

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

Matter 5: Green Belt Issue 5.3 Green Belt Allocations

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

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.

Issue 5.3: Whether the Green Belt allocations are justified, consistent with national policy and whether the policies would be effective in delivering sustainable forms of development.

Policy DS11 – Development allocations – south west Bristol

Q5.9: Green Belt

Taking each site in turn, how would development proposed by DS11 affect each of the five Green Belt purposes set out in paragraph 138 of the NPPF?

Council's response

1. The plan is being examined against NPPF September 2023. The latest NPPF December 2024 makes various changes to Green Belt policy including the introduction of grey belt which is defined in the annex to the latest NPPF. Noting the transitional provisions, it may be appropriate and material to have this new policy in mind as it is currently applicable to any development proposals and would be applicable from the point of adoption of the local plan. A new PPG on Green Belt was issued last week (Friday 28th February) and this may also be relevant.
2. The fundamental aim of Green Belt policy is unchanged in the latest NPPF which indicates that aim to be to '*prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*'.
3. The West of England Combined Authority Strategic Green Belt Assessment September 2022 (EVEG01) provides an assessment of the Green Belt having regard to its purposes. The assessment assists in providing an understanding of the effect of the local plan's proposals on the stated five purposes of Green Belt. Purpose 5 is treated equally across the assessment so is not referred to again here.
4. As discussed the published appendix¹ to the above assessment is not in the examination library and this is being/has been rectified. It is necessary for the understanding of the evaluation of the assessment parcels.

¹ West of England Combined Authority Strategic Green Belt Assessment – Appendix B: Strategic Assessment Proforma

Policy DS11

Land at Ashton Vale ('Longmoor Village')

5. The land has planning permission as referenced in explanation paragraph 3.3.29.

6. The site falls within parcel P96 of the assessment which is noted as making a moderate or weak contribution to purposes 1 and 4 and strong to 2 and 3. However, the assessment notes a weaker contribution to the allocation site stating:

'The area adjacent to Ashton Vale (map point B) has a stronger relationship with adjacent urban edges to the north, east and south. It lacks landform variation and strong boundaries, and adjacent large scale commercial development has an urbanising visual influence. Therefore, land here makes a weaker contribution to Green Belt Purposes 1, 3 and 4. A road and hedgerow form a boundary to this area, coinciding with the district boundary, that would not represent a significant weakening of adjacent Green Belt land in North Somerset. Inset development already extends up to this edge both to the north and south of the parcel, and the Long Ashton Park and Ride is an urbanising influence in the Green Belt to the west. There is a designated Town Green to the south of the MetroBus route.'

Land adjacent to Elsbert Drive

7. This site is also in parcel P96 of the assessment. At this location the assessment notes:

'Land to the west of Highridge (map point C) also has a more moderate distinction from the urban area, which means that it makes a less significant contribution to Purpose 3 than the Bedminster Down area. Release of land here within the Bristol City Council boundary would not in isolation be strategic in scale, and would cause a knock-on weakening of adjacent land in North Somerset, but the A4174 would form a strong boundary to a release that encompassed land in both districts.'

Q5.10: Would Policy DS11 be effective in ensuring that the proposed Green Belt boundaries around the Ashton Vale and Elsbert Drive allocations are clearly defined using physical features that are readily recognisable and likely to be permanent?

Council's response

8. At Ashton Vale the Metrobus roadway forms a strong boundary to the south with physical features coinciding with the local authority boundary forming a recognisable boundary to the north west.

9. At Elsbert Drive the land is bounded by hedgerows. There is the potential for the release of Green Belt on adjacent land in North Somerset subject to the preparation of the local plan for that authority.

Q5.11: Would Policy DS11 be effective in securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of removing the allocation from the Green Belt?

Council's response

10. This matter is discussed in the council's response to preliminary question PQ56. No ways in which the impact of removing the land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land have been identified or referred to in the published local plan.

11. The proposal represents a relatively limited removal of land from the Green Belt. It is noted that there are public footpaths at the allocation site to which relevant policies would be applicable (Policy TR5).

12. As noted in the council's statement regarding Matter 5 Issue 1 Q5.7 it is noted that 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.

Q5.12: Site Selection and Location

Are the Ashton Vale and Elsbert Drive allocations suitably located, having regard to the Plan's spatial strategy and the national aim of promoting a sustainable pattern of development?

Council's response

13. The council's response to preliminary question PQ55 refer to the sites' locations with respect to the urban area and transport provision. The sites are located where they would promote a sustainable pattern of development.

The Council's response to PQ45 states that development requirements are not necessary for Ashton Vale as planning permission has been granted.

Q5.13: Development Requirements

Notwithstanding the extant planning permission, is Policy DS11 likely to be effective in dealing with any subsequent applications should they be submitted?

Council's response

14. The council's response to preliminary question PQ45 discusses the planning permission. Any subsequent planning applications at the site would be determined in accordance with the relevant policies of the local plan. The planning permission would be a material consideration.

Q5.14: With regard to Elsbert Drive, would the policy be effective in securing sustainable development? In particular with regard to:

a) A cross boundary masterplan or development framework. To what

extent is the delivery of this allocation dependent on North Somerset's Local Plan?

Council's response

15. Development of the site would be in accordance with other relevant policies in the local plan which would assist in securing sustainable development.

16. The approach to adjacent land is likely to be significant as it is likely that the most effective approach to development would be as part of the wider consideration of the area. At this time, the North Somerset Local Plan Publication Version proposes that the land should be allocated for development.

Q5.14 b) Scale and density of development.

Council's response

17. The estimated capacity for the site is 150 homes.

Q5.14 c) Potential effects of development and expected mitigation.

Council's response

18. The effects of development and any required mitigation would be considered in relation to the relevant policies of the local plan and any relevant legal requirements such as biodiversity net gain.

19. A specific reference is made within the policy to addressing the residential amenity of existing homes on Elsbert Drive. This takes account of the relationship of the site to thirteen properties on Elsbert Drive with shallow rear gardens which directly adjoin the proposed allocation.

Policy DS12 - New Neighbourhood – Bath Road, Brislington

Policy DS12 allocates land for a new neighbourhood at Bath Road, Brislington. The allocation would be removed from the Green Belt.

Q5.15: Green Belt

How would development proposed by Policy DS12 affect each of the five Green Belt purposes set out in paragraph 138 of the NPPF?

Council's response

20. In terms of the area covered by Policy DS12, the policy proposes the land is removed from the Green Belt. The land once removed would not be Green Belt and would not serve any of the Green Belt purposes individually or taken together.

21. In terms of how this removal impacts on purposes 1 and 2 with respect of the integrity of the current and proposed amended Green Belt, Local Plan explanation text 3.3.33 discusses the openness between Bristol and Keynsham indicating that the integrity of the Bristol Bath Green Belt would be retained.

22. In the West of England Combined Authority Strategic Green Belt Assessment Parcel P78 is shown as making a significant contribution to a number of the relevant Green Belt purposes. However, the assessment also notes:

'To the south of the A4, the Brislington Park and Ride (map point B) is an urbanising influence that diminishes the openness of the Green Belt. Fields to the east of this have well-treed boundaries which retain some distinction from the urban area, but also have similar strength outer boundaries that would limit the impact on the distinction of adjacent Green Belt land.'

Q5.16: Would Policy DS12 be effective in ensuring that the proposed Green Belt boundaries around the Bath Road, Brislington allocation are clearly defined using physical features that are readily recognisable and likely to be permanent?

Council's response

23. The site is bounded by Scotland Lane to the south, hedgerow features and a stream at Scotland Bottom to the east (the boundary with Bath and North East Somerset) and the A4 Bath Road to the north. These all enable permanence of the boundary to the remaining Green Belt should that permanence continue to be a feature of local plans.

24. The area to the north of the A4 is within the Avon Valley Conservation Area and, west of Ironmould Lane, a Registered Park and Garden: Brislington House. These areas north of the A4 are proposed to remain in the Green Belt.

25. The area to the south of Scotland Lane is proposed to remain in the Green Belt. This area includes playing fields, a local nature reserve, a site of nature conservation interest and an area proposed as Local Green Space in the local plan (Stockwood Open Space).

Q5.17: Would Policy DS12 be effective in securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of removing the allocation from the Green Belt?

Council's response

26. This matter is discussed in the council's response to preliminary question PQ56.

27. No ways in which the impact of removing the land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land have been identified or referred to in the published local plan.

28. It is noted that there are no existing public footpaths at the site nor any form of general access. The allotments are to be retained.

29. As noted in the council's statement regarding Matter 5 Issue 1 Q5.7 it is noted that 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.

Q5.18: Site Selection and Location

Is the Bath Road, Brislington allocation suitably located, having regard to the Plan's spatial strategy and the national aim of promoting a sustainable pattern of development?

Council's response

30. The council's response to preliminary question PQ55 refer to the sites' locations with respect to the urban area and transport provision.

The response to PQ16 indicates that DS12 is the only allocation that is affected by a Minerals Safeguarding Area (MSA). It goes on to conclude that it appears unlikely that prior extraction would be practicable or environmentally acceptable at this location and that any issue would be examined as part of a planning application.

Q5.19: Minerals safeguarding

Is there any substantive evidence to suggest that development DS12 would be prejudiced by the safeguarding of minerals? Has any assessment been carried out of the potential for extraction?

Council's response

31. The council has not commissioned an assessment of the potential for extraction.

32. The council's response to preliminary question PQ16 discusses the minerals safeguarding area.

33. Over many years of consideration of potential development in this area, the council has not become aware of any information to suggest that there may be the potential for the extraction of coal (the safeguarded mineral) or any active interest in the extraction of coal at this location.

Q5.20: To be effective, should Policy DS12 refer to the MSA?

Council's response

34. The Minerals Safeguarding Area is shown on the Policies Map and the relevant policy will be applicable to the site. A cross reference to the policy may be appropriate with relevant text which discusses the impact of the MSA.

Q5.21: Development Requirements

Are the detailed requirements set out in Policy DS12 justified, consistent with national policy and would they be effective in securing sustainable development? In particular with regard to:

a) The type of development proposed. Is the policy sufficiently clear about the mix of uses expected to be delivered?

Council's response

35. The explanatory text indicates the housing capacity. The allocation is for housing led mixed use to allow for the development of any non-residential

development which may be appropriate in support of a residential development of the scale indicated.

Q5.21 b) The potential housing capacity identified. Is the scale of development proposed appropriate and should the policy be specific about what is expected to be delivered (see also Q5.22 in relation to the park and ride site)?

Council's response

36. A capacity of 500 to 750 home is referred to in paragraph 3.3.34. The council's response to Preliminary Question 48 makes reference to the park and ride site.

Q5.21 c) Effects on the transport network and proposed mitigation.

Council's response

37. The site is located on the A4, a principal connecting route between Bristol and Bath, and leading into the city. The considerations in the policy seek to ensure that the development is supported by appropriate local and strategic transport infrastructure to address the impact of development. The policy also expects the provision of land along the A4 frontage to allow for a mass transit/walking and cycling corridor.

38. The council's response to Preliminary Question 139 refers to a corridor improvement scheme at A4 Bath Road/West Town Lane to Hicks Gate.

Q5.21 d) Effect on biodiversity and proposed mitigation.

Council's response

39. The land does not contain any habitat sites and is not identified as a site of nature conservation interest. Biodiversity gain requirements would be as set out in legislation. Specific reference is made to the retention of (and incorporation of new) important trees, hedgerows and other green infrastructure including the creation of linear park at Scotland Bottom.

40. There are tree preservation orders applicable to parts of the sites – trunks within some of hedgerows and canopy at the former garden centre site in the north east section.

41. Allotments at the site would no longer be part of the Green Belt but would be retained as stated in the policy.

Q5.21 e) Reference to a detailed development framework or masterplan.

Council's response

42. The policy refers to a detailed framework or master plan prepared in consultation with the local community which addressed the mix of uses, form of development and relationship with surrounding areas.

Q5.21 f) Affordable housing and self-build (see also Q7.3)

Council's response

43. Matter 7 responses discusses the approach to self-build.

44. Policy DS12 seeks 35% affordable housing and 5% community-led self-build housing.

The reasoned justification to Policy DS12 refers to the potential for the Brislington Park & Ride to be relocated to land within Bath and North East Somerset. The response to PQ48 states that the housing delivery figures assume the relocation will happen. The response also indicates that there is currently no firm commitment in place for the relocation.

Q5.22: Park & Ride

Is the removal of the park and ride site from the Green Belt justified given the status of any relocation proposal?

Council's response

45. The removal of the site from the Green Belt is appropriate having regard to the removal of land to the east. It ensures that a developed site would not be retained in the Green Belt between the existing built-up area and the proposed development area to the east.

46. Paragraph 3.34 discusses the park and ride site and the fact that its relocation would allow for the higher level of proposed development.

47. It is understood that the existing park and ride site would fall within the definition of grey belt in the current NPPF December 2024.

Q5.23: If so, should the policy make specific reference to the relocation of the park and ride site?

Council's response

48. Discussion of the park and ride site is included in paragraph 3.3.34. The policy would result in the removal of the Green Belt designation from the site currently occupied by the park and ride site.

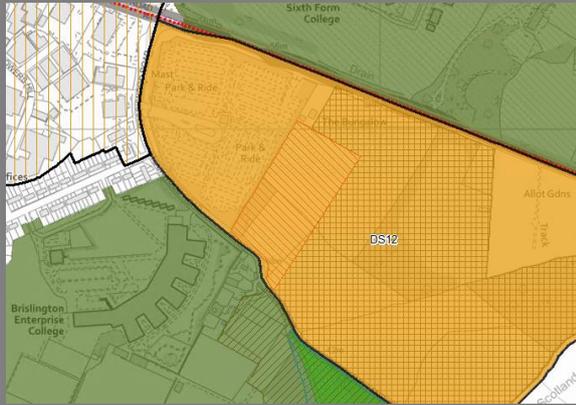
Q5.24: The submitted policies map identifies an area for park and ride expansion under Policy T2A. Given the expectations of Policy DS12, is this designation still necessary and justified? If so, should the policy refer to the potential for expansion as an alternative to relocation?

Council's response

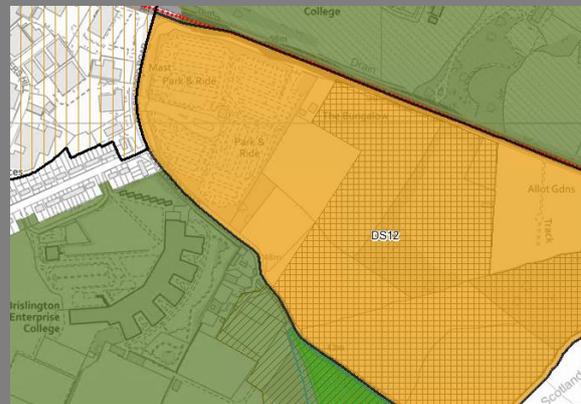
49. Further consideration has been given to the need to expand the Park and Ride onto the site safeguarded for expansion. It is not considered necessary to continue

to safeguard the site and therefore it is suggested that a modification is made to remove the designated area from the Policies Map.

The proposed modification to remove the Brislington Park and Ride from the Policies Map is set out below:



As published:



With proposed modification: