



Pearce Planning Ltd have been appointed by Bristol Grammar School (BGS) to submit a written statement to the Bristol Local Plan Examination in relation to land at Golden Hill, Bristol. This statement has been prepared in accordance with *'IN4 – Appendix 2: Written Statement Guidance'*. The ID number for BGS in EXA001 is '422'.

It is understood that there is no need to repeat in detail anything that has been provided in previous representations. We therefore cross-refer to the representations we submitted to previous rounds of consultation and include a summary below.

- Bristol Local Plan Publication Version (November 2023) – dated 25th January 2024
- Bristol Local Plan Review (Further Consultation – November 2022) – dated 20th January 2023
- Bristol Local Plan Review: Draft Policies and Development Allocations 2019 – dated 23rd May 2019

This statement primarily refers to **Matter 10: Biodiversity and Green Infrastructure** but also touches on **Matter 18: Housing Trajectory and Housing Land Supply**

To put the representations in context, BGS have been promoting alternative uses of the land for part residential/part leisure use, potentially extending the scope of leisure uses to the general public, whilst delivering valuable homes to help achieve the unmet need. The main driver for this being the need for and use of certain parts of this area as playing fields reducing in recent years and wanting to make more efficient use of the land as well as a need for an upgrade of the remaining sports field and facilities to ensure continued use in the longer term. There is no public access to the site currently and the facility is secured at all other times so at present the benefit to the community is very limited. A community based private organisation leases the pitches but the proposed development area is not laid out as formal playing pitches.

It is acknowledged that it is not the purpose of the examination to discuss 'omission sites' and therefore whilst we strongly believe the site should be identified for development, based on i) the overriding unmet need for housing in Bristol; ii) Bristol needing to work harder at releasing more land and achieving the target housing supply rather than leaving it for others to cooperate given those locations are suboptimal; and iii) the site being sequentially preferable to other sites identified for development which questions the methodology for selection (e.g. Green Belt released over this land?), We understand its allocation may only be possible should the Inspectors find the Plan unsound and require Bristol to identify more opportunities like this site. We do however feel that there must be an amendment to the current Reserved Open Green Space allocation so that it omits part of the site suitable for development and make a change to the proposed policy wording to make this easier to develop in planning terms.

It is noted that in the Council's response to representations received in examination document EXA001 no modifications are suggested to policy GI2 or the extent of the Reserved Open Green Space allocation in relation to the Golden Hill site.



Matter 10: Biodiversity and Green Infrastructure

Issue 10.2: Whether the Plan's policies on open space and green infrastructure are justified, consistent with national policy and effective.

Generally, we support the proposed distinction between 'Local Green spaces' and Reserved Open Green Space' and concur that the site does not warrant allocation as a Local Green Space given the ownership, limited use, access, location in the context of public routes and appearance.

Q10.17: Is Policy GI2 justified, consistent with national policy and effective, including:

a) Are areas of Reserved Open Green Space identified on the policies map justified?

No, the areas of Reserved Open Green Space are not justified as they have not taken into consideration other reasonable alternatives or the actual current ownership/use of the space.

The evidence indicates additional homes will need to be delivered to ensure the City's housing needs are met and as such there is merit in unlocking more sites to help with housing delivery, rather than placing further constraints on them. Greenfield sites in Bristol are rare and most are required to be retained either as green belt land, or for recreation, or to sustain and enhance biodiversity for food growing. Considering the land that can come forward for housing development and the places which are reserved for other necessary land uses places constraints on the amount of land that can come forward for housing development. Maximising the development potential of sites in sustainable locations will help to ease the pressure on Green Belt releases and development in less sustainable locations or desirable in terms of where the need exists.

The previous rounds of representations in relation to the Golden Hill site have outlined how only part of the site could be designated as a 'Reserved Open Green Space' whilst still maintaining adequate provision (and potentially increasing overall real provision and community use) both on the site and in the local area, meaning that the remainder of the site would be able to come forward for development, including for housing, of which there is a clear need for additional sites.

There is an increased pressure on delivery of housing in the city and this is leading to Green Belt review to consider the release of land. As a result, further consideration should be given to sites that have been designated as 'Reserved Open Green Space' to ensure that they are not unnecessarily excluding parcels of land that may be suitable for housing development, whilst still maintaining adequate open space provision, such as in the case of the Golden Hill site.

b) Is the policy consistent with paragraph 99 of the NPPF in relation to the assessment of the loss of open space?

Paragraph 99 of the NPPF relates to the assessment of the loss of open space and advises they should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*



b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

As put forward in previous representations, it is considered that the addition of the third suggested criterion (below in **bold**) would bring the policy more in line with paragraph 99 of the NPPF as it would bring in the loss vs benefits element, which the current policy wording is currently lacking.

This suggested third criteria considers sites in private use at present which have limited public use or are in poor quality which could be enhanced through the release of part of the land for development.

The suggested wording is as follows:

Development which would result in the loss of all or part of land identified as a Reserved Open Space as shown on the Policies Map will not be permitted unless it can be demonstrated that:

- i. The open space is no longer required for its open space function; and*
- ii. A deficiency of open space provision would not be created through its loss, measured against the local plan's policies for open space provision (Policy GI A 'Open space for recreation'); **or***
- iii. **When judged against current use, the loss would be mitigated through a comprehensive redevelopment of existing underused open space including securing a community use agreement to enhance public availability***

Ancillary development of a proportional scale that supports the function and role of the Reserved Open Green Space may be acceptable provided it does not have a harmful impact on the space as a whole.

c) Paragraph 9.2.16 refers to the policy approach allowing local communities to consider and review the approach to open spaces in their areas. Does this refer to anything other than review through future Local Plans or Neighbourhood Plans?

Due to the length of time that local plan reviews and Neighbourhood Plan preparation can take there should be a process whereby local communities can review the approach to open spaces in their areas outside of the local plan or neighbourhood plan process. The above suggested third criterion to the draft policy would be a way to achieve this.

The Golden Hill site is a good example of where this would be beneficial as if a community use agreement is delivered and the open space enhanced in conjunction with development on part of the site this would benefit the community more than the current situation.



Matter 18: Housing Trajectory and Housing Land Supply

Issue 18.1: Whether the plan will provide for a sufficient housing land supply to deliver the planned scale of housing growth over the plan period and whether a deliverable five-year supply of housing will be available on adoption.

Q18.3: Does the Plan identify a supply of development sites, or broad locations for growth, for years 6-10 and, where possible, years 11-16 of the Plan, from the point of adoption?

Q18.2: Would the Council be able to demonstrate a 5-year supply of deliverable housing land on adoption of the Plan? Are assumptions on deliverability appropriate, justified and consistent with national policy?

We do not intend to go into detail on these questions, but in general terms there is a major concern that there is not a sufficient supply of development sites given that the Council appear to have missed opportunities to allocate sites for housing, or place unnecessary constraints (such as Reserved Open Green Space designations) on some areas of land which are perfectly suitable for development, in sustainable locations and a good source of land for residential use (e.g. the BGS site at Golden Hill).

As stated above, maximising the development potential of sites in sustainable locations will also help to ease the pressure on Green Belt releases and development in less sustainable locations in the normal sequential test. This is particularly relevant given the Council's admission during the examination that they have not updated their urban capacity study to reflect the current situation or consider new sites which hold potential. The implication of this is that their evidence base of what could be delivered is now 5 years old and a lot has changed in this period, with businesses, uses being affected by Covid and post Covid. If examined, the Golden Hill site would be found suitable for some development alongside an improvement to the pitches and an increased availability for the public.

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