

Examination of the Bristol Local Plan 2022-2040

Hearing Statement Matter 4: Development Strategy and Site Selection Process

Issue 4.1: Whether the development strategy and strategic policies of the Plan are positively prepared, justified, effective and consistent with national policy?

Introduction

1. This Hearing Statement is submitted by Marrons on behalf of Bellway Strategic Land, part of Bellway Homes Ltd (Bellway). The Statement reflects Bellway's key role on the Policy DS12 allocation, New Neighbourhood at Bath Road, Brislington.

General Strategy Questions

Q4.1: Are the specific areas of growth and regeneration justified, consistent with the development strategy and the Plan's overall Vision and Objectives?

Response:

2. Yes, and for the reasons explained in response to Issue 4.6 and Matter 5: Green Belt, the exceptional circumstances for Green Belt land release clearly exist in accordance with September 2023 NPPF140-141, and Bristol City Council (BCC)'s approach to reviewing boundaries is consistent with NPPF142-143.
3. It should be noted, in particular, that Green Belt land release to the southeast of Bristol (in the area encompassed by draft allocation DS12: New neighbourhood – Bath Road, Brislington) formed a contingency location for future Green Belt land release in the adopted Core Strategy (Policy BCS5). Further details regarding this contingency policy and how the principle of development in this location is already established in the adopted development plan are set out in Bellway's Regulation 19 Representations, so are not replicated here.

Issue 4.6: Whether the proposed site allocations are justified taking into account the reasonable alternatives, effective in terms of deliverability and consistent with national policy in enabling sustainable development?

Q4.27: Are the proposed allocations identified by policies DS11, DS12, E4 and DA1 justified as appropriate when considered against reasonable alternatives and would they be consistent with national policy? In particular:

- a) **Does the evidence demonstrate that the sites have been selected based on a robust, consistent and objective basis? What criteria were used to identify suitable sites and are the reasons for selecting some sites and rejecting others clearly set out and justified?**

Response:

4. Yes. Sites have been assessed and selected on a robust, consistent and objective basis, using a site/broad location assessment and considering the City's constraints (contained in Appendix A to the Strategic Housing Land Availability Assessment [SHLAA], **EVEH01**), with further assessments contained within SHLAA Appendix B.
5. Fundamentally, BCC'S approach is centred on maximising the supply of sites within the urban area to meet its housing needs, reflecting the City's tightly drawn administrative boundaries and limited supply of available and suitable Green Belt land for development, against which reasonable alternatives are clearly limited.
6. As explained in **TPC004** Housing Need and Supply Topic Paper, "*Greenfield sites are rare in Bristol, and most are required to be retained as Green Belt land, for recreation or to sustain and enhance biodiversity and food growing.*" (paragraph 1.6, page 2). The range of constraints facing Bristol is evident throughout the site assessments contained within Appendix A and Appendix B to the SHLAA (**EVEH01**).
7. Nevertheless, once urban capacity has been maximised, BCC's evidence base then needed to test both the principle and extent of Green Belt land release possible within the City's administrative boundaries. The Sustainability Appraisal (SA) (**CSD004**) provides the evidence as to why Green Belt will need to be released to avoid adverse sustainability outcomes given the constrained nature of the City and limited land supply to meet housing needs (page 53 of **CSD004**). The main options considered in the SA centred on whether to release land from the Green Belt or not. Option 1, which includes Green Belt land release performs more favourably with respect to there being a more 'realistic prospect' that the needs of communities within the housing market area will be met. Option 2, which does not require Green Belt land release flags both uncertain effects and negative effects from "*increased development pressures which could result from the densification and intensification in Areas of*

Growth and Regeneration”, with Table 11 flagging particular issues with respect to the City’s cultural heritage arising from this intensification (pages 58-59 of **CSD004**).

8. The need to release land from the Green Belt is further explained in **TPC004** Housing need and Supply Topic Paper, paragraph 1.6, page 2, with respect to the need to release land for 1,400 dwellings across three sites. The evidence base information the selection of these sites comprises the SHLAA (**EVEH01**), where at page 6 it explains why only three Green Belt locations were considered suitable, available and achievable.
9. The SA (**CSD004**) assesses the three Green Belt allocations against the SA Framework in Table 14, section 6.3, page 78. The SA also explains why a further Green Belt location at Yew Tree Farm was rejected (**CSD004**, pages 54 and 56).
10. The West of England Combined Authority (WECA) Strategic Green Belt Assessment (**EVEG01**) (published by WECA in 2022, prepared by LUC in 2021) also underpins the identification of these Green Belt locations. The SGBA forms part of BCC’s site selection and allocations process, as reported in **TPC001** Allocations and Designations Process Topic Paper, where the findings of the SGBA are set out in paragraph 3.18.
11. BCC also has a wider evidence base to support the selection of sites including **TPC002** Flood Risk Assessment Topic Paper and **PAL005** Habitat Regulations Assessment.
12. Based on the information presented at Appendix D to the SHLAA (**EVEH01**, page 177), it does not appear that other Green Belt sites were submitted for consideration as part of the call-for-sites process so no further options were considered as part of the SHLAA.
13. The mapping submitted by the Council as part of its response to **IN2**, contained in **EXA024b PQ19**, demonstrates the level of constraints and existing uses facing other Green Belt land around the city.
14. It is also important to reference the unique position underpinning the selection of the draft DS12 allocation, whereby this part of southeast Bristol is identified as a contingency location to meet future housing needs as part of the adopted Bristol Core Strategy 2011, as explained in Bellway’s previous representations, and recognised by BCC in **IN2**, BCC response to the Inspectors (page 35, answer to PQ52).

Flooding and drainage issues

- f) Has a sequential risk-based approach been taken to identifying the spatial strategy and specific allocations, as required by paragraph 161 of the NPPF? Are any locations identified for growth within Flood Zones 2 and 3? If so, has the exception test been carried out and are the conclusions justified?**

Response:

15. Yes. BCC has undertaken Level 1 and Level 2 Strategic Flood Risk Assessments (SFRAs) (**EVEF01** and **EVEF02** respectively). The SFRAs site alongside **TPC002** Flood Risk Assessment Topic Paper, where Appendix 1 sets out the level of flood risk. With respect to the Green Belt allocations, Appendix 1 explains that a sequential test was undertaken as part of the planning application process for DS11-1, that DS11-2 is wholly within Flood Zone 1 and that only a very small percentage of DS12 is affected (2% in FZ2 and 2% in FZ3).
16. With respect to DS12, this very small percentage relates to the Scotland Bottom watercourse, which forms the defensible Green Belt boundary for the allocation. No development, access or other works are proposed on this part of the allocation.

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