

Home Builders Federation (HBF) Response to Matters, Issues and Questions (MIQs) for the Bristol Local Plan- Matter 5

HBF is the principal representative body of the housebuilding industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We have not commented on every policy on those of interest to our members.

We have not repeated our Regulation 19 concerns which remain outstanding but have referred them where we feel this is helpful. This response should therefore be read in tandem with our Regulation 19 comments.

Matter 5: Green Belt

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?

HBF agree with the Council that that the gap between housing need and capacity to deliver housing constitutes the exceptional circumstances needed to justify altering Green Belt boundaries. A such HBF support the removal of the land from the Green Belt to help meet housing need and suggest more sites needs to be released.

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

Unclear from current evidence.

**Q5.3: Were all reasonable options for meeting the need for meeting the identified need for development fully examined? In particular:
Has the Council sought to make as much possible use of suitable brownfield sites and underutilised land?
Has the Council sought to optimise the density of development?
Has the Council discussed whether there is any potential to accommodate some of the development needs of the City in other authority areas?**

HBF believe that the scale of housing need within the City will require Green Belt release, additional sites and opportunities for housing should be explored fully, but the consequence of additional housing from other sources of supply, would be a reduction in the unmet housing need being exported elsewhere, not the removal of the justification for Green Belt release.

HBF have provided details comment about density in our Regulation 19 response see para 33- 38.

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?

Yes. As the Council acknowledge in their response to PQ51, page 34 of the EX024 “In order to ensure a sufficient number and range of development sites become available to meet the need for new homes, the local plan indicates that it is considered necessary to allow for a limited release of land from the Green Belt (paragraph 3.3.31). The need to bridge the gap between housing need and capacity to deliver housing constitutes the exceptional circumstances in this case. The authority cannot meet sufficient of its identified need for new homes by any other means.”

Although HBF agree that the need to meet the housing needs to Bristol is the creates the exceptional circumstances required to justify Green belt release, the releases proposed are insufficient to meeting housing need and as such the Council are not meeting the housing need of Bristol in full, or doing all they can to do so, so further Green Belt release is needed.

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?

HBF would support a full up to date Green Belt review.

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?

HBF would observe that larger scale Green Belt release could support a level of housing development that would enable new public transport services to be viably provided.

Word Count 909 (including wording of the questions)