

Examination of the Bristol Local Plan 2022-2040

Hearing Statement Matter 5: Green Belt

Issue 5.1: Whether the approach to altering the Green Belt boundaries and development within it is justified 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.

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?

Response:

2. Yes. As set out in the Strategic Housing Land Availability Assessment (SHLAA) (**EVEH01**) - section 6.1, page 11 – and against the planned requirement of 34,650 dwellings, BCC has identified capacity of 30,854 dwellings arising from:
 - 'Areas of growth and regeneration' (capacity 20,386 dwellings)
 - 'Extant planning permissions' (capacity 9,087 dwellings)
 - 'Existing development allocations' (capacity 1,381 dwellings).
3. Then through the new plan the Council seeks to allocate 1,125 dwellings within the urban area (Proposed development allocations).
4. This then leaves a shortfall of 2,671 dwellings, which is why Green Belt land needs to be released. The principle of Green Belt land needing to be released to meet higher housing requirements is already established in the *adopted* development plan as set out in Bellway's previous representations and identified by BCC in **IN2**, BCC response to preliminary questions (page 35, PQ52).
5. The Council then includes allowances for 'Small sites windfall' (capacity 3,600 dwellings), 'Urban potential' (capacity 2,219 dwellings) and 'Student accommodation' (600 dwellings), to estimate a total supply of 39,798 dwellings.

6. Paragraph 1.6, page 2 of **TPC004** Housing Need and Supply Topic Paper also explains why a limited release of Green Belt land is needed to deliver new homes (totalling 1,400 dwellings across three allocations, including at DS12).
7. The need to review Green Belt boundaries to avoid adverse sustainability outcomes given the extent of the City's housing needs is also set out in the Sustainability Appraisal (SA) (**CSD004**), pages 40, 41 and 53 in particular: "*there was limited land supply to meet housing need*" and that "*The urban and already built-up nature of Bristol means that the overall spatial strategy is limited to a narrower range of reasonable alternatives...*"
8. Fundamentally, the SA considers whether to release land from the Green Belt (including DS12 New Neighbourhood at Brislington) 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**).

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?

Response:

9. Yes. BCC used the Strategic Green Belt Assessment (SGBA) (**EVEG01**) (published by WECA in 2022, prepared by LUC in 2021) as part of their evidence base. 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.
10. For example, paragraph 3.18 provides a specific explanation which is provided to underpin the rationale and approach to the DS12 allocation, which is part of parcel 78 in the SGBA. This sets out that the sub-area of land south of the A4 contains urban features (including the Park and Ride) which diminish the openness of the Green Belt in this location, also noting the strength of well-treed boundaries which limit the impact on the distinction of wider Green Belt land. The boundary of the DS12 allocation

follows existing physical features, notably the Scotland Bottom watercourse, in accordance with September 2023 NPPF143(f).

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?

Response:

11. Yes. As explained in BCC's response to the Inspectors' preliminary questions (**IN2**, page 36, PG55), there is very little previously developed land in the Green Belt, and where there is, this is already incorporated within proposed Green Belt land releases. This is the case for draft Policy DS12, which includes the existing Brislington Park and Ride site. DS12 is clearly consistent with the ambitions of September 2023 NPPF142.
12. DS12 also demonstrates that BCC has prioritised Green Belt land release on land well-served by public transport, with the A4 Bath Road a high frequency public transport corridor into Bristol, again meeting the requirements of September 2023 NPPF142.
13. In fact, the unique benefit of DS12 is that it meets both elements of September 2023 NPPF142, including previously developed land *and* being well-served by public transport.

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