

**CPRE West Yorkshire: Response to the Bradford Green Belt Review Methodology
consultation paper, January 2018**

Introduction

CPRE welcomes the opportunity to comment on the review methodology. Indeed, we note that a number of local authorities have not consulted on the methodology, and we commend Bradford for pursuing good practice in this regard.

As CPRE works on many Green Belt reviews, we have responded to this consultation with reference to examples from other reviews. We also ran a community seminar on 16th January where we discussed the consultation with a range of interested community groups from around Bradford, and whilst they may well be making their own responses, we have sought to make our response a reflection of the shared concerns that were discussed at the seminar.

On this basis, and also due to time constraints, we have not provided a detailed response to every consultation question, but have instead focused on three key ingredients to the methodology that we argue are missing.

Headline Comments

Most of what it presented for consultation is, in itself, well-reasoned and thorough. However, in our view it cannot be considered to be robust basis for generating useful Green Belt review evidence, due to the following omissions:

- 1. A fully transparent, inter-authority review of the Green Belt ‘pinchpoints’ that straddle LPA boundaries, especially those with Leeds in Wharfedale, Aireborough and the Tong Valley;**
- 2. A methodology for assessing Green Belt parcels against NPPF para 81;**
- 3. A fourth stage to the proposed general approach, outlining the impact scenarios that the Development Plan would have on the Green Belt, and thereby enabling the Site Allocations process to be informed by a meaningful assessment of whether the impacts on the Green Belt are acceptable.**

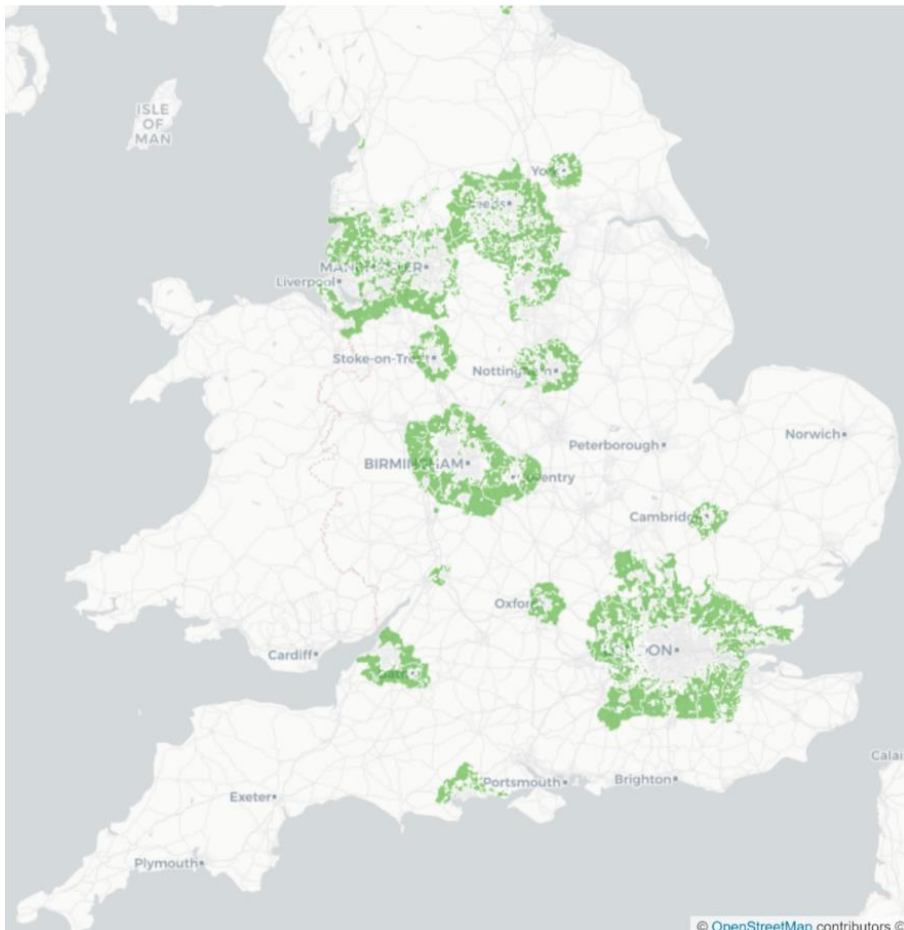
We will deal with each of these points in detail below.

Pinchpoints and inter-authority issues

CPRE's general policy position is that if the Green Belt must change it should only change once, because the key characteristics of Green Belt are its openness and permanence. Crucial to this is that areas of Green belt straddling LPA boundaries should be reviewed in an integrated way. It has been argued that the different timings of neighbouring Local Plan's preclude the necessarily inter-authority cooperation to make this work. We have little sympathy with this argument, because in reality the Green Belt reviews and Local Plan processes have been taking place iteratively since at least 2013, and there would have been plenty of scope for integrated work to have taken place during this five-year period. The current hiatus in the Leeds Site Allocations Plan, and impending Core Strategy review in Leeds, create a further opportunity for synergy which it would be wrong to miss.

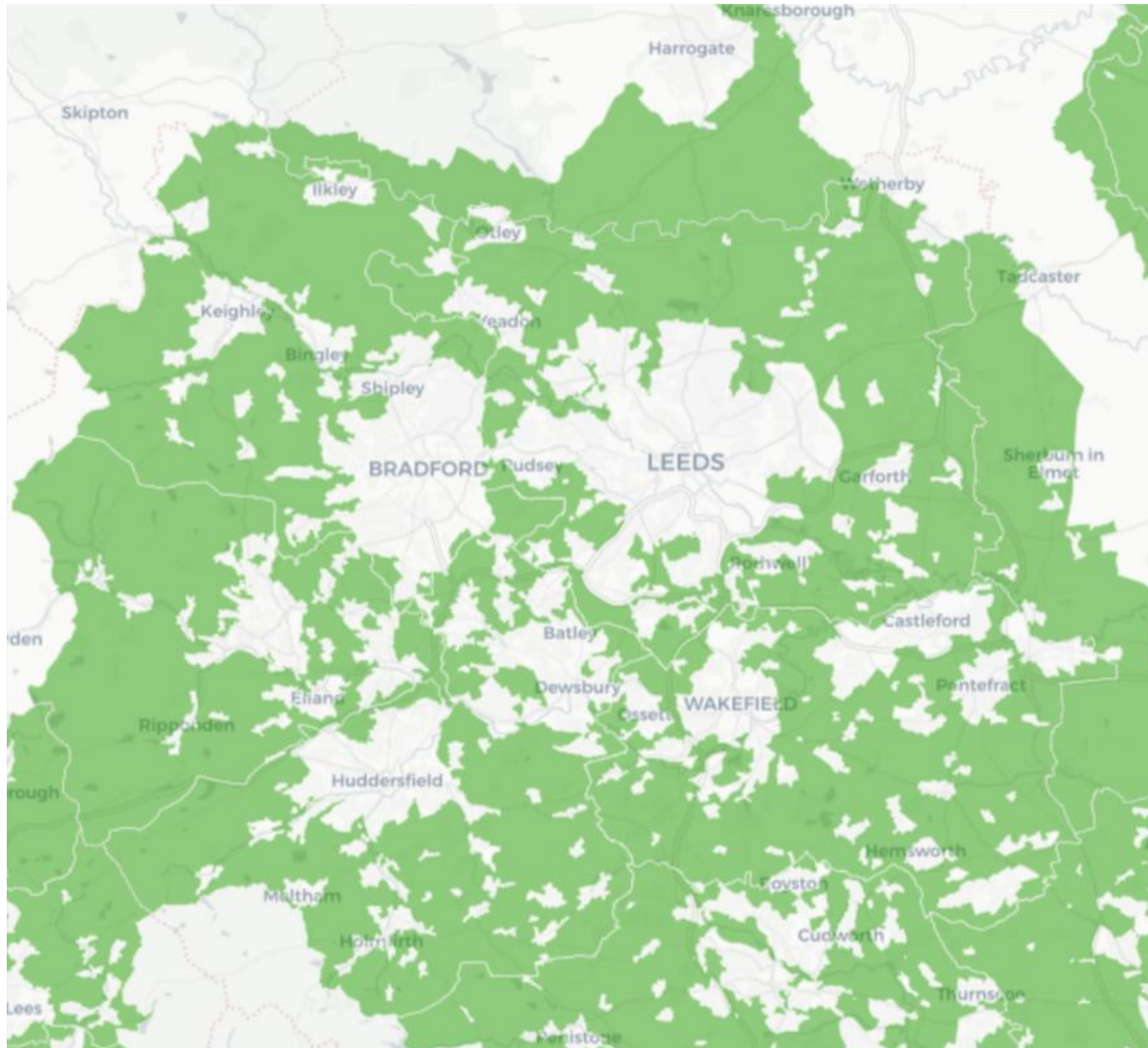
At the national scale, we can see that Green Belt is working very well at containing the main urban areas. The large majority of the population lives within these main urban areas; and the Green Belt is preventing these areas from sprawling.

Green Belt: the national picture



At the West Yorkshire scale, the picture is very different. Almost all the countryside in the area is Green Belt. It is defending the green infrastructure, the open spaces, and bringing the countryside into town. Crucially, it is the only effective planning tool for preventing these urban areas from coalescing, and maintaining those open spaces - even if individual parcels of land don't perform strongly on the Green Belt purposes.

West Yorkshire Green Belt showing dependence on Green Belt policy to maintain green infrastructure and open space at strategic scale



Zooming in further, local authorities are faced with a challenge: they can either grow towards each other, or outwards to more peripheral areas. Growing towards each other is arguably the more sustainable option, but some of the gaps are already very narrow. These pinch points contain Green Belt deletion proposals in adjacent authorities, and in our view it is essential that these areas be planned for on an inter-authority basis. There is no evidence of inter-authority planning or joint Green Belt reviews for these areas, and that is a major flaw in the soundness of all associated Local Plans. The Bradford methodology does not address this.

West Yorkshire Green-Belt showing numerous pinchpoints around Bradford's edges, where inter-authority work is needed



NPPF Para 81

This para states: *“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*

The requirement here is clear; and since Bradford's Green Belt has existed for many years it is reasonable to expect that progress would have been made in this regard. In this context, CPRE considers that any Green Belt should not only consider the performance against NPPF para 80 - the five purposes - but also against para 81. It should ask, 'how well is the Green Belt currently providing these benefits, and what scope does the review offer to increase them?'

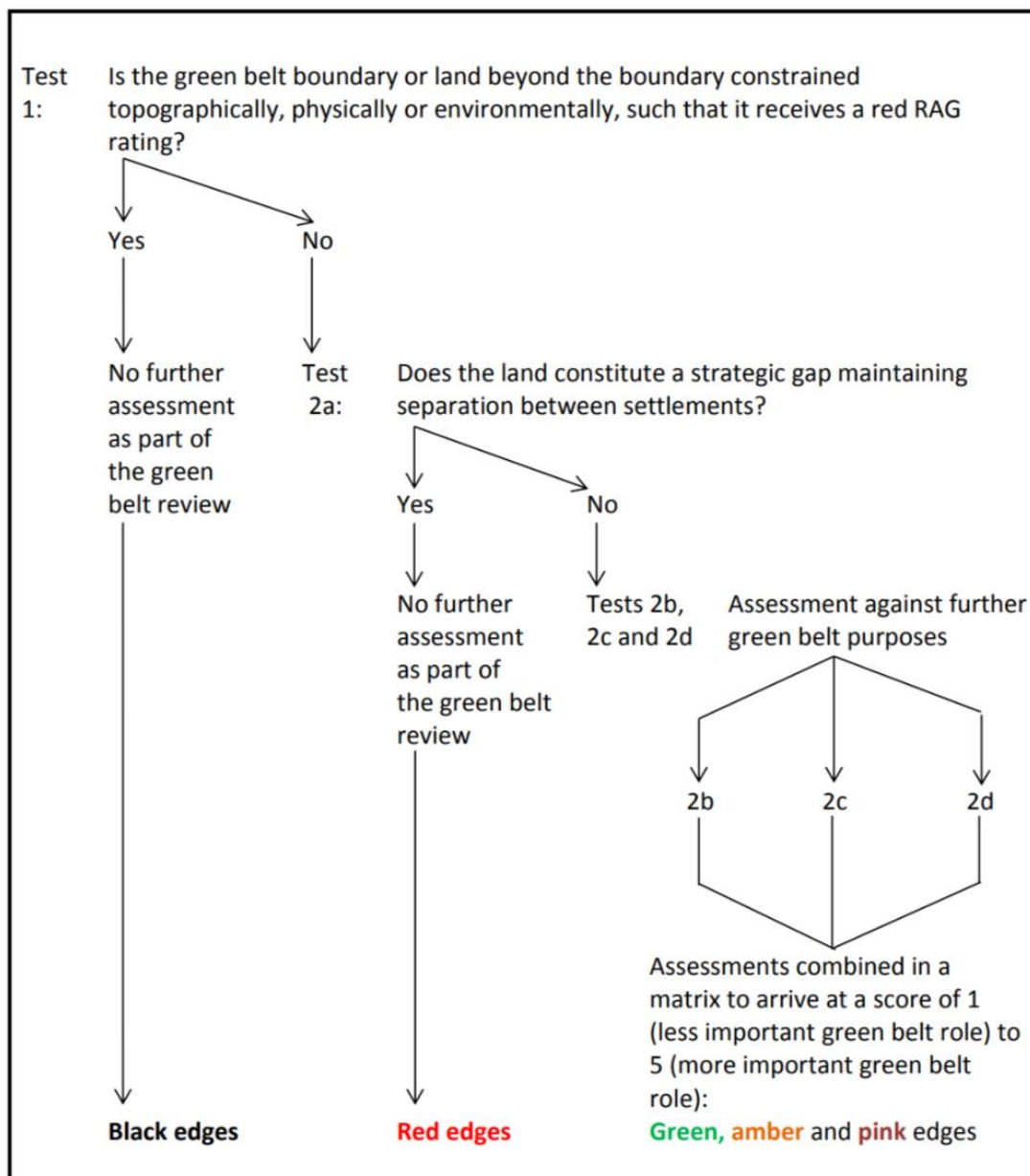
We need to see an assessment of the opportunities for each parcel to contribute pro-actively to the enhancement of sustainability through non-built land uses. That means securing land-use change within the Green Belt that is appropriate to the Green Belt but also achieves wider benefits; not just seeing a Green Belt review as a binary exercise ('should it stay or should it go?').

The Kirklees Green Belt review methodology offers a possible way to do this. It includes ‘edge testing’, which enables a focus not just on the edge itself, but also on what land-uses and characteristics sit either side of that edge. Therefore it becomes a lot easier to ask what the merits of moving the edge would be: what would moving the edge *enable*?

The Kirklees method was challenged quite strongly by the development industry at Public Examination, because it appears to make an assumption that one Green Belt purpose - preventing coalescence - is more important than the other four purposes, and there is no policy basis in NPPF for making this difference. However, if the edge testing method were applied with specific reference to NPPF para 81, instead of to the five purposes, this would be much more robust approach, and we commend it to Bradford on that basis.

Kirklees Green Belt review: edge-testing as part of the methodology

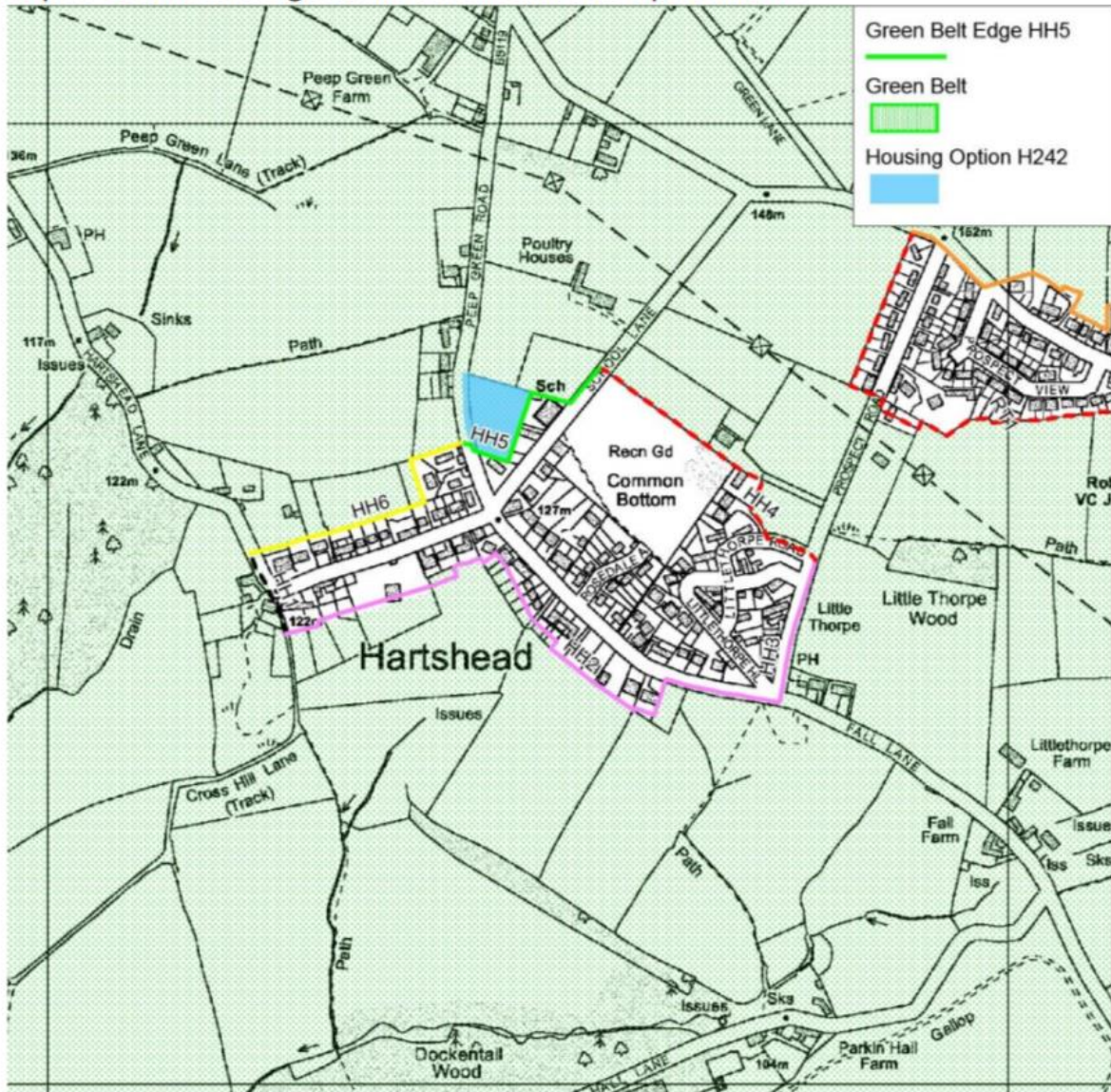
Figure 1: The Green Belt Review Test Sequence.



Kirklees Green Belt review: example of edge testing applied to a settlement

Example 1: Housing option H242 Peep Green Road Hartshead which abuts green belt edge HH5.

Map 1: Green Belt Edge at Hartshead and Site Option H242



Assessing Impact Scenarios

Bradford is not the first authority to adopt a Core Strategy that is predicated on land being removed from Green Belt, but with the Green Belt review itself deferred to the Site Allocations stage. In CPRE's view this is a fundamentally flawed approach, because it pre-judges the outcome of the Green Belt review. Effectively the Core Strategy is saying, *"We think we can release Green Belt without undermining the function of the Green Belt, but if the Green Belt review shows this not to be the case, then we will just have to press ahead and undermine the Green Belt anyway, because that's what the Core Strategy requires."*

Para 3.22 of the Bradford methodology paper confirms this with reference to a District Wide Growth Assessment undertaken to inform the Core Strategy. In effect this is a very broad-brush Green Belt review that has already happened without the level of methodological robustness or transparency that is now being provided for the full review.

In CPRE's view this pre-emptive feature of the Core Strategy means there is a missing stage in the Green Belt review, without which it does not form effective evidence for the Site Allocations. With reference to the three-step method described in Figure 2 in the methodology paper, we will call this 'Step 4 - Impact Scenarios'.

Step 3 identifies three categories of land parcel:

1. Performing strongly and not suitable for mitigation (ie leave in the Green Belt);
2. Performing strongly but capable of mitigation (ie possible scope to remove from Green Belt if there is a policy case to do so);
3. Performing weakly (ie good candidate for removal if there is a policy case to do so).

Step 4 should therefore outline:

1. The amount of development capacity that could be released using only the weakly performing Green Belt parcels;
2. The further development capacity that could be found on the mitigation parcels, alongside an analysis of the cumulative extent of impact and mitigation that this would entail.

This would enable the review to be then used to directly inform the policy iterations. It would allow a clear analysis of the Green Belt impact, and the mitigations needed, to meet a given amount and distribution of development; and on this basis whether that impact is deemed acceptable in order to implement the Core Strategy in full.
