



Appeal by: Bristol Airport Limited

Appeal Reference: APP/D0121/W/20/3259234

North Somerset Council Application Reference: 18/P/5118/OUT

**Rebuttal proof of evidence of
David Gurtler BA(Hons), BPI, DipSurv MRTPI
Planning and Green Belt**

Reference: NSC/W7/4

Alpha Planning Ltd



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Bristol Airport Public Inquiry

Rebuttal Planning Proof of Evidence

David Gurtler

on behalf of

North Somerset Council

PINS ref: APP/D0121/W/20/3259234

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APPENDIX A: North Somerset Green Belt Assessment April 2021

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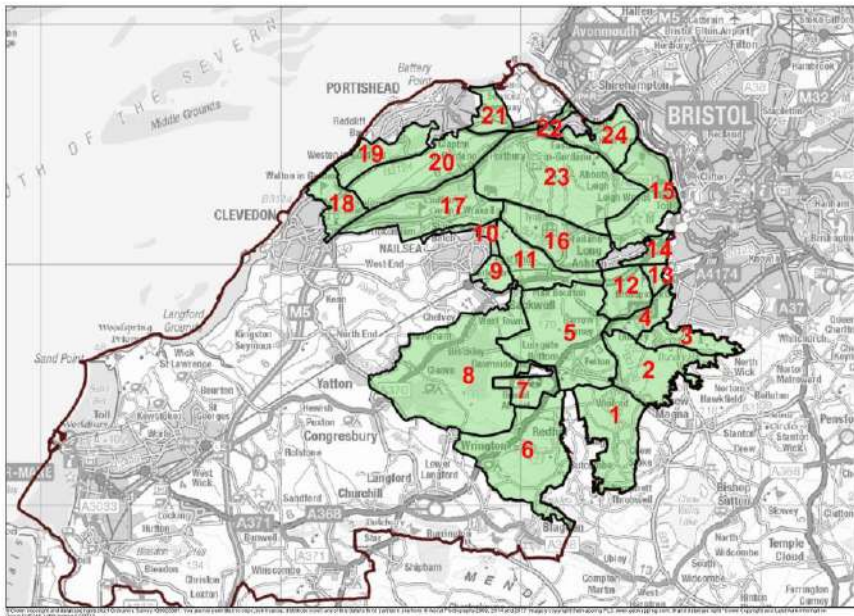
I. INTRODUCTION

1. This rebuttal proof of evidence has been prepared in response to evidence provided by Mr Melling, on behalf of Bristol Airport Limited (“BAL”), on Green Belt matters.
2. Mr Melling’s proof of evidence (BAL/7/2) included Appendix A: Green Belt Assessment of Land to the South of Bristol Airport, since “*an assessment of the Green Belt was not previously undertaken by BAL*” (paragraph 1.1.2). Accordingly, this rebuttal responds to matters raised in this new piece of work undertaken for BAL.
3. I have structured this rebuttal in table form in order that the response can clearly be seen in relation to the points that Mr Melling has made in his proof of evidence.
4. I have sought to limit this rebuttal proof of evidence as much as possible. Accordingly, I have not dealt with every element of Mr Melling’s evidence with which I do not agree. The fact that I have not responded to a particular point in Mr Melling’s evidence in this rebuttal proof of evidence is not, and should not be taken as, a concession that I agree with that point.

II. RESPONSE TO BAL/7/2 APPENDIX A: ‘GREEN BELT ASSESSMENT OF LAND TO THE SOUTH OF BRISTOL AIRPORT’

	Paragraph	Text	Response
1	1.1.2 (page 3)	<i>“An assessment of the Green Belt was not previously undertaken BAL [sic], nor was one requested by NSC officers during the determination of the planning application, as it was considered that the proposed development would quite clearly result in only limited harm to the Green Belt.”</i>	<p>An assessment of the Green Belt within North Somerset has been undertaken by the Council. The Council initially contributed to the strategic assessment of the Green Belt which formed part of the evidence base for the Joint Spatial Plan (JSP) in 2015.¹ Whilst the JSP has been withdrawn, the Stage 1 work for the evidence base still remains relevant and has informed the North Somerset Green Belt Assessment April 2021, which provides part of the evidence base for the emerging North Somerset Local Plan 2038 (attached as Appendix A to this rebuttal proof of evidence).</p> <p>The Green Belt assessment methodology is based on that carried out by the four local authorities for the JSP. In the 2015 Green Belt Assessment, the Green Belt within the four authorities was divided into manageable areas for analysis, a total of seventy-nine cells, with the airport given the reference 62. In the North Somerset Green Belt</p>

¹ Joint Spatial Plan: Green Belt Assessment (November 2015)

			<p>Assessment April 2021, twenty-four cells are identified in North Somerset, with the airport reference being Cell 7 (see image below).</p>  <p>Further details associated with the North Somerset Green Belt Assessment are provided below in response to other points raised by Mr Melling in Appendix A of his proof of evidence (BAL/7/2).</p>
2	1.1.3 (page 3)	<p><i>“A field survey was undertaken in April 2021 that comprised access to the Silver Zone Phase 1 and 2</i></p>	<p>Unfortunately, on the occasions that I have visited the Airport this year (4 and 5 January and 18 June) I have not been able to gain access to the Silver Zone car park (including the Silver Zone Phase</p>

		<p><i>car parks to assess views out and an appraisal of views back towards the Silver Zone Phase 1 and 2 car parks from publicly accessible locations in the surrounding landscape.”</i></p>	<p>1 and Phase 2 extension sites). On the most recent visit a request for access to the Silver Zone car park was made to BAL on 8 June for a visit on 18 June – this was turned down on the basis that “facilitating your request could potentially place other parties at a disadvantage” and that a more appropriate time would be when the scheduled site visit takes place towards the end of August. This has meant that I have not been able to verify the views or assertions made by Mr Melling in relation to the outlook from within the site.</p> <p>I have however, been able to view the site from publicly accessible locations informed by the locations identified in the Landscape and Visual Impact Assessment submitted with the planning application (ref: 18/P/5118/OUT) and the recommendations of local residents that I met whilst carrying out my site visits. Overall, this has given me a good understanding of the area and the Silver Zone car park specifically. I would expect that my assessment of impact on the Green Belt would likely have been higher (i.e. a conclusion of a greater impact) with access to the Silver Zone car park.</p>
3	2.1.2 (page 5)	<p><i>“There is a common public misconception that Green Belt land is ‘sacrosanct’ and that once</i></p>	<p>Nowhere has the Council contended that the Green Belt is sacrosanct. However, it is worth noting that since at least 2006, BAL has sought to challenge the Green Belt boundary at the airport, with</p>

		<i>designated it should never be developed.”</i>	<p>the Inspector in his final report to the Replacement Local Plan noting that <i>“Green Belt boundaries should only be altered if exceptional circumstances justify doing so, there is a presumption against such modifications”</i> (paragraph 11.1).</p> <p>This position is reiterated in the NPPF, with paragraph 136 stating that <i>“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”</i></p>
4	2.1.4 (page 5)	<i>“If permission for development in the Green Belt is considered, National Planning Policy Guidance (2019) states that: ...”</i>	<p>The paragraph quoted from the PPG (Paragraph: 003 Reference ID: 64-003-20190722) is in fact referring to compensatory measures where land is taken out of the Green Belt through the actions of the strategic policy making authority (the preceding paragraph being entitled <i>“How might plans set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements?”</i> (Paragraph: 002 Reference ID: 64-002-20190722).</p>

			<p>BAL are not proposing any compensatory improvements other than the peripheral landscaping on an engineered bund around the field that will become the Silver Zone Phase 2 extension, together with some additional planting on an existing field to the south of the Silver Zone car park (referred to as Gruffy's field).</p>
5	2.1.5 (page 6)	<p><i>"...it is recognised that there are benefits in using other features as Green Belt boundaries, where these are clearly defined on the ground and perform a physical and/or visual role in separating town and countryside."</i></p>	<p>Paragraph 139 of the NPPF references defining Green Belt boundaries in local plans (not decision taking), <i>"using physical features that are readily recognisable and likely to be permanent"</i>. Paragraph 5.3 of the North Somerset Green Belt Assessment, confirms that <i>"clear physical features have been used wherever possible in identifying assessment cells."</i></p> <p>The four parcels of land covered in Mr Melling's Green Belt Assessment (parcels S1 to S4), fall within Cell 7 in the North Somerset Green Belt Assessment April 2021, which is described as follows:</p> <p><i>"Cell 7: Bristol Airport.</i></p> <p><i>"Bristol airport sits on an elevated plateau. The terminal and built up areas were excluded from the Green Belt in the 2007</i></p>

			<i>North Somerset Replacement Local Plan. Part of the land in the Green Belt is in use by the airport this includes the runway and surface car parking. The land to the south falls towards Redhill and is mainly open and visually prominent. The A38 passes through the western part of the cell. This cell mainly acts to contain the spread of development around the airport and serves purposes 3 and 5.”</i>
6	3.1.13 (page 8)	<i>“The methodology is derived from that used in Green Belt reviews undertaken elsewhere.”</i>	<p>The methodology is not dissimilar to that used in the North Somerset Green Belt Assessment April 2021 (Appendix A to this rebuttal proof). As noted above, the Council has divided the Green Belt into twenty-four cells, with physical features being used to help identify cells, together with amongst other things, land use, landscape character and topography.</p> <p>The cells are then assessed against the five purposes of the Green Belt (not dissimilar to Mr Melling’s Table 3.1), with analysis of the cell’s performance against those criteria and an overall description of the cell, with particular reference to its openness.</p>
7	Table 3.1 (page 8)	<i>“Purpose and Guide Questions”</i>	Mr Melling’s Table 3.1 is similar to Table 1 in the North Somerset Green Belt Assessment April 2021. The five purposes of the Green

			<p>Belt, set out in paragraph 134 of the NPPF, form the basis for that assessment, with an analysis undertaken as to how each cell performs against the each of the five purposes.</p> <p>From my experience of either making representations to local authorities in their 'call for sites' or in response to their review of the Green Belt boundaries as they seek to prepare their local plans, there are further questions that I have asked on those occasions, and applied in this instance, in order to better inform my evidence.</p> <p>In terms of the parcels of land identified as S1, S2, S3 and S4 (and specifically the Silver Zone Phase 1 and Phase 2 extension sites) I have considered the following questions in addition to the Mr Melling's initial 'Guide Questions' (which cover the NPPF purposes):</p> <ul style="list-style-type: none"> a) Is there built form in the individual land parcels and what is the nature of that built form? b) How much undeveloped land lies within the individual land parcels and what is the nature of that undeveloped land? c) Are there any definitive boundaries in the individual land parcels and do those boundaries contain existing
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			<p>development? Is there opportunity to create permanent boundaries?</p> <p>d) Do the individual parcels of land define/constrain existing built development?</p> <p>e) What is the current use of the individual parcels of land and how does the land use relate to the purposes of the Green Belt?</p> <p>f) Have the individual parcels of land been subject to development pressure (planning history)?</p> <p>g) What opportunities are there to enhance the beneficial use of the individual parcels of land (paragraph 141 of the NPPF)?</p> <p>My answers to these seven questions in relation to land parcel S1 are set out in point 36 below and in relation to parcel S2 in point 41.</p>
8	Table 3.2 (page 8)	<i>“Encroachment – a gradual advance beyond usual or acceptable limits (Oxford Dictionary online).</i>	<p>I am content with the first two definitions that have been provided, but not the third, and I would point out the following:</p> <p>i. Encroachment: the aerial photographs in Appendix 2 of my proof of evidence, together with the planning histories in</p>

		<p><i>“The countryside – open land with an absence of built development and urbanising influences and characterised by rural land uses including agriculture and forestry.</i></p> <p><i>“Openness – the degree of built development or other urbanising elements along with degree of enclosure created by topography and/or vegetation.”</i></p>	<p>Appendices 1 and 3 show the general encroachment of car parking at the airport into the open countryside on the South Side.</p> <p>ii. Countryside: the description provided effectively describes Silver Zone Phase 2 extension.</p> <p>iii. Openness: this has been amplified by Mr Melling to include ‘<i>enclosure created by topography and/or vegetation</i>’, which I consider to be inappropriate, since one would still refer to open countryside which may comprise fields with hedgerows, trees, rivers, escarpments. I prefer the approach taken by Sales LJ in Turner v SSCLG quoted in paragraph 23(b) of my proof of evidence.</p>
9	Table 3.3 (page 9)	<p><i>“Criteria used in the Assessment of Visual and Physical Openness”</i></p>	<p>I assume that the significance criteria assigned should be “High, Moderate and Low” rather than ‘mixed’ (see Section 3.2 in terms of ranking the individual land parcels).</p> <p>Whilst landform and vegetation can impact visual openness, in terms of views into an individual parcel of land, the reality is that, as noted above, trees, hedgerows and topography may form boundaries, but are also features of the countryside and smaller land parcels with</p>

			<p>hedgerows and vegetation are being encouraged to enhance the countryside in terms of appearance and biodiversity. These features may limit immediate views, but do not take away the importance and contribution of an individual parcel to the overall openness of the countryside, in particular in spatial terms (and may add to interest of the countryside when viewed from a distance, such as views from the Mendip Hills AONB).</p>
10	<p>Section 3.2 (page 10)</p>	<p><i>“Results of Green Belt Assessment of Purposes: Parcel S1”</i></p> <p><i>‘check unrestricted sprawl’</i></p>	<p>Parcel S1 includes the field that comprises the seasonal car park (Silver Zone Phase 1 extension), together with the rest of the Silver Zone car park and a number of buildings.</p> <p>In the analysis section on the first purpose, I would emphasise that there are defined boundaries to parcel S1, with the manmade engineered bunds and their perimeter fencing and planting clearly defining the airport’s operational boundary and separation from open agricultural land to the south, whilst the A38 defines the eastern boundary.</p>
11	<p>Section 3.2 (page 10)</p>	<p><i>“Results of Green Belt Assessment of Purposes: Parcel S1”</i></p>	<p>The North Somerset Green Belt Assessment April 2021 identifies this third purpose as one that the Green Belt in Cell 7 serves.</p>

		<p><i>‘assist in safeguarding the countryside from encroachment’</i></p>	<p>With regard to the analysis associated with the third purpose, Appendices 1 and 2 of my proof of evidence clearly show that the Airport has made use of its permitted development rights (PDR) within this area, and thus the Council has had limited opportunity to prevent the encroachment of built development within the Green Belt on this operational land. Whilst the south side of the airport may be dominated by mass car parking, there are also a number of buildings within parcel S1 (including the Snow Base, Royal Mail facility, Bristol and Wessex Flying Club, Lulsgate House, car rental building, etc).</p> <p>I agree with Mr Melling’s statement that <i>“the land, as part of the wider Green Belt in this location, helps to maintain openness through preventing further intensification of existing development which can erode that quality.”</i></p> <p>I agree with the conclusion in his overall assessment, namely that parcel S1 <i>“retains a degree of openness.”</i></p> <p>It is also worth noting that the North Somerset Green Belt Assessment April 2021 identifies Cell 7 as serving purpose five of the NPPF, namely <i>“to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land.”</i> The Green Belt</p>
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			Assessment concluded that all cells within North Somerset assist urban regeneration as they collectively encourage the recycling of derelict land and other urban land. In relation to Cell 7 (Bristol Airport) this purpose would be likely to be achieved by encouraging the more intensive use of land outside of the Green Belt (i.e. within the Green Belt Inset) before recourse to development in the Green Belt.
12	Section 3.2 (page 11)	<p><i>“Results of Green Belt Assessment of Purposes: Parcel S2”</i></p> <p><i>“There is evidence of emerging scrub woodland to the north of the parcel. Built development is limited to a strip immediately adjacent to the A38 and the land is part of a wider expanse of open countryside to the south of Bristol Airport. There is a well-vegetated bund which forms the southern boundary of the Airport and provides clear functional and visual separation.”</i></p>	<p>Parcel S2 includes the field that is proposed to be developed as Silver Zone Phase 2 extension, to accommodate 2,700 vehicles and associated access roads, aisles, lighting and CCTV columns, together with a new perimeter bund and security fence.</p> <p>The emerging scrub woodland in the north of parcel S2 appears to be within the field that is owned by the airport and on the Landscape Visual and Ecology Mitigation Masterplan is referred to as Gruffy’s field (where the existing woodland is to be managed, new copses to be introduced and planting of parkland trees proposed).</p> <p>I agree that the northern boundary of parcel S2 is well defined by the manmade bund, which in places is well-vegetated, though where that bund defines the boundary with the seasonal car park (Silver Zone</p>

			<p>Phase 1 extension), from my site visits the vegetation did not appear to be well established. However, as the vegetation becomes established, the bund together with the vegetation on top will provide “functional and visual separation” of the airport from the open countryside that is parcel S2.</p> <p>I agree with the assessment in relation to ‘physical openness’, namely that it is ‘high’ since this is open countryside, predominantly agricultural land, with limited built development.</p>
13			<p>With regard to visual openness, Mr Melling has suggested that this is low to moderate, considering there only to be long and middle distance views from Winters Lane and only glimpsed views from the A38. On my site visits, there were various gaps in the hedgerow adjacent to the A38 – though Gruffy’s field has more peripheral vegetation obscuring views – whilst from Winters Lane there were views across parcel S3 towards these fields and I would not have differentiated between the open countryside in the two land parcels. Accordingly, I consider Mr Melling’s assessment of visual openness to be underplayed.</p>

14	Section 3.2 (page 12)	<i>“Results of Green Belt Assessment of Purposes: Parcel S2”</i> <i>‘check unrestricted sprawl’</i>	I agree with the assessment that parcel S2 helps to contain the development associated with the airport, and as such it plays an important role both spatially and visually.
15	Section 3.2 (page 12)	<i>“Results of Green Belt Assessment of Purposes: Parcel S2”</i> <i>‘assist in safeguarding the countryside from encroachment’</i>	<p>Mr Melling’s assessment of the contribution of parcel S2 to safeguarding the countryside from encroachment is not significantly different to that associated with parcel S1 which is within the airport boundary. I consider that his assessment underplays the importance of this parcel of land.</p> <p>As open fields immediately adjacent to the airport boundary I consider that the fields play an important role in safeguarding the countryside from further encroachment from the airport. The bunds to their north act as a physical barrier and separate the operational airport from the open fields to the south. These fields are an important buffer preventing the further sprawl of the airport southwards and containing the existing built form.</p>
16	Section 3.2 (page 12)	<i>“Results of Green Belt Assessment of Purposes: Parcel S2”</i> <i>‘overall assessment’</i>	I agree with Mr Melling’s conclusion, namely that parcel S2 is <i>“part of open countryside”</i> to the south of the airport and its principal function is <i>“limiting the intrusion of built development”</i> , or as

			paragraph 133 of the NPPF says, <i>“to prevent urban sprawl by keeping land permanently open”</i> .
17	Section 3.2 (page 13)	<i>“Results of Green Belt Assessment of Purposes: Parcel S3”</i>	<p>Parcel S3 comprises land to the east of Winters Lane. This land rises from the south, with clear views looking up the hill at the fields and hedgerows, with a few dwellings scattered amongst trees. At the top of Winters Lane there are uninterrupted views across the field to the seasonal car park, with the proposed Silver Zone Phase 2 extension beyond that.</p> <p>I agree with Mr Melling’s assessment that the physical openness can be rated as high, though I would also rate the visual openness as high, given the views that exist across the land.</p>
18	Section 3.2 (page 13)	<i>“Results of Green Belt Assessment of Purposes: Parcel S3”</i> <i>‘check unrestricted sprawl’</i>	<p>The northern most part of parcel S3 abuts the airport boundary on three sides, with the eastern side being adjacent to the Snow Base and the seasonal car park (Silver Zone Phase 1 extension).</p> <p>I agree with Mr Melling’s assessment that as such it helps to contain the airport, though with the incremental growth of facilities in the South Side I would imagine that as with the field to the east (Silver Zone Phase 2 extension) there could be pressure in the future for the airport to encroach on this open countryside.</p>

19	Section 3.2 (page 13)	<i>Results of Green Belt Assessment of Purposes: Parcel S3”</i> <i>‘assist in safeguarding the countryside from encroachment’</i>	Mr Melling’s description of parcel S3’s contribution is identical to that of parcel S2. Given that the field to the east of Winters Lane provides the only open countryside between a publicly accessible location and the seasonal car park (and the proposed Silver Zone Phase 2 extension), I consider that this parcel of land plays an important role in safeguarding the countryside from the encroachment of development associated with the airport.
20	Section 3.2 (page 14)	<i>Results of Green Belt Assessment of Purposes: Parcel S4”</i> <i>‘physical and visual openness’</i>	<p>This parcel of land is bounded on the south by a public footpath linking the A38 to Winters Lane. The footpath runs to the south of the only development within the land parcel, namely Hailstone Cottages. There are open and clear views across the fields to the north, both from the A38 and from the track leading to the cottages. However, approximately one third of the way along the footpath (just past the cottages) there is a copse that restricts views to the north, though this opens up as one gets to the final field leading to the path that takes one to Winters Lane.</p> <p>I agree with the assessment that spatially parcel S4’s openness is high, whilst visually there are views across much of the site, and</p>

			whilst the copse may constrain views, the wooded area itself is part of the open countryside.
21	Section 3.2 (page 15)	<i>Results of Green Belt Assessment of Purposes: Parcel S4”</i> <i>‘check unrestricted sprawl’</i>	As noted by Mr Melling, this land parcel is not adjacent to the airport.
22	Section 3.2 (page 15)	<i>Results of Green Belt Assessment of Purposes: Parcel S4”</i> <i>‘assist in safeguarding the countryside from encroachment’</i>	I agree with Mr Melling’s assessment that parcel S4 helps to maintain openness by safeguarding the countryside from encroachment.
23	Table 4.1 (page 18)	<i>Evaluation Template Relating to Site Development</i>	Mr Melling has provided a number of ‘guide questions’ that can be asked in relation to the likely effect of development upon the Green Belt. I have indicated an additional seven questions, in response to Table 3.1 (see point 7 above), that I use in order to assess and evaluate the impact of the proposed development upon the parcels of land within the Green Belt.
24	4.4.5 (page 21)	<i>“The western boundary of the Silver Zone Phase 1 Car Park is contained by a bund and a mature</i>	I agree that there is a bund on the western boundary of the seasonal car park (as there is on the southern boundary), however, there was no mature hedgerow with trees on this boundary (rather the northern

		<i>hedgerow with trees runs parallel to the southern and central part of the western boundary.”</i>	boundary appeared well planted). With the difference in levels between Winters Lane and the seasonal car park, there were clear views down into the car park, and I anticipate that were the car park to have been in use the block parking of thousands of cars would have a significant visual impact – though due to the pandemic, on both occasions that I have visited, the car park has been deserted (see photographs in Appendix B of this rebuttal proof).
25	4.4.6 (page 21)	<i>“The southern boundary of the Silver Zone Phase 1 Car Park is contained by a ~2m high perimeter bund with recent tree and shrub planting.”</i>	The southern boundary bund is clearly visible from Winters Lane as one looks down into the seasonal car park. This manmade structure, an alien feature in the landscape, does form a partially defensible and defined boundary demarcating the perimeter of the airport.
26	4.4.7 (page 21)	<i>“The proposal is to replace the temporary lighting with permanent lighting columns at a similar height and design to the lighting columns within the permanent Silver Zone parking area to the east.”</i>	The temporary lighting columns are exactly that, temporary, brought on to the seasonal car park at the beginning of May and taken off at the end of October, at which point, the seasonal car park reverts on the main to having the appearance of a field (albeit not as green as the fields around and retaining the vestiges of its summer use – including the asphalt roads).

27	4.4.13 (page 22)	<i>“Potential visual receptors”</i>	<p>I concur with the identification of the potential visual receptors that are likely to be impacted by the proposed extensions to the Silver Zone car park (Phase 1 and Phase 2).</p> <p>From my site visits I did not enter private land nor individual dwellings so I am not able to confirm the assessment in paragraphs 4.4.15 and 4.4.20.</p>
28	4.4.16 (page 23)	<i>“A localised view is available near a right-angle bend on Winters Lane to the south of the airport runway.”</i>	<p>From Winters Lane this appears to be the main view of the site, though the overall impact of the parking of up to 3,650 vehicles within the Silver Zone Phase 1 extension and the proposed additional 2,700 in the Phase 2 extension could not be fully appreciated, since the pandemic has resulted in the Silver Zone car parks being closed, with no vehicles being located in these areas.</p> <p>Whilst the assessment describes this vantage point as offering fleeting views and indicates that these would be increasingly filtered as the planting becomes established, from my site visits I encountered walkers, cyclists, plane spotters and motorists on Winters Lane, all of whom would have views of cars parked in the Phase 1 extension (with the Phase 2 behind). The land slopes down from Winters Lane to the seasonal car park and the 2m high bund</p>

			<p>does not obscure the site behind, which with cars on it would be more obtrusive. The planting that was approved with the original permission for the seasonal car park in 2016, has yet to become established, consequently there are clear views of the bund which appears as an alien feature, together with the perimeter fence, surface parking, asphalt roads and temporary lighting columns beyond.</p>
29	<p>4.4.18</p> <p>(page 23)</p>	<p><i>“Public Right of Way network – West and North of Redhill”</i></p>	<p>Whilst there were no cars parked in the Silver Zone at the time of my site visits, I am inclined to agree with the assessment that due to the topography and vegetation between the public footpath from Hailstone Cottages to Winters Lane it is unlikely that there would be views of vehicles behind the bund that forms the southern boundary of the seasonal car park, nor likely to be views of cars within the proposed Silver Zone Phase 2 extension.</p>
30	<p>4.4.22</p> <p>(page 24)</p>	<p><i>“Long range views from elevated land within the Mendip Hills AONB”</i></p>	<p>I have been able to visit the Mendip Hills AONB and walk from the Burrington Ham car park to locations where there are distant views of the airport to the north (directed by local residents to the vantage points). I also gained views from Two Trees (a road linking the B3134 to the village of Blagdon), where again there were views of the airport.</p>

			<p>Due to the fact that the Silver Zone car park was not in operation at the time of my visits, nor when Mr Melling's site visit was undertaken in April 2021, I am not surprised by the statement that <i>"neither the Silver Zone Phase 1 Car Park nor the site of the Silver Zone Phase 2 Car Park were identifiable."</i></p> <p>The most prominent features when viewed from the Mendip Hills AONB are the aircraft (with their vivid colours and tall tails) against a backdrop of 'grey' structures (the most recent visit in June was on an overcast day). Given that the Silver Zone car park was not in use, it was not possible to identify the area of existing or proposed parking, however, the addition of some 6,350 cars year round, whilst not readily distinguishable at a distance from the existing spaces, would increase the built mass and sprawl.</p>
31	4.4.32 (page 26)	<i>"The proposed indicative lighting regime for the Silver Zone Phase 2 Car Park would have a minor adverse impact upon the visual amenity of receptors."</i>	<p>Since the Silver Zone car park was not in operation when I visited the airport, I have not been able to assess the impact of the lighting regime, though from my stay at the airport hotel in January 2021, I recognise that the lighting on the North Side (within the Green Belt Inset) is likely to be more obtrusive than that on the South Side. Nevertheless, the proposal will introduce permanent year round</p>

			lighting into the seasonal car park and also new lighting into the open countryside for the Silver Zone Phase 2 extension.
32	Table 4.5 (page 27)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 1 Site Development”</i></p> <p><i>“What is the nature and extent of the harm to the Green Belt arising from site development”</i></p>	<p>In response to this question Mr Melling’s assessment is that the impact would be ‘Limited’. I would disagree. His own Table 4.3 sets out the criteria that he uses for the ‘Degree of Harm’ and the description of ‘Limited’ is given as: <i>“No discernible effect of development on physical and/or visual openness and permanence.”</i></p> <p>The Silver Zone Phase 1 car park introduces permanent built development into the Green Belt and results in the use of the previously open field for block parking 365 days in the year, rather than the seasonal use currently permitted. As set out in my proof of evidence, this will have clear adverse effects on both the physical and visual openness of the Green Belt and the changes would be permanent. On the basis of Mr Melling’s own significance criteria, I would suggest that his assessment should have found the harm to be ‘Significant’, which accords with the assessment in my proof of evidence.</p>

33	Table 4.5 (page 27)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 1 Site Development”</i></p> <p><i>“To what extent could the impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?”</i></p>	<p>Mr Melling indicates that <i>“substantial landscaping (bunds and planting) has already been introduced on the southern and western boundaries.”</i> I have already commented on the fact that the manmade bund is an alien feature, and that the planting has not matured, with clear views into the site from Winters Lane. In my proof of evidence I did comment on this further, accepting that over time the planting is likely to limit views, however, the proposed development does allow the year round use of the site and introduces permanent built development that will be present in the winter months when views into the site are likely to be less well screened and the visual impact is likely to be greatest.</p>
34	Table 4.5 (page 27)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 1 Site Development”</i></p> <p><i>“Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable?”</i></p>	<p>The two metre high engineered bund (approximately thirteen metres wide at its base) provides a physical feature that reflects bunds around other sections of the Silver Zone car park that have been in place for years and defined the airport's operational boundary.</p> <p>In relation to the Silver Zone Phase 1 extension, this existing bund does differentiate the operational area of the airport from the agricultural fields to the south.</p>

35	Table 4.5 (page 28)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 1 Site Development”</i></p> <p><i>“If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site’s development?”</i></p>	<p>I agree with Mr Melling’s assessment that the surrounding fields would still serve at least one of the five purposes of the Green Belt, that purpose being to assist in safeguarding the countryside from encroachment (though as noted in the North Somerset Green Belt Assessment April 2021, the Council considers that purpose 5, ‘assisting with urban regeneration’, would also be served). However, as is clearly evident both from the past history of the airport’s incremental expansion, and the current proposal to introduce a further 2,700 parking spaces on the adjacent open field, there will be harm to the Green Belt, both spatially and visually, and the southward migration of the airport undermines the purposes of the Green Belt.</p> <p>Whilst Mr Melling differentiates between the Silver Zone Phase 1 extension (which he describes as low profile development) and that associated with buildings, I would differentiate between this area on the South Side and the Green Belt Inset on the North Side, where built development has been concentrated. The Inspector’s Final Report into the Replacement Local Plan in April 2006, made such a distinction, noting that the Green Belt Inset was broadly <i>“the area within which development would be least likely to injure the visual</i></p>
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			<p><i>amenities of the Green Belt</i>” (paragraph 46.10). The year round introduction of parked cars and the associated permanent built development, would represent encroachment into the Green Belt and undermine that purpose, as well as causing a loss of openness in spatial and visual terms (consistently with the Inspector’s Report).</p>
36	Table 4.5 (page 28)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 1 Site Development”</i></p> <p><i>“Overall Conclusions on the Likely Effects on the Green Belt of Site Development”</i></p>	<p>As noted above, I disagree with Mr Melling’s overall conclusion that the degree of harm would be ‘Limited’, on the basis of his assessment criteria I find it to be ‘Significant’. My proof of evidence provided an assessment of the harm to the Green Belt, considering the: spatial and visual harm; permanence, remediability and duration; and traffic generation. I also considered the harm against the purposes of including land within the Green Belt, with the proposed development amounting to encroachment into the open countryside, together with the cumulative impacts of the series of intrusions that have taken place over the years on the South Side of the Airport.</p> <p>Whilst Mr Melling considers that the effects of harm can be minimised through existing and proposed landscaping measure, I do not give much weight to his suggestion, since the manmade bund is an alien feature, is at a level that is lower than Winters Lane and</p>

			<p>does not screen the vehicles that would be parked behind it, whilst the landscaping to date has not succeeded in screening the site and in the winter months would be less effective at precisely the time when new harm will have been introduced into the Green Belt through the extension of the parking season to cover the whole year.</p> <p>Below I address my seven further questions that I identified in point 7 above,</p> <p><i>a) Is there built form in the individual land parcels and what is the nature of that built form?</i></p> <p>Yes. Parcel S1 includes a number of buildings, significant areas of hard standing, large areas for the parking of vehicles, associated built development such as permanent lighting/CCTV columns, barriers, fencing and perimeter bunds. However, the seasonal car park does not include this level of built form. The asphalt perimeter roads and aisles, together with the ‘grasscrete’ parking areas are permanent built development, though the light columns and CCTV masts are temporary and removed from site when the Silver Zone Phase 1 extension is not in use. The impact upon the Green Belt in terms of spatial harm is addressed in paragraphs 52-</p>
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			<p>54 of my proof of evidence, the visual harm in paragraph 61 and the permanence and remediability in paragraphs 64 and 66.</p> <p><i>b) How much undeveloped land lies within the individual land parcels and what is the nature of that undeveloped land?</i></p> <p>The vast majority of parcel S1 has been developed with hardsurfacing, light columns, CCTV masts and paved access roads. However, the Silver Zone Phase 1 extension is less developed since it is not given over to permanent year round parking, rather its use is seasonal, with elements of the built form (together with the vehicles) being removable and not in place for half the year.</p> <p><i>c) Are there any definitive boundaries in the individual land parcels and do those boundaries contain existing development? Is there opportunity to create permanent boundaries?</i></p> <p>Parcel S1 has some definitive boundaries, with the A38 defining the eastern boundary, the manmade perimeter bunds the majority of the southern and western boundaries, and the</p>
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			<p>airfield the northern boundary. The southern, western and eastern boundary features are permanent, whilst the airfield to the north is open and predominantly flat (albeit security fencing divides parcel S1 from the airfield itself).</p> <p>The Silver Zone Phase 1 extension includes the manmade bunds on the southern and western boundaries (together with a well vegetated bund on the eastern boundary).</p> <p><i>d) Do the individual parcels of land define/constrain existing built development?</i></p> <p>Parcel S1 has not constrained development since the site falls within the operational boundary of the airport and by virtue of past planning permissions, BAL as a statutory undertaker can, and has, made use of its PDR on this operational land in order to undertake development in connection with the provision of services and facilities at the airport.</p> <p>The Silver Zone Phase 1 extension is more constrained, given the planning conditions that restrict its use, such that it is only used between May and October, and lighting columns, CCTV masts and vehicles have to be removed for half the year.</p>
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			<p>e) <i>What is the current use of the individual parcels of land and how does the land use relate to the purposes of the Green Belt?</i></p> <p>The majority of Parcel S1 (which is approximately 36.5ha) is taken up with parking associated with the Silver Zone (circa 27.5ha). Other uses within S1 include the Snow Base, hangars, office buildings, car hire/rental buildings and associated parking. None of these uses relate to the purposes of including land within the Green Belt. The Silver Zone Phase 1 extension is used for six months in the year, and consequently for the winter/spring months when the site is not in use, it plays more of a role in safeguarding the countryside from encroachment.</p> <p>f) <i>Have the individual parcels of land been subject to development pressure (planning history)?</i></p> <p>Appendices 1 and 3 of my proof of evidence provide some of the planning history associated with parcel S1, though these appendices have concentrated upon development associated with the provision of car parking and not listed other</p>
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			<p>permissions or PDR consultations for buildings within the area.</p> <p>The Silver Zone Phase 1 extension has been subject to development pressure, firstly with the 2016 permission permitting the change of use from agricultural land to the seasonal use for the parking of up to 3,650 vehicles, whilst a subsequent application in 2018 permitted the temporary use for the winter period (November 2018 to April 2019). The permissions are set out in Appendix 3 of my proof of evidence.</p> <p><i>g) What opportunities are there to enhance the beneficial use of the individual parcels of land (paragraph 141 of the NPPF)?</i></p> <p>There are limited opportunities given that this land is operational land within the airport and BAL has taken the opportunity to undertake development over the majority of the land. The only element of the site that could be enhanced without significant work is the seasonal car park, which has more of an appearance of an open field than other sites within Parcel S1, due to the restrictions preventing its year round use and requiring lighting columns and CCTV columns to be removed for six months in the year.</p>
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37	Table 4.6 (page 28)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 2 Site Development”</i></p> <p><i>“What is the nature and extent of the harm to the Green Belt arising from site development?”</i></p>	<p>Mr Melling has identified the level of harm to be ‘Moderate to Limited’. Within his criteria in Table 4.3 this would mean that the proposed Silver Zone Phase 2 extension would have <i>“some effects...on physical and/or visual openness and permanence with opportunities for mitigation.”</i> I would strongly disagree with this assessment, which does not reflect his own criteria.</p> <p>As set out in my proof of evidence, the introduction of 2,700 vehicles into this open field with the associated paraphernalia of built development would have a significant effect. Using Mr Melling’s own criteria, there would be <i>“clear adverse effects of development on physical and/or visual openness and permanence which is unlikely to be successfully mitigated.”</i></p> <p>It appears that Mr Melling has sought to play down the harm arising from this inappropriate development by referring to the size of the site as being similar to that of the seasonal car park to the north. As noted in my proof of evidence the combined area of these two fields is 12.9ha and the total number of cars that would be parked on these areas would be 6,350. This represents both a significant spatial intrusion and visual intrusion into the Green Belt, bringing permanent built development further south into the open countryside.</p>
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38	Table 4.6 (page 28)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 2 Site Development”</i></p> <p><i>“To what extent could the impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?”</i></p>	<p>Mr Melling’s assessment does not address the purpose of the Green Belt that is relevant in this case, namely <i>“to assist in safeguarding the countryside from encroachment.”</i> Rather he refers to the fact that <i>“substantial boundary vegetation exists on the southern extent of the site.”</i> Whilst there are hedgerows around the site, I would anticipate that these are likely to be lost by the construction of the bund that would be proposed to screen the parked vehicles behind, and based on the experience of the seasonal car park, the new boundary landscaping would take some time to become established.</p> <p>Mr Melling contends that the <i>“strengthened boundary vegetation would be of a similar character to that already used to contain similar development in this location”</i>, however, that does not ameliorate the harm that would be caused by the encroachment of 2,700 vehicles into the open countryside, nor would the landscaping reduce that impact to the ‘lowest reasonably practicable extent.’</p>
39	Table 4.6 (page 29)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 2 Site Development”</i></p>	<p>There is currently no defined Green Belt boundary around the site. The field has hedgerows around it, which is common for agricultural land in the open countryside. The northern and eastern boundaries are defined by manmade bunds, which are alien features that have</p>

		<p><i>“Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent?”</i></p>	<p>been introduced by BAL in an attempt to screen the car parking that has built up behind them on the airport operational land. However, the land behind the bunds also falls within the Green Belt, as does the open expanse of the airfield up to the point where the aircraft stands begin to the north of Taxiways Golf and Zulu (the Green Belt Inset).</p>
40	Table 4.6 (page 29)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 2 Site Development”</i></p> <p><i>“If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site’s development?”</i></p>	<p>I agree that the surrounding fields to the south and west would continue to fulfil the Green Belt purpose of assisting in safeguarding the countryside from encroachment. However, there would inevitably be pressure on the adjacent fields from development pressure associated with the airport.</p>
41	Table 4.6 (page 29)	<p><i>“Assessment of the Likely Effects on the Green Belt of the Proposed Phase 2 Site Development”</i></p>	<p>I agree with Mr Melling that the principal purpose of the Green Belt in relation to the field that is within parcel S2 is to prevent the encroachment into the open countryside, as such the proposed</p>

		<p><i>“Overall Conclusions on the Likely Effects on the Green Belt of Site Development”</i></p>	<p>Silver Zone Phase 2 extension is inappropriate development and conflicts with this purpose of the Green Belt.</p> <p>As noted above I strongly disagree with Mr Melling's assessment that the impact is 'Moderate to Limited', even with the mitigation that BAL propose, the harm based on Mr Melling's criteria would be 'Significant'. I also disagree with his assertion that <i>“the harmful effects can be mitigated through landscaping of site boundaries”</i> and his conclusion that with the 'mitigation' the harm would be 'Limited'.</p> <p>As set out in my proof of evidence the introduction of 2,700 vehicles into this open field, together with the permanent operational development that is required, would have a significant impact upon the openness of the Green Belt in spatial terms, and whilst views of the site may be more restricted than the Silver Zone Phase 1 extension, there will be visual harm caused by the proposed development, which will present a stark contrast to the current open nature of the field.</p> <p>Addressing my seven further questions that I identified in point 7 above,</p>
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			<p><i>a) Is there built form in the individual land parcels and what is the nature of that built form?</i></p> <p>No. Whilst Parcel S2 may have a few buildings on the eastern periphery adjacent to the A38, the field proposed for the Silver Zone Phase 2 extension is open agricultural land with no built development and located outside the airport's operational boundary.</p> <p><i>b) How much undeveloped land lies within the individual land parcels and what is the nature of that undeveloped land?</i></p> <p>The vast majority of parcel S2 has not been developed, whilst the field proposed for the Silver Zone Phase 2 extension is pristine agricultural land.</p> <p><i>c) Are there any definitive boundaries in the individual land parcels and do those boundaries contain existing development? Is there opportunity to create permanent boundaries?</i></p> <p>Other than field boundaries that are demarcated by hedgerows, the only 'permanent' boundary is to the north of</p>
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			<p>Parcel S2, and that is the perimeter fence (and engineered bund) that defines the operational boundary of the airport. In relation to the field proposed for the Silver Zone Phase 2 extension, the bund sits to the north and east (though that boundary has scrub/trees that are becoming well established).</p> <p><i>d) Do the individual parcels of land define/constrain existing built development?</i></p> <p>Parcel S2 constrains the southern expansion of the airport, with the field that is proposed for the Silver Zone Phase 2 expansion being an integral part of that buffer.</p> <p><i>e) What is the current use of the individual parcels of land and how does the land use relate to the purposes of the Green Belt?</i></p> <p>The land is in agricultural use and as such the field proposed for the Silver Zone Phase 2 extension fully relates to the purpose of assisting in safeguarding the countryside from encroachment.</p>
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			<p><i>f) Have the individual parcels of land been subject to development pressure (planning history)?</i></p> <p>Up to this point there has not been development pressure affecting this site.</p> <p><i>g) What opportunities are there to enhance the beneficial use of the individual parcels of land (paragraph 141 of the NPPF)?</i></p> <p>There would be opportunities to enhance the beneficial use of this land in terms of landscape, visual amenity and biodiversity (as evidenced by BAL's proposals in relation to 'Gruffy's field on the Landscape Visual and Ecology Mitigation Masterplan).</p>
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III. CONCLUSION

5. As I have set out above and in my main proof of evidence, I consider that the Silver Zone Phase 1 extension and the Silver Zone Phase 2 extension will cause harm to the openness of the Green Belt, both in visual and spatial terms. I consider this harm to be significant and disagree with Mr Melling's assessment which downplays the harm and does not follow his own criteria.
6. I also consider that the parking extensions will amount to encroachment into the countryside and as such are contrary to the Green Belt purpose in the NPPF (paragraph 134[c]), and disagree with Mr Melling's assessment that the proposed bund and landscaping will ameliorate that harm.
7. In my professional opinion, the Silver Zone Phase 1 and Phase 2 parking extensions will result in a loss of openness, threatening the Green Belt, and conflicting with the purposes of including land within the Green Belt, and Mr Melling's assessment in Appendix A does not alter my opinion.

APPENDIX A: North Somerset Green Belt Assessment April 2021

Contents

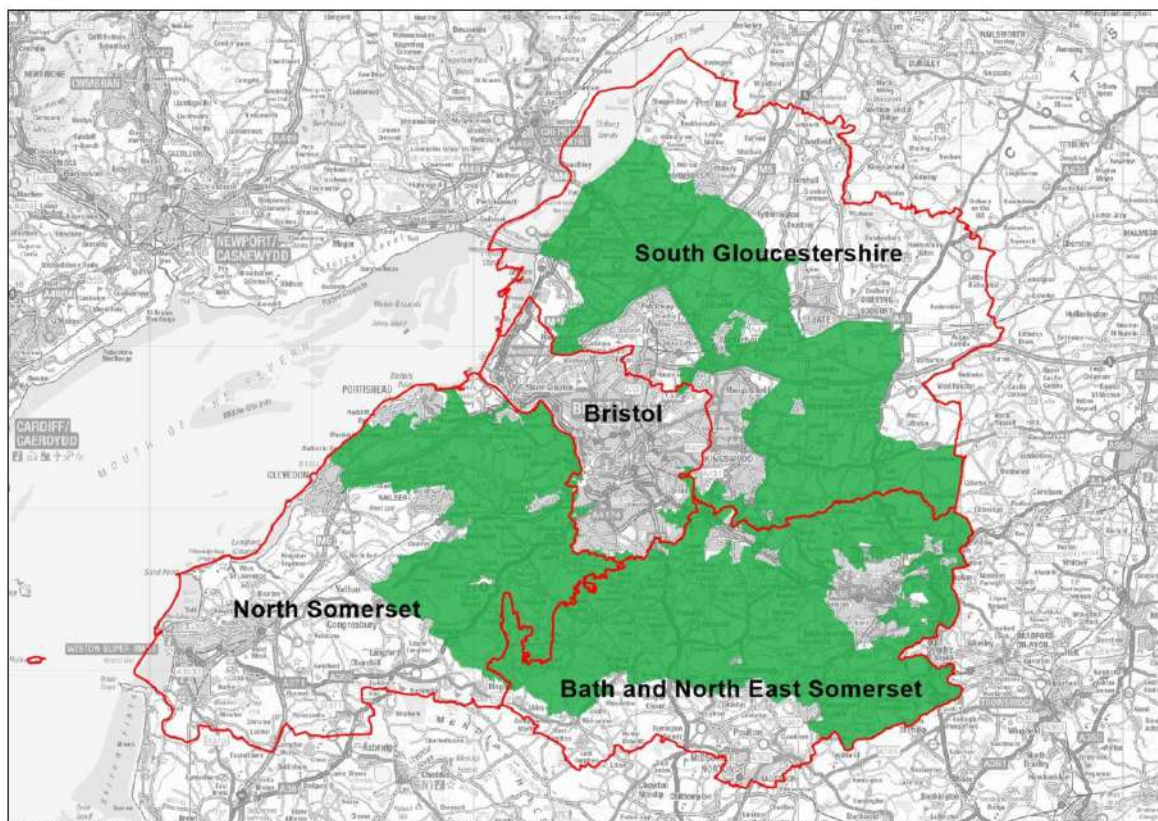
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1. Objective and Purpose

1.1 The objective of this document is to provide a strategic assessment of the Green Belt across North Somerset. This assessment provides part of the evidence base for the North Somerset Local Plan 2038. It helps to inform the consideration of the four approaches set out in the Choices for the Future Consultation in 2020. It assesses the whole Green Belt across the plan area in relation to the purposes of Green Belts as set out in the National Planning Policy Framework. For the purposes of this study, the Green Belt has been divided into cells which have been assessed to determine which of the five purposes of Green Belt they serve, having regard to the essential characteristic of openness. The assessment also identifies and describes any changes to the characteristics of locations within the Green Belt.

1.2 The assessment is based on earlier work carried out by the West of England as part of the evidence base for the Joint Spatial Plan. It has however been reviewed and updated where necessary. The assessment relates only to the North Somerset element of the Green Belt and cells and text have been amended accordingly. It is acknowledged that the Green Belt in North Somerset is part of the wider Bristol and Bath Green Belt and the council will continue to engage with neighbouring authorities regarding any proposals which may affect the designation.

Figure 1 Bristol and Bath Green Belt



2. National Planning Policy

2.1 The National Planning Policy Framework (NPPF) explains that the government attaches great importance to Green Belts. The NPPF states:

‘The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.’ (NPPF paragraph 133)

The NPPF goes on to state that Green Belt serves five purposes. These are:

- ‘to check the unrestricted sprawl of large built-up areas;*
- to prevent neighbouring towns merging into one another;*
- to assist in safeguarding the countryside from encroachment;*
- to preserve the setting and special character of historic towns; and*
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. (NPPF paragraph 134)*

The NPPF explains that the general extent of Green Belts across the country is already established (paragraphs 135-136) and that boundaries

‘should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.’

3. History of the Green Belt

3.1 The Bristol and Bath Green Belt was broadly established in the mid-1950s through the Gloucestershire, Somerset and Wiltshire County Development Plans. The majority of the Bristol and Bath Green Belt fell within the Somerset authority area and the Green Belt designation was locally adopted in 1957 and then given Ministerial approval in 1966.

3.2 The Avon County Structure Plan of 1985 defined the general extent of the Green Belt at that time with the detailed boundaries then defined in Local Plans. These included the South West Avon Green Belt Local Plan which was adopted in 1988.

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

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

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

3.4 The aim of the Green Belt in the West of England has been, in the main, to prevent the urban sprawl and merger of Bristol and Bath. It is apparent, however, from the 2002 Joint Structure Plan that emphasis was placed on preserving the setting and special character of the villages and towns within the Green Belt, as well as the overall aim of checking the growth of Bristol and Bath and preventing the merger of the two cities.

3.5 The current extent of the Bristol and Bath Green Belt is shown in Figure 1.

4. North Somerset's Green Belt today

4.1 The current extent and detailed boundaries of the Green Belt in North Somerset is defined on the Policies Map. It covers 15,490 hectares (40%) of land in North Somerset. The North Somerset Core Strategy (2017) includes a policy for the Green Belt which confirms that the boundary remains unchanged from the previous Plan (the North Somerset Replacement Local Plan 2007). The explanatory text of Policy CS6 North Somerset's Green Belt (paragraph 3.91) identifies the five functions Green Belt performs. Paragraph 3.93 goes on to say:

‘The protection and maintenance of the Green Belt is very important to the affected communities and ensures a clear distinction between urban Bristol and rural North Somerset. It makes an important contribution to their local character and distinctiveness and is highly valued and strongly supported’.

4.2 The last time changes were made to the Green Belt was in the North Somerset Replacement Local Plan 2007. This Plan extended the Green Belt between the Royal Portbury Dock and the new development to the east of Portishead whilst excluding an area at Court Farm specifically for port related uses. The Replacement Local Plan also created an inset in the Green Belt at Bristol Airport to accommodate medium term expansion requirements.

5. Green Belt Assessment Methodology

5.1 This assessment is based on that carried out by the four local authorities as part of the evidence for the Joint Spatial Plan¹. It extracts the information for the North Somerset area, updates reference to developments which have taken place and document references. Cells, which had previously crossed Local Authorities boundaries, have been adjusted to correspond with the unitary boundary.

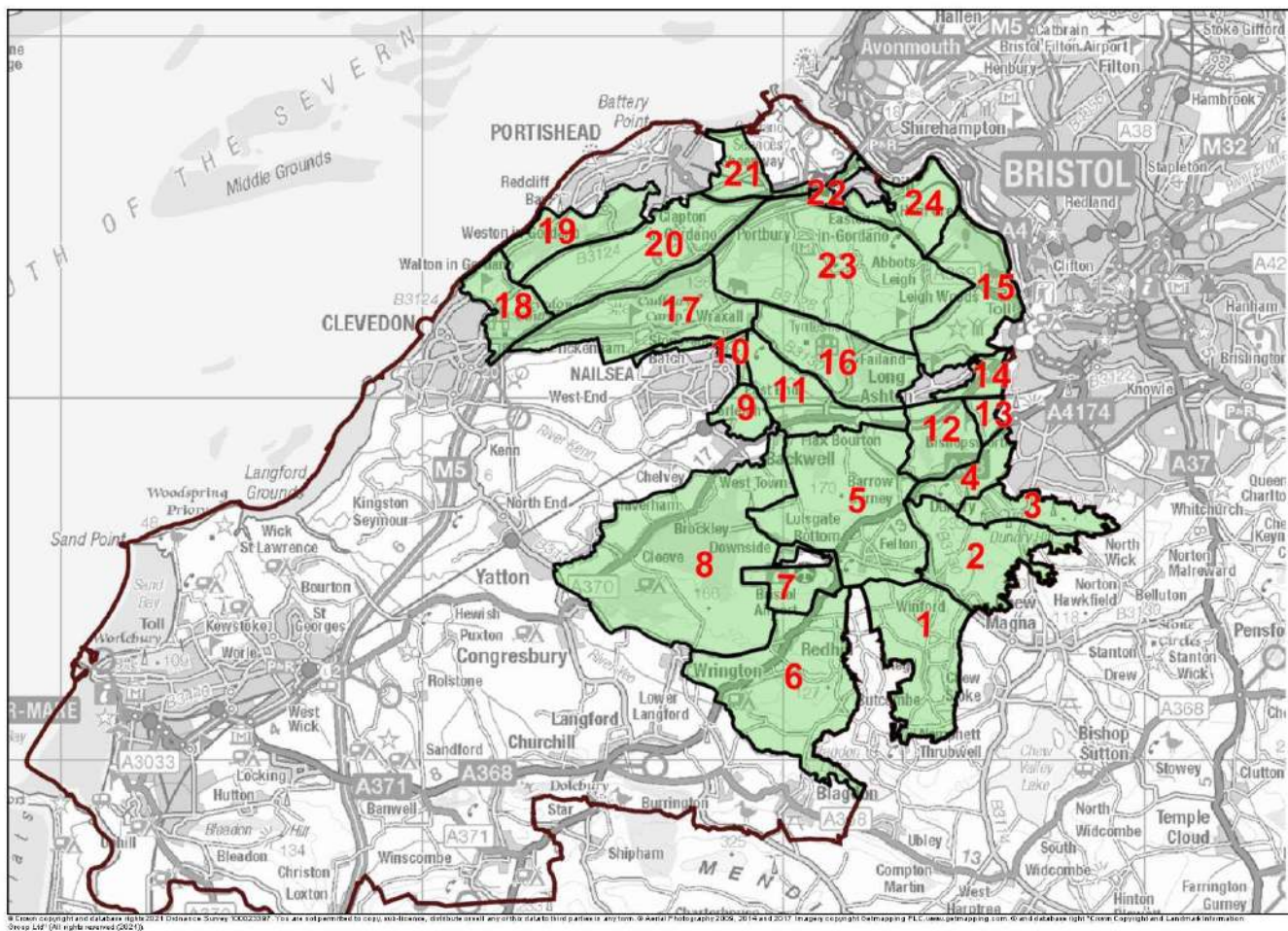
Definition of the cells

5.2 Twenty-four cells are identified in North Somerset. They provide manageable areas for analysis and presentation of results. Cells have been renumbered but generally reflect that used in the JSP assessment with some cells amended to correspond with the North Somerset administrative boundary.

5.3 Clear physical features have been used wherever possible in identifying assessment cells. These include motorways, roads, railways, rivers or water features, belts of trees and woodland. Consideration has also been given to landscape character and/or topography, including existing land use, plus any boundaries of designated historic/ecological sites (where they have identifiable boundaries). Boundaries do not cross administrative areas the cells relate solely to North Somerset.

5.4 Each cell was given a reference number and a name to assist with identification. These are shown on the map and in the matrix.

¹ West of England Joint Spatial Plan Nov 2015



Assessment of cell against the 5 purposes

5.4 The five purposes of Green Belts set out in the NPPF form the basis for the assessment. These are listed below in table 1 alongside the form of analysis which was undertaken for each purpose.

Table 1:

National policy: Purposes of Green Belt	Cell analysis
1. To check the unrestricted sprawl of large built-up areas	Assessment of whether cell performs the purpose of checking the unrestricted sprawl of the Bristol built-up area.
2. To prevent neighbouring towns merging into one another:	Assessment of the cell and whether it prevents neighbouring towns merging into one another. Consideration of whether the cell contributes to purpose 2 by preserving the individual character, identity and setting of villages and hamlets within the Green Belt.

National policy: Purposes of Green Belt	Cell analysis
3. To assist in safeguarding the countryside from encroachment	Assessment of the cell and whether it performs the role of assisting in safeguarding the countryside from encroachment. Assessment informed by consideration of existing use and topography
4. To preserve the setting and special character of historic towns	Assessment of the cell and whether it performs the role of preserving the setting and special character of historic towns. Consideration given to historic areas and their setting and special character with reference to settlements designated as or containing Conservation Areas.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Assessment of the cell and whether it performs the role of assisting urban regeneration. Noting that this purpose is served by all Green Belt areas, particular note is taken of the relationship of the cell with areas of urban regeneration.

The assessment matrix also includes a description and summary.

Description and summary	An overall description of the features of each cell with particular reference to openness. Identification of any changes in the cell since the Green Belt was most recently designated in the Local Plan. A summary of whether the cell contributes to serving any of the five purposes.
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5.5 The assessment process made use of the following sources of information:

- Up-to-date aerial photography – images for each cell were examined systematically to enable the cell to be described and for it to be assessed against the five purposes.
- Data in geographic information systems – these were interrogated to identify mapped features such as AONB or heritage assets.
- Planning application records – were examined to identify planning permissions for development in the Green Belt which may have implications for the cell being assessed.

- Site visits/professional knowledge – these were used to verify information identified from aerial photography

6. Results

6.1 The results of the cell assessment are set out in the matrix below. Ticks and green shading are used to denote when a cell clearly meets one of the purposes of the Green Belt. (The criteria in bold in Table 1) The commentary notes the additional analysis set out in Table 1.

A series of maps shown in the conclusion set out how the cells are assessed against each purpose.

Cell No. (JSP cell no) Name	1. To check the unrestricted sprawl of large built-up areas	2 To prevent neighbouring towns merging into one another	3. To assist in safeguarding the countryside from encroachment	4. To preserve the setting and special character of historic towns	5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Description and Commentary
1 (part 56 & part 61 JSP) South of Winford	-	- (Maintains the separation of villages and settlements - Winford, Chew Stoke, Chew Magna)	✓ Safeguards mainly open agricultural land from encroachment	-	✓	This land to the south of Winford consists mainly of undulating open farmland. The Green Belt in this cell directly serves purposes 3 and 5.
2 (part 57 JSP). Land to north and east of Winford, and south of Dundry	- Northern section helps to check the sprawl of Bristol	- (Maintains the separation of villages and settlements Dundry, Winford and Chew Magna)	✓ Safeguards mainly open agricultural land from encroachment.	-	✓ Adjacent to the south Bristol regeneration area	This land to the south of Dundry, and to the north and east of Winford consists mainly of rural undulating farmland with occasional woodland and belts of trees. Parts are steeply sloping particularly as the land rises to the Dundry ridge. The high ground and topography particularly to the north are prominent landscape features. The Green Belt in this cell directly serves purposes 3 and 5.



Cell No. (JSP cell no) Name	1. To check the unrestricted sprawl of large built-up areas	2 To prevent neighbouring towns merging into one another	3. To assist in safeguarding the countryside from encroachment	4. To preserve the setting and special character of historic towns	5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Description and Commentary
3 (part 58 JSP). Dundry Ridge	✓ Checks the sprawl of Bristol	- (Prevents the merger of Bristol with Dundry)	✓ Safeguards mainly open agricultural land from encroachment.	-	✓ Adjoins south Bristol regeneration area.	This land to the south of Withywood and Hartcliffe forms part of the prominent, steeply sloping ridge to Dundry Hill. The extent of the built-up area of Bristol forms the inner Green Belt boundary at a similar height along the ridge. The land is mainly open agricultural land with some woodland and includes the village of Dundry. The high ground and topography make it a highly visible part of the Green Belt with the ridge providing a visual and physical limit to the built up area of Bristol. The Green Belt in this cell directly serves purposes 1, 3 and 5.

Cell No. (JSP cell no) Name	1. To check the unrestricted sprawl of large built-up areas	2 To prevent neighbouring towns merging into one another	3. To assist in safeguarding the countryside from encroachment	4. To preserve the setting and special character of historic towns	5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Description and Commentary
4 (59 JSP) Southeast of the A38 towards Highridge and Dundry	✓ Checks the sprawl of Bristol	-	✓ Safeguards mainly open agricultural land from encroachment	- (The high ground is visible from western parts of the city. There are views to and from Ashton Court Estate)	✓ Adjacent to south Bristol regeneration area	This land cell to the southeast of the A38 abuts the city at Highridge. The land rises progressively toward Dundry and the distinctive hill known as the Peart. The area is predominately open agricultural land although there is some development alongside the A38 and Dundry Lane. The Green Belt in this location has an effect of preventing coalescence of development on the A38 and thus restraining the sprawl of Bristol and towards the airport. The South Bristol link in the far north eastern section of the cell is newly constructed it runs from north of Highridge Common towards the A38 near Castle Farm. The cell directly serves three Green Belt purposes.



Cell No. (JSP cell no) Name	1. To check the unrestricted sprawl of large built-up areas	2 To prevent neighbouring towns merging into one another	3. To assist in safeguarding the countryside from encroachment	4. To preserve the setting and special character of historic towns	5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Description and Commentary
5 (60 JSP) North of Bristol Airport, Felton, Barrow Gurney and south of A370 at Flax Bourton.	-	- (Maintains the separation of villages and settlements Felton, Potters Hill, Winford Barrow Gurney)	✓ Safeguards open agricultural land from encroachment. Some areas of quarrying	- (Preserves the setting of Felton and Barrow Gurney Conservation Areas)	✓	This land to the north of Bristol Airport, contains the villages of Felton and Barrow Gurney and encompasses land to the south of the A370 at Flax Bourton. It is mainly open agricultural land but has a significant area of quarrying. The land slopes downwards towards Flax Bourton. The Green Belt in this location has a role in preventing coalescence of development on the A38 and thus restraining the sprawl of Bristol and towards the airport. The Green Belt in this directly serves purposes 3 and 5.
6 (part 61 JSP) Land northwest and southeast of the A38 at	-	- (Maintains the separation of villages and settlements)	✓ Safeguards mainly open agricultural land from encroachment	-	✓	This land to the northwest and southeast of the A38 at Redhill includes Butcombe, Numpnett Thrubwell and Blagdon Lake. The land is open and undulating rising to the plateau at Bristol



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Redhill, and east of Wrington includes Butcombe, and part of Blagdon Lake.		-Redhill, Butcombe, Numpnett Thrubwell)				Airport. It is interspersed with small rural hamlets. The Green Belt directly serves purposes 3 and 5.
7 (62 JSP) Bristol Airport	-	-	✓ A proportion of the land is in airport uses, the area outside of this serves to safeguard the countryside from encroachment.	-	✓	Bristol airport sits on an elevated plateau. The terminal and built up areas were excluded from the Green Belt in the 2007 North Somerset Replacement Local Plan. Part of the land in the Green Belt is in use by the airport this includes the runway and surface car parking. The land to the south falls towards Redhill and is mainly open and visually prominent. The A38 passes through the western part of the cell. This cell mainly acts to contain the spread of development around the airport and serves purposes 3 and 5.



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8 (63 JSP) Land north of Wrington, south of Backwell extending to Yatton and Congresbury in the west	-	-	✓ The Green Belt safeguards the countryside which is heavily wooded and interspersed with farmland.	- (The Green Belt abuts or includes parts of the conservation areas in Backwell and Wrington preserving their settings.)	✓	This land cell straddling the A370 consists of wooded steep slopes (particularly to the west of the A370) and open farmland. The Green Belt abuts the villages of Wrington Claverham, Yatton, and Congresbury maintaining a substantial area of open land between Bristol and these settlements. The Green Belt directly serves purpose 3 and 5.
9 (64 JSP) Land to the southeast Nailsea and north of Backwell	-	✓ Maintains the separation of Nailsea and Backwell and the merger of this area with Bristol.	✓ Safeguards an area of lower lying open countryside which is mainly agricultural from encroachment	- (Preserves the settling of the Farleigh conservation area at Backwell)	✓	This cell comprises mainly open agricultural land. It is crossed north/south by the main railway line. This land directly serves purposes 2, 3 and 5.

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10 (65 JSP) Land to the north and east of Nailsea	-	✓ To the east prevents the merger of Nailsea with the Bristol urban area and to the north merger of Nailsea and Portishead. Maintains the separation of villages (between Nailsea and Tickenham and Wraxhall)	✓ Safeguards mainly open agricultural land from encroachment	-	✓	The cell comprises open agricultural land to the north of Nailsea, with a stream along the northern edge of the cell. The Green Belt in this cell directly serves purposes 2, 3 and 5
11 (66 JSP) A370 corridor between Backwell and Long Ashton Land and southwest of Clevedon Road near Wraxall	-	✓ The Green Belt serves to prevent merger between Bristol and Nailsea/Backwell, (Maintains separation of villages -Flax Bourton and Farleigh with Long Ashton)	✓ Safeguards predominantly agricultural land and some woodland to the south from encroachment	- (Preserves the setting of the conservation area at Farleigh, Backwell)	✓	Predominantly open agricultural land and some woodland This land cell follows the lower lying land between steeply sloping land to the north and south. It is bounded to the northeast by Clevedon Road and includes the A370 corridor as well as the village of Flax Bourton and the newer development at the former Farleigh hospital site.



Cell No. (JSP cell no) Name	1. To check the unrestricted sprawl of large built-up areas	2 To prevent neighbouring towns merging into one another	3. To assist in safeguarding the countryside from encroachment	4. To preserve the setting and special character of historic towns	5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Description and Commentary
						The Green Belt directly serves purposes 2, 3 and 5.
12 (67 JSP) Land between the A38 and the railway line including Woodspring Golf club and Barrow Hospital	✓ With cell 13 to the east, prevents the sprawl of the Bristol in this direction	✓ Prevents the merger of Nailsea, Long Ashton and Bristol.	✓ Safeguards open countryside which includes agricultural land, a golf course, woodland and a reservoir from encroachment.	- (Preserves the setting of the conservation area at Yanley.)	✓ Adjacent to the south Bristol regeneration area	The land to the east of Monarchs Way public footpath is predominantly open. West of Monarchs Way the land is more wooded and contains the former Barrow Hospital, reservoir and associated water works development. The land sits between the ridge at Dundry to the south and the steep ridge to the north of Long Ashton. The cell directly serves purposes 1, 2, 3 and 5 of the Green Belt.

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13 (68 JSP) Land bounded by the A38, Yanley Lane and the railway line, adjoining Bedminster Down.	✓ Checks the sprawl of Bristol	✓ Prevents the merger of Nailsea, Long Ashton and Bristol.	✓ Safeguards open agricultural and recreational uses from encroachment	- (Preserves the setting of the conservation area at Yanley and includes views from the higher ground towards the Avon Gorge and the Suspension Bridge.)	✓ Adjacent to the south Bristol regeneration area.	<p>This land cell to the east of Yanley Lane abuts the city at Ashton Vale and Bedminster Down. The cell contains a steep sided valley adjacent to Hanging Hill wood. The area is predominately agricultural. It also contains the Yanley landfill site which is being restored and some outdoor recreation.</p> <p>The South Bristol link has recently been constructed bisecting this cell from the A38 to the railway line. The Green Belt directly serves purposes 1, 2, 3 and 5 of the Green Belt.</p>
14 (69 JSP) Land to the east of Long Ashton	✓ Checks the sprawl of Bristol	✓ This area prevents the merger of Long Ashton and Bristol	✓ Safeguards agricultural land although land uses also include a Park and Ride, the Long Ashton bypass and South Bristol Link.	- (Preserves the setting of the Long Ashton and Yanley Conservation Areas. Also helps preserve the setting of the grade 1 Ashton Court Estate.)	✓ Adjacent to south. Bristol regeneration area	<p>Most of this land to the east of Long Ashton is in open agricultural use. It is also the site of a park and ride facility.</p> <p>It is crossed by route corridors including the SBL. The land adjoins an area of Green Belt in Bristol City which BCC are proposing</p>

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						to release from the Green Belt. The land directly serves purposes 1, 2, 3 and 5.
15 (70 JSP) Ashton Court, Leigh Woods	✓ Land is immediately adjacent to the Avon Gorge. The river and gorge provide a significant physical boundary. The Green Belt prevents the sprawl of Bristol extending beyond this boundary.	- (The Green Belt serves to maintain the separation of settlements Abbots Leigh, Leigh Woods and Long Ashton)	✓ The land safeguards the countryside from encroachment.	✓ Preserves an open setting for the Gorge and Suspension Bridge, preserves the setting of the conservation areas in Clifton, central Bristol and Leigh Woods. Also contains the Ashton Court Estate.	✓	Area of land including the open environment of the Ashton Court Estate and Leigh Woods to the west of the Avon Gorge with extensive recreation uses. Land is heavily wooded including the ridge to the north of Long Ashton. Area also includes nationally important environmental designations. The cell directly serves purposes 1, 3, 4, and 5.
16 (71 JSP) Wraxall, Failand, the Tyntesfield	-	✓ Helps prevent the merger of Nailsea, Long Ashton and Bristol	✓ This land safeguards the countryside from encroachment.	- (The Green Belt assists in preserving the setting of	✓	This area forms part of the steep sided ridge in the vicinity of Wraxhall and Failand and includes the Tyntesfield estate (National Trust). The area is primarily



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Estate to the west of Long Ashton			There is also significant recreational and agricultural use	Tyntesfield House and the country estate.)		open and undeveloped, with heavily wooded areas, agricultural land and open recreation uses. The Green Belt in this cell directly serves purposes 2, 3 and 5
17 (72 JSP) Tickenham Ridge	-	✓ Prevents the merger of Portishead and Nailsea. Maintains the separation of villages and settlements (Tickenham, Wraxall)	✓ Safeguards mainly open agricultural land and woodland from encroachment	-	✓	Steeply sloping ridge to the north of Nailsea and south of the M5. Primarily open land which includes the village of Tickenham and residential development at Cadbury Camp Lane. Directly serves purposes 2, 3 and 5.
18 (73 JSP) Northeast of Clevedon	- (Prevents the spread of Clevedon to the northeast.)	✓ Prevents the merger of Clevedon and Portishead	✓ Safeguards areas of woodland and agricultural land from encroachment	- (Preserves the setting of Walton Conservation Area)	✓	Area of land to the northeast of Clevedon includes steeply sloping ridges separated by the Gordano Valley. Open agricultural land, woodland and a golf course. The Green Belt in this cell directly serves purposes 2, 3 and 5.



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19 (74 JSP) Southwest of Portishead	- (Prevents the spread of Portishead to the south and southwest.)	✓ Prevents the merger of Clevedon and Portishead. Maintains the separation of villages (Weston in Gordano) from Portishead.	✓ Safeguards open countryside including from encroachment	- (Part of the wider setting of Portishead and preserves the setting for the Weston in Gordano Conservation Area)	✓	Open agriculture and extensive woodland. Area of higher ground between the coast and the Gordano Valley including Portishead Down. The Green Belt directly serves purposes 2, 3 and 5.
20 (75 JSP) Gordano Valley	-	✓ Prevents the merger of Portishead and Nailsea and maintains the separation of Clapton in Gordano and smaller settlements	✓ Safeguards open countryside from encroachment.	-	✓	Visually prominent area of land to the north of the M5 motorway primarily in open agricultural or nature conservation use. Includes the villages of Clapton in Gordano and part of Weston-in Gordano. Part of cell is designated as Gordano National Nature Reserve. The Green Belt in this cell directly serves purposes 2, 3 and 5
21 (76 JSP) Area at Sheepway	✓ Checks the urban sprawl associated with Bristol Port (Portbury)	✓ Maintains the separation of the Bristol urban areas at Bristol Port from Portishead	✓ Safeguards the countryside and environmental designation in this	-	✓	Area of open countryside between the Port and Portishead at Sheepway containing Portbury Wharf Nature Reserve and

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between the Royal Portbury Dock and Portishead			area from encroachment			agricultural land. Adjoins Bristol Port. The Green Belt is this cell was designated in the North Somerset Replacement Local Plan 2007. Directly serves purposes 1, 2, 3, and 5.
22 (77 JSP) Small parcel of land between the M5 and Easton-in-Gordano	✓ Helps to contain the urban sprawl of Bristol Port	-	✓ Safeguards some open agricultural land from encroachment	-	✓	Small parcel of land between the M5 and Easton in Gordano. Comprises open agricultural land and river bank area. There is some development including a motorway service station. The M5 motorway and a branch railway line pass through the cell. It adjoins Bristol Port. Directly serves purposes 1, 3 and 5.
23 (78 JSP) Area to the south of the A369, north of the	-	- (Maintains the separation of villages and settlements - Portbury, Lower	✓ Safeguards countryside which is mainly agricultural and woodland.	-	✓	Area of undulating open countryside with some prominent steep slopes. This cell directly serves purposes 3 and 5.

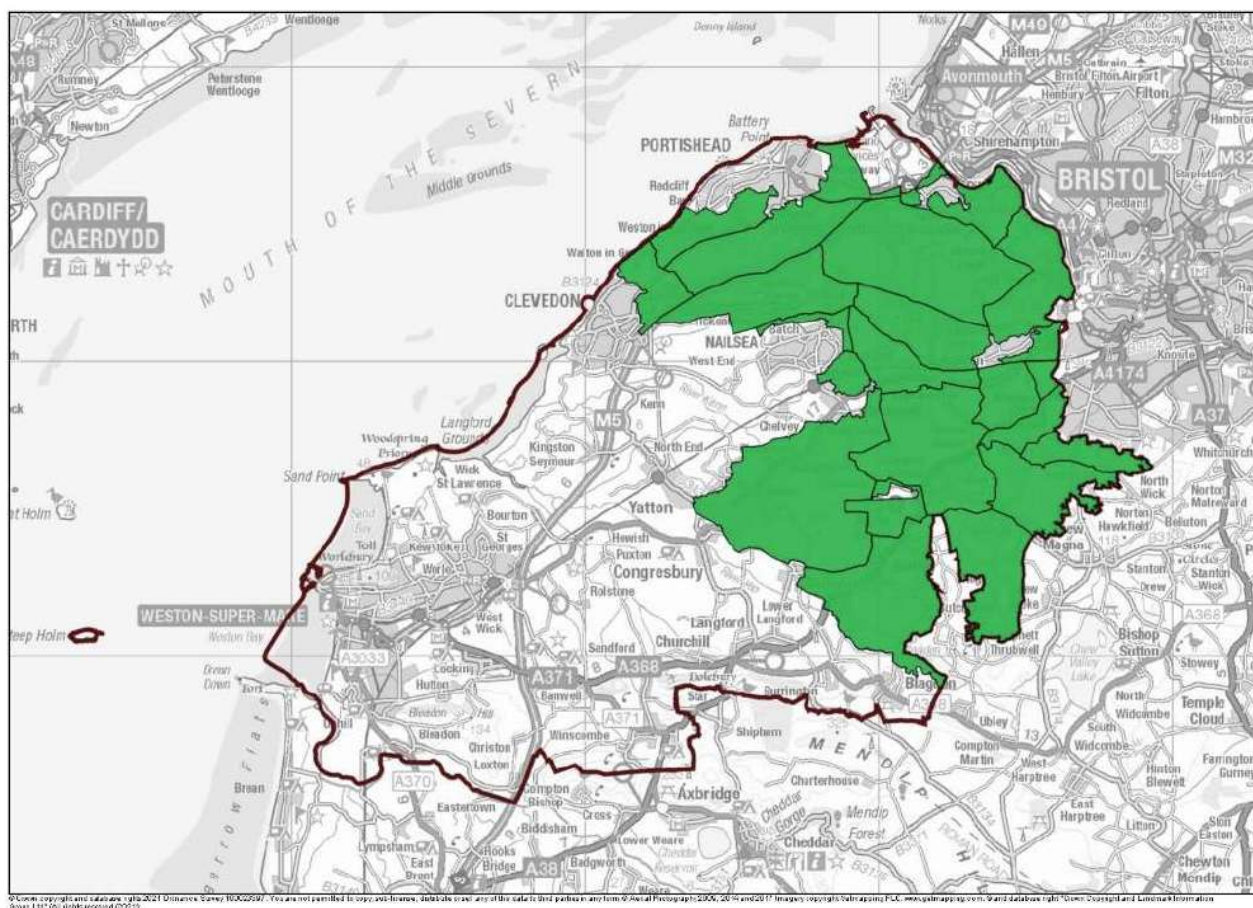


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B1328 including Portbury and Lower Failand		Failand, Easton- in-Gordano)				
24 (79 JSP) East of Easton-in-Gordano including Ham Green and Leigh Court	✓ Land is immediately adjacent to the River Avon which provides a significant physical boundary. The Green Belt prevents sprawl of Bristol extending beyond this boundary.	- (Maintains separation of villages (Ham Green from Pill) and whilst the river forms a strong defensible boundary the Green Belt prevents the merger of Bristol with Easton-in-Gordano.	✓ Safeguards mainly agricultural land	- (Preserves the setting of the designated historic park and garden of Leigh Court.)	✓	Area to the east of Easton in Gordano and south of the River Avon. Mainly open agricultural land and part of the Leigh Court estate with its parkland and woodlands. It includes a developed area, comprising residential development and a business park, at the former Ham Green hospital. The Green Belt in this cell directly serves purposes 1, 3 and 5

Assist in urban regeneration

The role of the Green Belt in assisting urban regeneration is supported by policies in Local Plans which have regeneration objectives. All cells were identified as assisting in urban regeneration as they collectively encourage the recycling of derelict and other urban land in Bristol (including Avonmouth), and the other settlements surrounded by Green Belt. The cells closest to the regeneration areas of south Bristol were specifically identified in the assessment matrix.

Map 5 shows cells which assist in urban regeneration:



7.2 Changes to the Green Belt

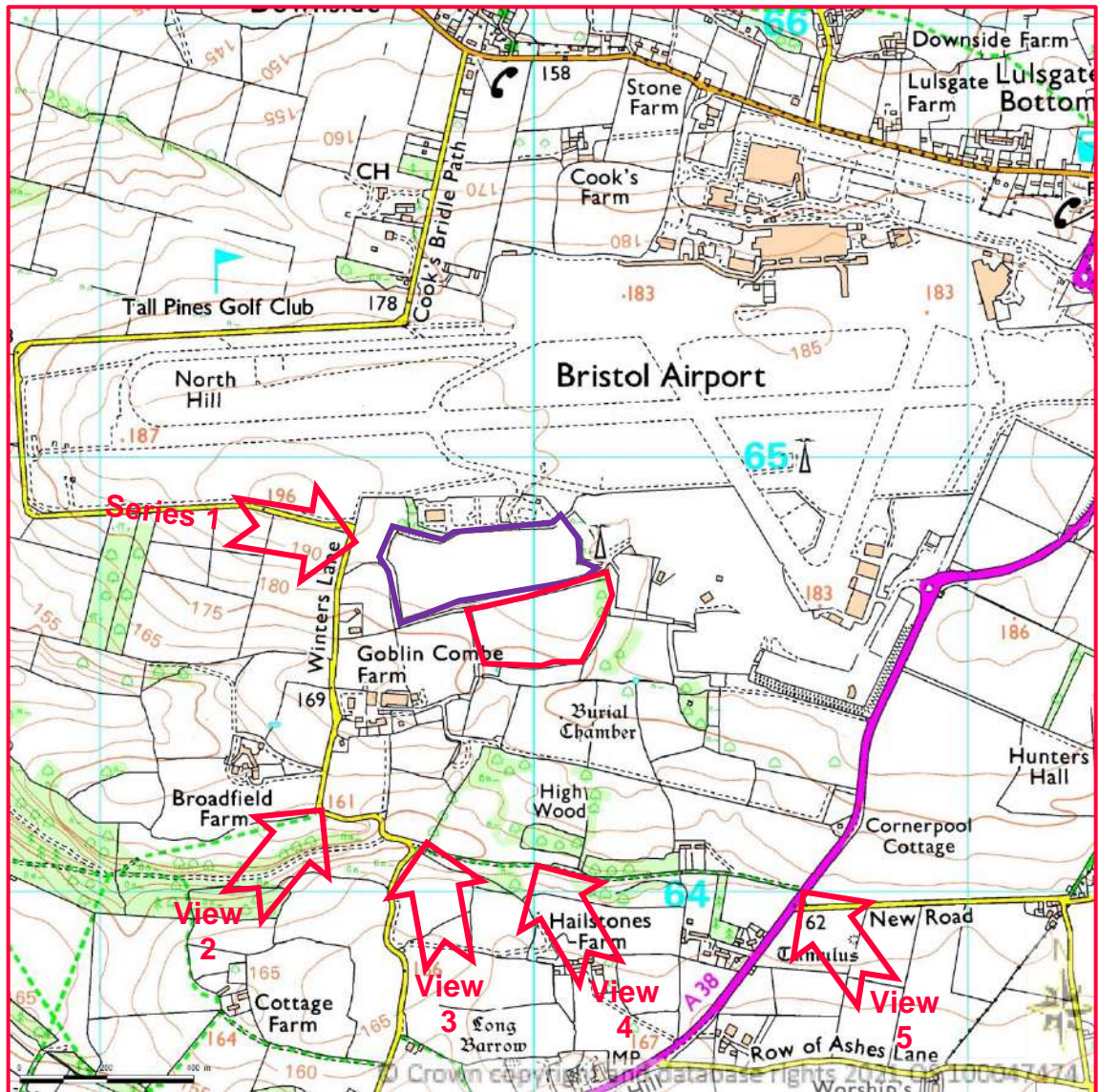
The assessment identified very few areas of significant change to the Green Belt since it was most recently established in Local Plans. The most notable change was the construction of Colliters Way. This road and rapid transit route connect the A370 and A38. The construction of the road has not reduced the openness of the wider Green Belt in this location but has resulted in a new feature close to the western

edge of the Bristol urban area. Some areas of open land to east of the new route is now physically separated from open areas to the west.

7.3 Further assessment

The NPPF requires that Green Belt boundaries are only changed if there are exceptional circumstances. Should the work on emerging Local Plan conclude the exceptional circumstances have been met further work will consider the impact on the Green Belt of the preferred strategy and broad locations for growth, the consideration of detailed amendments, the impact of removing any locations from the Green Belt, as well as considering the effect on the integrity of the remaining Green Belt area.

APPENDIX B: Photographs from Site Visit 18.06.2021



Series 1: Silver Zone Phase 1 extension (from Winters Lane)



Silver Zone Phase 1 extension starting at the north (10x magnification)



Silver Zone Phase 1 extension (10x magnification)



Silver Zone Phase 1 extension (10x magnification)



Silver Zone Phase 1 extension (10x magnification)



Silver Zone Phase 1 extension (10x magnification)



Silver Zone Phase 1 extension (10x magnification)



Silver Zone Phase 1 extension (10x magnification)



Silver Zone Phase 1 extension (10x magnification)



View 2: Bottom of Winters Lane view towards Goblin Combe Farm



View 3: Looking north from the stile on the public footpath (western end)



View 4: Looking towards northwest from public footpath (High Wood to the right)



View 5: A38 view towards Silver Zone from access to Hailstone Cottages



Mendip Hills AONB: View from Burrington Ham escarpment towards Bristol Airport



Mendip Hills AONB: Burrington Ham escarpment view to Bristol Airport (10x magnification)

