

HEARING STATEMENT

Matter 5: Green Belt

On behalf of Redrow Homes.

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5. Matter 5: Green Belt

Issue 5.1: Whether the approach to altering the Green Belt boundaries and development within it justified and consistent with national policy?

Q5.1. How much land is proposed to be removed from the Green Belt, both in overall terms and as a proportion of the existing Green Belt?

As noted in the Council's response (EXA024) to the Inspectors' preliminary questions (IN2), the area of Green Belt within the authority's boundary extends to approximately 600 hectares. The release of the three proposed allocation sites (DS11.1, DS11.2, DS12) within the Green Belt would amount to the release of 41.6ha, or 6.93% of the existing Green Belt.

Pegasus Group consider there are further opportunities for the release of Green Belt land which have been dismissed by the Council in preparing the BLP. For example, the Yew Tree Farm site previously included in Reg 18 version of the BLP. This site was previously assessed by the Council and agreed to be removed from Green Belt, but subsequently (and without adequate explanation/justification) this decision was reversed in the consultation on Draft Policies and Development Allocations Further Consultation – November 2022. Nothing has changed regarding the principle of removing land from Green Belt.

Q5.2. What would the capacity be for housing *without* altering Green Belt boundaries?

No comment. This is a matter for the Council to clarify.

Q5.3. Were all reasonable options for meeting the need for meeting the identified need for development fully examined? In particular:

a) Has the Council sought to make as much possible use of suitable brownfield sites and underutilised land?

No comment.

b) Has the Council sought to optimise the density of development?

No comment.

c) Has the Council discussed whether there is any potential to accommodate some of the development needs of the City in other authority areas?

Please see Pegasus Group's comments on Matter 1.

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?

Yes. The Council Acknowledge this need in paragraph 3.3.31 of the Reg 19 Plan (CSD001), "*in order to ensure a sufficient number and range of development sites become available to meet the need for new homes it is considered necessary to allow for a limited release of land from the existing Green Belt.*"



The Council has concluded that *"a limited release of land from existing Green Belt"* is necessary, however the Council have not demonstrated that they have examined fully all reasonable alternatives for meeting its identified need for development (as set out in paragraph 141 of the NPPF September 2023) Furthermore the releases proposed are insufficient to meet the housing need and as such the Council are not meeting the housing need of Bristol in full, further release of Green Belt is needed. Please see Pegasus Group's comments on Matter 2.

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?

The version of the NPPF against which the BLP will be assessed (September 2023) requires at Paragraph 140 that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Paragraph 141 requires that before concluding exceptional circumstances exist to justify changes to Green Belt boundaries, the LPA should be able to demonstrate it has fully examined all other reasonable options for meeting its identified need for development.

The West of England Combined Authority's Strategic Green Belt Assessment September 2022 (EVEG01) is the only document the LPA have put forward as evidence that the Council have undertaken an assessment of the impacts of releasing land from the Green Belt. However, this assessment does not propose any release of land from the Green Belt, neither does it make any recommendations for release, instead it points to considerations of potential harm that the release of land from the Green Belt would have on the integrity of remaining Green Belt land. This was then intended to inform the preparation of the Local Plans.

Paragraph 3.3.31 of the Plan (CSD001) states that:

"in order to ensure a sufficient number and range of development sites become available to meet the need for new homes it is considered necessary to allow for a limited release of land from the existing Green Belt."

However, it is not clear what evidence has led the Council to conclude that only a limited release of land from the Green Belt is necessary when the Standard Method for housing need is 3,380 dpa.

No comprehensive assessment of the Green Belt has been undertaken, in which case it is not transparent how the sites that are included in the plan have been selected.

(EVEG01) was a 'stage 1' assessment and did not consider sites now proposed for release through the CSD001 in an adequate level of detail. Indeed, the EVEG01 acknowledges this at paragraphs 5.4 – 5.6. Paragraph 5.4 states:

"The strategic contribution analysis and comments on potential harm of release of land provided in this 'Stage 1' assessment will form the basis of future detailed Green Belt assessment work assessing the harm of releasing defined areas Green Belt land



(i.e. sites or development search areas), and identifying ways that harm could be minimised.

Paragraph 5.6 goes on to state:

“The more detailed ‘Stage 2’ assessment will apply the same basic assessment criteria, but at a finer grain in terms of both the size of areas of variation that are identified, and the ratings scale that is applied.”

There is a clear expectation within EVEG01 that further work needs to be undertaken before the constituent local authorities determine which areas of the Green Belt may be suitable for release.

Work on the WECA Spatial Development Strategy has been halted and is no longer being progressed. There is therefore no expectation that any organisation other than the Council would be in a position to undertake a stage 2 Green Belt review. The Council have clearly chosen not to do so.

It is also clear that EVEG01 applies to larger/different parcels of land than were considered by the Council when determining the proposed BLP allocations. There has therefore been no comprehensive assessment of these sites in relation to the impact on their release on Green Belt purposes.

In the Council’s response to the Inspectors’ preliminary questions (EXA024), the Council do not even appear to seek to heavily lean on the assessment of the EVEG01, stating:

“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 impact of the proposed changes.”

Similarly, the Allocations and Designations Process Topic Paper states:

“The West of England Combined Authority Strategic Green Belt Assessment has been used to assist in consideration of the nature and extent of harm to the Green Belt which would arise from these amendments and the extent to which the consequent impacts on the purposes of the Green Belt can be ameliorated or reduced to the lowest reasonably practicable extent”

However, nowhere in the Council’s evidence base is it noted that the EVEG01 (a) was not a stage 2 detailed assessment, or (b) the EVEG01, by virtue of its strategic nature, assessed far larger parcels of land than considered under the Council’s process for selecting/allocating sites. Both of these factors indicate the EVEG01 does not, on its own, provide a sufficiently robust basis for the selecting of sites to be released from the Green Belt.

No document within the examination library provides a detailed comprehensive assessment of the Green Belt in assessing the impacts of the release of Green Belt sites upon the Green Belt. The examining Inspectors are therefore left with no robust justification in answer to the following critical questions:

- What effect will the release of the 3x identified proposed allocation Green Belt sites have upon the Green Belt (in terms of both purposes and openness)?



- What are the comparative impacts of the 3 identified sites on GB purposes and openness in relation to other Green Belt sites which have not been proposed for release?

Land at Yew Tree Farm was included in the West of England JSP Green Belt Assessment Stage 2 (November 2016) within Cell 68b. The assessment concluded that the site made a limited contribution to the purposes of the Green Belt. Whereas the Land at Bath Road, Brislington, which is a retained allocation in the latest version of the Local Plan Review CSD001, within Cell 48d – concluded that this cell makes a major contribution to restricting the sprawl of Bristol and prevents the city and Keynsham from merging into one another.

The only justification that the Council provided for the de-allocation of Yew Tree Farm is that: *“the land has an important role as part of the existing farming enterprise and is being managed to enhance its nature conservation value.”* This is factually incorrect.

The site comprises 5.2 hectares, it is not part of a working farm, neither is it an organic farm, the land does not have an important role in terms of the farming enterprise. The land has been used for grazing and historically has been subject to a grass keep license, which was reviewed annually and terminated in 2023.

Kernon Countryside Consultants have provided advice on the site to Redrow Homes and concluded that the site of 13 acres used as grassland would not constitute a working farm. It may have been grazed under a grass keep license for some years, but this was with the sole purpose of ensuring good estate management in terms of grass keeping. The landowner has previously granted the licenses to access the land for the purposes of grazing or mowing and removing grass only. These licenses were on a temporary basis which could be terminated by the landowner at any time.

The documents submitted to the Council by Pegasus Group in relation to the Regulation 18 (January 2023) and Reg 19 consultations (January 2024) outline how the development of the Yew Tree Farm site could conform to relevant local planning policy and legislation if it were released from the Green Belt for allocation for residential development.

We contend that the Yew Tree Farm site, as demonstrated not only by our evidence as previously submitted, but also by the Council’s own evidence in support of the Reg 18, should have been considered by the Council for release from the Green Belt in preference to allocation DS11, given the findings of previous Green Belt studies in comparing the impacts upon the purposes of the Green Belt. The Council’s process for selecting appropriate sites to release from the Green Belt was not robust and consequently, Policy DS10 is not positively prepared, justified, effective or consistent with national policy.

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?

This is a matter for the Council to address. However, it should be noted that land at Yew Tree Farm is well served by public transport.

It should be noted that the Council in the Draft Local Plan 2019, Draft Policy DS10: Changes to the Draft Policy DS10: Changes to the Green Belt in South Bristol paragraph 4.3.18 stated:



"At southwest Bristol, the construction of the new MetroBus route and the South Bristol Link (Colliter's Way) has changed the character of that edge of the city. The Green Belt previously provided an uninterrupted connection from the very edge of the built up area into the wider countryside. The new link road and part of the MetroBus system has the effect of separating the area to the east from the rest of the Green Belt. The transport infrastructure acts as a boundary. In order for the Green Belt to serve its purposes the council considers that it is no longer necessary for it cover those areas to the east of the link road which lie within Bristol and it is proposed that the Green Belt boundary is amended here as shown on Diagram 4.3.1 below."

The site is located in close proximity to multiple local facilities. These include local shops, supermarket with cash machine, post office, child care and medical facilities. There is good connectivity to the rail services, with A1 bus service providing frequent direct services towards Parton Street Rail Station, approximately 2km northeast of the site and on to the centre of Bristol to access Bristol Temple Meads Rail Station. In addition to existing services, the South Bristol Link Road includes provision for MetroBus services, with stops to the north of the roundabout with the A38. There is no current service along this section of the South Bristol Link Road, though with plans to provide a future route between Long Ashton Park & Ride to the north, and Hengrove Park to the south.

The West of England JSP Strategy recognised that there are exceptional circumstances which justified the release of Green Belt sites.

The evidence base for the JSP in Topic Paper "The Formulation of the Emerging Spatial Strategy" para 43 recognised:

"... that in light of the strong evidence underpinning the most sustainable pattern of development outlined above, it is recognised that consideration needs to be given to Green Belt locations and specifically the case to consider locations in close proximity/well related to existing urban centres. However, this needs to be undertaken in the context of the Plan's overall priorities and spatial objectives at set out above"

Paragraph 45 stated that:

"It is evident from the Green Belt stage 2 assessments that the part of Ashton Vale that lies within the City boundary and is inside the South Bristol Link Road makes only a limited contribution to the Green Belt compared to other Green Belt locations. This location would accommodate around 400 dwellings and whilst not strategic in size, it could contribute to non-strategic growth within Bristol, see para 4."

Yew Tree Farm, Bridgewater Road is within this location i.e., within the line of the South Bristol Link Road and can contribute approximately 150 dwellings, including woodland network and providing on site biodiversity net gain, towards meeting Bristol's housing needs, it is a highly sustainable location and a deliverable site.

Evidence has been submitted to the Council at the Reg 18 consultations to demonstrate that the Yew Tree Farm site is both suitable and sustainable for residential development and can deliver much needed housing included affordable housing without delay.



Q5.7. What assessment, if any, of the opportunities that might exist for compensatory improvements to remaining Green Belt has been carried out?

Given the shortcomings of the EVEG01 as identified above, the Council has not undertaken a robust exercise to determine where opportunities for compensatory improvements exist, nor conducted a comparative assessment of such potential improvements.

Issue 5.2: Whether policies relating to development in the Green Belt justified, consistent with national policy and effective.

Q5.8. Is Policy DS10 justified, consistent with national policy and effective? In particular:

a) Is the policy clear and unambiguous about how planning applications for development within the Green Belt would be assessed?

Whilst the policy does make a specific reference to national planning policy, it is considered that it does not go far enough in explaining that applications will be supported where they comply with national policy. As currently worded, this policy of the CSD001 only explicitly seeks to 'protect' the Green Belt from inappropriate development.

It is considered that the policy should also provide explicit support for development which national planning policy sets out is appropriate. This would lessen ambiguity surrounding the application of the policy.

b) Is the second paragraph relating to previously developed land consistent with the first paragraph, which suggests development in Green Belt would be considered using national policy?

Again, the policy should be consistent with national policy. It should be made clear within the wording of the policy that development proposals relating to previously developed land within the Green Belt will be supported in-line with national planning policy.

c) What is the purpose of the third paragraph, particularly considering that any areas removed from the Green Belt by the Plan would no longer be designated as such and, once established, Green Belt boundaries can only be revised through a revision to the Plan? Is it the Council's position that this paragraph would prohibit any neighbourhood development plans from revising Green Belt boundaries?

No comment.

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



Green Belt

Q5.9. 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?

As referred to in Pegasus Group's representations to the Regulation 19 consultation on CS001, and as noted above, the West of England JSP Green Belt Assessment Stage 2 found that cell 48d (which included the DS11 allocation site) makes a major contribution to restricting the sprawl of Bristol and prevents the city and Keynsham from merging into one another. However, Yew Tree Farm, which the JSP Green Belt Assessment concluded was in a cell (68b) that would make a limited contribution to the Green Belt purposes, has not been proposed by the Council as an allocation site in CS001 whereas land at Yew Tree Farm was a proposed allocation in the Reg 18 Plan.

There has been no comprehensive assessment of the impact of the development upon the Green Belt purposes. The Council seek to rely on the WECA EVEC01, which as noted above, is not a stage 2 detailed assessment and does not assess parcels at a small enough scale.

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?

No comment.

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?

No comment.

Site Selection and Location

Q5.12. 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?

No comment.

Development Requirements

Q5.13. Notwithstanding the extant planning permission, is Policy DS11 likely to be effective in dealing with any subsequent applications should they be submitted?

No comment.

Q5.14. With regard to Elsbert Drive, would the policy be effective in 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?**

No comment.



b) Scale and density of development.

No comment.

c) Potential effects of development and expected mitigation

No comment.

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?

Q5.16. The Plan is not supported by a comprehensive assessment of the Green Belt. 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?

No comment.

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?

No comment.

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?

No comment.

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?

No comment.

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

No comment.

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?**

No comment.

- 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)?**

No comment.

- c) **Effects on the transport network and proposed mitigation.**

No comment.

- d) **Effect on biodiversity and proposed mitigation.**

No comment.

- e) **Reference to a detailed development framework or masterplan.**

No comment.

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

No comment.

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?**

No comment.

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

No comment.

- 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?**

No comment.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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