important role in maintaining the immediate context and setting of the Word Heritage Site as it is located within its setting and includes prominent features of landscape setting including a plateau area and an important green hillside within the east of the site. Development of the site would therefore have a significant impact upon the setting or character if the World Heritage Site. The removal of the site from the Green Belt would result in a significant finger of development extending into the countryside and effectively enclose an area of Green Belt to the east as well as introducing urbanising influences, weakening its role in preventing sprawl.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The section of Green Belt between the site and Bath would have increased importance for purposes (a), (b) and (c).

Are there any cumulative impacts (due to release of adjacent sites)?	There would be cumulative impacts should the site to the west of Corston (S-030) be released from the Green Belt. These impacts would be to increase the site's role in safeguarding the countryside from encroachment because of an increase of urbanising influences from the development. Furthermore, there would be an increased perception of Keynsham and Bath merging together given the size of the site, and because the site follows the A4 Bath Road which connects the two areas and already features pockets of ribbon development. There could also be a perception of Keynsham and Bath merging into one another due to development along A4 Bristol Road, alongside related impacts on the urban sprawl of Bath.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defined by Wells Road, Pennyquick Road and the Globe Roundabout along part of the western and southern boundary. The remainder of the site's existing boundary is less defensible consisting of field boundary and treeline within the north, east, west and south. These existing boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes
Are there any Footnote 7 constraints present within the parcel?	No, however it abuts Newton St Loe Conservation Area to the south west, Corston Conservation Area to the west, Newton Park Registered Park and Garden to the south west, two listed buildings to the west and a listed building to the east.
Does the parcel have the potential to be considered grey belt?	No
Summary:	The site scores strongly against purposes (a) and (b) and (d) and as such cannot be considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-014 South Saltford



S-014 A: Looking west from lane on eastern boundary across open countryside to the western boundary



S-014 B: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	South Saltford
Site Size	12.75 ha
Stage 1 Parcel Reference	P-059
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	The site is located south of Saltford and comprises open agricultural fields.
Boundary Features	The site is bounded to the north by Manor Road, to the east by a narrow unclassified public road and field boundary and to the south and west by hedgerows, sparse treeline and undefined boundaries through agricultural land. Inner boundaries: north. Outer boundaries: east, south, west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not at the edge of a large built-up area, in physical or perceptual terms, and makes no contribution to purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns of Keynsham and Bath. The existing gap between the neighbouring towns is approximately 5.6km across the site. The site forms a very small part of the gap between Keynsham and Bath which is of sufficient scale and character that development of the site is unlikely to cause merging. There is intervening development between the neighbouring towns consisting of Corston and Saltford, this does not influence the assessment of Purpose (b) as Corston and Saltford are not defined as towns so are not considered relevant to Purpose (b) towns. Overall, the site makes a weak contribution to Purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains no built form (excluding hardstanding and temporary structures). The site comprises open agricultural fields. The site is surrounded by open countryside along its east, south and west boundaries, and while the site's topography is flat, the visual connections to the neighbouring Saltford impact the sense of openness and introduces urbanising influences. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to Purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to two purposes. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and Bath. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns and it would not result in them merging Purpose (c): The site is 12.75 ha and development of the site would entail a moderate incursion into undeveloped countryside relative to the size of Saltford. Purpose (d): Development of the site would have no impact on a historic town as the site does not adjoin an identified historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are two other sites around Saltford: S-015 and S-016. Collectively, the development of these sites would have a similar impact as set out above however, their release in combination would also have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Saltford. The remaining surrounding Green Belt would continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary would be considered less defensible, consisting of an unclassified, minor public road and field boundary to the east, and undefined boundaries, hedgerows and treelines to the south and west. These existing boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No

Are there any Footnote 7 constraints present within the parcel?	No
Does the parcel have the potential to be considered grey belt?	Yes
Summary: The site does not score strongly against Purposes (a), (b) or (d), and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment. There are no footnote 7 constraints within the site.	

S-015 West Saltford



S-015 A: Looking south from Bath Road to open countryside



S-015 B: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	West Saltford
Site Size	23.3 ha
Stage 1 Parcel Reference	P-058
Stage 1 Parcel Findings	Overall contribution: Weak
Site Description	The site is located south east of Keynsham and west of Saltford. The site comprises of agricultural fields and a dense treeline.
Boundary Features	The site is bounded by the A4 Road and the rear gardens of residential dwellings to the north, treeline and the rear gardens of residential dwellings to the east, a gas pipeline and its HSE safety zone and dense treeline to the west, and Manor Road and the curtilage of detached residential properties to the south. Inner boundaries: east. Outer boundaries: north, south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area or Bath) and therefore makes no contribution to Purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns of Keynsham and Bath. The existing gap between the neighbouring towns is approximately 5.6km. Development of the site would reduce the gap to approximately 4.77km. The site forms a very small part of the gap between Keynsham and Bath which is of sufficient scale and character that development of the site is unlikely to cause merging. There is intervening development between the neighbouring towns consisting of Saltford, although this does not influence the assessment of Purpose (b) as Saltford is not defined as a town for Purpose (b). Overall, the site makes a weak contribution to Purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains no built form (excluding hardstanding and temporary structures). The site comprises of agricultural fields and trees and shrubs in the south west corner. The site is partly enclosed by the built form of Saltford along its eastern boundary and the A4 Road and an area of washed over development along its northern boundary which impacts its sense of openness. Overall, the site possesses a largely rural character and therefore makes a moderate contribution to Purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to Purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to two purposes. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and Bath. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns, and it would not result in them merging Purpose (c): The site is 23.3ha and development of the site would entail a small incursion into undeveloped countryside relative to the size of Keynsham however the site is enclosed by development to the east and the A4 Road to the north which would reduce the perception of encroachment. Purpose (d): Development of the site would have no impact on a historic town as the site does not adjoin an identified historic town or provide views to a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are two other adjacent sites around Saltford: S-014 and S-016. Collectively, the development of these sites would have a similar impact as set out above, however, their release in combination would also have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Saltford. The remaining surrounding Green Belt would continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defined by the A4 Road and the curtilage of residential properties to the north, Manor Road and the curtilage of residential property to the south which are mixed boundaries. The remainder of the sites existing outer boundary is considered less defensible consisting of field boundary to the west which would need to be strengthened to create a recognisable and permanent new Green Belt boundary, including through new planting and vegetation along the alignment of the Gas Pipeline, in order to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	No
Does the parcel have the potential to be considered grey belt?	Yes
Summary: The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.	

S-016 North West Saltford



S-016 A: Looking south from within the parcel with view of 'woof park'



S-016 B: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	North West Saltford
Site Size	11.4 ha
Stage 1 Parcel Reference	P-057
Stage 1 Parcel Findings	Overall assessment: Weak
Site Description	The site is located north west of Saltford and comprises an open field and a broken tree line through the centre.
Boundary Features	The site is bounded to the north east by a dense hedgerow/treeline and a railway line, to the east by a sparse hedgerow and broken tree line, to the south by the A4 Road and the edge of residential properties, and to the north west by a mixture of boundaries including a treeline, a hedgerow and the edge of existing development, comprising a car park and the edge of a residential property. Inner boundaries: Curtilage of residential properties. Outer boundaries: Bath Road, Hedgerow and railway track, field boundary and Glenavon Farm.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area or Bath) and therefore makes no contribution to Purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns of Keynsham and Bath. The existing gap between the neighbouring towns is approximately 5.1km. The site forms a very small part of the gap between Keynsham and Bath which is of sufficient scale and character that development of the site is unlikely to cause merging. There is intervening development between the neighbouring towns consisting of Saltford, although this does not influence the assessment of Purpose (b) as Saltford is not defined as a town for Purpose (b). Overall, the site makes a weak contribution to Purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains no built form (excluding hardstanding and temporary structures). The site comprises open fields including a fenced area used as a dog park along part of the southern boundary. The site is enclosed by development to the north, south and partially to the west across Bath Road. This in combination with the dense vegetation and railway line to the north impacts on the sites sense of openness and wider visual links to surrounding Green Belt land, although the gently sloping topography of the site down towards the north creates open views from much of the central parts of the site. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to Purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to two purposes. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and Bath. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns and it would not result in them merging. Purpose (c): The site is 11.4 ha and development of the site would entail a large incursion into undeveloped countryside relative to the size of Saltford. Purpose (d): Development of the site would have no impact on a historic town as the site does not adjoin an identified historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are two other adjacent sites around Saltford: S-014 and S-015. Collectively, the development of these sites would have a similar impact as set out above, however, their release in combination would also have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Saltford. The remaining surrounding Green Belt would continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defined by a combination of dense treeline/hedgerow and railway line to the north, the A4 Road to the south and existing development to part of the west. These existing boundaries are considered defensible. The remainder of the site's existing outer boundary is considered less defensible as it comprises field boundaries demarcated by hedge rows and sparse treelines, and would require strengthening.

Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No

Are there any Footnote 7 constraints present within the parcel?	No, however the site abuts a listed building to the north
Does the parcel have the potential to be considered grey belt?	Yes
Summary: The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.	

S-017 North Keynsham



S-017 A: Looking east from within the parcel towards the eastern boundary



S-017 B: Looking south from within the parcel towards the southern boundary



S-017 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	North Keynsham
Site Size	49 ha
Stage 1 Parcel Reference	P-056 and P-057 (Predominantly within P-056 located north of the A4)
Stage 1 Parcel Findings	P-056 overall assessment: Moderate P-057 overall assessment: Weak
Site Description	The site is located north of Keynsham and comprises dispersed development associated with Avon Valley Adventure Park, Broadleaze Plants Garden Centre and other commercial and residential developments, as well as open countryside and dispersed vegetation.

Boundary Features	The site is bounded to the north by the River Avon, to the east by undefined boundaries which follow the edge of a gas pipeline and its HSE safety zone, to the south in part by an in-use railway line as well as the A4 Road and undefined boundaries which follow the edge of a gas pipeline and the edge of the promoted site. It is bounded to the west by Broadmead Lane. Inner boundaries: south (in part), west (in part) Outer boundaries: north, east, south (in part), west (in part).
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area or Bath) and therefore makes no contribution to Purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Moderate The site is located between the neighbouring towns of Keynsham and Bath. The existing gap between Keynsham and Bath is approximately 5.2km. Development of the site would reduce the gap to approximately 4.1km. The site forms a small part of the gap between Keynsham and Bath which is of sufficient scale and character that development of the site is unlikely to cause merging, and in addition the site already contains evidence of existing development. There is intervening development between these neighbouring towns consisting of Saltford, though this does not influence the assessment of Purpose (b) as Saltford is not defined as a town under Purpose (b). On balance with the above, and due to its large size, overall the site makes a moderate contribution to purpose (b).

Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains less than 3 percent built form (excluding hardstanding and temporary structures). Built form comprises dispersed residential properties within the south and centre of the site, as well as warehouses/buildings for commercial/light industrial use situated in two pockets in the centre of the site. The site otherwise comprises open agricultural land across much of the east, west and north. The site is surrounded by open countryside along its north and east boundaries. This includes agricultural land to the north, beyond the River Avon, as well as to the east and parts of the south. The site topography is flat, and due to the dispersed tree line along the north and east boundaries, there are longer distance views into the countryside. Visual links to the neighbouring Keynsham are largely interrupted by treelines, however development introduces an urbanising influence which impact on openness. Overall, due its large size and the relative coverage of development, the site possesses a largely rural character and makes a moderate contribution to Purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Weak The site adjoins the Historic Town of Keynsham; however the site has no visual or physical connection to the historic core. The site therefore does not play a role in maintaining the immediate context and setting of the historic town. Overall, the site makes a weak contribution to Purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to Purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a moderate contribution to three purposes, a weak contribution to one purpose and no contribution to one purpose. Overall, the site makes a moderate contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and Bath. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns and it would not result in them merging. Purpose (c): The site is 49 ha and development of the site would entail a large incursion into undeveloped countryside relative to the size of Keynsham. The site has existing development within it consisting of dispersed residential properties within the south and centre of the site, as well as warehouses/buildings for commercial/light industrial use situated in two pockets in the centre of the site, which would reduce the perception of encroachment to an extent. Purpose (d): Development of the site would have no impact on a historic town as the site does not provide views to the historic town the Historic Town of Keynsham or form part of its setting.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are two other adjacent sites: S-015 and S-016 - Collectively, the development of these sites would have a similar impact as set out above, however, their release in combination would have a greater cumulative impact on purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham. The remaining surrounding Green Belt would continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defined by the River Avon to the north, and an in-use railway line and the A4 to the parts of the south which constitute the outer boundary. These are considered existing defensible boundaries. The remainder of the site's existing outer boundary is considered less defensible consisting of irregular hedgerows and dispersed trees to the east and a gas pipeline and its HSE safety zone through fields to the other sections of the south. These existing boundaries would need to be strengthened in order to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	Yes- the north of the site is located within Flood Zone 3b
Does the parcel have the potential to be considered grey belt?	Yes
Summary: The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.	

S-018 South East Keynsham



S-018 A: Looking west from Wellsway across open countryside to western boundary



S-018 B: Looking east from Wellsway across open countryside to eastern boundary



S-018 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	South East Keynsham
Site Size	14.7 ha
Stage 1 Parcel Reference	P-041 and P-059
Stage 1 Parcel Findings	P-041 overall assessment: Moderate P-059 overall assessment: Strong
Site Description	The site is located south of Keynsham and comprises open fields and the B3116 (Wellsway).
Boundary Features	The site is bounded to the north by the regular backs of residential properties/gardens, fences, hedgerows and treelines, to the east by a hedgerow, to the south by hedgerows, existing development, and residential curtilage and to the west by a dense woodland area. Inner boundaries: north. Outer boundaries: east, south and west.
Green Belt Purposes	Contribution

Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area or Bath) and therefore makes no contribution to Purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns of Keynsham and Midsomer Norton, with the site forming part of the gap between the two. The villages of Marksbury, Farmborough, Timsbury and Paulton are in between the site and Midsomer Norton. The existing gap between the neighbouring towns is approximately 11.2km across the site. Development of the site would reduce the gap to approximately 11km. The site forms (a very small) part of the gap between Keynsham and Midsomer Norton, which is of sufficient scale and character that development of the site is unlikely to cause merging. The site also somewhat sits within the gap between Keynsham and Bath. The site forms (a very small) part of the gap between the two, which is of sufficient scale and character that development of the site is unlikely to cause merging. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains less than 1 percent built form (excluding hardstanding and temporary structures). Built form comprises the B3116 (Wellsway) running north west to south east through the site. The rest of the site comprises open countryside. The site is surrounded by open countryside along most of its boundaries, although along its northern boundary it is connected to Keynsham and there is residential development to the south, which introduces urbanising influences to the site. In combination with the dense woodland along the western boundary, this introduces a sense of enclosure to the site. The site topography is predominantly flat, and there are longer distance views across the site and over open fields to the west, slightly interrupted in several places by dispersed trees and hedges. Overall, the site possesses a strongly rural character and makes a moderate contribution to purpose (c).

Purpose (d): To preserve the setting and special character of historic towns	Weak The site adjoins the Historic Town of Keynsham; however the site has no visual or physical connection to the historic core. The site therefore does not play a role in maintaining the immediate context and setting of the historic town. Overall, the site makes a weak to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a moderate contribution to two purposes, a weak contribution to two purposes and no contribution to one purpose. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes with the site making a strong contribution to purpose (c). Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and Midsomer Norton, and partially between Keynsham and Bath. However, due to the size of the site and the respective gaps, this would represent a small decrease in the separation of the towns and it would not result in them merging. Purpose (c): The site is 14.7 ha and development of the site would entail a modest incursion into undeveloped countryside relative to the size of Keynsham. Purpose (d): Development of the site would have no impact on a historic town as the site does not provide views to the Historic Town of Keynsham or form part of its setting.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.

Are there any cumulative impacts (due to release of adjacent sites)?	There is an adjacent site at South Saltford (S-014). The development of these sites would have a similar impact as set out above, however, their release in combination would have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside between Saltford and Keynsham, and introduce urbanising influences to a large degree of surrounding Green Belt land. The remaining surrounding Green Belt could continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary would be considered predominantly less defensible, consisting of irregular treelines and hedgerows to the east and the edge of an established woodland to the west and parts of north and south. However, it would also comprise more defensible boundaries to part of the south and to the north, including the edge of Keynsham built form. Therefore, boundaries would need to be strengthened in order to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	No
Does the parcel have the potential to be considered grey belt?	Yes
Summary: The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.	

S-019 South Keynsham



S-019 A: Looking east from Park House Lane across open countryside



S-019 B: Looking east from Park House Lane across open countryside



S-019 C: Looking east from Park House Lane across open countryside



S-019 D: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	South Keynsham
Site Size	23.7 ha
Stage 1 Parcel Reference	P-042
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	The site is located south of Keynsham and comprises open fields, a barn structure to the north and dispersed hedgerows.

Boundary Features	The site is bounded to the north by a field boundary consisting of inconsistent hedgerows and treelines, to the east and south by a mixture of hedgerow, undefined boundaries and Redlynch Lane, and to the west by a gas pipeline and its HSE safety zone. Inner boundaries: north. Outer boundaries: east, south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area) and therefore makes no contribution to Purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns of Keynsham and Midsomer Norton, with the site forming part of the gap between the two. The villages of Farmborough, Timsbury and Paulton are in between the site and Midsomer Norton. The existing gap between the neighbouring towns is approximately 11.5km across the site. Development of the site would reduce the gap to approximately 11.2km. The site forms a very small part of the gap between Keynsham and Midsomer Norton, which is of sufficient scale and character that development of the site is unlikely to cause merging. The site is also in relative proximity to the Bristol urban area, with the gap between the two being approximately 2km at the narrowest point. Whilst the site is adjacent to the South of Keynsham, the site is not located within the gap between the two settlements. As such, development of the site will not result in merging. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains less than 3 percent built form (excluding hardstanding and temporary structures). Built form comprises a barn structure (agricultural building) to the north, which is not considered inappropriate development in the Green Belt. The rest of the site comprises open countryside. The site is surrounded by open countryside along most of its boundaries, though it is connected to the edge of Keynsham built form to the north which introduces urbanising influences to the site. This influence is limited by the large size of the site. The site topography is predominantly flat, and there are longer distance views across the site and over open fields to the east, south and west, though these are interrupted in several places by dispersed trees and hedges. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).

Purpose (d): To preserve the setting and special character of historic towns	Weak The site is located adjacent to the Historic Town of Keynsham; however the site has no visual or physical connection to the historic core. The site therefore does not play a role in maintaining the immediate context and setting of the historic town. Overall, the site makes a weak to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to Purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to one purpose. Overall, the site makes a moderate contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes, making a significant contribution to only purpose (c). Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and Midsomer Norton. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns and it would not result in them merging. Purpose (c): The site is 23.7 ha and development of the site would entail a large incursion into predominantly undeveloped countryside relative to the size of Keynsham. Purpose (d): The site is located adjacent to the Historic Town of Keynsham; however the site has no visual or physical connection to the historic core. The site therefore does not play a role in maintaining the immediate context and setting of the historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would largely continue to perform its function and against relevant purposes, except for the area of Green Belt to the north east, comprising allotments, which would become enclosed as a result. It would result in an increased importance for the remaining Green Belt in safeguarding the countryside from encroachment and preventing urban sprawl and preventing neighbouring towns from merging into one another.

Are there any cumulative impacts (due to release of adjacent sites)?	There are two other adjacent sites : (S-020, S-021). Collectively, the development of these sites would have a similar impact as set out above, however, their release in combination would have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham. The remaining surrounding Green Belt could continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defined by Redlynch Lane to part of the south and Enginehouse Lane to part of the east, which are considered to form existing defensible boundaries. The remainder of the site's existing outer boundary is less defensible consisting of dispersed tree and hedge lines to the south and east, while to the west, there is no clear boundary feature on the ground along the allocated boundary. It is recognised that this site boundary has been drawn for the associated allocation due to the underground Gas Pipeline running along it. Whilst this constitutes a permanent man-made feature, it is not a readily recognisable boundary, and is thus less defensible. These existing boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	No
Does the parcel have the potential to be considered grey belt?	Yes
Summary: The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.	

S-020 West Keynsham



S-020 A: Boundary between West Keynsham and West Keynsham 2, looking west



S-020 B: Views of open countryside looking south across the parcel towards southern boundary



S-020 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	West Keynsham 2
Site Size	7.6 ha
Stage 1 Parcel Reference	P-044
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	The site is located south west of Keynsham and comprises field boundary and an access track within the south the of site.

Boundary Features	The site is bounded to the north and west by a gas pipeline and its HSE safety zone, hedgerow and the allocated site boundary, to the east and south by Charlton Road. Inner boundaries: east. Outer boundaries: north, south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area) and therefore makes no contribution to Purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns of Keynsham and the Bristol urban area, and the existing gap between the neighbouring towns is approximately 1.88km across the site. Development of the site would reduce the gap to approximately 1.73km. The site forms a very small part of the gap between Keynsham and the Bristol urban area. The gap consists of open fields, dispersed residential dwellings, industrial and commercial development, and Stockwood Vale golf course. The gap is of sufficient scale and character that development of the site is unlikely to cause merging. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains no built form (excluding hardstanding and temporary structures). The site comprises open agricultural fields. The site adjoins the edge of Keynsham built form along its eastern boundary which impacts the sense of openness and introduces urbanising influences to the site. The site is predominantly flat and there are long distance views towards the west from across much of the site, excluding where it comprises hedgerows and parcel of woodland. To the west, some development within Queen Charlton is visible from the Northern half of the site. Long distance views are also available towards the south in a section of the site that sits beyond the woodland parcel. Overall, the site possesses a largely rural character and therefore makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Weak The site adjoins the Historic Town of Keynsham; however the site has no visual or physical connection to the historic core. The gap between the site and Keynsham Conservation area is wholly covered by built form within Keynsham, and the topography of this gap is such that neither is in view of the other. The site therefore does not play a role in maintaining the immediate context and setting of the historic town. Overall, the site makes no contribution to Purpose (d).

Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to Purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a no contribution to one purpose, a weak contribution to two purposes, and a moderate contribution to two purposes. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and the Bristol Urban area. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns and it would not result in them merging. Purpose (c): The site is 7.6 ha and development of the site would entail a modest incursion into predominantly undeveloped countryside relative to the size of Keynsham. Purpose (d): The site is located adjacent to the historic town of Keynsham, however it has a weak physical and visual connection with the historic core, therefore development would not impact upon the setting or character of a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are two other adjacent sites: (S-021, S-019). Collectively, the development of these sites would have a similar impact as set out above, however, their release in combination would have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham. The remaining surrounding Green Belt could continue to perform its Green Belt function.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The sites existing outer boundaries are considered less defensible, particularly as to the west this consists of no clear boundary feature on the ground. It is recognised that this site boundary has been drawn for the associated allocation due to the underground Gas Pipeline running along it. Whilst this constitutes a permanent man-made feature, it is not a readily recognisable boundary, and is thus less defensible. The inner boundary, however, is considered defensible comprising Charlton Road. The existing outer boundaries would need to be strengthened, including through new planting and vegetation along the alignment of the Gas Pipeline, in order to create a recognisable and permanent new Green Belt boundary.
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Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	No
Does the parcel have the potential to be considered grey belt?	Yes
Summary: The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.	

S-021 West Keynsham (North)



S-021 A: Looking south from the road leading towards the trading estate, view of residential properties to the west



S-021 B: Looking south from the trading estate across open countryside towards the southern boundary



S-021 C: Looking east down the road leading to residential area from the trading Estate showing the site connections to existing town



S-021 D: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	West Keynsham
Site Size	16.3 ha
Stage 1 Parcel Reference	P-044
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	The site is located west of Keynsham, and comprises of an industrial estate and agricultural fields.

Boundary Features	The site is bounded to the north by sparse hedgerows, a fenceline and backs of residential properties, to the east by the backs of residential properties and Charlton Road, to the south by hedgerow, and to the west by a gas pipeline and its HSE safety zone and dense hedgerows and tree line. Inner boundaries: North and East. Outer boundaries: South and West.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area) and therefore makes no contribution to Purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns of Keynsham and the Bristol urban area, the existing gap between the neighbouring towns is approximately 1.52km across the site. Development of the site would reduce the gap to approximately 1.42km. Whilst this is a relatively small gap, the width and form of the site is such that development of the site would have limited risk of perceived merging. Namely, the site is of a linear shape which follows the existing built form of Keynsham, and development would therefore constitute an extension of the town without appearing as a clear encroachment into the gap with Bristol. The gap consists of open fields, dispersed residential dwellings, industrial and commercial development, and Stockwood Vale Golf Course. The gap is of sufficient scale and character that development of the site is unlikely to cause merging. Overall, the site makes a weak contribution to purpose (b).

Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains less than 3 percent built form (excluding hardstanding and temporary structures). Built form comprises industrial units located within the middle of the site. The site otherwise comprises open fields with hedgerows and treelines cutting across the site in multiple places. The site adjoins the edge of Keynsham built form along its eastern boundary impacting the sense of openness. The site is predominantly flat and there are long distance views over open countryside towards the west from across much of the site, though these are blocked in parts by treelines along the northwest. Development in Stockwood within the Bristol urban area can be seen in the distance to this direction from isolated parts of the site. Long distance views over the site itself are limited by a series of field boundaries (treelines) and the industrial estate which sits centrally and crosses the width of the site. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Weak The site adjoins the Historic Town of Keynsham; however the site has no visual or physical connection to the historic core. The gap between the site and Keynsham Conservation area is wholly covered by built form within Keynsham, and the topography of this gap is such that neither is in view of the other. The site therefore does not play a role in maintaining the immediate context and setting of the historic town. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a no contribution to one purpose, a weak contribution to two purposes, and a moderate contribution to two purposes. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and the Bristol Urban area. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns and it would not result in them merging Purpose (c): The site is 16.3 ha and development of the site would entail a modest incursion into predominantly undeveloped countryside relative to the size of Keynsham. Purpose (d): The site is located adjacent to the historic town of Keynsham, however it has a weak physical and visual connection with the historic core, therefore development would not impact upon the setting or character of a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are two other adjacent sites: (S-020, S-019). Collectively, the development of these sites would have a similar impact as set out above, however, their release in combination would have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham. The remaining surrounding Green Belt could continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The sites existing outer boundaries are considered less defensible, particularly as to the west this consists of no clear boundary feature on the ground. It is recognised that this site boundary has been drawn for the associated allocation due to the underground Gas Pipeline running along it. Whilst this constitutes a permanent man-made feature, it is not a readily recognisable boundary, and is thus less defensible. These existing outer boundaries would need to be strengthened , including through new planting and vegetation along the alignment of the Gas Pipeline, in order to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
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Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	No
Does the parcel have the potential to be considered grey belt?	Yes
The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.	

S-022 Devonport House



S-022 A: View of Devonport house looking north off Durley Park



S-022 B: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	Devonport House
Site Size	1.4 ha
Stage 1 Parcel Reference	P-052
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	The site is located east of the Bristol urban area and north west of Keynsham. The site comprises of vacant commercial property at Devonport House, dense vegetation and car parking spaces.
Boundary Features	The site is bounded by dense treeline which abuts Keynsham Bypass to the north, by Durley Lane and the rear gardens of a residential property to the east, by the curtilage of residential property and hedgerow to the south, and by a hedgerow to the west. Inner boundaries: none. Outer boundaries: north, south, east and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area) and therefore makes no contribution to purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns of Bristol urban area and Keynsham. The existing gap between the neighbouring towns is approximately 2.82km. Development of the site would reduce the gap to approximately 2.6km. There is intervening development within the gap consisting of commercial development and detached residential properties. The gap between the towns is narrower from north of Keynsham to Longwell Green and unlikely to result in the perceived merging of the two towns. The site forms a very small part of the gap between two neighbouring towns, and the relatively small site size in relation to the scale of the gap and considering the gap comprises of extensive development means that development of the site is unlikely to cause merging or the perception of merging. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	No contribution The site contains more than 15 percent built form comprising of car park, and Babcock Devonport House commercial buildings. The site therefore possesses a strongly urban character. Overall, the site makes no contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes no contribution to three purposes, a weak contribution to one purpose, and no contribution to one purpose. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would slightly reduce the gap between Keynsham and the Bristol urban area. However, due to the size of the site and the gap this would represent a small decrease in the separation of the neighbouring towns and it would not result in them merging. Purpose (c): The site is already completely developed as Babcock Devonport House and its facilities are located within the site, therefore development would not be perceived as further encroachment into the countryside. Purpose (d): Development of the site would have no impact on a historic town as the site does not adjoin an identified historic town or provide views to a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The site does not directly adjoin the settlement of Keynsham. Removal of the site from the Green Belt would result in an island of green belt being released which would result in the remaining Green Belt to the east becoming enclosed by development. If the site was extended to the east to connect to Keynsham, the surrounding Green Belt could continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are two other adjacent sites around the Bristol urban area : (S-024 and S-023). Collectively, the development of these sites would have a similar impact as set out above, however, their release in combination would represent a larger incursion into undeveloped countryside, albeit this would not be significant relative to the size of the Bristol urban area. The remaining surrounding Green Belt could continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	Assuming the site is taken forward with S-034, and S-033, the new Green Belt boundary would be defined by Keynsham Bypass to the north, and Durley Hill to the South which are defensible boundaries, the remainder of the sites outer boundary is less defensible consisting of residential gardens and field boundary to the east. These boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	No
Does the parcel have the potential to be considered grey belt?	Yes
Summary: The site does not score strongly against purpose (a), (b) or (c) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment. The site does not contain any footnote 7 constraints.	

S-023 Durley Farm



S-023 A: Looking west from the lane leading towards Devonport House with views of open countryside



S-023 B: Looking south along lane from Devonport House showing eastern boundary



S-023 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	Durley Farm
Site Size	3.8 ha
Stage 1 Parcel Reference	P-052
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	The site is located east of the Bristol urban area and north west of Keynsham. The site comprises an agricultural field.

Boundary Features	The site is bounded by a dense tree line which abuts the Keynsham Bypass to the north, by Durley Hill Road and the curtilage of a residential property to the south, by Durley Park and Babcock Devonport House to the east and the curtilage of a fire station to the west. Inner boundaries: none Outer boundaries: north, south, east, west
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area) and therefore makes no contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns the Bristol urban area and Keynsham. The existing gap between the neighbouring towns is approximately 2.84km. Development of the site would reduce the gap to 2.64km There is intervening development within the gap consisting of commercial development and detached residential properties along the A4 Road. The gap between the towns is narrower from north of Keynsham to Longwell Green and therefore would reduce the perceived merging of the neighbouring towns. The site forms part of a very small part of the gap between the neighbouring towns which is of sufficient scale and character that development of the site is unlikely to cause merging. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Weak The site contains 3 percent built form (excluding hardstanding and temporary structures) consisting of an agricultural building within the north of the site. The site comprises an agricultural field. The site is completely enclosed by built form to the west and east which introduces strong urbanising influences to the site. Dense woodland to the east, in addition to the A4 Road to the north and the A4175 to the south creates a strong sense of enclosure for the site and limits outward views to the surrounding countryside. Overall, the site possesses a largely urban character and makes a weak contribution to purpose (c)
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).

Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to Purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a weak contribution to two purposes, no contribution to two purposes, and a moderate contribution to one purpose. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would slightly reduce the gap between Keynsham and the Bristol urban area. However, due to the size of the site and the gap this would represent a small decrease in the separation of the neighbouring towns and it would not result in them merging. Purpose (c): Development of the site would entail a small incursion into undeveloped countryside, although the site is enclosed by development on its east and west sides which limits its impact on this purpose. Purpose (d): Development of the site would have no impact on a historic town as the site does not adjoin an identified historic town or provide views to a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The site does not directly adjoin the settlement of Keynsham. Removal of the site from the Green Belt would result in an island of Green Belt released which would result in the remaining Green Belt to the east of the site, specifically north of Durley Hill and South of Keynsham Bypass becoming enclosed by development. If the site was extended to the east to connect to Keynsham, the surrounding Green Belt could continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.

Are there any cumulative impacts (due to release of adjacent sites)?	There are two adjacent sites around the Bristol urban area (Brislington): (S-024 and S-022). Collectively, the development of these sites would have a similar impact as set out above however, they would have a greater impact on Purpose (b) as they would significantly reduce the gap between the large built-up area of Bristol and Keynsham. They would also have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of the large urban area of Bristol. However, the remaining surrounding Green Belt could continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	Assuming the site is taken forward with S-034, the new Green Belt boundary would be defined by Keynsham Bypass to the north, and Durley Hill to the south which are defensible boundaries, the remainder of the sites outer boundary is less defensible consisting of residential gardens, and the curtilage of Devonport House to the east. These boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	No
Does the parcel have the potential to be considered grey belt?	Yes
Summary: The site does not score strongly against purposes (a), (b) or (d), and as such has been considered for grey belt for the purposes of this Stage 2 Green Belt Assessment. The site does not contain any footnote 7 constraints.	

S-024 Hicks Gate



S-024 A: Buildings on Hicks Gate land looking south towards open countryside along southern boundary



S-024 B: Looking south east across open countryside from Durley Hill



S-024 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	Hicks Gate
Site Size	94.5 ha
Stage 1 Parcel Reference	P-047 and P-046
Stage 1 Parcel Findings	P-047 overall assessment: Moderate P-046 overall assessment: Moderate
Site Description	The site is located south of the Bristol urban area, north west of Keynsham and north west of Bath.

Boundary Features	The site is bounded to the north by a dense tree line which abuts a railway track. It is bounded to the east by the A4174, the A4175 and a small section of Bath Road. It is bounded to the south by tree line and hedgerow. To the west, the site is bounded by a mix of features including of Bath Road, Ironmould Lane, a hedgerow, playing fields associated with Brislington football club, Scotland Lane, the curtilage of a residential property, and Stockwood Road. Inner boundaries: west (in part). Outer boundaries: north, south, east and west (in part).
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	Moderate The site is located at the edge of the large built-up area (the Bristol urban area). The site is predominantly open and there is limited evidence of existing sprawl within the site consisting of Brislington Park & Ride to the northeast along the A4 Bath Road adjoining the edge of the large built up area, and an industrial park also along the A4 Road along the north west boundary which comprises garages, a gym and Bristol Ambulance EMS (a private ambulance firm). The site is physically connected to the large built-up area along its western-most boundary. The remaining boundaries are connected to the surrounding Green Belt. The sites western boundary comprises of Bath Road, Ironmould Lane, a hedgerow, playing fields associated with Brislington football club, Scotland Lane, the curtilage of a residential property, and Stockwood Road. Therefore, the inner Green Belt edge is mixed which may not be able to prevent unrestricted sprawl. The outer boundary of the site is defined by A4 Bath Road, Ironmould Lane, hedgerow, playing fields associated with Brislington Football Club, and dense tree line which abuts the railway track. The sites eastern boundary comprises of the A4174, and a small section of A4 Bath Road. The sites southern boundary comprises of field boundary, tree line and hedgerow. Therefore, the outer boundary is the site is a mixed boundary which may not be able to prevent unrestricted sprawl. If the site was released, some of the outer boundary would need to be strengthened. Overall, the site makes a moderate contribution to purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	Strong The site is located between the neighbouring towns of Keynsham and the Bristol urban area. The existing gap between the neighbouring towns is approximately 2.37km across the site. Development of the site would reduce the gap to approximately 813m. The gap comprises of industrial units, garages, open fields and sports facilities. The site forms a large part of the gap, where its development would significantly reduce the perceived and visual separation between the Bristol urban area and Keynsham and would result in the perceived merging of the neighbouring towns. Overall, the site makes a strong contribution to purpose (b)
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains less than 1 percent built form (excluding hardstanding and temporary structures). Built form comprises industrial development, a detached residential property within the centre of the site, Brislington Park and Ride alongside the west boundary of the site, and the A4 Bath Road running from west to east across the site. The site otherwise comprises open countryside with hedgerows and treelines defining various field boundaries within it. The site is partly enclosed by existing development along the western boundary, the A4174 along its eastern boundary and dense tree line along its northern boundary creates a strong sense of enclosure, impacting its sense of openness. Overall, the site possesses a largely rural character and makes a moderate contribution to Purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Moderate The site is located partly within the Historic Core of Bristol to the north, specifically the Avon Valley Conservation Area, and is adjacent to the Avon Valley Conservation Area along the northern boundary. The site includes limited features of the landscape setting which contributes to the character of the Avon Valley Conservation Area. Features include Ironmould Lane and is in proximity to the Brislington House estate along its northern boundary. Ironmould Lane which provides access to Swiss Cottage and the rear of Brislington House, which are named features of the Conservation Area. The infill of the large gardens associated with Brislington House have been identified as a risk of altering the character of the estate. Overall, the site makes a moderate contribution to purpose (d).

Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to Purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a moderate contribution to four purposes and a significant contribution to one purpose. Overall, the site makes a moderate contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes with the site making a significant contribution to purpose b. Purpose (a): Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl. Development would have a defensible outer boundary to the north consisting of Bath Road and dense treeline abutting the railways track, and to the east consisting of the A4174 and A4175. The sites outer boundary to the south is less defensible comprising open field boundary which lack durability, this would need to be strengthened to create a recognisable and permanent new Green Belt boundary which would prevent unrestricted sprawl. Purpose (b): Development of the site would significantly reduce the gap between the Bristol urban area and Keynsham resulting in the perceived merging of the neighbouring towns. Purpose (c): The site is 94.5 ha and development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of Bristol urban area. The site includes Bath Road which runs from west to east through the site, has existing development consisting of commercial development within the centre and a residential dwelling within the east which would reduce the perception of encroachment to an extent. Purpose (d): The site is located adjacent to the historic town of Bristol and partly located within the Avon Valley Conservation Area and includes Ironmould Lane and is in proximity to the Brislington House estate along its northern boundary. Ironmould Lane which provides access to Swiss Cottage and the rear of Brislington House, which are named features of the Conservation Area. The site includes limited features of the landscape setting including which contribute to the character of the historic town, therefore development would not significantly impact upon the setting or character of a historic town.

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are two other adjacent sites around the Bristol urban area (Brislington): (S-023 and S-022). Collectively, the development of these sites would have a similar impact as set out above however, their release in combination would represent a larger incursion into undeveloped countryside, albeit this would not be significant relative to the size of the Bristol urban area, and the fact that the Bristol urban area extends outwards to the east in an incongruous pattern. The remaining surrounding Green Belt could continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defined by dense treeline and the railway track, and the A4 Bath Road to the north, the A4174 and A4175 to the east, and Scotland Lane to the south west which are mixed less defensible boundaries. The remainder of the sites existing outer boundary is less defensible consisting of tree line and field boundary to the south. These boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either Purpose (a), Purpose (b) or Purpose (d)?	Yes
Are there any Footnote 7 constraints present within the parcel?	Yes - the site contains one listed building with the north of the site, the site is also partly located within the Avon Valley Conservation area within the north.
Does the parcel have the potential to be considered grey belt?	No
Summary: The site scores strongly against purpose (b) and as such has not been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment	

S-025 North Whitchurch (north of Staunton Lane)



S-025 A: Looking east from footpath leading from Staunton Lane with views of open countryside



S-025 B: Looking west from Staunton Lane along lane towards Manor Farm Barns with views of open countryside



S-025 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026])

Site Name	North Whitchurch (north of Staunton Lane)
Site Size	13 ha
Stage 1 Parcel Reference	P-044
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	South east of Keynsham, site comprises open fields.
Boundary Features	The site is bounded by tree line and hedgerow adjoining residential properties to the north, tree line and Stockwood Lane to the east, the backs of residential properties adjoining Stanton Lane to the south and tree line to the west. Inner boundaries: north, south and west (although there is a small area of Green Belt to the west). Outer boundaries: east.

Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	Weak The site is located at the edge of the large built-up area (the Bristol urban area). The site is predominantly open and there is no existing development within the site. The site is physically enclosed by the settlement of Whitchurch Village along the sites northern boundaries, although this is not deemed part of the large built-up area. The site's southern and western boundaries are enclosed by the settlement of Whitchurch Village, the sites eastern boundary is enclosed by Stockwood Lane. Due to the level of enclosure, development would round off the settlement edge and would not result in unrestricted sprawl. The edge of the large built-up area is defined by the backs of residential properties and tree line to the north, residential properties to the south and dense treeline to the west. Therefore, the edge of the large built-up area has a boundary which lacks durability in order to prevent unrestricted sprawl. The outer boundary of the site is defined by tree line and Stockwood Lane to the east. Therefore, the outer boundary of the site largely has a defensible boundary which could prevent unrestricted sprawl. Overall, the site makes a weak contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the Bristol urban area and the neighbouring town of Keynsham. The existing gap between the neighbouring towns is approximately 2.55km across the site. Development of the site would reduce the gap to approximately 2.35km. The existing gap is narrower from the settlement edge of Stockwood to the northeast of the site. Additionally, the site is largely enclosed by existing development such that its development would round off the settlement edge. This would limit any risk of there being a perception of encroachment upon the gap between neighbouring towns. As such, development of the site would not cause merging. Overall, the site makes a weak contribution to purpose (b).

Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate Site contains no built form. The site comprises open fields. The site is partly enclosed by the settlement edge of Bristol along some of its boundaries impacting the sense of openness. The site's topography is relatively flat although the surrounding built form, combined with dense treeline creates a strong sense of enclosure, with limited outward views to the surrounding countryside. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Weak The site is located adjacent to the historic town of Bristol; however the site has no visual or visual connection to the historic core. The gap between the site and Avon Valley Conservation Area, which is the nearest Conservation Area, is of sufficient size and nature, being partly covered by built form within Stockwood, such that neither is in view of the other. The site therefore does not play a role in maintaining the immediate context and setting of the historic town. Overall, the site makes a weak contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a moderate contribution to two purposes and a weak contribution to three purposes. Overall, the site makes a weak contribution to Green Belt purposes.

Assessment of Green Belt Harm

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes. Purpose (a) Whilst entailing growth of the large built-up area of Bristol, the level of enclosure of the site is such that development would round off the settlement edge and would not result in unrestricted sprawl. The outer boundary of the site is defined by tree line and Stockwood Lane to the east. Therefore, the outer boundary of the site largely has a defensible boundary which could prevent unrestricted sprawl. Purpose (b) The site is located between the Bristol urban area and the neighbouring town of Keynsham, however Whitchurch Village lies between the two towns. The existing gap between the two is narrower elsewhere, from the settlement edge of Stockwood to the northeast of the site. Purpose (c) The site is 13 ha and development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of Bristol urban area. While the site comprises open fields and no built form, it is largely enclosed by existing development combined with dense treeline, creating a strong sense of enclosure which would reduce the perception of encroachment to an extent. Purpose (d) The site is located adjacent to the historic town of Bristol, however it has no physical or visual connection with the historic core, and therefore development does not impact upon the setting or character of a historic town The removal of the site from the Green Belt would not impact the remaining Green Belt to perform against its functions and purposes. The eastern boundary is a defensible boundary which would not need to be strengthened to become the settlement edge.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would largely continue to perform its function and against relevant purposes, except for the small area of Green Belt to the west which would become completely enclosed as a result. It would result in an increased role for the remaining Green Belt in safeguarding the countryside from encroachment and preventing urban sprawl.
Are there any cumulative impacts (due to release of adjacent sites)?	The cumulative impact resulting from the release of the adjacent site East Whitchurch (S-026) would further enclose the site itself as it is already largely enclosed by built form, weakening its role further. If the site was released in combination with East Whitchurch this would result in the remaining Green Belt land being strengthened, although the release of East Whitchurch alone would result in a finger of development in the Green Belt.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defensible as it would consist of Stockwood Lane.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	No.
Are there any Footnote 7 constraints present within the parcel?	No.
Does the parcel have the potential to be considered grey belt?	Yes.
Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-026 East Whitchurch



S-026 A: Looking east from the lane leading towards Horse World with views of open countryside



S-026 B: Looking south east from Queen Charlton Lane with views of open countryside



S-026 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026]).

Site Name	East Whitchurch
Site Size	34 ha
Stage 1 Parcel Reference	P-044, P-043 and P-041
Stage 1 Parcel Findings	P-044 overall assessment: Moderate P-043 overall assessment: Moderate P-041 overall assessment: Moderate
Site Description	East of Whitchurch, site comprises of open countryside, agricultural fields and Horse World, with ancillary agricultural buildings.

Boundary Features	The site is bounded by mature tree and hedge lines to the north, tree and hedge lines to the east and south, and by roads and the regular backs of residential properties/settlement edge of Whitchurch to the west. Inner boundary: none. Outer boundary: north, east, south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	Weak The site is not located at the edge of the large built-up area (the Bristol urban area), but rather adjoins Whitchurch village along its western boundary. The site is not considered to have any physical or functional connection with the large built-up area as there is a gap with no development between the Bristol urban area and the north of Whitchurch. There is, however, a visual connection, with the Stockwood area of Bristol being visible across the northern portion of the site, and vice versa. This is somewhat limited by the existence of established hedgerows and tree lines bounding the north of the site, and relatively flat topography limiting long distance views between the two. The site therefore makes a weak contribution to Purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Strong The site is located between the Bristol urban area and neighbouring town of Keynsham with the site forming part of the gap between the Bristol urban area. The village of Queen Charlton is in between the site and Keynsham. The existing gap between the neighbouring towns/inset settlement is approximately 2.12km across the site. Development of the site would reduce the gap to approximately 1.74km. The gap consists of open countryside. The site forms a large part of the gap, where development would significantly reduce the actual distance and visual separation between Keynsham and the Bristol urban area. Overall, the site makes a strong contribution to purpose (b).

Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains less than 3 percent built form (excluding hardstanding and temporary structures). Built form comprises agricultural development, with Horse World located in the centre of the site and is development that is not inappropriate in the Green Belt. The remainder of the site comprises open countryside. The site is partly enclosed by existing development and established trees and hedges along some of its boundaries impacting the sense of openness. The site topography is predominantly flat, and there are longer distance views across open fields, slightly interrupted in several places by dispersed trees and hedges. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Strong
Reason for Overall Assessment:	The site makes a strong contribution to two purposes, a moderate contribution to one purpose, a weak contribution to one purpose and no contribution to one purpose. Overall, the site makes a strong contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a strong overall contribution to Green Belt purposes with the site making a significant contribution to purposes (b) and (c). The site is not located adjacent to the historic town of Bristol and therefore development would not impact upon the setting or character of a historic town. The removal of the site from the Green Belt would result in a significant finger of development extending into the countryside and effectively enclose an area of Green Belt to the north west as well as introducing urbanising influences, weakening its role in preventing sprawl.

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would largely continue to perform its function and against relevant purposes, except for the area of Green Belt to the north west which would largely become enclosed as a result. It would result in an increased importance for the remaining Green Belt in safeguarding the countryside from encroachment and preventing urban sprawl and preventing neighbouring towns from merging into one another.
Are there any cumulative impacts (due to release of adjacent sites)?	The cumulative impact resulting from the release of the adjacent sites S-025, S-028 and S-029, would increase the site's role in safeguarding the countryside from encroachment and preventing urban sprawl.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would not be defensible as it would consist of dispersed tree and hedge lines. This existing boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes
Are there any Footnote 7 constraints present within the parcel?	No.
Does the parcel have the potential to be considered grey belt?	No.
Summary:	The site scores strongly against purpose (b) and as such has not been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-027 East Whitchurch 2



S-027: Aerial view showing site and surrounding land uses
(Google Maps, [April 2026])

Site Name	East Whitchurch 2
Site Size	3.29 ha
Stage 1 Parcel Reference	P-043
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	Southeast of Whitchurch, site comprises an open field.
Boundary Features	The site is bounded by a hedgerow and residential property in addition to a gas pipeline and its HSE safety zone to the north, by a hedgerow to the east, by hedgerow in combination with the edges of built form of Meer Mead Farm to the south, and Woollard Lane to the west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution Site is not at the edge of a large built-up area, in physical or perceptual terms, and therefore makes no contribution to purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the Bristol urban area and the neighbouring town of Keynsham, with the site forming part of the gap between the two. The washed over village of Queen Charlton is in between the site and Keynsham. The site sits in the centre of the gap between the neighbouring towns, which measures approximately 3.8km through the site. The site forms a very small part of the gap between Keynsham and Bristol, which is of sufficient scale and character that development of the site is unlikely to cause merging. The existing gap between Keynsham and Bristol is already narrower elsewhere at 2.14km. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains no built form. The site comprises open countryside. The site is flanked by existing development along the boundary to the south, impacting the sense of openness. The site topography is predominantly flat, and there are longer distance views across open fields to the north. Views are limited by built form to the south, but the remaining boundaries provide long distance views to the wider Green Belt, although hedgerows and vegetation along field boundaries impacts on this. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak

Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to one purpose, a weak contribution to one purpose and no contribution to two purposes. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. The site makes a strong contribution to purpose (c) but a weak contribution to purpose (b) and no contribution to either purpose (a) or (d). Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site not making a significant contribution to any purposes. Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and Bath. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns and it would not result in them merging Purpose (c): The site is 3.29 ha and development of the site would entail a small incursion into undeveloped countryside relative to the size of Whitchurch. Purpose (d): Development of the site would have no impact on a historic town as the site does not adjoin an identified historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	The cumulative impact resulting from the release of the adjacent sites S-025, S-026, S-028 and S-029 would increase the site's role in safeguarding the countryside from encroachment and preventing urban sprawl.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would not be defensible as it would consist of hedgerow to the east and north. This existing boundary would need to be strengthened, including along the gas pipeline alignment to the north, to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the site score strongly against either purpose (a), purpose (b) or purpose (d)?	No.
Are there any Footnote 7 constraints present within the site?	No.
Does the site have the potential to be considered grey belt?	Yes.
Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-028 West Whitchurch



S-028 A: Looking west from the north east site boundary on Norton Lane with views of rugby pitches and football playing pitches



S-028 B: Looking west from the south east boundary on Norton Lane with views of open countryside



S-028 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026]).

Site Name	West Whitchurch
Site Size	9.5 ha
Stage 1 Parcel Reference	P-036
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	South east of Whitchurch, site comprises rugby and football playing pitches with associated buildings and track, and open countryside.
Boundary Features	The site is bounded by the A37 Bristol Road and the back of a residential property and garden to the north, Norton Lane to the east as well as an established tree and hedge line. The site is bounded by a hedgerow to the south and west. Inner boundaries: none. Outer boundaries: north, east, south and west.
Green Belt Purposes	Contribution

Purpose (a): To check the unrestricted sprawl of large built-up areas	Weak The site is not located at the edge of the large built-up area (the Bristol urban area) but rather adjoins Whitchurch village along its northern boundary. The site is not considered to have any physical or functional connection with the large built-up area as there is a gap with no development between the Bristol urban area and the north of Whitchurch. There is, however, a visual connection, albeit limited, as no open land of rural character can be observed between the site and the Bristol urban area, with the latter being visible from the site. The site therefore makes a weak contribution to Purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the Bristol urban area and the neighbouring town of Keynsham. The settlement of Whitchurch Village, which sits along the eastern boundary of the site, is located in between Keynsham and the site. This would limit any risk of there being a perception of encroachment upon the gap between the Bristol urban area and Keynsham. As such, development of the site would not cause merging. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains less than 1 percent built form (excluding hardstanding and temporary structures). Built form comprises facilities for outdoor sport in the centre of the site, to the north and is not considered to be inappropriate development in the Green Belt. The remainder of the site comprises open countryside. The site is partly enclosed by existing development and established trees and hedges along some of its boundaries impacting the sense of openness. The site topography is predominantly flat, and there are longer distance views across open fields, slightly interrupted in several places by dispersed trees and hedges. Overall, the site possesses a largely rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate

Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to one purpose, weak contribution to two purposes and no contribution to one purpose. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. While the site makes no contribution to one purpose, it is still deemed to make a strong contribution to purpose (c) as well as a moderate contribution to purpose (e) and on balance makes a moderate contribution to Green Belt purposes as a result.
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Assessment of Green Belt Harm

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes with the site making a significant contribution to purpose (c). The removal of the site from the Green Belt and its development would result in a moderate incursion into the countryside, as well as introducing urbanising influences, weakening its role in preventing sprawl. Removal of the site would not result in the potential for merging between Keynsham and the Bristol urban area and would not impact upon the setting or character of a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform its function and against relevant purposes. It would have an increased role in safeguarding the countryside from encroachment and preventing urban sprawl.
Are there any cumulative impacts (due to release of adjacent sites)?	The cumulative impact resulting from the release of the adjacent sites S-025, S-028 and S-029 would increase the sites role in safeguarding the countryside from encroachment and preventing urban sprawl. The outer boundary of the site would be less defensible to the south, comprising hedgerow, and as such may not be able to prevent unrestricted sprawl.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would not be defensible as it would consist of dispersed tree and hedge lines. This existing boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt

Response

Does the site score strongly against either purpose (a), purpose (b) or purpose (d)?

No.

Are there any Footnote 7 constraints present within the site?	No.
Does the site have the potential to be considered grey belt?	Yes.
Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-029 Whitchurch Taylor Wimpey site



S-029 A: Looking east from the western site boundary adjacent to Stoneberry Road with views across the site



S-029 B: Looking north from the north of the site with views of site boundary and East Wing Lyons Court Farm



S-029 C: Aerial view showing site and surrounding land uses (Google Maps, [April 2026]).

Site Name	Whitchurch Taylor Wimpey site
Site Size	22.1 ha
Stage 1 Parcel Reference	P-036
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	South-east of Whitchurch, site comprises fields, hedgerows and dispersed trees.

Boundary Features	The site is bounded by Church Lane, the backs of residential gardens, dense treelines and hedgerow surrounding East Wing Lyons Court Farm, and other more sparse tree and hedge lines to the north, tree and hedge lines and an undefined boundary and sparse hedgerow to the east, tree and hedge lines to the south, and the backs of residential properties and gardens along Emmett Wood, Stoneberry Road and Fylton Croft and a dispersed tree and hedge line to the west. Inner boundaries: north and west. Outer boundaries: east and south.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	Strong The site is located at the edge of the large built-up area (the Bristol urban area). The site is open and there is no evidence of existing development within the site. The site is physically connected to the large built-up area along the site's western boundary and part of the northern boundary. The inner boundary to the north is defined by Church Lane, which is a public residential street. The inner boundary to the west is defined by the backs of residential properties and gardens and a dispersed tree and hedge line. Therefore, the inner Green Belt edge of the large built-up area has a less defensible boundary which may not be able to prevent unrestricted sprawl. The outer boundary of the site is defined by tree, hedge lines and an undefined boundary to the east and tree and hedge lines to the south. Therefore, the outer boundary of the site has a less defensible boundary which may not be able to prevent unrestricted sprawl. Overall, the site makes a strong contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the Bristol urban area and the neighbouring town of Keynsham, with the site forming part of the gap between the two. The washed over village of Queen Charlton is in between the site and Keynsham. The existing gap between the neighbouring towns/inset settlement is approximately 3.51km across the site. Development of the site would reduce the gap to approximately 2.85km. The site forms a very small part of the gap between Keynsham and Bristol, which is of sufficient scale and character that development of the site is unlikely to cause merging. The existing gap between Keynsham and Bristol is already narrower elsewhere at 2.14km. Overall, the site makes a weak contribution to purpose (b).

Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains no built form (excluding hardstanding and temporary structures). The site comprises open countryside The site is partly enclosed by existing development along some of its boundaries impacting the sense of openness. The site topography is predominantly flat, and there are longer distance views across open fields, slightly interrupted in several places by dispersed trees and hedges. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution The site is located adjacent to the historic town of Bristol; however the site has no visual or visual connection to the historic core. The gap between the site and Avon Valley Conservation Area, which is the nearest Conservation Area, is of sufficient size and nature, being partly covered by built form within Whitchurch and Stockwood, such that neither is in view of the other. The site therefore does not play a role in maintaining the immediate context and setting of the historic town. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Strong
Reason for Overall Assessment:	The site makes a strong contribution to two purposes, moderate contribution to one purpose, weak contribution to one purpose and no contribution to one purpose. Overall, the site makes a strong contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a strong overall contribution to Green Belt purposes with the site making a significant contribution to purposes (a) and (c). Removal of the site from the Green Belt would not increase the potential for merging between Keynsham and the Bristol urban area and would not impact upon the setting or character of a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform its function and against relevant purposes. It would have an increased role in safeguarding the countryside from encroachment and preventing urban sprawl.

Are there any cumulative impacts (due to release of adjacent sites)?	The cumulative impact resulting from the release of the adjacent sites West Whitchurch and East Whitchurch would increase the sites' role in safeguarding the countryside from encroachment and preventing urban sprawl.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would not be defensible as it would consist of dispersed tree and hedge lines.

Identification of potential grey belt	Response
Does the site score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes.
Are there any Footnote 7 constraints present within the site?	No.
Does the site have the potential to be considered grey belt?	No.
Summary:	The site scores strongly against purpose (a) and as such has not been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-030 Land west of Corston Lane



S-030 A: Looking south from footpath in north of site with views of open countryside and Corston village



S-030 B: Looking southwest from footpath in north east of site with views of open countryside



S-030 C: Looking southwest from entrance on Corston Lane with views of open countryside and mature tree line



S-030 D: Aerial view showing site and surrounding land uses (Google Maps, [May 2026])

Site Name	West of Corston
Site Size	6.8 ha
Stage 1 Parcel Reference	P-059
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	The site is located west of Corston. The site comprises two open fields, with the larger being used for agricultural (arable) purposes, and a driveway within the north-eastern extended finger of the site.
Boundary Features	The site is bounded by a parcel of dense woodland, Bath Road and a tree-lined boundary with an adjacent field to the north, by Corston Lane and rear garden boundaries to the east, by rear garden boundaries and a small woodland area to the south, and by a hedgerow to the west. Inner boundary: none. Outer boundary: north, east, south and west.

Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution Site is not at the edge of a large built-up area, in physical or perceptual terms, and therefore makes no contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located centrally between the neighbouring towns of Keynsham and Bath. The existing gap between the neighbouring towns is approximately 5.6km through the site. There is intervening development (consisting of Saltford) between the neighbouring towns, although this does not influence the assessment of purpose (b) as Saltford is not defined as a town for purpose (b). The site forms a very small gap between Keynsham and Bath, which is of sufficient scale and character that development of the site is unlikely to cause merging. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains no built form, comprising an open field. The site slopes down towards the north, with longer distance and open views to this direction, as well as to the west from elevated parts of the site. There are views of residential development in the washed over village of Corston to the south and east from much of the site, impacting its sense of openness to some degree. This introduces an urbanising influence, albeit to a small degree due to the topography of the site limiting the visibility of built development, and the mature trees being the dominant feature in views to the north. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Strong The site does not directly adjoin the World Heritage Site, however, it is located within its setting. The site includes prominent features of landscape setting including an important green hillside throughout the site. The site therefore plays a role in maintaining the immediate context and setting of the world heritage site. Overall, the site makes a strong contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate

Reason for Overall Assessment:	The site makes a strong contribution to two purposes, a moderate contribution to one purpose, a weak contribution to one purpose and no contribution to one purpose. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. While the site makes no contribution to one purpose, it is still deemed to make a strong contribution to purpose (c) and (d) as well as a moderate contribution to purpose (e) and on balance makes a moderate contribution to Green Belt purposes as a result.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes with the site making a strong contribution to purposes (c) and (d). Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath. Purpose (b): Development of the site would reduce the gap between Keynsham and Bath. However, due to the size of the site and the gap, this would represent a small decrease in the separation of towns and it would not result in them merging. Purpose (c): The site is 6.8ha and development of the site would entail a large incursion into undeveloped countryside relative to the size of Corston. Purpose (d): The site is located within the setting of the World Heritage Site and plays an important role in maintaining the immediate context and setting of the World Heritage Site due to it including prominent features of landscape setting including an important green hillside throughout the site. Development of the site would therefore have a significant impact upon the setting or character of the World Heritage Site.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The removal of the site will result in a 'hole' in the Green Belt, undermining the surrounding Green Belt's function and purposes. It will also introduce urbanising influences to the Green Belt, though its development would not harm the integrity of the wider green belt given the site is somewhat enclosed by development in the washed over village of Corston.

Are there any cumulative impacts (due to release of adjacent sites)?	There would be cumulative impacts should the site S-013 between Corston and Bath be released from the Green Belt. Collectively, the development of these sites would have a similar impact as set out above, however, they would have a greater impact on Purpose (c), as development of these sites would represent a large incursion into undeveloped countryside relative to the size of the washed over village of Corston. This would increase the site's role in safeguarding the countryside from encroachment.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary would not be defensible as it would consist of tree lines, hedgerows and rear garden boundaries. These existing boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes.
Are there any Footnote 7 constraints present within the parcel?	No.
Does the parcel have the potential to be considered grey belt?	No.
Summary:	The site scores strongly against purpose (d) and as such has not been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-031 Kingswood School Playing Fields



S-031 A: Aerial view showing site and surrounding land uses (Google Maps, [May 2026]).

Site Name	Kingswood School Playing Fields
Site Size	3.1 ha
Stage 1 Parcel Reference	P-082
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	The site is located north of Bath, towards Lansdown. The site comprises a tree line and open fields containing an athletics track and playing field.
Boundary Features	The site is bounded by open fields partially demarcated by a hedgerow to the north, the edge of an astroturf pitch and an open field used as a sports pavilion to the east, Lansdown Road to the south, and open fields partially demarcated by a tree line to the west. Inner boundary: east. Outer boundary: north, south and west.
Green Belt Purposes	Contribution

Purpose (a): To check the unrestricted sprawl of large built-up areas	Strong The site is located at the edge of the large built up area of Bath. The site is open and there is no evidence of existing sprawl within the site. The site is physically connected to the large built up area along the site's eastern boundary. The remaining boundaries are connected to the surrounding Green Belt. The eastern boundary is defined by the edge of an astroturf pitch and an open field that is used as a sports pavilion. Therefore, the inner Green Belt edge of the large built up area has a less defensible boundary which may not be able to prevent unrestricted sprawl. The outer boundary of the site is defined by open fields partially demarcated by a hedgerow to the north, Lansdown Road to the south, and open fields partially demarcated by a tree line to the west. Therefore, the outer boundary of the site has a mixture of defensible and less defensible features which may not be able to prevent unrestricted sprawl. Overall, the site makes a strong contribution to purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to Purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains no built form and comprises open fields used as an athletics track and playing field. The site is flat, with open long line views to the north east and north west from central parts of the site. Dense treelines limit long distance views and impact on openness to the south, while development and treelines adjacent to neighbouring fields limit views and impact openness to the south east and west. Whilst the site is adjacent to the Bath urban area, there is limited urbanising influence from nearby development to the south east of the site due to it being largely concealed by a tree line. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).

Purpose (d): To preserve the setting and special character of historic towns	Strong The site is located within the Bath World Heritage Site. The site contains prominent features of landscape setting including the edge of an important green hillside in the southeast corner of the site. There are no historic features present within the site itself, but Beckford's Tower, a grade I listed building, is located approximately 200m southeast of the site. The tower is partially visible from some parts of the site. Overall, the site makes a strong contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Strong
Reason for Overall Assessment:	The site makes a strong contribution to three purposes, a moderate contribution to one purpose and no contribution to one purpose. Overall, the site makes a strong contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a strong overall contribution to Green Belt purposes with the site making a strong contribution to purposes (a), (b) and (c). Purpose (a): Development of the site, which is located at the edge of the large built up area of Bath, may represent unrestricted sprawl due to the extent of openness available and presence of less defensible features that define both the inner and outer boundaries. Purpose (b): Development of the site would have no impact on preventing neighbouring towns from merging as the site does not protect a gap between neighbouring towns. Purpose (c): The site is 3.1ha and development of the site would entail a small incursion into undeveloped countryside relative to the size of Bath. Purpose (d): The site is located within the Bath World Heritage Site. The site plays an important role in maintaining the immediate context and setting of the historic town due to it site containing prominent features of landscape setting including the edge of an important green hillside in the southeast corner of the site. Development of the site would therefore have a significant impact upon the setting or character of a historic town.

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are four other sites around Bath: S-012, S-011, and S-007. Collectively, the development of these sites would have a similar impact as set out above however cumulatively it would represent a larger incursion into undeveloped countryside, albeit this would not be significant relative to the size of the Bath urban area. The remaining surrounding Green Belt would continue to perform its Green Belt function.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defined by Lansdown Road to the south which is an existing defensible boundary. The remainder of the sites existing outer boundary is lacking in durability consisting of consisting of open fields partially demarcated by a hedgerow to the north and open fields partially demarcated by a tree line to the west. These existing boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes.
Are there any Footnote 7 constraints present within the parcel?	Yes, the site is within the Cotswolds National Landscape.
Does the parcel have the potential to be considered grey belt?	No.
Summary:	The site score strongly against purpose (a) and (d) and as such has not been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-032 Whitchurch Taylor Wimpey 2



S-032 A: Aerial view showing site and surrounding land uses (Google Maps, [May 2026]).

Site Name	Whitchurch Taylor Wimpey 2
Site Size	0.77 ha
Stage 1 Parcel Reference	P-036
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	Unable to access site. This assessment has been completed largely from aerial photography. South-east of Whitchurch, site comprises fields and hedgerows.
Boundary Features	The site is bounded by Church Road and hedgerows to the north, by the backs of residential properties/gardens, fences and hedgerows to the east, and by sparse hedgerow and treelines to the south and west. Inner boundaries: none. Outer boundaries: north, east and south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	Weak The site is not located at the edge of the large built-up area (the Bristol urban area) but rather adjoins Whitchurch village along its northern boundary. The site is not considered to have any physical or functional connection with the large built-up area as there is a gap with no development between the Bristol urban area and the north of Whitchurch. There is, however, a visual connection, albeit limited, as no open land of rural character can be observed between the site and the Bristol urban area, with the latter being visible from the site. The site therefore makes a weak contribution to Purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the Bristol urban area and the neighbouring town of Keynsham, with the site forming part of the gap between the two. The washed over village of Queen Charlton is in between the site and Keynsham. The site forms a very small part of the gap between Keynsham and Bristol, which is of sufficient scale and character that development of the site is unlikely to cause merging. The existing gap between Keynsham and Bristol is already narrower elsewhere. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains no built form. The site comprises open fields. The site is enclosed by development to the north and east. This in combination with the development to the west, comprising East Wing Lyons Court Farm, and dense tree line south of the site, impacts on the site's sense of openness and wider visual links to surrounding Green Belt land. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose. Overall, the site makes no contribution to purpose (d).
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Weak
Reason for Overall Assessment:	The site makes a moderate contribution to two purposes, a weak contribution to two purposes and no contribution to one purpose. Overall, the site makes a weak contribution to Green Belt purposes.
Assessment of Green Belt Harm	

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a weak overall contribution to Green Belt purposes with the site making no strong contributions to individual purposes. Purpose (a): The site is not located at the edge of the large built-up area (the urban area of Bristol), however, there is a visual link between the site and the Stockwood area of Bristol. Development of the site may therefore result in a perceivable level of merging with Bristol. Purpose (b): Development of the site would reduce the gap between Keynsham and Bristol. However, due to the size of the site and the gap, this would represent a small decrease in the separation of towns and it would not result in them merging. Purpose (c): The site is 0.77 ha and development of the site would entail a small incursion into undeveloped countryside relative to the size of Whitchurch. Purpose (d): Development of the site would not impact upon the setting or character of a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	The cumulative impact resulting from the release of the adjacent sites S-018, S-019, S-020, S-021 and S-029 would increase the sites role in safeguarding the countryside from encroachment and preventing urban sprawl. Collectively, the development of these sites would have a similar impact as set out above, however, they would have a greater impact on Purpose (c), as development of these sites would represent a large incursion into undeveloped countryside relative to the size of Whitchurch. The outer boundary of the site would be less defensible to the south and west, comprising hedgerow and dispersed trees, and as such may not be able to prevent unrestricted sprawl.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would not be defensible as it would consist of dispersed trees and hedgerows to the south and west. These existing boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary.

Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	No
Are there any Footnote 7 constraints present within the parcel?	No.

Does the parcel have the potential to be considered grey belt?	Yes
Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

S-033 South Keynsham 2



S-033 A: Aerial view showing site and surrounding land uses
(Google Maps, [May 2026])

Site Name	South Keynsham 2
Site Size	3.2 ha
Stage 1 Parcel Reference	P-042
Stage 1 Parcel Findings	Overall assessment: Strong
Site Description	South-east of Whitchurch, site comprises fields and hedgerows.
Boundary Features	The site is bounded by St Clements road and a dense hedgerow / treeline to the north, by the curtilage of a neighbouring property and dense hedgerow / treeline to the east, by a sparse hedgerow and minor ridgeline to the south, and by Enginehouse lane abutting Keynsham allotments to the west. Inner boundary: north. Outer boundary: east, south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution The site is not located at the edge of the large built-up area (the Bristol urban area) and therefore makes no contribution to Purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another	Weak The site is located between the neighbouring towns of Keynsham and Midsomer Norton, with the site forming part of the gap between the two. The villages of Farmborough, Timsbury and Paulton are in between the site and Midsomer Norton. The site forms a very small part of the gap between Keynsham and Midsomer Norton, which is of sufficient scale and character that development of the site is unlikely to cause merging. The site is also in relative proximity to the Bristol urban area. Whilst the site is adjacent to the South of Keynsham, the site is not located within the gap between the two settlements. As such, development of the site will not result in merging. Overall, the site makes a weak contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Moderate The site contains no built form. The site comprises open fields. The site is enclosed by existing development to the north and east. Combined with the site's undulating topography, which rises towards both the northern and southern boundaries, this reduces its sense of openness and limits visual connectivity with the surrounding Green Belt. In particular, the ridgeline to the south restricts views towards the wider Green Belt beyond. Overall, the site possesses a largely rural character and makes a moderate contribution to purpose (c).
Purpose (d): To preserve the setting and special character of historic towns	Strong The site is located adjacent to the Historic Town of Keynsham and forms part of its setting. The site includes open countryside with an undulating topography whereby the south of it slopes upwards away from the conservation area. This contributes to the character and views from the Historic town. The impacted part of the conservation area consists of Area 13 (termed 'Conygre Farm') of the Keynsham Conservation Area. The views across land north and south of Conygre Farm are one of only two connections between the conservation Area and open countryside, and views from Wellsway (towards the site, from the east) of a farm courtyard at Conygre Farm contain an isolated cluster of development identified as a key feature in the open countryside. Should this site be released from the Green Belt and developed, this key feature would be directly impacted. Overall, the site makes a strong contribution to purpose (d).

Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a strong contribution to one purposes, moderate contribution to two purposes, weak contribution to one purpose and no contribution to one purpose. Overall, the site makes a moderate contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes with the site making a strong contributions to purpose (d). Purpose (a): Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not physically or perceptually connected to the large built-up area of the Bristol urban area or Bath Purpose (b): Development of the site would reduce the gap between Keynsham and Midsomer Norton. However, due to the size of the site and the gap, this would represent a small decrease in the separation of towns and it would not result in them merging. Purpose (c): The site is 3.2 ha and development of the site would entail a small incursion into undeveloped countryside relative to the size of Keynsham. Purpose (d): The site is located adjacent to the historic town of Keynsham and is within the setting of Area 13 of the Conservation Area. Development of the site would directly impact identified views and key features of the Conservation Area and would therefore have a significant impact upon the setting or character of a historic town.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.
Are there any cumulative impacts (due to release of adjacent sites)?	There are two other adjacent sites: S-018 and S-019. Collectively, the development of these sites would have a similar impact as set out above, however, their release in combination would have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham. The remaining surrounding Green Belt could continue to perform its Green Belt function.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be considered less defensible, consisting of the curtilage of a neighbouring property and dense hedgerow / treeline to the east, a sparse hedgerow and minor ridgeline to the south and by Enginehouse lane, abutting Keynsham allotments, to the west. The existing outer boundaries would need to be strengthened in order to create a recognisable and permanent new Green Belt boundary
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Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	Yes
Are there any Footnote 7 constraints present within the parcel?	No.
Does the parcel have the potential to be considered grey belt?	No
Summary:	The site scores strongly against purpose (d) and as such has not been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment

S-034 West of Clutton



S-034 A: Aerial view showing site and surrounding land uses
(Google Maps, [May 2026])

Site Name	West of Clutton
Site Size	2.7 ha
Stage 1 Parcel Reference	P-038
Stage 1 Parcel Findings	Overall assessment: Moderate
Site Description	Unable to access site. This assessment has been completed largely from aerial photography. South-east of Whitchurch, site comprises fields and hedgerows.
Boundary Features	The site is bounded by hedgerow/treeline to the north, south, east and west. Inner boundary: None. Outer boundary: north, east, south and west.
Green Belt Purposes	Contribution
Purpose (a): To check the unrestricted sprawl of large built-up areas	No contribution Site is not at the edge of a large built-up area, in physical or perceptual terms, and does not meet purpose (a).
Purpose (b): To prevent neighbouring towns merging into one another	No contribution Site does not protect a gap between neighbouring towns and therefore makes no contribution to purpose (b).
Purpose (c): To assist in safeguarding the countryside from encroachment	Strong The site contains no built form and comprises an open field. The site is predominantly flat, although due to dense hedgerow/treeline around the site's perimeter longer distance views of the countryside are limited and the site appears enclosed. Overall, the site possesses a strongly rural character and makes a strong contribution to purpose (c).

Purpose (d): To preserve the setting and special character of historic towns	No contribution Site does not adjoin an identified historic town or provide views to a historic town and therefore does not meet this purpose.
Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate All Green Belt is considered to play a role in contributing to Purpose (e) by encouraging re-use of urban land. All selected sites therefore make a moderate contribution to purpose (e).
Overall Assessment:	Moderate
Reason for Overall Assessment:	The site makes a strong contribution to one purpose, a moderate contribution to one purpose and no contribution to three purposes. Professional judgement has been applied taking into account the overall aims and purposes of the Green Belt in preventing urban sprawl and keeping land permanently open. While the site makes no contribution to three purposes, it is still deemed to make a strong contribution to purpose (c) as well as a moderate contribution to purpose (e) and on balance makes a moderate contribution to Green Belt purposes as a result. Overall, the site makes a moderate contribution to Green Belt purposes.
Assessment of Green Belt Harm	
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	The site makes a moderate overall contribution to Green Belt purposes. Development of the site would entail a small incursion into undeveloped countryside. The site does not impact upon the setting or character of a historic town. The removal of the site from the Green Belt would result in a moderately performing area of Green Belt (against its functions and purposes) being removed. The remaining surrounding Green Belt could continue to perform its Green Belt function.
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	The removal of the site will result in a 'hole' in the Green Belt, undermining the surrounding Green Belt's function and purposes. It will also introduce urbanising influences to the Green Belt, although as the site is nearby to the settlement of Clutton the impact of this is more limited
Are there any cumulative impacts (due to release of adjacent sites)?	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new green belt boundary would not be defensible as it would consist of tree lines and hedgerow.
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Identification of potential grey belt	Response
Does the parcel score strongly against either purpose (a), purpose (b) or purpose (d)?	No.
Are there any Footnote 7 constraints present within the parcel?	No.
Does the parcel have the potential to be considered grey belt?	Yes.
Summary:	The site does not score strongly against purpose (a), purpose (b) or purpose (d) and as such has been considered as potential for grey belt for the purposes of this Stage 2 Green Belt Assessment.

Annex C Fundamentally Undermine Test

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
S-001 Hedgehogs and Hedgehogs Further, Chew Stoke	The removal of the site will result in a ‘hole’ in the Green Belt, potentially undermining the surrounding Green Belt’s function and purposes. However, any potential harm to the integrity of the wider green belt arising from development of the site would be limited given the site is partly enclosed by development in the washed over village of Chew Stoke.	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site is partly enclosed by the settlement of Chew Stoke, impacting on its sense of openness. The site also makes no contribution to three other purposes ((a), (b) and (d)).
S-002 Old Tennis Courts	The removal of the site would result in a ‘hole’ in the Green Belt, should it be released from the Green Belt. The site contains previously developed land where development may be “not inappropriate” in line with NPPF 154 (2024). However, its development would not harm the integrity of the wider green belt given the site is largely enclosed by development in the washed over village of Chew Magna and not connected to the wider Green Belt.	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site is largely enclosed by the settlement of Chew Magna, impacting on its sense of openness and introducing urbanising influences into it. The site also makes no contribution

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
			to three other purposes ((a), (b) and (d)).
S-003 Maypole Clutton	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site is partly enclosed by the settlement of Clutton, impacting on its sense of openness. The site also makes no contribution to three other purposes ((a), (b) and (d)).
S-004 South Farmborough and Timsbury Road (Phases 1 and 2)	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the importance of certain purposes.	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition,

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
			the site makes no contribution to three purposes ((a), (b) and (d)).
S-005 West of BP, Peasedown St John	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the Site from the Green Belt would not increase or decrease the importance of certain purposes.	There would be cumulative impacts if S-006 (East of BP) was also released from the Green Belt, leading to increased perception of urban sprawl and encroachment into the countryside relative to the size of Peasedown St John. However, this is somewhat limited by the fact that Bath business park sits within the gap with this other sites.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes no contribution to three purposes ((a), (b) and (d)).
S-006 East of BP	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There would be cumulative impacts if S-005 (West of BP) was also released from the Green Belt, leading to increased perception of urban sprawl and encroachment into the countryside relative to the size of Peasedown St John. However, this is somewhat limited by the fact that Bath business park sits within the gap with these other sites.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes no contribution to three purposes ((a), (b) and (d)).
S-007 Odd Down	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. It would result in an increased importance for the remaining Green	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt.

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
	Belt in preventing urban sprawl and preventing neighbouring towns from merging into one another.		Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes a weak contribution to two purposes ((b) and (c)).
S-008 Box Road	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. It would result in an increased importance for the remaining Green Belt in preventing urban sprawl.	There would be cumulative impacts if Bathford Nurseries (South) (S-010) were also released from the Green Belt, leading to increased perception of urban sprawl and encroachment into the countryside due to the ribbon of development along A4 Box Road. This is somewhat limited though, due to the fact that the Bathford Nurseries site already contains development and both sites are enclosed to the east and west by existing development on neighbouring sites.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes a weak contribution to purpose (a) and no contribution to purpose (b).
S-009 Ashley Road	The surrounding Green Belt would largely continue to perform its function and against relevant purposes.	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. The site is

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
			partly enclosed by Bathford along some of its boundaries impacting the sense of openness. In addition, the site makes a weak contribution to two purposes ((a) and (b)).
S-010 Bathford Nurseries (South)	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. Its removal would result in an increased importance for the remaining Green Belt in preventing urban sprawl.	There would be cumulative impacts if Box Road (S-008) was also released from the Green Belt, leading to an increased perception of urban sprawl and encroachment into the countryside as it would further contribute to the ribbon of development along A4 Box Road. This is somewhat limited though, due to the fact that the site already contains development and both sites are enclosed to the east and west by existing development on neighbouring sites.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, it makes a weak contribution to purpose (a) and no contribution to purpose (b) and due to topography has a limited sense of openness.
S-011 Bath Equestrian Centre	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. The removal of the site from Green Belt would result in an increased importance for the remaining Green Belt in preventing urban sprawl.	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. Although it is within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 4), due to its location, its release would not fundamentally undermine the five

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
			purposes of the remaining Green Belt given it adjoins Bath and makes a limited contribution to the area given its relatively small size. In addition, the site makes a weak contribution to purpose (b).
S-012 North of Napier Road, Weston	The surrounding Green Belt would largely continue to perform its function and against relevant purposes. Its removal would result in an increased importance for the remaining Green Belt in preventing urban sprawl and preventing neighbouring towns from merging.	There are no cumulative impacts from the release of adjacent sites, as there are no adjacent sites to consider.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a strong contribution to Green Belt purposes. Despite its overall score and that it is within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 4), due to its location, its release would not fundamentally undermine the five purposes of the remaining Green Belt given it adjoins Bath and makes a limited contribution to the area given its relatively small size. In addition, the site makes a weak contribution to purpose (b).
S-013	The section of Green Belt between the site and Bath would have increased importance for purposes (a), (b) and (c).	There would be cumulative impacts should the site to the west of Corston (S-030) be released from the Green Belt. These impacts	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt.

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
West of Bath Option 3		would be to increase the site's role in safeguarding the countryside from encroachment because of an increase of urbanising influences from the development. Furthermore, there would be an increased perception of Keynsham and Bath merging together given the size of the site, and because the site follows the A4 Bath Road which connects the two areas and already features pockets of ribbon development. There could also be a perception of Keynsham and Bath merging into one another due to development along A4 Bristol Road, alongside related impacts on the urban sprawl of Bath.	Overall, the site makes a strong contribution to Green Belt purposes. While the site is a significant size compared to others assessed and makes an important contribution to an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 3), due to its proximity to Bath and relative scale in comparison to the wider B&NES Green Belt extent, its release would not fundamentally undermine the five purposes of the remaining Green Belt.
S-014 South Saltford	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are two other sites around Saltford: S-015 and S-016. Collectively, the development of these sites would have a similar impact as set out in the individual site assessment however, their release in combination would also have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Saltford. The remaining surrounding Green Belt would continue to perform its Green Belt function.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. Although it is within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 3), due to its location, its release would not fundamentally undermine the five purposes of the remaining Green Belt given it makes a limited contribution to the area given its relatively small

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
			size, level of enclosure and urbanising influences from nearby built form.
S-015 West Saltford	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are two other adjacent sites around Saltford: S-014 and S-016. Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, their release in combination would also have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Saltford. The remaining surrounding Green Belt would continue to perform its Green Belt function.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. Although it is within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 3), due to its location, its release would not fundamentally undermine the five purposes of the remaining Green Belt given it makes a limited contribution to the area given its relatively small size, level of enclosure and urbanising influences from nearby built form. In addition, the site makes a weak contribution to purpose (b) and no contribution to purpose (a) and (d).

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
S-016 North West Saltford	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are two other adjacent sites around Saltford: S-014 and S-015. Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, their release in combination would also have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Saltford. The remaining surrounding Green Belt would continue to perform its Green Belt function.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. Although it is within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 3), due to its location, its release would not fundamentally undermine the five purposes of the remaining Green Belt given it makes a limited contribution to the area given its relatively small size, level of enclosure and urbanising influences from nearby built form. In addition, the site makes a weak contribution to purpose (b) and no contribution to purpose (a) and (d).
S-017 North Keynsham	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are two other adjacent sites: S-015 and S-016 - Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, their release in combination would have a greater cumulative impact on purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. Although it is within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 3), due to its location, its release would

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
		The remaining surrounding Green Belt would continue to perform its Green Belt function.	not fundamentally undermine the five purposes of the remaining Green Belt given it makes a limited contribution to the area given its level of existing development and urbanising influences from nearby built form. In addition, the site makes a weak contribution to purpose (d) and no contribution to purpose (a).
S-018 South East Keynsham	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There is an adjacent site at South Saltford (S-014). The development of these sites would have a similar impact as set out in the individual site assessment, however, their release in combination would have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside between Saltford and Keynsham, and introduce urbanising influences to a large degree of surrounding Green Belt land.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. Although it is within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 3), due to its location, its release would not fundamentally undermine the five purposes of the remaining Green Belt given it makes a limited contribution to the area given its relatively small size, level of enclosure and urbanising influences from nearby built form. In addition, the site makes a weak contribution to purpose (b) and (d) and no contribution to purpose (a).

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
S-019 South Keynsham	The surrounding Green Belt would largely continue to perform its function and against relevant purposes, except for the area of Green Belt to the north east, comprising allotments, which would become enclosed as a result. It would result in an increased importance for the remaining Green Belt in safeguarding the countryside from encroachment and preventing urban sprawl and preventing neighbouring towns from merging into one another.	There are two other adjacent sites : (S-020, S-021). Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, their release in combination would have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham. The remaining surrounding Green Belt could continue to perform its Green Belt function.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes a weak contribution to two purposes ((b) and (d)) and no contribution to purpose (a).
S-020 West Keynsham	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are two other adjacent sites: (S-021, S-019). Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, their release in combination would have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham. The remaining surrounding Green Belt could continue to perform its Green Belt function.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes a weak contribution to two purposes ((b) and (d)) and no contribution to purpose (a).
S-021 West Keynsham (North)	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the	There are two other adjacent sites: (S-00, S-019). Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, their release in combination would have a	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt.

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
	performance of the rest of the Green Belt against any of the five purposes.	greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham. The remaining surrounding Green Belt could continue to perform its Green Belt function.	Overall, the site makes a weak contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes a weak contribution to two purposes ((b) and (d)) and no contribution to purpose (a).
S-022 Devonport House	The site does not directly adjoin the settlement of Keynsham. Removal of the site from the Green Belt would result in an island of Green Belt being created which would result in the remaining Green Belt to the east becoming enclosed by development. If the site was extended to the east to connect to Keynsham, the surrounding Green Belt could continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are two other adjacent sites around the Bristol urban area : (S-024 and S-023). Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, their release in combination would represent a larger incursion into undeveloped countryside, albeit this would not be significant relative to the size of the Bristol urban area. The remaining surrounding Green Belt could continue to perform its Green Belt function.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes no contribution to three purposes ((a), (c) and (d)) and a weak contribution to purpose (b).
S-023 Durley Farm	The site does not directly adjoin the settlement of Keynsham. Removal of the site from the Green Belt would result in an island of Green Belt released which would result in the remaining Green Belt to the east of the site, specifically north of Durley Hill and South of Keynsham Bypass becoming	There are two adjacent sites around the Bristol urban area (Brislington): (S-024 and S-022). Collectively, the development of these sites would have a similar impact as set out in the individual site assessment however, they would have a greater impact on Purpose (b) as they would significantly	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes.

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
	enclosed by development. If the site was extended to the east to connect to Keynsham, the surrounding Green Belt could continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	reduce the gap between the large built-up area of Bristol and Keynsham. They would also have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of the large urban area of Bristol. However, the remaining surrounding Green Belt could continue to perform its Green Belt function.	The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes no contribution to two purposes ((a) and (d)) and a weak contribution to two purposes ((b) and (c)).
S-024 Hicks Gate	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are two other adjacent sites around the Bristol urban area (Brislington): (S-023 and S-022). Collectively, the development of these sites would have a similar impact as set out in the individual site assessment however, their release in combination would represent a larger incursion into undeveloped countryside, albeit this would not be significant relative to the size of the Bristol urban area, and the fact that the Bristol urban area extends outwards to the east in an incongruous pattern. The remaining surrounding Green Belt could continue to perform its Green Belt function.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site is partly enclosed by existing development, limiting its sense of openness.
S-025 North Whitchurch (north of Staunton Lane)	The surrounding Green Belt would largely continue to perform its function and against relevant purposes, except for the small area of Green Belt to the west which would become completely enclosed as a result. It would result in an increased role for the remaining	The cumulative impact resulting from the release of the adjacent site East Whitchurch (S-026) would further enclose the site itself as it is already largely enclosed by built form, weakening its role further. If the site was released in combination with East	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes.

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
	Green Belt in safeguarding the countryside from encroachment and preventing urban sprawl.	Whitchurch would result in the remaining Green Belt land being strengthened, although the release of East Whitchurch alone would result in a finger of development in the Green Belt.	The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes a weak contribution to three purposes ((a), (b) and (d)).
S-026 East Whitchurch	The surrounding Green Belt would largely continue to perform its function and against relevant purposes, except for the area of Green Belt to the north west which would largely become enclosed as a result. It would result in an increased importance for the remaining Green Belt in safeguarding the countryside from encroachment and preventing urban sprawl and preventing neighbouring towns from merging into one another.	The cumulative impact resulting from the release of the adjacent sites S-025, S-028 and S-029, would increase the site's role in safeguarding the countryside from encroachment and preventing urban sprawl.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a strong contribution to Green Belt purposes. Despite this, it is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, it makes a weak contribution to purpose (a) and no contribution to purpose (d).
S-027 East Whitchurch 2	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	The cumulative impact resulting from the release of the adjacent sites S-025, S-026, S-028 and S-029 would increase the site's role in safeguarding the countryside from encroachment and preventing urban sprawl.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes a weak contribution to

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
			purpose (b) and no contribution to purposes (a) and (d).
S-028 West Whitchurch	The surrounding Green Belt would continue to perform its function and against relevant purposes. It would have an increased role in safeguarding the countryside from encroachment and preventing urban sprawl.	The cumulative impact resulting from the release of the adjacent sites S-025, S-028 and S-029 would increase the sites role in safeguarding the countryside from encroachment and preventing urban sprawl. The outer boundary of the site would be less defensible to the south, comprising hedgerow, and as such may not be able to prevent unrestricted sprawl.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a strong contribution to Green Belt purposes. Despite its overall contribution and being within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 2), due to its location, its release would not fundamentally undermine the five purposes of the remaining Green Belt given it adjoins Whitchurch and is largely enclosed by development. In addition, the site makes a weak contribution to two purposes ((a) and (b)) and no contribution to purpose (d).
S-029 Whitchurch Taylor Wimpey site	The surrounding Green Belt would continue to perform its function and against relevant purposes. It would have an increased role in safeguarding the countryside from encroachment and preventing urban sprawl.	The cumulative impact resulting from the release of the adjacent sites West Whitchurch and East Whitchurch would increase the sites' role in safeguarding the countryside	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a strong contribution to Green Belt purposes.

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
		from encroachment and preventing urban sprawl.	Despite its overall contribution and being within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 2), due to its location, its release would not fundamentally undermine the five purposes of the remaining Green Belt given it adjoins the large-built up area of Bristol and is largely enclosed by development. In addition, the site makes a weak contribution to purpose (b) and no contribution to purpose (d).
S-030 Land west of Corston Lane	The removal of the site will result in a ‘hole’ in the Green Belt, undermining the surrounding Green Belt’s function and purposes. It will also introduce urbanising influences to the Green Belt, though its development would not harm the integrity of the wider green belt given the site is somewhat enclosed by development in the washed over village of Corston.	There would be cumulative impacts should the site S-013 between Corston and Bath be released from the Green Belt. Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, they would have a greater impact on Purpose (c), as development of these sites would represent a large incursion into undeveloped countryside relative to the size of the washed over village of Corston. This would increase the site’s role in safeguarding the countryside from encroachment.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. Although it is within an area of Fundamental Importance as identified as part of the Stage 1 SGBA (Area 3), due to its location, its release would not fundamentally undermine the five purposes of the remaining Green Belt given it makes a limited contribution to the area given its relatively small size, level of enclosure and urbanising influences from the nearby built form

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
			of Corston. In addition, the site makes a weak contribution to purpose (b) and no contribution to purpose (a).
S-031 Kingswood School Playing Fields	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are four other sites around Bath: S-012, S-011, and S-007. Collectively, the development of these sites would have a similar impact as set out in the individual site assessment however cumulatively it would represent a larger incursion into undeveloped countryside, albeit this would not be significant relative to the size of the Bath urban area. The remaining surrounding Green Belt would continue to perform its Green Belt function.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a strong contribution to Green Belt purposes. Despite this, it is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, it makes no contribution to purpose (b).
S-032 Whitchurch Taylor Wimpey 2	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	The cumulative impact resulting from the release of the adjacent sites S-018, S-019, S-020, S-021 and S-029 would increase the sites role in safeguarding the countryside from encroachment and preventing urban sprawl. Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, they would have a greater impact on Purpose (c), as development of these sites would represent a large incursion into undeveloped countryside relative to the size of Whitchurch. The outer boundary of the site would be less defensible to the south and	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a weak contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes a weak contribution to two purposes ((a) and (b)) and no contribution to purpose (d).

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
		west, comprising hedgerow and dispersed trees, and as such may not be able to prevent unrestricted sprawl.	
S-033 South Keynsham 2	The surrounding Green Belt would continue to perform the same Green Belt function and purposes. Removal of the site from the Green Belt would not increase or decrease the performance of the rest of the Green Belt against any of the five purposes.	There are two other adjacent sites: S-018 and S-019. Collectively, the development of these sites would have a similar impact as set out in the individual site assessment, however, their release in combination would have a greater cumulative impact on Purpose (c) as the development of these sites would represent a large incursion into undeveloped countryside relative to the size of Keynsham. The remaining surrounding Green Belt could continue to perform its Green Belt function.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes a weak contribution to purpose (b) and no contribution to purpose (a).
S-034 West of Clutton	The removal of the site will result in a 'hole' in the Green Belt, undermining the surrounding Green Belt's function and purposes. It will also introduce urbanising influences to the Green Belt, although as the site is nearby to the settlement of Clutton the impact of this is more limited.	The site makes a moderate overall contribution to Green Belt purposes. Development of the site would entail a small incursion into undeveloped countryside. The site does not impact upon the setting or character of a historic town. The removal of the site from the Green Belt would result in a moderately performing area of Green Belt (against its functions and purposes) being removed.	No - its release is not deemed to fundamentally undermine the five purposes of the remaining Green Belt. Overall, the site makes a moderate contribution to Green Belt purposes. The site is not in an area of Fundamental Importance identified as part of the Stage 1 SGBA. In addition, the site makes no contribution to three purposes ((a), (b) and (d)).

Site ID	What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	Are there any cumulative impacts (due to release of adjacent sites)?	Is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?
		The remaining surrounding Green Belt could continue to perform its Green Belt function.	