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Bristol Local Plan Examination –  
Hearing Statement  
**Matter 5: Green Belt**

On behalf of Crest Nicolson

March 2025

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## **Matter 5: Green Belt**

### ***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.***

*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?*

- 1.1** Policy DS12 allocates land to the south of the A4, proposing to remove the land from the Green Belt. Policy DS10: The Green Belt provides the policy basis for the new Green Belt boundary, and in paragraph 3.3.25 notes that “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.”
- 1.2** We agree that the allocation of the land at Bath Road, Brislington as Policy DS12, and the new Green Belt boundary therefore proposed will continue to contain the outward expansion of Bristol, and moreover will also continue to fulfil the second purpose of the Green Belt “to prevent neighbouring towns merging into one another” given that the gap between Bristol and Keynsham will be maintained.
- 1.3** Policy DS12 will create a new, strong and defensible boundary to the Green Belt. However, it should be noted that the allocation is adjacent to the boundary with Bath and North East Somerset Council (B&NES). The emerging B&NES Local Plan proposes an allocation at Hicks Gate to the north of the A4, which would also entail the removal of the land from the Green Belt.
- 1.4** The text box on Page 54 of the Bristol Local Plan notes that “In order to meet the need for development across the wider region it is possible that proposals for urban extensions in the Green Belt beyond Bristol City Council’s boundary may emerge through the local plans of neighbouring authorities” and goes on to directly reference the potential for land to come forward adjacent to the land allocated under Policy DS12 – noting that Bristol City Council will work with neighbouring authorities to ensure that integrated and well-planned communities are created.
- 1.5** We would suggest that the land at Bath Road, Brislington should be seen in the context of these emerging allocations in the B&NES Local Plan – which are of critical importance in ensuring that the housing needs of B&NES are met, and that the unmet housing needs of Bristol can be met in locations as close as possible to the City boundary. In particular, if the land at Hicks Gate to the north of the A4 is allocated, the removal of the land from the Green Belt will result in the creation of strong and defensible boundaries along the A4 and the A4174 – easily defined physical features which would also form a strong edge to the urban area, preventing neighbouring towns such as Keynsham merging with Bristol.

- 1.6** We would argue that the changes to the Green Belt in this location should therefore be understood in the context of the wider changes emerging through the B&NES Local Plan, and that in totality the changes are justified against Green Belt objectives and will create sustainable, well-planned new communities with strong and defensible Green Belt boundaries.

*Q5.22: Is the removal of the park and ride site from the Green Belt justified given the status of any relocation proposal? Q5.23: If so, should the policy make specific reference to the relocation of the park and ride site?*

- 1.7** The potential relocation of the Park and Ride site is connected to the emerging proposals for new homes at Hicks Gate. The B&NES Local Plan Options Document which was consulted upon between February and April 2024 shows a proposed allocation of land at Hicks Gate, to the north of the A4 and the west of the A4174 allocated for residential-led mixed use. To the south of the A4, adjacent to the Hicks Gate roundabout, a location is shown for a ‘mobility hub’. Paragraph 6.78 of the Options Document, second bullet point notes that “The Park and Ride site at Brislington is proposed to be relocated, expanded, and increased in functionality to provide interchange between a variety of transport modes to provide a network of connections across the local area. The south-west corner of the Hicks Gate Roundabout has been identified as the preferred location.”
- 1.8** Clearly, the B&NES Local Plan is at an earlier stage than the Bristol Local Plan, and has a number of consultation stages to pass through before it is submitted for Examination. Nevertheless it seems that the proposals for the relocation of the Park and Ride have some momentum and are connected to the wider transport improvements intended to be delivered alongside the A4, connected to the Bristol to Bath Corridor project being led by WECA, and is set out in the Joint Local Transport Plan 4 2020-2036 (p.179) (RELO03). It seems pragmatic and flexible for the Bristol Local Plan to make reference to the relocation and to take account of the implications even though the Local Plan is slightly more advanced than the proposals to deliver the relocation.
- 1.9** It is noted that the potential relocation of the Park and Ride is only mentioned in paragraph 3.3.34 in the context of the number of homes that could be delivered at Bath Road, Brislington. Given that the proposal to relocate the Park and Ride has yet to be confirmed through the B&NES Local Plan, and that the Park and Ride is proposed to be relocated to a site in another local authority area not covered by the Bristol Local Plan, this approach is broadly correct and it would be difficult to justify the inclusion of the proposals to relocate the Park and Ride in Policy DS12 itself. It may be helpful, however, for the explanatory text to set in some more detail the rationale for the relocation of the Park and Ride, including details of where the Park and Ride site would be relocated to, confirming the B&NES Council are supportive of the approach, that the proposal is led by WECA and is set out in the Joint Local Transport Plan 4 2020 – 3036, how the relocation will be funded and confirming that the project will not require funding from development coming forward in the area, and finally an indication of how and when a decision may be

taken and when the relocation will take place – in order to provide more certainty around the implications of the relocation for the development at Bath Road, Brislington. We note that the Council’s response to PQ48 set out in EXA024 sets out an extract from the B&NES Local Plan Options Document from February 2024. It may be that an updated statement in the Explanatory Text to Policy DS12, building on the explanation to the Council’s response to PQ48, setting out the above information, would assist in providing a more complete picture of the likelihood and implications of the relocation of the Brislington Park and Ride.



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