Bath and North East Somerset Council

Local Plan 2025 – 2043

Pre-Submission Draft Local Plan (Reg 19)

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Green Belt Exceptional Circumstances Topic Paper

Bath & North East Somerset Council

Improving People's Lives

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1. Introduction

1.1 The purpose of this document is to justify why the Council has needed to undertake a review of the Green Belt, provide an overview of the process the Council has followed in undertaking that review, and the exceptional circumstances for releasing land from the Green Belt for development as required by national policy.

1.2 This topic paper should be read alongside the Site Selection Topic Paper and the Housing Topic Paper which provides more detail about the site selection process and how the Council has arrived at its proposed housing requirement.

1.3 The B&NES Local Plan 2025-2043 has been prepared under the government's transitional arrangements related to the plan-making system established under the Planning and Compulsory Purchase Act 2004 and the December 2024 version of the National Planning Policy Framework (NPPF). All references to the NPPF in this Topic Paper therefore, relate to that version except where specified.

1.4 The structure of this topic paper is as follows:

- Section 2 – Background and Planning Policy Context. This sets out the context for the topic paper, provides a brief overview of the Green Belt in B&NES and summarises planning policy and guidance (and related case law) in relation to the Green Belt and exceptional circumstances matters.
- Section 3 – Strategic Case for Exceptional Circumstances. This outlines the assessed scale of housing and employment needs in B&NES, and the constraints on land supply to meet these needs. Section 3 also explains some of the difficulties in achieving sustainable development without amending the Green Belt boundary, and in turn sets out the strategic level exceptional circumstances case for undertaking a review of the Green Belt boundary.
- Section 4 – Local Case for Exceptional Circumstances. This sets out the approach to demonstrating the local level exceptional circumstances for the proposed allocations in the Green Belt, and the sites identified as grey belt, with the detail provided in Appendix A.
- Section 5 – Summary and Conclusions. This summarises the topic paper and provides overall conclusions, confirming the Council's position that exceptional circumstances exist to justify the proposed development in the Green Belt.

2. Background and Planning Policy Context

The Bristol and Bath Green Belt

2.1 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.

2.2 More than two thirds of the district is designated as Green Belt with 24,750 hectares of the Bristol and Bath Green Belt within the B&NES administrative area. The extent of the Bristol and Bath Green Belt is shown in **Figure 1** overleaf.

Local Planning Policy

2.3 The current extent of the Green Belt in B&NES is shown on the Policies Map, which provides a visual representation of the Local Plan policies.

2.4 The Local Plan for B&NES currently comprises 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.

2.5 The Spatial Strategy set out in the adopted Core Strategy (2014) identifies the following strategic sites on land 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

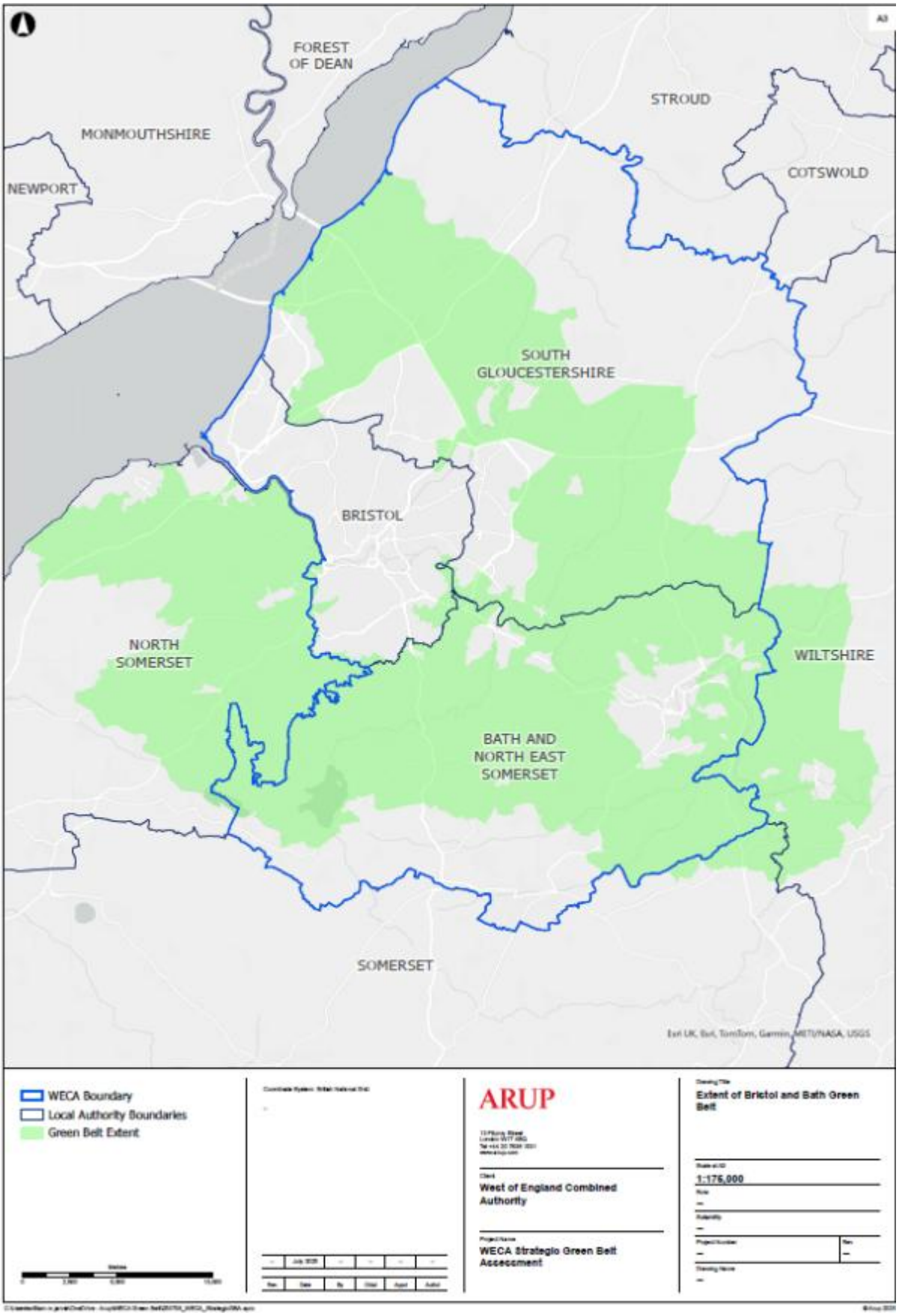

Figure 1 Extent of the Bristol and Bath Green Belt (2026)

2.6 The Local Plan Partial Update identified three new sites 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.

2.7 B&NES is in the process of updating its Local Plan. Following the publication of the National Planning Policy Framework (NPPF) in December 2024, which fundamentally changed Green Belt policy and recalculated the standard method local housing need figure for the Council, B&NES commenced a reset of the 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.

2.8 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.

2.9 Through legislative change and further planning reforms 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.

2.10 In the West of England, the Strategic Authority is the West of England Combined Authority, which covers the B&NES area. Future reviews of the B&NES 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.

National Planning Policy

2.11 As outlined earlier the B&NES Local Plan is being prepared against the 2024 NPPF under transitional arrangements. The NPPF is supplemented by the Planning Practice Guidance on Green Belt.

2.12 The NPPF sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. The NPPF (Paragraph 143) further states that the purposes of Green Belts are to:

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

2.13 The 2024 NPPF introduced very significant changes. Under the previous version of the NPPF, there was no requirement for LPAs to review Green Belt boundaries where they fell short of meeting their housing need. Instead, LPAs could choose to review and alter Green Belt boundaries where exceptional circumstances were fully justified. The 2024 NPPF now requires an LPA to undertake a review where it cannot meet its identified housing, commercial or other need without altering green belt boundaries.

Exceptional circumstances

2.14 Paragraph 145 advises that established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, but removed the previous reference to there being no requirement to review the boundaries. Paragraph 145 states that the evidencing and justifying the need for such alterations based on exceptional circumstances should be established through strategic policies and detailed amendments to these boundaries may be made through non-strategic policies, including neighbourhood plans.

2.15 Paragraph 146 of the NPPF states that exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial or other development through other means. In

those circumstances, authorities should review Green Belt boundaries and propose alterations to meet these needs in full unless the review provides clear evidence that such alterations would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.

2.16 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has fully examined all other reasonable options for meeting its identified need for development. Those other options to be considered should include using as much brownfield land and underutilised sites as possible, optimising density, and discussing with neighbouring authorities about whether they could accommodate some of the identified need for development).

2.17 Once justified, any release of land from the Green Belt should be based on the following sequential approach, as set out in paragraph 148 of the NPPF, but having regard to the need to promote sustainable patterns of development:

- plans should give first priority to previously developed land
- then consider grey belt land, which is not already previously developed, and
- then consider other sustainable Green Belt locations.

Review of Green Belt boundaries

2.18 The review of Green Belt boundaries enables the identification of grey belt land, as confirmed in the PPG. This, as the PPG advises, should be done either as part of the Green Belt boundary review during the preparation or updating of a local plan or at another relevant point.

2.19 The PPG sets out the key steps in a Green Belt assessment which in most cases will require the division of the Green Belt into separate areas for the purpose of identifying grey belt. Areas must be sufficiently granular to enable the assessment of their variable contribution to green belt purposes.

Grey belt land

2.20 Grey belt land is a ‘sub-category’ introduced by the 2024 NPPF to identify relatively under-performing land, in terms of land which is not strongly

contributing to Green Belt land purposes (a), (b) or (d) of paragraph 143 of the NPPF, with the potential to assist in meeting development needs. It can be previously developed or not.

2.21 ‘Grey belt’ is defined in the Glossary (Annex 2 to the NPPF) as: ‘For the purposes of plan-making and decision-making, ‘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 (see above). ‘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.’

2.22 Footnote 7 states: ‘The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.’

2.23 In addition to providing guidance on the identification of grey belt land, the PPG provides detailed advice on:

- considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land
- considerations involved in determining whether release or development of Green Belt land would fundamentally undermine the Green Belt in the plan area
- considering proposals on potential grey belt land
- identifying sustainable locations when considering the release or development of Green Belt land
- how major housing development on land which is released from the Green Belt through plan-making, or on sites in the Green Belt, should contribute to accessible green space, and
- how to consider the potential impact of development on the openness of the Green Belt.

2.24 There is detailed guidance in the PPG to assist in making judgments as to the contribution the land in any assessment area makes to Green Belt purposes A

(checking unrestricted sprawl of large built-up areas), B (prevent neighbouring towns from merging into one another), and D (preserve the setting and special character of historic towns). This makes clear that large built-up areas do not include villages, in relation to purpose A. In relation to purpose B, it is advised that this relates to the merging of towns and not villages. This exclusion of villages from these two Green Belt purposes has important implications and further widens the potential for land being assessed as grey belt.

Golden rules

2.25 Where land is released for development through plan preparation or review, as described above, the 'Golden Rules' in paragraph 156 of the NPPF apply. These rules require enhanced contributions for major development in respect of affordable housing (at least 50% affordable, unless this would make the development of these sites unviable, as per NPPF paragraph 67), necessary improvements to local or national infrastructure and the provision of new, or improvements to existing, green spaces that are accessible to the public.

2.26 The PPG advises that the following contributions to open space should be considered in order to meet this element of the 'Golden Rules':

- new residents and the wider public should be able to access good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve
- accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions
- where possible access to green spaces should include safe active travel routes and should be served by public transport, which also means providing the necessary infrastructure (such as footpaths and bridleways)
- proposals should consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes
- where appropriate, authorities should consider the use of conditions or planning obligations. The community infrastructure levy can also be used to fund improvements to existing green spaces or the provision of new ones. Local authorities should consider arrangements for the long-term maintenance of green spaces.

The ‘Exceptional Circumstances’ Test

2.27 The definition of ‘exceptional circumstances’ was set out in the Guildford judgment, Compton and Ockham Parish Councils V Guildford Borough Council and SoS (2019) EHWC 3242. Sir Duncan Ousley confirmed that:

- There is no definition of the policy concept of "exceptional circumstances". This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case. It is deliberately broad, and not susceptible to dictionary definition.
- Whether a particular factor was capable of being an "exceptional circumstance" in any particular case was a matter of law; but whether in any particular case it was treated as such, was a matter of planning judgment.
- A judicial decision that a factor relied on by a planning decision-maker as an "exceptional circumstance" was not in law capable of being one is likely to require some caution and judicial restraint. All that is required is that the circumstances relied on, taken together, rationally fit within the scope of "exceptional circumstances" in this context. The breadth of the phrase and the array of circumstances which may come within it place the judicial emphasis very much more on the rationality of the judgment than on providing a definition or criteria or characteristics for that which the policy-maker has left in deliberately broad terms.
- "Exceptional circumstances" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "very special circumstances."
- The phrase does not require at least more than one individual "exceptional circumstance". The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.
- General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that "exceptional circumstances" exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need.

2.28 The Guildford judgment concerned a local plan examined under the 2012 NPPF. Since the Guildford judgment was handed down the new NPPF 2024 has clarified the exceptional circumstances test further through Paragraph 146 which states 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”. This replaced the December 2023 NPPF’s Paragraph 145 which did not provide any examples of potential

exceptional circumstances, simply stating that “Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process”.

3. Strategic Case for Exceptional Circumstances

3.1 As outlined in Section 2 the NPPF (145-146) states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means.

Housing need and lack of non-Green Belt supply

3.2 The Government's standard method figure of housing need is currently 1,518 dwellings per annum which equates to 27,324 dwellings over the plan period 2025-2043.

3.3 As set out in the Housing Topic Paper only around 22,000 dwellings can be sustainably accommodated, which is just over 80% of housing need. The Topic Paper provides a housing trajectory that breaks the supply down into different sources. This includes new allocations on land released from the Green Belt.

3.4 The housing trajectory, reproduced in **Figure 2**, identifies a supply over the plan period of 22,214 dwellings against a requirement of 22,018 dwellings, a headroom of 0.9% over the plan period. It should be noted that the amount of headroom in the supply will be kept under review and may change in advance of plan adoption, through the granting of permission for large windfall sites. Typically, development industry stakeholders such as the Homebuilders Federation advocate for a headroom of 10% or more through the plan-making process to ensure delivery against the requirement over the plan period. The Council is seeking to allocate as much land as is reasonably possible to deliver as much housing as possible against the standard method housing figure during the plan period.

3.5 Of the proposed 22,018 housing requirement 9,036 dwellings or around 41% of the requirement is from sites proposed to be released from the Green Belt. Without any development in the Green Belt the supply would drop to 13,178 dwellings or 48% of the standard method local housing need figure. This would

significantly underdeliver against the standard method, with significant socio-economic consequences for current and future residents in B&NES. It would also disproportionately affect residents in Bath and the north of the North East Somerset area in the Bath to Bristol Corridor area.

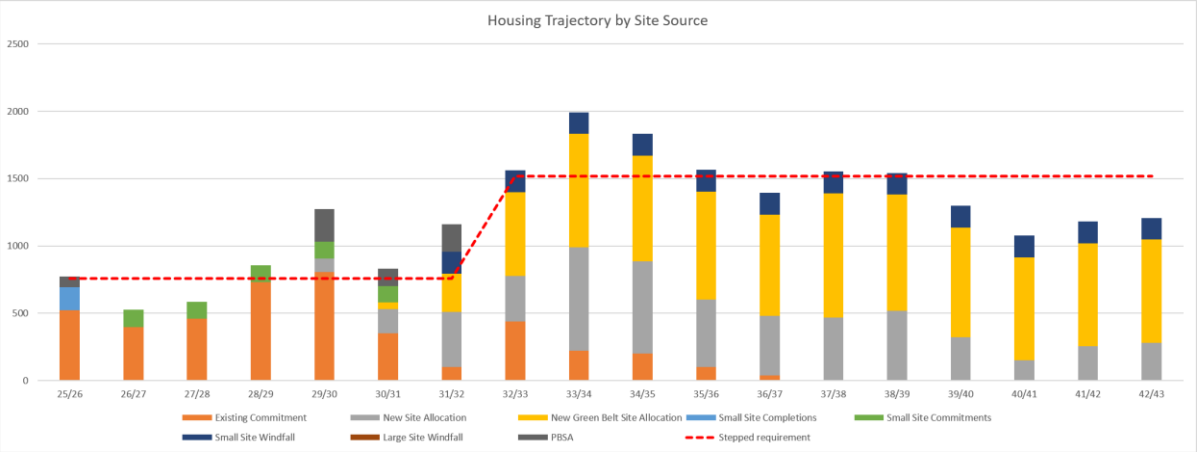

Figure 2 B&NES Local Plan Housing Trajectory - by site source

3.6 In contrast allocations on sites outside of the Green Belt are around 25% of the housing requirement. As set out in the Site Selection Topic Paper and the Housing Topic Paper the Council is allocating all it reasonably can on such sites, leaving 'no stone unturned'. A lack of land availability and significant environmental constraints (including footnote 7 constraints) preclude the allocation of further strategic sites whilst additional non-strategic development at smaller villages would not result in sustainable development.

3.7 NPPF 148 states when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Paragraph 110 states that "significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making".

3.8 Additionally, Paragraph 115 states that "in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that… any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach". As set out in the Site Selection Topic Paper, notably Stage 3 of the site selection process, allocating sites at lower tier settlements (Tier 4 and 5 Settlements) would undermine the transport evidence base and vision-led approach in the emerging plan and fail to comply with Paragraphs 110 and 115.

3.9 NPPF Para 146 states that "authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full *(emphasis added)*, 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". A Green Belt Review compliant with the PPG has been undertaken by the Council (explained further in Section 4), however the Council is unable to meet its housing needs in full for other sustainable development and land availability reasons (as set out in both the Site Selection and Housing Topic Papers), rather than relying on the 'fundamentally undermine' test with regard to Green Belt.

3.10 The Council has left no stone unturned in reaching 80% of the standard method local housing need figure, and even with significant Green Belt release the Council is unable to meet housing needs in full.

Affordable housing

3.11 Bath & North East Somerset is one of the least affordable places to live in the UK. According to data from the Office of National Statistics in 2025, the region had one of the highest affordability ratios in the country, with average homes selling for 10.4 times average earnings. House prices are generally less affordable in Bath than in North East Somerset.

3.12 In planning for around 22,000 homes evidence in the Local Housing Needs Assessment (LHNA) Addendum shows that providing around 40% as affordable

housing will enable a substantial element of need to be met, including both current need and projected need. Delivering this amount of affordable housing will also enable around half of potential households (i.e. people living in the local area as part of another household who want to live independently) to form a separate household and live in their own home.

3.13 To meet those needs summarised above would require a higher proportion of affordable housing to be provided in Bath where need is greatest (around 61% of all new homes) and around 33% across North East Somerset.

3.14 The proportion of affordable housing sought is shaped not just by evidenced need but also by the viability of development. Generally, viability is more favourable in Bath and the north of the district in areas surrounded by Green Belt, and less favourable in the south beyond the Green Belt in the Somer Valley. Informed by viability evidence Policy 6.14 of the emerging Local Plan requires 40% affordable housing on large sites (including from sites released from the Green Belt) and 30% in the Somer Valley. Furthermore flatted-only developments, typically within urban areas and on previously developed land, are only viable at 20% affordable housing.

3.15 Land released from the Green Belt therefore has greater potential to deliver affordable housing than non-Green Belt alternatives, and furthermore it does so in Green Belt locations accessible to Bath where affordable housing needs are greatest. Where suitable, available and achievable such land makes a disproportionately positive contribution towards meeting affordable housing needs in B&NES.

Employment land needs

3.16 In addition to housing needs there is a significant need for employment land. The Economic Development Needs Assessment (EDNA) identifies a need of 228,000-245,000 sqm.

3.17 B&NES is also part of the wider West of England sub-region. The WECA has prepared a Local Growth Plan which outlines ambitions and actions to foster a sustainable and productive sub-regional economy based on continued innovation

and creativity. In seeking to deliver a highly productive economy the Growth Plan identifies key growth zones within the West of England to act as the focus for economic investment. Two of these lie partly or wholly within B&NES - the central Bristol and Bath Growth Zone (including the corridor between) and the Somer Valley Growth Zone.

3.18 The EDNA requirement for employment floorspace is informed by local evidence and seeks to ensure that the space provided is sufficient to facilitate job growth that at least maintains the current balance between resident workers and jobs within Bath and North East Somerset. Planning for around 22,000 homes would require around 22,000 additional jobs to maintain this balance. This is important in seeking to reduce the need to travel and giving the opportunity to live and work locally.

3.19 Based on forecast economic growth and aligning job growth to likely population growth resulting from the Local Plan housing requirement the EDNA outlines the estimated quantum of employment floorspace required to meet generated demand across the district and the sub-areas.

3.20 The spatial distribution across the different sub-areas is based on the current share of existing employment floorspace within each sub-area. Around 60% of the identified employment need is located in the Bath and the Bath to Bristol Corridor sub-areas, which are constrained by Green Belt, plus a further 15% in the Somer Valley (which is constrained by Green Belt to the east and north of Peasedown St John). The majority of the employment land need is in areas constrained by Green Belt.

3.21 The B&NES Employment Sites Assessment 2026 assesses existing employment sites and new employment site options and confirms that whilst there is a sufficient overall supply of employment land to accommodate the need identified, a more nuanced consideration of the assessment findings presents a more constrained picture, including the fact that many sites are occupied and in use, and many new site options are on Green Belt land.

3.22 The Local Plan makes allocations for around 235,000 sqm to meet the identified need, but this is only possible with Green Belt allocations in the Bath,

Bath to Bristol Corridor and Somer Valley (Peasedown St John) areas. These locations are also where a significant increase in residential development is planned.

3.23 Delivering a significant increase in new housing without a commensurate increase in employment land alongside it in nearby locations risks encouraging unsustainable long-distance car-based commuting to employment opportunities outside B&NES. This would undermine the objectives of the Local Plan and depart from the vision-led approach taken.

Other reasonable options

3.24 NPPF 147 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. The B&NES local plan will need to evidence that it a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.

3.25 Taking these in turn, as discussed under “Housing need and lack of non-Green Belt supply” the Council has left no stone unturned in seeking to meet as much of its standard method local housing need figure as possible. This includes brownfield land and under-utilised land in the Council’s Housing and Economic Land Availability Assessment (HELAA) and as outlined in the Site Selection Topic Paper at Stage 2 of the process.

3.26 In terms of density, the Council has used the density multipliers in **Table 1** from the HELAA to optimise density for new site allocations, which uses higher densities in urban and more accessible locations including town and city centres and other locations well served by public transport (either now, or in the future).

Table 1: B&NES HELAA density multipliers

B&NES HELAA Location Definition	Lower Density Multiplier	Upper Density Multiplier
Bath Central Area	100	120
Town Centre, District Centre and Local Centres in Bath	70	85
Area outside the Town Centre but within 400m of Housing Development Boundaries	50	65
Area outside Town Centre but within 400m of adopted Housing Development Boundaries	40	50
Rural Areas	30	40
Hicks Gate	55	75

3.27 NPPF Paragraph 147 c) requires discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, before exceptional circumstances can be demonstrated.

3.28 Although there is no longer a strict “Duty to Co-operate”, the Local Authorities across the West of England have worked together on strategic cross boundary matters (including housing and any unmet need arising) as local plans have been prepared – see the separately published B&NES Duty to Co-operate Statement relating to engagement on the B&NES Local Plan. In B&NES even with Green Belt release of 9,036 dwellings and a housing requirement of 22,018 dwellings there is an unmet need of around 5,000 dwellings identified through the Local Plan.

3.29 Through the preparation of the Bristol Local Plan, it has been established that Bristol City Council is unable fully to meet its objectively assessed need. The level of unmet need arising within Bristol is 13,860 dwellings over the period 2022 to 2040.

3.30 A Local Plan housing requirement for B&NES is established of around 22,000 dwellings between 2025 and 2043, which is just over 80% of the B&NES standard method figure of housing need. The Local Plan prioritises meeting B&NES housing need and as such is not identifying and allocating sites to contribute towards meeting the unmet need arising in Bristol.

3.31 No unmet need is currently identified in the emerging Local Plans for either North Somerset or South Gloucestershire. Therefore, across the West of England sub-region a total unmet need of around 19,000 dwellings has been identified through the two Bristol and B&NES Local Plans.

3.32 The West of England Plan Combined Authority (WECA) have commenced work on the Spatial Development Strategy (SDS). The SDS will cover a thirty-year period, will establish the amount of growth to be planned for across the West of England, and will set out a spatial strategy and identify locations for accommodating it. In so doing, the SDS will establish a housing requirement for each West of England unitary authority. In preparing the SDS unmet housing need arising through this round of Local Plans will need to be taken into account. It is appropriate that the best solutions to addressing unmet need are considered strategically and sub-regionally through the SDS. Consultation on a vision for the SDS will take place in autumn this year, followed by consultation on a draft SDS in autumn 2027. It is anticipated the SDS will be adopted in 2029.

Conclusion

3.33 This section sets out the strategic case for demonstrating exceptional circumstances which includes:

- the significant need for housing in the district and the lack of non-Green Belt supply;
- that only around 80% of the housing need can be met from all site sources in the district (including Green Belt) and the unmet need would be around 9,000 dwellings greater without any Green Belt release;
- that a greater proportion of affordable housing is viable on Green Belt sites and these are generally located nearer to Bath where the need for affordable housing is most acute;
- that employment land is also disproportionately needed in Bath and the Bath to Bristol Corridor which is affected by Green Belt constraints; and

- that a failure to align housing development with employment would lead to unsustainable transport movements and commuting patterns undermining the local plan objectives, spatial strategy and vision-led approach in the plan.

3.34 In line with NPPF 147 there are no ‘other reasonable options’ and a Green Belt review is justified at the strategic level. Before Green Belt can be released there is also a need to set out the local case for exceptional circumstances which includes site-specific factors for reviewing individual areas of Green Belt. This is set out in the following section (Section 4).

4. Local Case for Exceptional Circumstances

Introduction

4.1 The strategic case has been demonstrated in Section 3. This section sets out the approach to developing the local case for site-specific exceptional circumstances. This uses the Green Belt Stage 2 outputs to understand the contribution the site makes to the five Green Belt purposes, the level of harm to the Green Belt, whether development would 'fundamentally undermine' the Green Belt and if the site is grey belt. Exceptional circumstances are set out with reference to the strategic case and the 'Golden Rules', with boundary considerations set out to ensure a permanent Green Belt boundary is established that is capable of enduring beyond the plan period.

4.2 The detail and site-specific conclusions are presented in Appendix A for the sites released from the Green Belt and allocated for development in the Local Plan.

Green Belt Assessment

4.3 The Council has undertaken a Green Belt Review in two parts: the Strategic Green Belt Assessment (SGBA) at Stage 1 and the follow-on Stage 2 Green Belt Assessment.

4.4 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.

4.5 The Stage 1 assessment report provides an overall summary of the findings of the SGBA Update for Green Belt parcels within the Bath and North East Somerset administrative boundary and an interim conclusion of 'fundamentally important' areas of Green Belt based on assessments undertaken to date, accounting for new policy and guidance set out in the NPPF (2024) and PPG (2025).

4.6 The Stage 1 assessment has been undertaken at the West of England scale covering the entire Bristol and Bath Green Belt with large parcels used to undertake the assessment. This is proportionate given the strategic scale at which the assessment has been undertaken, however it is not sufficiently granular to inform an assessment of ‘grey belt’ or site allocations within the Local Plan. A Stage 2 assessment has therefore been undertaken at the site-specific level to inform this work.

4.7 The methodology shown in **Figure 3** from the Stage 1 GBA shows the relationship between the Stage 1 assessment and the subsequent Stage 2 assessments, and how it meets PPG requirements. The parcels assessed at Stage 1 are shown in **Figure 4**, whilst the sites assessed at the more granular Stage 2 are shown in **Figure 5**.

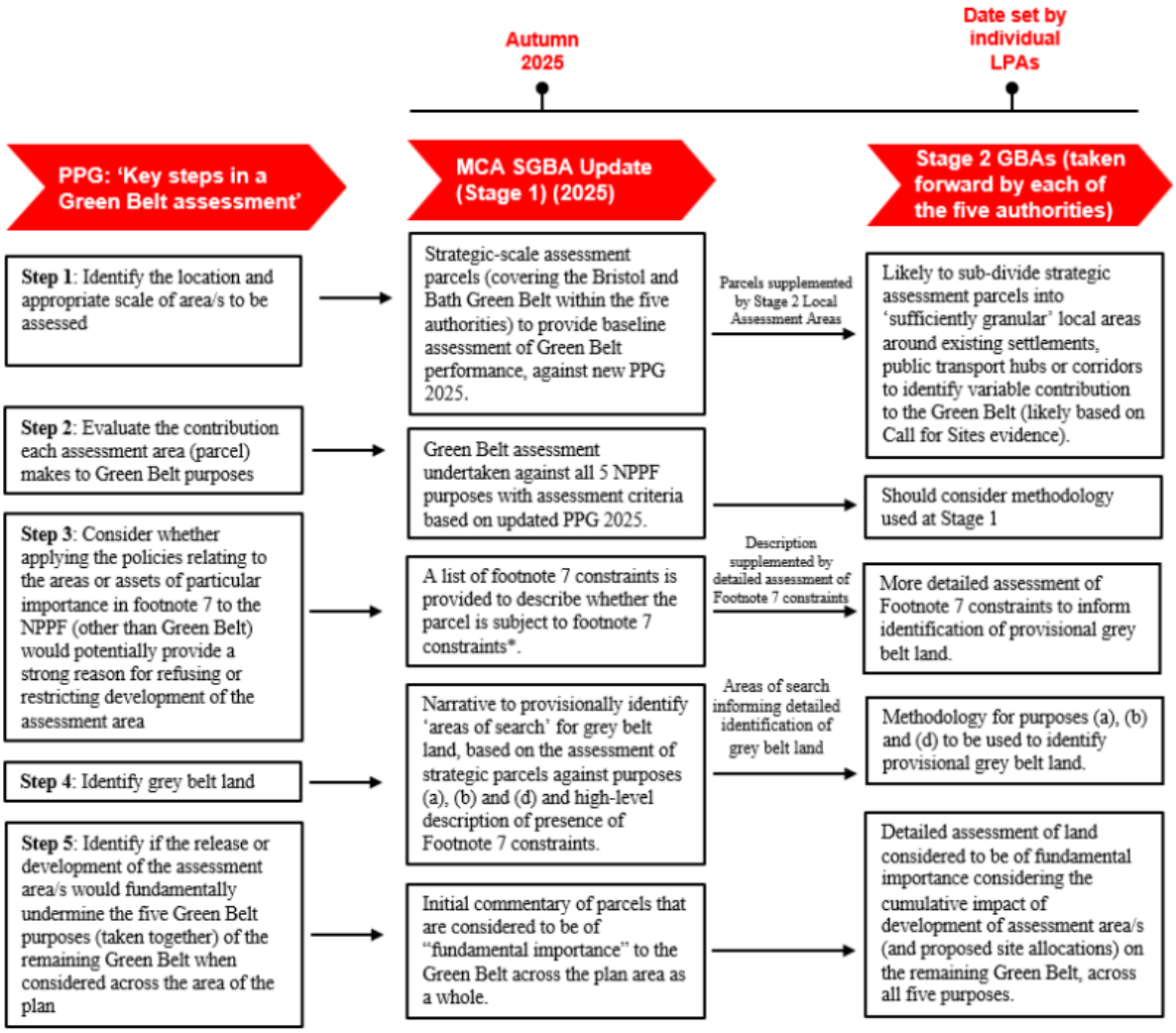

Figure 3: Overview of WECA Strategic Green Belt Assessment methodology and its relationship to future Stage 2 GBAs

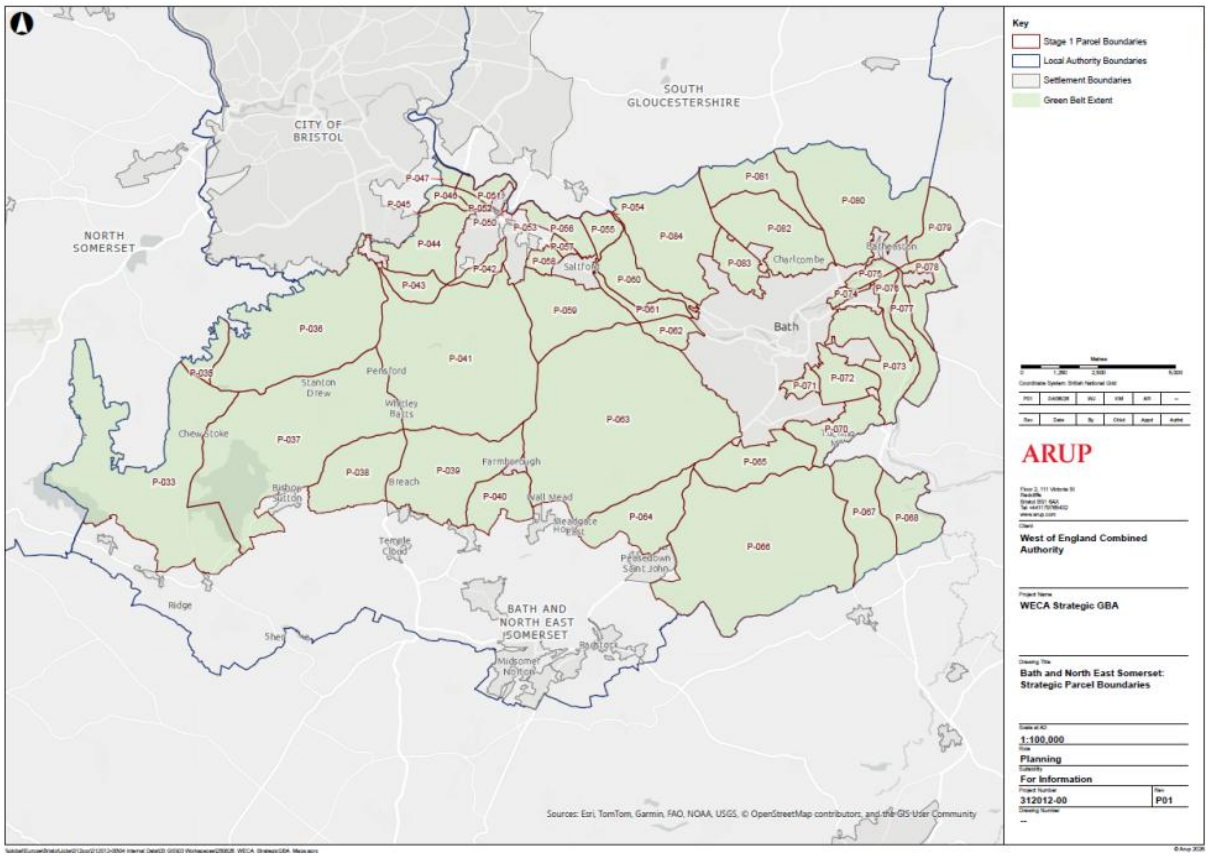

Figure 4: Strategic Green Belt Assessment (Stage 1) Parcels in B&NES authority boundary

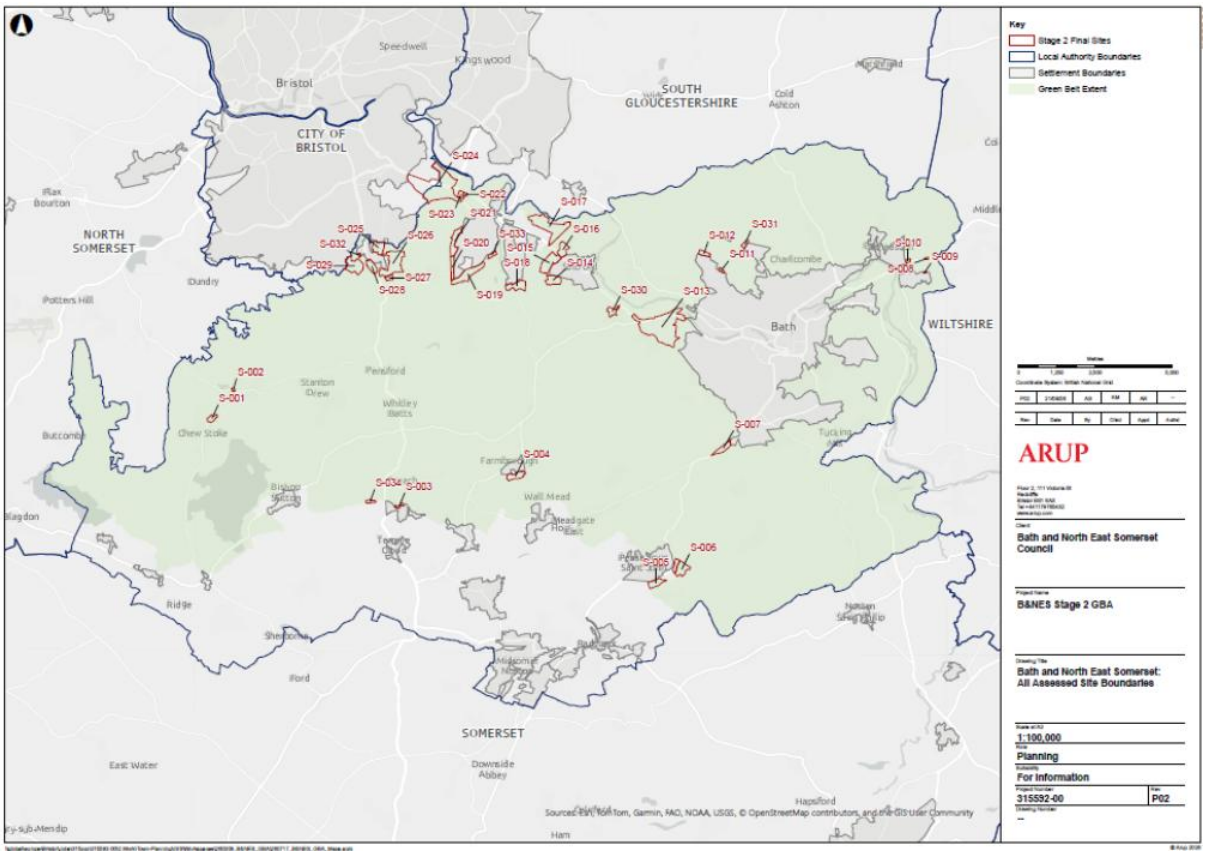

Figure 5: Map of sites assessed for the Stage 2 GBA

4.8 The Stage 2 assessment uses the Stage 1 Strategic Green Belt Assessment methodology, parcels and proformas as a starting point. 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.

4.9 Stage 2 provides an assessment of sites which have been filtered initially by the Council and are proposed for allocation. The Council's approach to filtering sites 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.

4.10 These sites have then been further refined to exclude Footnote 7 constraints and significant constraints to development such as gas pipelines.

4.11 NPPF 148 states that "when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework".

4.12 As outlined in the Site Selection Topic Paper the spatial strategy and sustainability of settlements has been a key driver informing the selection of sites for allocation. Sites have only been taken forward into Stage 2 if the site is suitable, available and achievable, in a sustainable location that conforms with the spatial strategy, is capable of meeting NPPF 110 and 115 requirements and the 'Golden Rules' in NPPF 155. A total of 34 sites were assessed at Stage 2.

Contribution towards the five purposes

4.13 The 34 sites assessed at Stage 2 were assessed in terms of their contribution towards the five Green Belt purposes. 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. The overall ratings are provided in **Table 2** and shown on **Figure 6**. Further detail is provided in Appendix A.

Table 2: Overall NPPF Contributions of Stage 2 GBA Sites

NPPF Score	Number of Stage 2 Green Belt Sites	Sites
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

NPPF Score	Number of Stage 2 Green Belt Sites	Sites
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

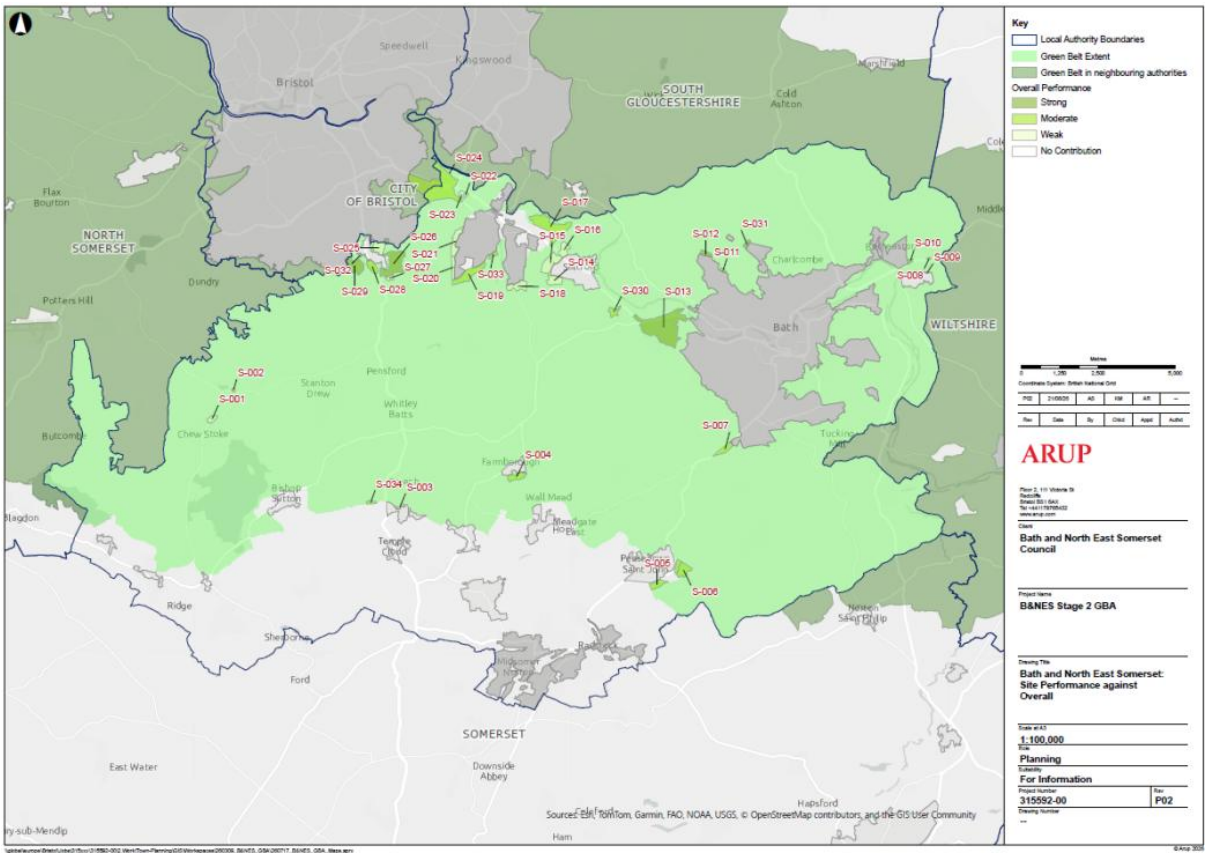

Figure 6: Map of overall performance of sites against NPPF purposes

Grey belt

4.14 The Stage 2 GBA provisionally identifies grey belt land, a sub-category of Green Belt land introduced following NPPF changes in 2024.

4.15 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, the GBA stresses 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. This is in line with the PPG which states "in reaching this judgement, authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7. Where this is the case, it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals". The Stage 2 GBA equates a 'strong' contribution to any one purpose as making a 'significant' contribution towards that Green Belt purpose.

4.16 The identification of grey belt is important as NPPF paragraph 148 outlines a sequential approach of firstly prioritising previously developed land (PDL), then grey belt, then other Green Belt land.

4.17 Only one site is PDL in the Green Belt (Old Tennis Courts, Chew Magna). The Stage 2 GBA identifies 21 sites as provisional grey belt and 13 sites as Green Belt, as shown in **Figure 7**.

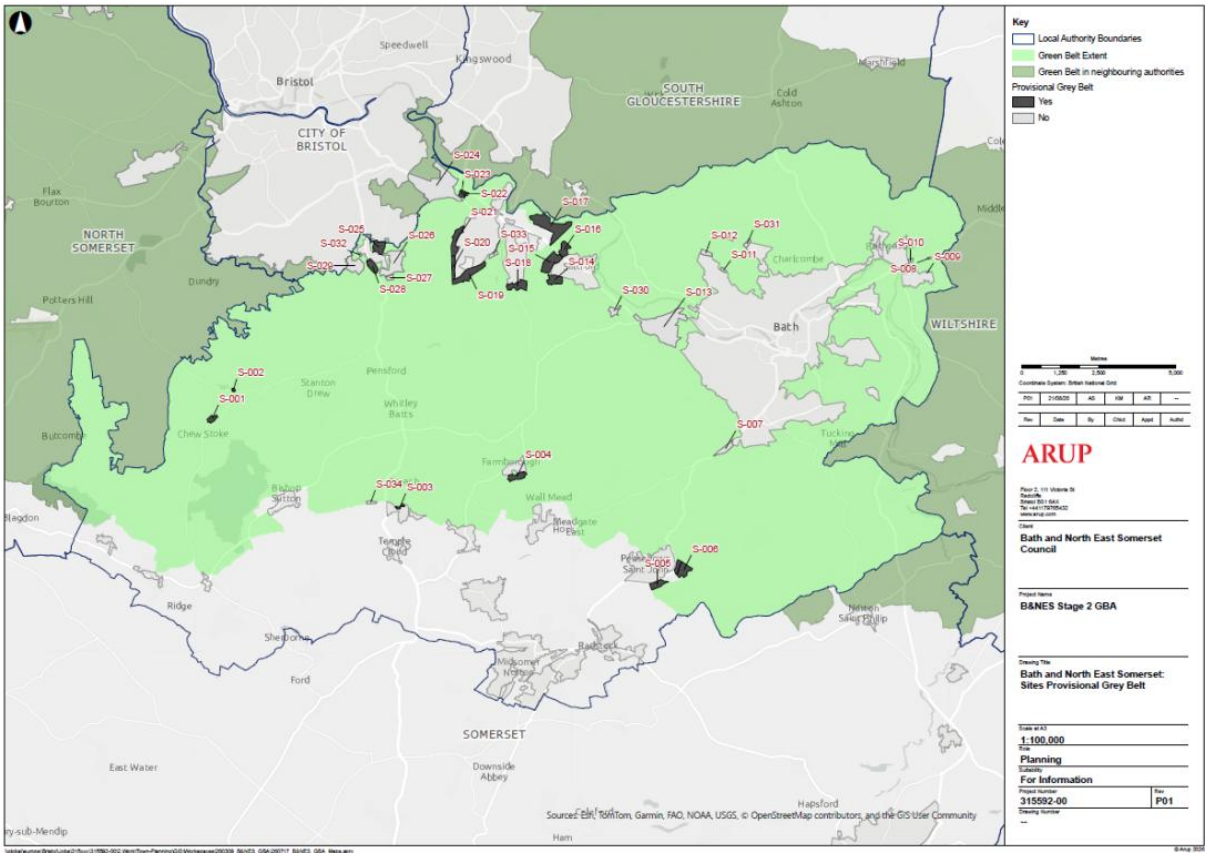

Figure 7: Provisional Grey Belt Map

4.18 The detail of the provisional grey belt assessment is set out in the Stage 2 proformas, reproduced in Appendix A.

4.19 Following consideration of the sites through the methodology outlined in the Site Selection Topic Paper all of those sites are suitable for development and not subject to Footnote 7 constraints that would restrict development, and therefore as a result the Council confirms that the sites constitute grey belt land, rather than merely provisional grey belt.

4.20 Development of the PDL site at the Old Tennis Courts, Chew Magna would deliver around 20 dwellings. The further grey belt sites translate to 17 local plan allocations which would deliver around 6,730-6,980 dwellings, around 85,000 sqm employment floorspace and a secondary school. Therefore, there remains a further need for non-grey belt Green Belt land to get closer to meeting the standard method local housing need figure; the employment need figure; and to deliver infrastructure – as PDL and grey belt alone cannot meet the identified need.

Whether the sites would fundamentally undermine the Green Belt

4.21 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.

4.22 Four areas are deemed 'areas of fundamental importance' at Stage 1. 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, when assessed more granularly at Stage 2.

4.23 Around 537ha of Green Belt land or 2% of overall Green Belt is proposed for release and allocation. The Stage 2 assessment concludes, however, that no site (if released), would fundamentally undermine the role of the remaining Green Belt against the purposes (taken together), individually or cumulatively. Further detail is provided in Appendix A, and section 8.1.4 and Annex C of the Stage 2 GBA.

Benefits of development and site-specific exceptional circumstances

4.24 NPPF 151 outlines a number of ways that local planning authorities should plan positively to enhance beneficial use of the Green Belt, and confirms that the 'Golden Rules' in NPPF 156 apply to sites released from the Green Belt through a local plan review. NPPF 156 covers affordable housing which reflects development plan policies, necessary improvements to local or national infrastructure, and the provision of new, or improvements to existing, green spaces that are accessible to the public.

4.25 NPPF 159 outlines that the improvements to green spaces required as part of the Golden Rules 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.

4.26 The courts have clarified that deciding what constitutes exceptional circumstances is a matter of planning judgement for the decision-maker, however the 'Golden Rules' introduced in the 2024 NPPF introduced a series of benefits that development that land released from the Green Belt through a plan review should comply with.

4.27 Strategic allocations are capable of providing significant new infrastructure, affordable housing and meeting the 'Golden Rules', which can contribute towards the local case for exceptional circumstances. Non-strategic allocations inherently have fewer such benefits due to their smaller scale, but if they are delivering new development in locations where housing needs (including affordable housing) or employment needs are acute and would otherwise remain unmet, this can also contribute towards demonstrating exceptional circumstances.

4.28 Appendix A contains the site-specific exceptional circumstances and how the 'golden rules' are considered to be met.

Boundary considerations

4.29 NPPF paragraph 149 outlines the factors that local plans should take into account when defining Green Belt boundaries. Most notable are criteria e) that the plan should be able to demonstrate that Green Belt boundaries will not need

to be altered at the end of the plan period; and f) plans should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

4.30 The Stage 2 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. The detail is provided in Appendix A.

4.31 Where relevant additional evidence, such as from the Landscape Sensitivity Assessment or Heritage Impact Assessment, has been carried through into policy wording, to inform and guide the creation of permanent, defensible boundaries that also mitigate the landscape and heritage impacts of development.

Sites assessed in the Green Belt Assessment but where exceptional circumstances are not required to be demonstrated

4.32 The GBA Stage 2 has assessed four sites where no Green Belt release is proposed in the Local Plan and therefore exceptional circumstances do not need to be demonstrated. The proformas are presented for completeness in Appendices B and C in this Topic Paper.

4.33 Appendix B contains the sites where no allocation is made (see also the Site Selection Topic Paper for a fuller explanation).

4.34 Appendix C contains the sites where an allocation is made in the Local Plan but no changes are proposed to Green Belt boundaries as the development proposed within the Green Belt through the allocation is compatible with Green Belt policy.

Conclusion

4.35 The local case for exceptional circumstances for all proposed site allocations in the Local Plan is set out in detail in Appendix A. This draws upon the Green Belt Stage 2 outputs to understand the contribution the site makes to the five Green Belt purposes, the level of harm to the Green Belt, whether development would ‘fundamentally undermine’ the Green Belt and if the site is grey belt land.

4.36 Exceptional circumstances are outlined with reference to the strategic case in Section 3 and the ‘Golden Rules’, with boundary considerations set out to ensure a permanent Green Belt boundary is established that is capable of enduring beyond the plan period.

5. Summary and conclusion

5.1 Section 3 sets out the strategic case for exceptional circumstances which includes:

- the significant need for housing in the district and the lack of non-Green Belt supply;
- that only around 80% of the housing need can be met from all site sources in the district (including Green Belt) and the unmet need would be around 9,000 dwellings greater without any Green Belt release;
- that a greater proportion of affordable housing is viable on Green Belt sites and these are generally located nearer to Bath where the need for affordable housing is most acute;
- that employment land is also disproportionately needed in Bath and the Bath to Bristol Corridor which is affected by Green Belt constraints; and
- that a failure to align housing development with employment would lead to unsustainable transport movements and commuting patterns undermining the local plan objectives, spatial strategy and vision-led approach in the plan.

5.2 The local case for exceptional circumstances is set out on a site-by-site basis in Appendix A outlining the harm that development in the Green Belt would cause; whether the site is previously developed land, grey belt of Green Belt; and the benefits of development including how the sites conform with the strategic case and how the 'Golden Rules' can be met. Together the Council considers that these strategic and site-specific local exceptional circumstances justify the release of sites from the Green Belt for development, meeting the requirements of NPPF Paragraphs 145 to 148.

5.3 Boundaries are set out in the site-specific allocation policies in the Local Plan with detail in the policy wording around how the boundaries can be strengthened, how the 'Golden Rules' in NPPF 156 can be met, and with the revised Green Belt boundaries confirmed on the Policies Map. The boundaries, whether through strengthening existing readily recognisable features or creating new ones, will be delivered in such a way that they will be permanent and can endure beyond the plan period.

Appendix A - Site proformas for the local case for exceptional circumstances

The proformas in this appendix summarise the Stage 1 and Stage 2 Green Belt Assessment findings and sets out the site-specific exceptional circumstances, boundary considerations and proposed Green Belt mitigation for the draft allocations. The are presented in ascending order using the policy number in the Pre-Submission Draft Local Plan.

It should be noted that some strategic site allocations contain more than one Stage 2 GBA parcel. Where this is the case, the allocation is split into its constituent parts with the individual Stage 2 GBA conclusions summarised.

Policy 2.10 Bath Equestrian Centre

Site allocation name	Bath Equestrian Centre
Site allocation policy number	Policy 2.10
Stage 1 GBA Site Reference	P-083
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-011
Stage 2 GBA Site Name	Bath Equestrian Centre
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	No

Stage 2 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).
Stage 2 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
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 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).
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site delivers the following benefits which meet the NPPF ‘golden rules’ and align with the strategic exceptional circumstances case: the site delivers housing, including affordable housing, in a sustainable location on the edge of Bath with access to local services and facilities. The benefits of the allocation including meeting the ‘golden rules’ are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 2.11 North of Napier Road

Site allocation name	North of Napier Road
Site allocation policy number	Policy 2.11
Stage 1 GBA Site Reference	P-083
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-012
Stage 2 GBA Site Name	North of Napier Road, Weston
Stage 2 Overall Purposes Contribution	Strong
Stage 2 provisional Grey Belt	No
Stage 2 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).
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	Site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: the site delivers housing, including affordable housing, in a sustainable location on the edge of Bath with access to local services and facilities. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 2.14 SW of the Odd Down P&R

Site allocation name	SW of the Odd Down P&R
Site allocation policy number	Policy 2.14
Stage 1 GBA Site Reference	P-065
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-007
Stage 2 GBA Site Name	Odd Down
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	No
Stage 2 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).
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 (c))
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	Site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: provision of needed employment land, located on an A road to the south of Bath, located next to Odd Down P&R to facilitate sustainable travel. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 3.1 North Keynsham

Site allocation name	North Keynsham
Site allocation policy number	Policy 3.1
Stage 1 GBA Site Reference	P-056 and P-057
Stage 1 Overall Assessment	Moderate (P-056) and Weak (P-057)
Stage 1 Area of Search for Grey Belt	Yes (P-056) and Yes (P-057)
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-017
Stage 2 GBA Site Name	North Keynsham
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	Yes
Stage 2 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.

Stage 2 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.
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 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).
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: enabling the Strategic Access Link Road which will deliver Keynsham Town Centre Regeneration Action Plan placemaking objectives, strategic employment allocation, affordable housing, new school, local centre, A4 corridor, strategic GI and delivering the WECA Parklands Vision, BNG, nature recovery. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation, in line with the Landscape Sensitivity Assessment, to create a permanent, defensible Green Belt boundary alongside mitigating views from the Cotswolds National Landscape. Landscape-led Green Belt boundary taking into account the pipeline, landscape mitigation and land for nature recovery and BNG.

Policy 3.4 West Keynsham

Site allocation name	West Keynsham
Site allocation policy number	Policy 3.4
Stage 1 GBA Site Reference	P-044
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-021
Stage 2 GBA Site Name	West Keynsham (North)
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: housing and affordable housing in a sustainable location in the Bath to Bristol Corridor, delivers strategic on-site nature recovery and 20% Biodiversity Net Gain, contributes towards delivering the WECA Parklands Vision, contributes towards the Strategic Access Link Road which will deliver Keynsham Town Centre Regeneration Action Plan placemaking objectives. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation, to create a permanent, defensible Green Belt boundary. Landscape-led Green Belt boundary taking into account the pipeline, landscape mitigation and land for nature recovery and BNG.

Policy 3.5 South West Keynsham (west of Charlton Road)

Site allocation name	South West Keynsham (west of Charlton Road)
Site allocation policy number	Policy 3.5
Stage 1 GBA Site Reference	P-044
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-020
Stage 2 GBA Site Name	West Keynsham 2
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: housing and affordable housing in a sustainable location in the Bath to Bristol Corridor, delivers a new primary school as part of the wider allocation, delivers strategic on-site nature recovery and 20% Biodiversity Net Gain, contributes towards delivering the WECA Parklands Vision, contributes towards the Strategic Access Link Road which will deliver Keynsham Town Centre Regeneration Action Plan placemaking objectives. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation, to create a permanent, defensible Green Belt boundary. Landscape-led Green Belt boundary taking into account the pipeline, landscape mitigation and land for nature recovery and BNG.

Policy 3.5 South West Keynsham (South of Parkhouse Lane)

Site allocation name	South West Keynsham (South of Parkhouse Lane)
Site allocation policy number	Policy 3.5
Stage 1 GBA Site Reference	P-042
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-019
Stage 2 GBA Site Name	South Keynsham
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	Yes
Stage 2 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 inro 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
Stage 2 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.
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: housing and affordable housing in a sustainable location in the Bath to Bristol Corridor, delivers a new primary school as part of the wider

	allocation, delivers strategic on-site nature recovery and 20% Biodiversity Net Gain, contributes towards delivering the WECA Parklands Vision, contributes towards the Strategic Access Link Road which will deliver Keynsham Town Centre Regeneration Action Plan placemaking objectives. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation, to create a permanent, defensible Green Belt boundary. Landscape-led Green Belt boundary with planned strong landscape mitigation towards the Chew Valley, plus land for nature recovery and BNG.

Policy 3.5 South West Keynsham (South of St Clements Road)

Site allocation name	South West Keynsham (South of St Clements Road)
Site allocation policy number	Policy 3.5
Stage 1 GBA Site Reference	P-042
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-033
Stage 2 GBA Site Name	South Keynsham 2
Stage 2 Overall Purposes Contribution	Strong
Stage 2 provisional Grey Belt	No
Stage 2 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.

Stage 2 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.
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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

Local Case for Exceptional Circumstances	The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: housing and affordable housing in a sustainable location in the Bath to Bristol Corridor, delivers a new primary school as part of the wider allocation, delivers strategic on-site nature recovery and 20% Biodiversity Net Gain, contributes towards delivering the WECA Parklands Vision, contributes towards the Strategic Access Link Road which will deliver Keynsham Town Centre Regeneration Action Plan placemaking objectives. The site also provides sustainable transport access to Keynsham Town Centre through the north / St Clements Road and Park Road. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Landscape-led Green Belt boundary with planned strong landscape mitigation towards the Chew Valley and land for nature recovery and BNG.

Policy 3.6 South East Keynsham

Site allocation name	South East Keynsham
Site allocation policy number	Policy 3.6
Stage 1 GBA Site Reference	P-041 and P-059
Stage 1 Overall Assessment	Moderate (P-041) and Strong (P-059)
Stage 1 Area of Search for Grey Belt	Yes (P-041) and No (P-059)
Stage 1 Area of Fundamental Importance	No (P-041) and Yes (P-059)
Stage 2 GBA Site Reference	S-018
Stage 2 GBA Site Name	South East Keynsham
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: housing and affordable housing in a sustainable location in the Bath to Bristol Corridor, delivers strategic on-site nature recovery and 20% Biodiversity Net Gain aligned with the proposed Country Park south of Saltford, contributes towards delivering the WECA Parklands Vision, contributes towards the Strategic Access Link Road which will deliver Keynsham Town Centre Regeneration Action Plan placemaking objectives, delivers a new shop for residents at South East Keynsham. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation, in line with the Landscape Sensitivity Assessment, to create a permanent, defensible Green Belt boundary alongside mitigating views from the Cotswolds National Landscape. Landscape-led Green Belt boundary taking into account the pipeline, landscape mitigation and settlement separation between Keynsham and Saltford.

Policy 3.7 West Saltford (North of A4)

Site allocation name	West Saltford (North of A4)
Site allocation policy number	Policy 3.7
Stage 1 GBA Site Reference	P-057
Stage 1 Overall Assessment	Weak
Stage 1 Area of Search for Grey Belt	Yes
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-016
Stage 2 GBA Site Name	North West Saltford
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: housing and affordable housing in a sustainable location in the Bath to Bristol Corridor, delivers a new Primary School and local centre, delivers strategic on-site nature recovery and 20% Biodiversity Net Gain aligned with the proposed extension to Manor Road Community Woodland and new Country Park, delivers a permanent Public Right of Way network replacing the existing temporary permissive path network as part of the wider allocation, contributes towards delivering the WECA Parklands Vision, contributes towards the Strategic Access Link Road which will deliver Keynsham Town Centre Regeneration Action Plan placemaking objectives. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation, in line with the Landscape Sensitivity Assessment, to create a permanent, defensible Green Belt boundary alongside mitigating views from the Cotswolds National Landscape. Landscape-led Green Belt boundary taking into account the pipeline, landscape mitigation and settlement separation between Keynsham and Saltford.

Policy 3.7 West Saltford (South of A4)

Site allocation name	West Saltford (South of A4)
Site allocation policy number	Policy 3.7
Stage 1 GBA Site Reference	P-058
Stage 1 Overall Assessment	Weak
Stage 1 Area of Search for Grey Belt	Yes
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-015
Stage 2 GBA Site Name	West Saltford
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: housing and affordable housing in a sustainable location in the Bath to Bristol Corridor, delivers a new Primary School and local centre as part of the wider allocation, delivers strategic on-site nature recovery and 20% Biodiversity Net Gain aligned with the proposed extension to Manor Road Community Woodland and new Country Park, delivers a permanent Public Right of Way network replacing the existing temporary permissive path network, contributes towards delivering the WECA Parklands Vision, contributes towards the Strategic Access Link Road which will deliver Keynsham Town Centre Regeneration Action Plan placemaking objectives. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation, in line with the Landscape Sensitivity Assessment, to create a permanent, defensible Green Belt boundary alongside mitigating views from the Cotswolds National Landscape. Landscape-led Green Belt boundary taking into account the pipeline, landscape mitigation and settlement separation between Keynsham and Saltford.

Policy 3.8 South Saltford

Site allocation name	South Saltford
Site allocation policy number	Policy 3.8
Stage 1 GBA Site Reference	P-059
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-014
Stage 2 GBA Site Name	South Saltford
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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.
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: housing and affordable housing in a sustainable location in the Bath to Bristol Corridor, delivers a new Country Park providing public open space, strategic on-site nature recovery and 20% Biodiversity Net Gain aligned with the proposed Country Park south of Saltford, delivers a permanent Public Right of Way network replacing the existing temporary permissive path network, contributes towards delivering the WECA Parklands Vision, contributes towards the Strategic Access Link Road which will deliver Keynsham Town Centre Regeneration Action Plan placemaking objectives. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation, in line with the Landscape Sensitivity Assessment, to create a permanent, defensible Green Belt boundary alongside mitigating views from the Cotswolds National Landscape. Landscape-led Green Belt boundary taking into account the pipeline, landscape mitigation and settlement separation between Keynsham and Saltford.

Policy 3.9 Hicks Gate

Site allocation name	Hicks Gate
Site allocation policy number	Policy 3.9
Stage 1 GBA Site Reference	P-046 and P-047
Stage 1 Overall Assessment	Moderate (P-046) and Moderate (P-047)
Stage 1 Area of Search for Grey Belt	No (P-046) and Yes (P-047)
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-024
Stage 2 GBA Site Name	Hicks Gate
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	No

Stage 2 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.
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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.
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site delivers the following benefits which meet the NPPF ‘golden rules’ and align with the strategic exceptional circumstances case: housing and affordable housing at a higher density in a sustainable location in the Bath to Bristol Corridor, delivers a new local centre and a new transport interchange, delivers 3FE of new Primary Schools either on one or two school sites, contributes towards delivery of the North Whitchurch Secondary School, delivers a new nature park and local nature reserve providing public open space, strategic on-site nature recovery and 20% Biodiversity Net Gain, contributes towards delivering the WECA Parklands Vision. The benefits of the allocation including meeting the ‘golden rules’ are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.

Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 3.10 Durley Farm

Site allocation name	Durley Farm
Site allocation policy number	Policy 3.10
Stage 1 GBA Site Reference	P-052
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	Yes
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-023
Stage 2 GBA Site Name	Durley Farm
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.

Stage 2 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.
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 two purposes ((a) and (d)) and a weak contribution to two purposes ((b) and (c)).
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: employment land in the Bath to Bristol Corridor, new employment near the Hicks Gate development. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 3.11 Devonport House

Site allocation name	Devonport House
Site allocation policy number	Policy 3.11
Stage 1 GBA Site Reference	P-052
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	Yes
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-022
Stage 2 GBA Site Name	Devonport House
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.

Stage 2 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.
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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

Local Case for Exceptional Circumstances	The site is identified as PDL and grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: housing including affordable housing and employment land in the Bath to Bristol Corridor, new employment near the Hicks Gate development. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 3.12 North Whitchurch

Site allocation name	North Whitchurch
Site allocation policy number	Policy 3.12
Stage 1 GBA Site Reference	P-044
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-025
Stage 2 GBA Site Name	North Whitchurch (north of Staunton Lane)
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes

Stage 2 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 Villages 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.
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 three purposes ((a), (b) and (d)).
Stage 2 Green Belt Boundary considerations	The new Green Belt boundary would be defensible as it would consist of Stockwood Lane.
Local Case for Exceptional Circumstances	The site is identified as PDL/grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF ‘golden rules’ and align with the strategic exceptional circumstances case: delivery of a new secondary school to support planned housing growth across Hicks Gate and Whitchurch Village in the Bath to Bristol Corridor. The benefits of the allocation including meeting the ‘golden rules’ are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 3.13 East Whitchurch

Site allocation name	East Whitchurch
Site allocation policy number	Policy 3.13
Stage 1 GBA Site Reference	P-041, P-043 and P-044
Stage 1 Overall Assessment	Moderate (P-041, P-043 and P-044)
Stage 1 Area of Search for Grey Belt	Yes (P-041 and P-043), No (P-044)
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-026
Stage 2 GBA Site Name	East Whitchurch
Stage 2 Overall Purposes Contribution	Strong
Stage 2 provisional Grey Belt	No
Stage 2 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.
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: affordable housing, new primary school, local centre, strategic GI / public open space to the east of the site, 20% BNG, nature recovery, access road will also help reduce traffic movements through the centre of the village, allowing for improvements to the local road network. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 3.13 East Whitchurch (east of Woollard Lane)

Site allocation name	East Whitchurch (east of Woollard Lane)
Site allocation policy number	Policy 3.13
Stage 1 GBA Site Reference	P-043
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	Yes
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-027
Stage 2 GBA Site Name	East Whitchurch 2
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 purpose (b) and no contribution to purposes (a) and (d).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: affordable housing, new primary school, local centre, strategic GI / public open space to the east of the site, BNG, nature recovery, access road will also help reduce traffic movements through the centre of the village, allowing for improvements to the local road network. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 3.14 South West Whitchurch (west of A37)

Site allocation name	South West Whitchurch (west of A37)
Site allocation policy number	Policy 3.14
Stage 1 GBA Site Reference	P-036
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-028
Stage 2 GBA Site Name	West Whitchurch
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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
Stage 2 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. 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: affordable housing, convenience shop, travel hub, opportunity to improve existing sport pitch facilities through relocation, strategic GI / public open space to the south-west of the site, BNG, nature recovery. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 3.14 South West Whitchurch (South of Church Road)

Site allocation name	South West Whitchurch (South of Church Road)
Site allocation policy number	Policy 3.14
Stage 1 GBA Site Reference	P-036
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-032
Stage 2 GBA Site Name	Whitchurch Taylor Wimpey 2
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.

Stage 2 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 site's 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: affordable housing, convenience shop, travel hub, opportunity to improve existing sport pitch facilities through relocation, strategic GI / public open space to the south-west of the site, BNG, nature recovery. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 3.14 South West Whitchurch (East of Whitchurch, Bristol)

Site allocation name	South West Whitchurch (East of Whitchurch, Bristol)
Site allocation policy number	Policy 3.14
Stage 1 GBA Site Reference	P-036
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-029
Stage 2 GBA Site Name	Whitchurch Taylor Wimpey
Stage 2 Overall Purposes Contribution	Strong
Stage 2 provisional Grey Belt	No
Stage 2 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.
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 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).
Stage 2 Green Belt Boundary considerations	The new Green Belt boundary would not be defensible as it would consist of dispersed tree and hedge lines.
Local Case for Exceptional Circumstances	The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: affordable housing, convenience shop, travel hub, opportunity to improve existing sport pitch facilities through relocation, strategic GI / public open space to the south-west of the site, BNG, nature recovery. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 4.2 Land Adjacent to Bath Business Park (West)

Site allocation name	Land Adjacent to Bath Business Park (West)
Site allocation policy number	Policy 4.2
Stage 1 GBA Site Reference	P-066
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-005
Stage 2 GBA Site Name	West of BP, Peasedown St John
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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)).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: provision of Needed employment land, located on an A road between a number of settlements including Bath and Radstock. Location of mobility hub to facilitate a sustainable travel route. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible boundary to the Green Belt. Mitigate views of the existing ridgeline.

Policy 4.2 Land Adjacent to Bath Business Park (East)

Site allocation name	Land Adjacent to Bath Business Park (East)
Site allocation policy number	Policy 4.2
Stage 1 GBA Site Reference	P-066
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-006
Stage 2 GBA Site Name	East of BP
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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)).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: provision of Needed employment land, located on an A road between a number of settlements including Bath and Radstock. Location of mobility hub to facilitate a sustainable travel route. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible boundary to the Green Belt. Mitigate views of the existing ridgeline.

Policy 5.1 Bathford Nurseries

Site allocation name	Bathford Nurseries
Site allocation policy number	Policy 5.1
Stage 1 GBA Site Reference	P-079
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-010
Stage 2 GBA Site Name	Bathford Nurseries (South)
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	No
Stage 2 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.
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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.
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as PDL land within the Green Belt and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: delivers around 20 homes, including affordable housing, in a sustainable location close to services and public transport. Makes effective use of previously developed land within the eastern Bath area and contributes to identified housing needs whilst supporting the vitality of local services and facilities. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 5.2 Box Road

Site allocation name	Box Road
Site allocation policy number	Policy 5.2
Stage 1 GBA Site Reference	P-079
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-008
Stage 2 GBA Site Name	Box Road
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	No
Stage 2 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.
Stage 2 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.

Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site delivers the following benefits which meet the NPPF ‘golden rules’ and align with the strategic exceptional circumstances case: supports local employment growth through delivery of employment floorspace, providing opportunities for rural enterprise and small businesses in a sustainable location close to Bath. The benefits of the allocation including meeting the ‘golden rules’ are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 5.3 Ashley Road

Site allocation name	Ashley Road
Site allocation policy number	Policy 5.3
Stage 1 GBA Site Reference	P-078
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-009
Stage 2 GBA Site Name	Ashley Road
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	No
Stage 2 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.
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 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)).
Stage 2 Green Belt Boundary considerations	The new green belt boundary would be more defensible as it would consist of the settlement edge.
Local Case for Exceptional Circumstances	The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: delivers around 10 homes, including affordable housing, through a logical rounding-off of the settlement in a sustainable village location. Supports local housing needs whilst reinforcing the existing settlement pattern and supporting village services and facilities. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 5.4 Land west of Corston Lane

Site allocation name	Land west of Corston Lane
Site allocation policy number	Policy 5.4
Stage 1 GBA Site Reference	P-059
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-030
Stage 2 GBA Site Name	Land West of Corston Lane
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	No
Stage 2 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.

Stage 2 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.
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 of Corston. In addition, the site makes a weak contribution to purpose (b) and no contribution to purpose (a).
Stage 2 Green Belt Boundary considerations	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.

Local Case for Exceptional Circumstances	The site delivers the following benefits which meet the NPPF ‘golden rules’ and align with the strategic exceptional circumstances case: delivers around 60 homes including affordable housing in a highly sustainable location on the A4 corridor with strong links to Bath. Supports local housing needs whilst helping maintain the vitality of the village, improving access to the countryside, strengthening active travel connectivity and delivering public open space, green infrastructure and biodiversity enhancements. The benefits of the allocation including meeting the ‘golden rules’ are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 5.5 Timsbury Road

Site allocation name	Timsbury Road
Site allocation policy number	Policy 5.5
Stage 1 GBA Site Reference	P-040
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	Yes
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-004
Stage 2 GBA Site Name	South Farmborough and Timsbury Road (Phases 1 and 2)
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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)).

Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: delivers around 200 homes including affordable housing. Supports the long-term sustainability of Farmborough through investment in education provision, community infrastructure, public open space, green infrastructure, active travel improvements and support for the village hall and community shop. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 5.10 Maypole Close

Site allocation name	Maypole Close
Site allocation policy number	Policy 5.10
Stage 1 GBA Site Reference	P-039
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	Yes
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-003
Stage 2 GBA Site Name	Maypole Clutton
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.
Stage 2 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

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 l 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)).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: delivers around 30 homes including affordable housing alongside recreation land and facilities for Clutton Primary School, publicly accessible open space and biodiversity enhancements. Provides significant community and education benefits in addition to housing delivery. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Policy 5.13 Hedgehogs

Site allocation name	Hedgehogs
Site allocation policy number	Policy 5.13
Stage 1 GBA Site Reference	P-033
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	Yes
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-001
Stage 2 GBA Site Name	Hedgehogs and Hedgehogs Further, Chew Stoke
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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)).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is identified as PDL/grey belt land and is sequentially preferable to developing a Green Belt site. The site delivers the following benefits which meet the NPPF 'golden rules' and align with the strategic exceptional circumstances case: delivers housing, including affordable housing, in a sustainable village location. Supports local services and facilities, provides opportunities for recreation and open space provision, and contributes towards meeting housing needs in the Chew Valley. The benefits of the allocation including meeting the 'golden rules' are considered to outweigh the harm to the Green Belt and demonstrate exceptional circumstances to release the site from the Green Belt.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to create a permanent, defensible Green Belt boundary

Appendix B – Sites assessed but not allocated in the Local Plan

The sites included in this Appendix were assessed at Stage 2 of the Green Belt Assessment but were ultimately not allocated. See the Site Selection Topic Paper for further information on the reasons why the sites are not allocated.

West of Bath

Site allocation name	West of Bath (Not allocated)
Site allocation policy number	N/A
Stage 1 GBA Site Reference	P-061, P-062
Stage 1 Overall Assessment	Strong (P-061 and P-062)
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-013
Stage 2 GBA Site Name	West of Bath Option 3
Stage 2 Overall Purposes Contribution	Strong
Stage 2 provisional Grey Belt	No

Stage 2 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.

Stage 2 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).
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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. 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.
Stage 2 Green Belt Boundary considerations	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.
Commentary	The site is not being allocated in the plan and no Green Belt changes are proposed; therefore, exceptional circumstances do not need to be demonstrated. The reasons why the site is not being progressed as an allocation in this local plan are set out in the Site Selection Topic Paper and paragraphs 2.137-2.143 in the Local Plan. The site has significant potential to meet the 'golden rules' and demonstrate exceptional circumstances, however as outlined there is a high degree of harm to the World Heritage Site and its setting, the Cotswolds National Landscape and also Green Belt.

Appendix C – Sites assessed but where no Green Belt release is proposed in the Local Plan

The site allocations included in this Appendix are where sites lie at least partially within the Green Belt. Where sites are partially in the Green Belt the GBA only assess that part of the site and does not comment on the remainder of the allocation outside of the Green Belt – this applies at Policy 2.9 Kingswood School and Policy 5.9 West of Clutton.

The sites below were assessed through the Stage 2 Green Belt Assessment however the local plan does not propose any changes to the Green Belt boundary in these locations as part of the allocation policy wording. As a result of this, exceptional circumstances do not need to be demonstrated at these site allocations. The information is provided here for completeness. Further information about the justification for the allocation and boundaries is provided in the Site Selection Topic Paper.

Policy 2.9 Kingswood School (partially in the Green Belt)

Site allocation name	Kingswood School
Site allocation policy number	Policy 2.9
Stage 1 GBA Site Reference	P-082
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-031
Stage 2 GBA Site Name	Kingswood School Playing Fields
Stage 2 Overall Purposes Contribution	Strong
Stage 2 provisional Grey Belt	No

Stage 2 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.
Stage 2 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.
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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).

Stage 2 Green Belt Boundary considerations	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.
Commentary	The site allocation includes land within and outside of the Green Belt, with built development due to take place on the land currently outside of the Green Belt. No Green Belt is proposed to be released at this site; therefore, exceptional circumstances do not need to be demonstrated. The area of land within the Green Belt has high landscape sensitivity and is constrained in heritage terms. The Green Belt element of the allocation will deliver public open space, 20% BNG, nature recovery and landscape mitigation on-site within the allocation.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to strengthen the existing boundary to create a permanent, defensible Green Belt boundary.

Policy 5.9 West of Clutton (partially within the Green Belt)

Site allocation name	West of Clutton
Site allocation policy number	Policy 5.9
Stage 1 GBA Site Reference	P-038
Stage 1 Overall Assessment	Moderate
Stage 1 Area of Search for Grey Belt	Yes
Stage 1 Area of Fundamental Importance	No
Stage 2 GBA Site Reference	S-034
Stage 2 GBA Site Name	West of Clutton
Stage 2 Overall Purposes Contribution	Moderate
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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
Stage 2 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.
Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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)).
Stage 2 Green Belt Boundary considerations	The new green belt boundary would not be defensible as it would consist of tree lines and hedgerow.

Commentary	The site allocation includes land within and outside of the Green Belt, with built development due to take place on the land currently outside of the Green Belt. No Green Belt is proposed to be released; therefore, exceptional circumstances do not need to be demonstrated. The vast majority of the site is located outside of the Green Belt where exceptional circumstances do not need to be justified and the site as a whole is required to deliver land for open space/nature recovery. The Green Belt element of the allocation will deliver public open space, 20% BNG, nature recovery and landscape mitigation on-site within the allocation.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to strengthen the existing boundary to create a permanent, defensible Green Belt boundary.

Policy 5.12 Old Tennis Courts

Site allocation name	Old Tennis Courts
Site allocation policy number	Policy 5.12
Stage 1 GBA Site Reference	P-036
Stage 1 Overall Assessment	Strong
Stage 1 Area of Search for Grey Belt	No
Stage 1 Area of Fundamental Importance	Yes
Stage 2 GBA Site Reference	S-002
Stage 2 GBA Site Name	Old Tennis Courts, Chew Magna
Stage 2 Overall Purposes Contribution	Weak
Stage 2 provisional Grey Belt	Yes
Stage 2 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.
Stage 2 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.
Stage 2 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.

Stage 2 is releasing the assessment area likely to fundamentally undermine the five purposes of the remaining Green Belt?	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 to three other purposes ((a), (b) and (d)).
Stage 2 Green Belt Boundary considerations	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.
Local Case for Exceptional Circumstances	The site is previously developed land within the Green Belt where development may be "not inappropriate" in line with NPPF 154. No Green Belt is proposed to be released; therefore, exceptional circumstances do not need to be demonstrated. The site is identified as grey belt land and is sequentially preferable to developing a Green Belt site.
Proposed Green Belt boundary policy requirements	Strong landscape mitigation to strengthen the existing boundary to create a permanent, defensible Green Belt boundary.