

Examination of the Bristol Local Plan 2022-2040

Hearing Statement 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.

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.

Policy DS12 - New Neighbourhood – Bath Road, Brislington

Green Belt

Q5.15: How would development proposed by Policy DS12 affect each of the five Green Belt purposes set out in paragraph 138 of the NPPF?

Response

2. Allocation DS12 sits *within* Parcel 78 as identified in the Strategic Green Belt Assessment (SGBA) (**EVEG01**). Page 81 of the assessment identifies that Parcel 78 as a whole makes a strong contribution to purpose a), b) and c), with a 'limited / no contribution' to purposes d) and 'equal' contribution to purpose e) (note that in the SGBA the purposes are labelled 1, 2, 3, 4 and 5 respectively against purposes a) – e) in September 2023 NPPF138).
3. However, Parcel 78 is much larger than the area identified in the DS12 allocation, extending into Bath and North East Somerset (BANES) district and the Hicks Gate roundabout. DS12 is a more physically and visually contained area within Parcel 78, lying to the west of the Scotland Bottom watercourse and associated hedgerow and trees. The area encompassed by DS12 is also distinct in that includes previously developed land (Park & Ride site and former garden centre) and is affected by urban influences including Oasis Academy and St Brendan's Sixth Form, for example.
4. A finder grain analysis of the performance of Green Belt on the western part of Parcel 78, to help justify DS12, is set out in Appendix B to the SGBA, PDF pages 234-236 ([link here](#), noting that this has not been published as an examination document, as

discussed at the Matter 4 Hearing: <https://www.westofengland-ca.gov.uk/wp-content/uploads/2023/07/Strategic-Green-Belt-Assessment-Appendix-B.pdf>).

5. This then informs the assessment presented in PDF page 11 of the Allocations and Designations Process Topic Paper (**TPC001**), whereby land to the south of the A4 and west of Parcel 78 is considered in more detail, recognising the urbanising influence of the park and ride and with the fields to the east having *“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”* (taken from page 235 of Appendix B to the SGBA).
6. As further explained in paragraphs 28-32 of Bellway’s Regulation 19 representations, the area encompassed by DS12, makes a limited contribution to purposes a), b) and c) given its characteristics, urbanising influences, topography, physical and visual enclosure. This is broadly similar to the conclusions reached by the Council in the SGBA and the Allocations and Designations Process Topic Paper.

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?

Response

7. Yes – the policy is effective in this regard, with established physical boundaries capable of enduring beyond the plan period. These boundaries comprise the A4 Bath Road to the north, Stockwood Road and Scotland Lane to the south, and Scotland Bottom Watercourse (and associated trees and hedgerows) to the east. The presence of these strong tree-lined boundaries is identified in Appendix B to the SGBA (**EVEG01**, page 235) and Allocations and Designations Process Topic Paper (**TPC001**, page 11).

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?

8. No further comments at this stage, reflecting the discussion during the Matter 4 Hearing.

Site Selection and Location

Q5.18: 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?

Response:

9. Yes. Allocation DS12 is suitably located, with its release signalled through contingency policy BCS5 in the adopted 2011 Core Strategy and supported through the Council's evidence base for the Local Plan Review, including Sustainability Appraisal. DS12 is in a sustainable location, adjoining a secondary school (Oasis Academy), St Brendan's College Sixth Form, Flowers Hill Trading Estate, Brislington Retail Park and a range of other nearby services and facilities. Significantly, it also sits on the A4 Bath Road, a high frequency public transport corridor into Bristol City Centre (via Bristol Temple Meads), with bus stops along the allocation's frontage.
10. This area is due to see further sustainability enhancements through the delivery of the West of England Combined Authority's mass rapid transit scheme, providing additional interventions in public transport, walking and cycling along the A4. This is envisaged in Policy DS12, under the second development principles bullet point, whereby land can be safeguarded along the allocation's frontage to help enable this transport scheme.

Minerals safeguarding

Q5.19: 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?

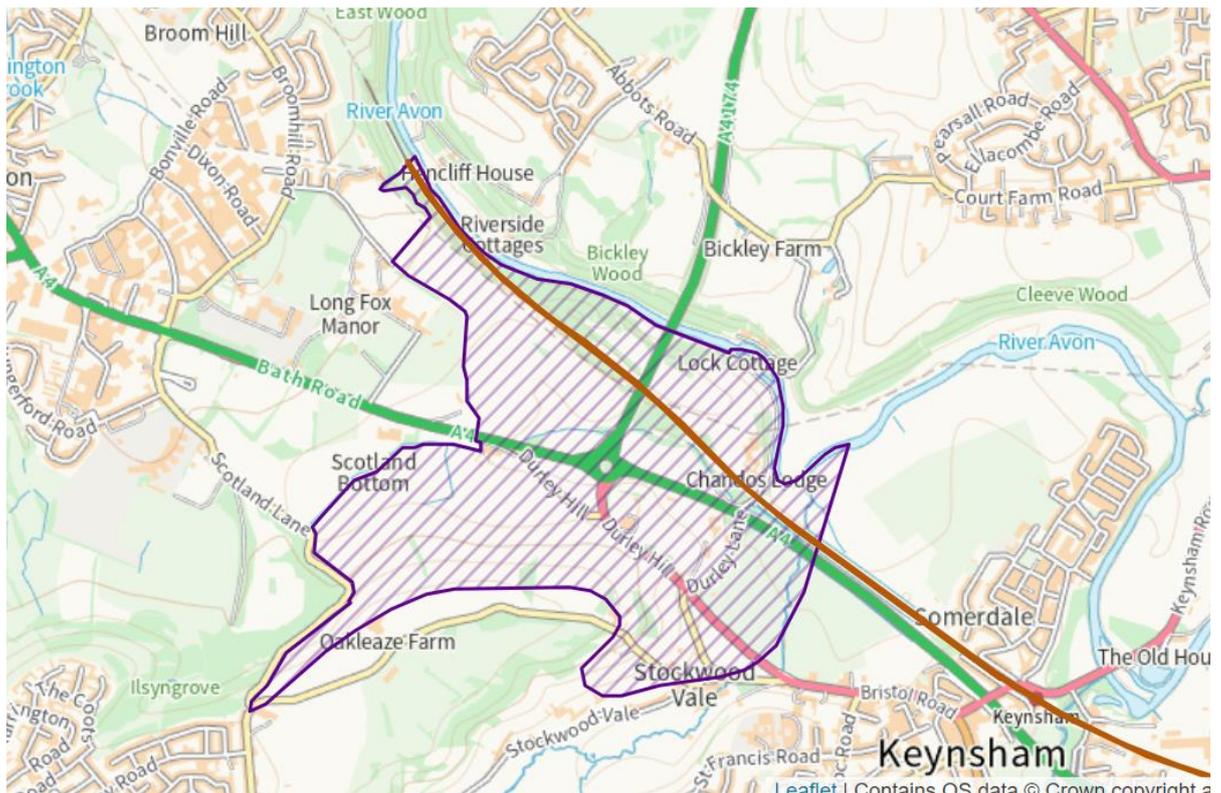
Response

11. No – DS12 would not be prejudiced by the safeguarding of minerals. Minerals safeguarding policies are a common issue on development sites and do not generally prohibit schemes coming forward for development, provided that the feasibility and viability of extraction is understood prior to development.
12. In the case of DS12, the Minerals Safeguarding Area (MSA) is a legacy of Policy DM38 in the Bristol Site Allocations and Development Management Policies (2014). Policy DM38 is designed to safeguard 'proven mineral resources which are, or may

become, of economic importance from unnecessary sterilisation’ however, ‘ there is no presumption that land within the MSAs will ultimately be allocated for extraction.’

13. It is also important to note that the MSA covers a much wider area, cross-boundary into BANES, as demonstrated on Figure 1 (extract from BANES Interactive Policies Map, Policy M1 of the BANES Placemaking Plan, adopted July 2017).

Figure 1 Extract from BANES Interactive Policies Map – extent of Policy M1, MSA



Source: BANES

14. Bellway has already undertaken preliminary investigations as part of its submitted outline planning application (ref. 24/03186/P, submitted August 2024) for their part of the DS12 allocation, evidence which can be submitted to the examination if required by the Inspectors. Considering that there is evidence within the ground to show that the Site has been worked previously for coal (with mineshafts recorded on the site), and possibly sandstone mining (with former quarrying evident in the centre of the Site), further removal of coal from the site is unlikely to be feasible and given the history of extraction it is unlikely that the remaining minerals on the site would have significant economic value.

15. Bellway also concurs with the Council's position, as expressed at page 19, PQ16. of IN2, where they state that the prior extraction of coal in this location *"is unlikely to be practical or environmentally acceptable at this location."*
16. No significant and unnecessary sterilisation of mineral resources is likely to arise from the allocation of DS12.

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

Response

17. The MSA is already identified on the policies map, with a requisite policy in the draft plan under draft Policy UM3. There is no need for DS12 to also refer to the MSA.

Development Requirements

Q5.21: 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?

18. Yes – the policy makes clear that the allocation is for residential-led mixed use development.

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)?

19. Yes – the scale of development is considered appropriate.

c) Effects on the transport network and proposed mitigation.

20. Yes – development principles 1, 2 and 3 (bullet points in Policy DS12), require development to be supported by appropriate transport infrastructure, land to be safeguarded for the A4 mass rapid transit scheme and creation of high levels of permeability. In combination with other policies in the draft Local Plan Review (including draft Policy T3A), the priority will be to reduce private car use and secure a modal shift towards walking, cycling and use of public transport. The unique location of Policy DS12 and nature of the proposals being brought forward by Bellway Homes

on their part of the allocation (summarised in Regulation 19 representations), allow for this modal shift to be realised.

d) Effect on biodiversity and proposed mitigation.

21. Yes – the policy is effective, with respect to development principles 4 and 5 (bullet points), through seeking the retention of existing important landscape features and securing biodiversity net gain in accordance with national legislation.

e) Reference to a detailed development framework or masterplan.

22. This can be addressed as part of the planning application process, whereby a framework or masterplan can be consulted on, considered and approved. Bellway Homes is already in discussions with the Council regarding this as part of their submitted outline planning application, with framework plans submitted for the allocation as a whole following pre-application consultation with the local community.

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

23. Bellway has no comments to make on this aspect of the policy.

Park & Ride

Q5.22: Is the removal of the park and ride site from the Green Belt justified given the status of any relocation proposal?

Response

24. Bellway understands that the relocation of the park and ride site is being progressed in combination with proposals being developed by BANES as part of their Local Plan Review 2022-2042. A potential site for a new transport interchange – on land to the south of the Hicks Gate roundabout - was consulted on by BANES in a Regulation 18 consultation undertaken between February and April 2024.

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

Response

25. The policy could cross-reference to emerging proposals for relocation of the park and ride site into BANES as part of their plan-making process.

26. However, it is important to note that delivery of other land within DS12 is not contingent on the park and ride's relocation. Bellway Homes part of the Scheme can come forward in the shorter term, enabling the early delivery of infrastructure to support implementation of the allocation as a whole, including redevelopment of the park and ride site. The measures proposed by Bellway include safeguarding land along the A4 (for the Combined Authority's Mass Transit proposals), masterplanning pedestrian, cycle and vehicle connectivity into a future redeveloped park and ride site, improvements to pedestrian and cycle links along Stockwood Road and further off-site improvements informed by ongoing discussions with the Council.

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?

Response

This policy is no longer justified and can now be removed, given that there are no proposals to provide park and ride expansion on the area identified on the policies map. This will need to be addressed via a modification to the plan. We understand that this is a point that the Council is intending to make as part of the examination process.

WORD COUNT (excluding MIQ questions and headings): 1,519

**David Fovargue, MRTPI
Planning Director
Marrons
March 2025**