



Change is inevitable: it should be for the better

POSITION STATEMENT 10 GLOUCESTER AND CHELTENHAM GREEN BELT

Summary

We endorse the five purposes of Green Belts as currently set out in the National Planning Policy Framework (February 2019) at paragraph 134.

The current general extent of the Gloucester and Cheltenham Green Belt should be broadly retained. There is also a case for extension to the north of Bishop's Cleeve to provide further containment to the Cheltenham urban area, and to the south of Gloucester to safeguard the important strategic gap between Gloucester and Stonehouse.

Any proposal to modify the general extent of Green Belt land to accommodate urban extensions or other development would need to be justified by exceptional circumstances and only be considered where this would provide the most sustainable solution.

The Green Belt should be a focus for investment in Green Infrastructure, as an integral part of new development and largely funded by developer contributions. Investment should fund: improved networks of open space; better access into the countryside; enhancement of the landscape and wildlife habitats, and more opportunities for recreation and exercise contributing to improving health.

Background

The Gloucester and Cheltenham Green Belt was designated in 1958. It is the second smallest Green Belt in England, confined to land separating Gloucester and Cheltenham, and Cheltenham and Bishop's Cleeve. Government policy for Green Belts has changed little; but the extent of the Green Belt has changed in Gloucestershire.

Section 13 of the National Planning Policy Framework (NPPF) sets out national policy for Green Belts. Paragraph 133 states that "*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*".

Paragraph 134 sets out five purposes for Green Belts, namely:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from 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.

Paragraph 136 says that *“once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan; and at that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”*.

Paragraph 138 says *“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary; towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”*.

The Government has made it clear its determination to protect Green Belt land from inappropriate development, but it is for local authorities to determine whether Green Belt boundaries should be amended in line with paragraph 136.

Landscape quality is not a criterion for Green Belt designation. However, paragraph 141 says that once Green Belts have been defined, *“local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such a 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”*.

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy

Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils prepared a Joint Core Strategy (JCS) to guide development to 2031. This was adopted in December 2017. It included a number of strategic allocations, nearly all in the Green Belt. These provided for around 10,280 dwellings, land for employment uses and a range of infrastructure, in order to meet needs arising from the County’s two main urban areas which could no longer be met within their administrative boundaries. The changes reduced the area of Green Belt by 720 ha, from 7390 ha to 6670 ha or 9.7%.

The adopted JCS also identified areas of safeguarded land, which would be the first to be considered for development beyond 2031, if required; and it included a commitment to an immediate partial review of housing supply for Gloucester and Tewkesbury.

CPRE Gloucestershire accepted that the strategic allocations were likely to provide the most sustainable pattern of new development and on the whole would not compromise the essential purpose of the Green Belt in preventing the coalescence of Gloucester and Cheltenham. However, we still maintain that the total housing requirement for the JCS area was set too high.

CPRE policy positions

Extent of Green Belt

In CPRE's view, notwithstanding the strategic allocations in the JCS, the Gloucester and Cheltenham Green Belt has served its primary purposes well, namely to prevent a risk of Gloucester and Cheltenham, and Cheltenham and Bishop's Cleeve from merging and to define a limit to urban sprawl.

We consider that the general extent of the current Green Belt should be broadly retained, but consideration should also be given to extension to the north of Bishop's Cleeve to provide further containment to the Cheltenham urban area, and to the south of Gloucester to safeguard the important strategic gap between Gloucester and Stonehouse (in Stroud District).

Any proposal to modify the general extent of Green Belt land to accommodate urban extensions or other development would still need to be justified by *exceptional circumstances*, in accordance with paragraph 136 of the NPPF. Removing land from the Green Belt for development should only be contemplated where it is clear that this would provide the most sustainable solution for accommodating future development requirements, for example by avoiding development leaping to settlements beyond the Green Belt leading to less sustainable patterns of development.

Separate detailed statements should be produced by the local authorities to set out the *exceptional circumstances* for *each* of any proposed modifications of the Green Belt boundary (ie for any proposed urban extensions into the Green Belt). Such statements should set out clearly the *relative advantages and disadvantages* of the proposal (including the material disadvantage of loss of the Green Belt land itself) and the assessment that concludes that this would be the most sustainable approach in that area. Any losses to the Green Belt should be kept to the absolute minimum and only land of low environmental quality considered for release.

Management of the Green Belt

The opportunities referred to in paragraph 141 of the NPPF have formed part of Government guidance on Green Belts for many years, if not exactly in the same form. However, in CPRE's opinion the planning authorities in which the Green Belt is located have done little to take those opportunities. We will continue to press for the inclusion of appropriate policies in local plans, starting with the Joint Core Strategy Review, consistent with the following strategic objective:

- *To promote the positive management of the Green Belt to enhance its contribution to the landscape, biodiversity and access.*

Better and more co-ordinated land management would help the Green Belt to deliver vital environmental and other services - from attractive landscapes with new woodland, wildlife rich habitats, to places for recreation and for growing local food.

We would wish to see the Green Belt as a focus for investment in Green Infrastructure, as an integral part of new development and largely funded by developer contributions through the Community Infrastructure Levy. Investment should fund:

- improved networks of open space;
- better access into the countryside on foot and by bicycle;
- provision and enhancement of landscape features including new areas of woodland;
- enhanced wildlife habitats and ecological networks contributing to delivering the county's Nature Recovery Strategy and helping to tackle the challenges of a changing climate;
- opportunities for Community Supported Agriculture; and
- more opportunities for recreation and exercise contributing to improving health.

Review of the Joint Core Strategy

The next stages of the JCS Review will be Preferred Options. The review will most likely roll forward the JCS to 2041, and will indicate how much additional housing will be needed and where it is proposed to be located.

We will engage with the review. Our representations will first of all address the issue of total housing provision, which should be undertaken in a more balanced way. It will again argue for Green Belt releases to be kept to a minimum and only taken forward when other development opportunities have been exhausted.

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CPRE Gloucestershire Position Statements are regularly reviewed and updated as necessary. They should be read as a set.