

## Bristol City Council's response to Inspectors' matters, issues and questions

### Matter 5: Green Belt Issues 5.1 and 5.2

This statement sets out the council's response to the Inspectors' matters, issues and questions regarding Green Belt matters (Issues 5.1 and 5.2).

#### Council's introduction

The Inspectors' questions are shown below in ***bold italics*** with a border, following any preamble to the question also in ***bold italics***. The council's responses are shown in normal typeface below the Inspector's questions.

Suggested main modifications arising from the Inspectors' questions are set out in grey tint boxes.

#### Responses to Inspectors' questions

***Issue 5.1: Whether the approach to altering the Green Belt boundaries and development within it justified and consistent with national policy?***

***The Plan proposes to alter the Green Belt boundaries in three locations, covered by policies DS11 and DS12. Paragraph 140 of the NPPF states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The Council's response to PQ51 concludes that the gap between housing need and capacity to deliver housing constitutes the exceptional circumstances needed to justify altering Green Belt boundaries.***

***Paragraph 141 of the NPPF sets out what it expects Councils to demonstrate before concluding there are exceptional circumstances to justify changes to the Green Belt. Paragraph 142 of the NPPF advises that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be considered. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport. The Council's response to PQ55 suggests there is little previously developed land in the Green Belt and that there is either incorporated into proposed Green Belt release or available for development under Green Belt policy. It goes on to provide information as to the public transport accessibility of the relevant allocations.***

***Q5.1: How much land is proposed to be removed from the Green Belt, both in overall terms and as a proportion of the existing Green Belt?***

#### Council's response

1. 44.2 hectares are proposed to be removed which is 7.3% of the current Green Belt in the plan area. The area of Green Belt within the city's boundaries would go from 609 hectares as now to 565 hectares if the plan is adopted with the proposed changes.
2. The wider Bristol and Bath Green Belt is roughly 71,700ha distributed across six local planning authorities. The local plan's proposals for removing land along parts of

one of the inner edges of the Green Belt would result in a reduction of roughly 0.06% of the Bristol and Bath Green Belt as a whole. The West of England Green Belt Assessment (EVEG01) has information on the wider Green Belt and includes a map showing the total extent.

**Q5.2: What would the capacity be for housing without altering Green Belt boundaries?**

Council's response

3. There would be less capacity for housing without altering the Green Belt's boundaries. Starting from Bristol's total SHLAA capacity of 39,915 homes (as updated – see the council's response to Matter 2, Q2.3(a)), a deduction of 1,400 homes of identified Green Belt capacity would result in a total remaining capacity of 38,515 homes.

**Q5.3: Were all reasonable options for meeting the need for meeting the identified need for development fully examined? In particular:**

**a) Has the Council sought to make as much possible use of suitable brownfield sites and underutilised land?**

Council's response

4. The council's responses to Matter 2, Q2.3(a-f) set out how all available sources of land have been fully considered in setting the proposed housing requirement. Through a comprehensive urban potential assessment (EVEH02) the council has searched proactively for sustainable brownfield sites and underused land in addition to the sites promoted to the council by stakeholders. Many of these have become development allocations or regeneration areas, with an additional citywide allowance made in the SHLAA report (EVEH01) for large site windfall development on unallocated urban potential sites.

**Q5.3 b) Has the Council sought to optimise the density of development?**

Council's response

5. The local plan proposes to optimise the density of development by setting a minimum density requirement of 50 dph and promoting higher density forms of development in accessible locations.

6. For planning applications this is to be done through the emerging urban living policies UL1 and UL2, supported by the Urban Living SPD.

7. The SHLAA (EVEH01) and the urban potential assessment (EVEH02) applied higher density assumptions to sites within the outer urban area, to reflect the objectives of ensuring the efficient use of land in those locations.

Area	Suggested minimum density in emerging policy UL2	Density assumed by SHLAA and urban potential assessment
Bristol City Centre	200 dph	200 dph

Inner urban area: more intensive locations	120 dph	120 dph
Inner urban area: general	100 dph	100 dph
Outer urban area: more intensive locations	60 dph	85 dph
Outer urban area: general	50 dph	65 dph

8. The emerging development strategy policies (DS1-14) refer to the potential for higher densities in certain regeneration areas.

**Q5.3 c) Has the Council discussed whether there is any potential to accommodate some of the development needs of the City in other authority areas?**

Council's response

9. The council has requested neighbouring authorities consider unmet housing need as part of the duty to co-operate process. Further information is set out in the council's responses to Matter 2, Q2.7 and Matter 1, Q1.1-Q1.6.

**Q5.4: Is there a quantitative need to remove land from the Green Belt in the Plan area to ensure provision of at least 34,650 homes in the plan period?**

Council's response

10. Because the total capacity identified in the SHLAA report (EVEH01) exceeds the housing requirement by approximately 15%, it would theoretically be possible for Bristol to meet its proposed housing requirement of 34,650 homes without the proposed changes to the Green Belt (see response to Q5.2 above). However, this would give greater importance to less certain components of Bristol's potential housing supply, such as urban potential (large site windfalls) or Development Strategy areas where detailed masterplans / development frameworks / phasing plans have yet to be progressed.

11. The proposed changes to the Green Belt in this context takes account of the fact that Bristol's objectively assessed housing need significantly exceeds its capacity. The proposed changes to the Green Belt would contribute specific, allocatable sites with a more certain contribution to Bristol's housing supply within the plan period, and would retain the 'headroom' within the SHLAA at its present level of around 15%, allowing a margin for non-delivery from less certain sources of housing supply.

**Q5.5: Was the Council's approach to assessing the opportunities for altering Green Belt boundaries robust and based on appropriate up-to-date evidence? How has this informed the Plan and specifically proposals to alter the Green**

***Belt boundary to accommodate development needs, including the assessment of opportunities not allocated for development?***

Council's response

12. The response to preliminary question PQ52 considers these matters. It refers to the evidence of housing need, the circumstances of the plan area, the contingency areas referred to in the existing local plan's Core Strategy and to the Green Belt Assessment.

13. The urban potential assessment (EVEH02) and Strategic Housing Land Availability Assessment (EVEH01) refer to the consideration of opportunities for development in locations not designated as Green Belt as discussed above.

***Q5.6: In selecting the allocations that are removed from the Green Belt, was first consideration given to land which has been previously developed and/or is well served by public transport?***

Council's response

14. The response to preliminary question PQ52 considers these matters.

15. The response discusses the limited practicable possibilities for development, including related to previously developed land (which would now be defined as grey belt under the NPPF December 2024) and explains that the locations identified are well located in respect of public transport accessibility.

***Paragraph 142 of the NPPF states that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The Council's response to PQ56 acknowledges that the Plan does not set out or propose compensatory improvements to the remainder of the Green Belt. This is justified based on there being little remaining Green Belt land within the City and that it is already well managed. The response concludes that policies for the release of Green Belt focus resources upon on-site enhancements.***

***Q5.7: What assessment, if any, of the opportunities that might exist for compensatory improvements to remaining Green Belt has been carried out?***

Council's response

16. For the reasons set out in response to PQ56, an assessment of the opportunities that might exist for compensatory improvements to remaining Green Belt was not relevant, appropriate or proportionate in the case of the proposed changes to Green Belt boundaries put forward in the local plan.

17. While the Local Plan is being examined against NPPF September 2023, it is relevant and material that the latest NPPF December 2024 does not appear to contain a provision regarding ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The closest equivalent to

paragraph 142, NPPF December 2024 paragraph 148, does not include the former provision.

***Issue 5.2: Whether policies relating to development in the Green Belt are justified, consistent with national policy and effective.***

***Q5.8: Is Policy DS10 justified, consistent with national policy and effective? In particular:***

***a) Is the policy clear and unambiguous about how planning applications for development within the Green Belt would be assessed?***

Council's response

18. While the Local Plan is being examined against NPPF September 2023, it is relevant and material to consider the latest NPPF December 2024 as that is currently the version of national planning policy which will be applicable to planning decisions when the local plan is adopted. The comments below (including in response to 5.8b and c) reflect this.

19. The opening phrase of the policy in effect confirms there is a Green Belt and that it is shown on the Policies Map. The sentence goes on to say that the Green Belt will be protected from inappropriate development which accords with the former NPPF and with NPPF December 2024 Chapter 13 'Protecting Green Belt Land' in particular paragraph 153. The sentence concludes by linking the policy to national planning policy which is appropriate because the relevant parts of the NPPF bear directly on the consideration of planning applications.

***Q5.8 b) Is the second paragraph relating to previously developed land consistent with the first paragraph, which suggests development in Green Belt would be considered using national policy?***

Council's response

20. The second paragraph has the effect of encouraging the redevelopment of previously developed sites. This can be seen to presage the introduction of grey belt in NPPF December 2024 which refers to previously developed land in the definition of grey belt and overall can be seen to be generally supportive of development of previously developed land.

21. For the avoidance of any uncertainty as to how the policy might operate in the context of the latest NPPF, it is suggested that the paragraph should be removed as a main modification.

~~Policy DS10, policy text - delete paragraph~~

~~Previously developed land in the Green Belt~~

~~The redevelopment of previously developed sites in the Green Belt will be encouraged where such development would contribute to delivery of affordable homes and provided that the proposals would not substantially harm the openness of the Green Belt.~~

***Q5.8 c) What is the purpose of the third paragraph, particularly considering that any areas removed from the Green Belt by the Plan would no longer be***

**designated as such and, once established, Green Belt boundaries can only be revised through a revision to the Plan? Is it the Council's position that this paragraph would prohibit any neighbourhood development plans from revising Green Belt boundaries?**

#### Council's response

22. It is not intended that the third paragraph will form part of the adopted local plan. With paragraph 3.3.27, the third paragraph was included in the Publication Version November 2023 only to confirm to readers that the Publication Version proposes that certain land within the existing Green Belt will be removed, subject to the passage of the plan through its examination process. If the plan is found sound and the changes are confirmed, the paragraph will not be needed and will not be included in the adopted plan. Neighbourhood plan processes will be unaffected by Policy DS10.

23. It is intended that, taking account of the modification suggested under Q5.8(b) the policy and explanation in the plan at adoption will read as set out below. The tinted section (Previously developed land in the Green Belt) is a suggested modification. The other ~~deletions~~ and additions are consequential amendments to the text if the plan is found sound:

#### **Policy DS10: The Green Belt**

~~3.3.23 This policy retains the Green Belt areas within Bristol with boundaries revised to reflect exceptional circumstances.~~

3.3.24 A key characteristic of the Green Belt is its openness and all remaining areas contribute to meeting the purposes of designation. In several locations, including Ashton Court, the slopes at Dundry, Stockwood and the Avon Valley, Green Belt land also forms very prominent elements of the city's landscape setting, extending into the Green Belt areas of neighbouring authorities. In Stapleton part of the Green Belt extends along the M32 Motorway. This is part of larger wedge of Green Belt stretching out into South Gloucestershire.

3.3.25 The Green Belt, ~~subject to its proposed boundary revisions,~~ continues to play a strategic role in containing the outward expansion of Bristol, providing a green setting for the city and focusing attention upon the regeneration of previously developed land in the urban area.

#### **Policy text**

**Land within the Green Belt as shown on the Policies Map will be protected from inappropriate development as set out in national planning policy.**

#### ~~Previously developed land in the Green Belt~~

~~The redevelopment of previously developed sites in the Green Belt will be encouraged where such development would contribute to delivery of affordable homes and provided that the proposals would not substantially harm the openness of the Green Belt.~~

#### ~~Boundary of the Green Belt~~

~~The boundary of the Green Belt in Bristol will remain unchanged with the exception of land which will be removed from the Green Belt as shown in Policies DS11 'Development allocations – south west Bristol' and DS12 'New neighbourhood – Bath Road, Brislington'.~~

#### **Explanation**

~~3.3.26 Some areas of the retained Green Belt are also have also been proposed as Local Green Space (see Policy GI1 'Local Green Space').~~

~~3.3.27 It is proposed that some of the areas removed from the Green Belt in Bristol will be allocated for development.~~