

# **Representation to South Gloucestershire Council Local Plan Reg 19 Consultation April 2025**

**For: Save our Green Spaces – South Gloucestershire**

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Planning Ltd**

## 1. INTRODUCTION

- 1.1 Context Planning Ltd have been instructed to prepare this representation to the Local Plan Regulation 19 consultation on behalf of Save our Green Spaces – South Gloucestershire (SOGS-SG).
- 1.2 SOGS-SG are a group of passionate, local people, who are concerned about the Reg 19 Local Plan and the proposals to build thousands of homes on land currently designated as Green Belt on the East Bristol fringe.
- 1.3 SOGS-SG wish to object to the Local Plan. This representation provides comments on the Local Plan Regulation 19 consultation document, with a focus on the Green Belt and Bristol East Fringe.
- 1.4 This representation accompanies separate Regulation 19 Consultation Stage Representation Forms:
  - LPS1: Strategy Principles
  - LPS2: Locational Strategy for South Gloucestershire
  - LP6: North Lyde ‘ecotech’ village
  - LP7: Carsons Green and Rockhouse Farm New Neighbourhoods
  - LP8: North Warmley New Neighbourhood
  - LPS11: Strategic Green and Blue Infrastructure and the Natural Environment

## 2. GREEN BELT

### *National Policy*

- 2.1 The National Planning Policy Framework sets out national policy guidance on protecting Green Belt land. The current NPPF was published in 2024. Under transitional arrangements, the Local Plan, reaching Regulation 19 stage before the 12<sup>th</sup> March 2025, will be examined under the 2023 version of the Framework.
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**2.2 The Government attaches great importance to Green Belts** (para 142). The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

**2.3** Green Belt serves five purposes (para 143):

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**2.4 Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated** (para 145).

**2.5 Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified**, in which case proposals for changes should be made only through the plan-making process (para 145). Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. The [Ministerial Statement](#) of December 2023 that accompanied the NPPF, expanded on this:

*“We seek to support the gentle densification of urban areas in preference to the erosion of Green Belt land. That is why the Government is ensuring it is clear there is generally no requirement on local authorities to review or alter Green Belt boundaries if this would be the only way to meet housing need. Where a relevant local planning authority chooses to conduct a review, existing national policy will continue to expect that Green Belt boundaries are only altered where exceptional*

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*circumstances are fully evidenced and justified, and this should only be through the preparation or updating of plans.”*

- 2.6 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development (para 146).**
- 2.7** This will be assessed through the examination of its strategic policies, and whether the strategy:
- makes as much use as possible of **suitable brownfield sites and underutilised land**;
  - **optimises the density of development** including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
  - has been **informed by discussions with neighbouring authorities** about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.
- 2.8** When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account (para 147).
- 2.9** Where it has been concluded that it is necessary to release Green Belt land for development, **plans should give first consideration to land which has been previously-developed and/or is well-served by public transport** (para 147).
- 2.10** They should also **set out 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** (para 147).
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- 2.11** When defining Green Belt boundaries, plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.
- 2.12** Linking to paragraph 147 of the NPPF, Paragraph 002 of the Planning Practice Guidance section on Green Belt provides guidance for strategic policy-making authorities on compensatory improvements to the remaining Green Belt and the measures that could be considered. This includes:
- New or enhanced green infrastructure
  - Woodland planting;
  - Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
  - Improvements to biodiversity, habitat connectivity and natural capital;
  - New or enhanced walking and cycle routes; and
  - Improved access to new, enhanced or existing recreational and playing field provision
- 2.13** In order to ensure such compensatory improvements are secured, paragraph 003 recommends that early engagement with landowners and other interest groups is undertaken by the strategic policy-making authority once the areas of land necessary for release have been identified. Such discussions should consider land ownership, the scope of works required and the appropriate use of conditions and Section 106 obligations.

## *The Local Context*

- 2.14** 40% of the land area within South Gloucestershire is currently designated as Green Belt, including land at Bristol East Fringe.
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**2.15** The County of Gloucestershire Development Plan set the original case for the Green Belt, by highlighting two areas which were **considered to be vulnerable to encroachment by urban sprawl from built-up areas**. This included the area around Bristol City and its environs.

**2.16** It was considered that the reason for the Bristol Green Belt was such that:

***“Any substantial expansion of the built-up area of Bristol and the built-up northern and eastern fringes in Gloucestershire should be checked and it is also considered essential to preserve the open character of the land between the urban areas of Bristol and Bath and to prevent these communities from merging into one another. Land between and adjoining these areas has therefore been defined in the Development Plan as a Green Belt, in which new development will be severely restricted to the uses listed in paragraph (5) [agriculture and forestry, sport, cemeteries, institutions standing in large grounds, or other uses appropriate to rural areas]”.***

**2.17** The Green Belt in South Gloucestershire has remained remarkably intact since it's creation, with a limited number of changes made within Development Plans over the last two decades:

- Local Plan (2006): minor change made to the south of Hanham Business Park, and a Major Developed Site in the Green Belt at Hortham Hospital in Almondsbury
- Core Strategy (2013): Changes made to the East of Harry Stoke/Stoke Gifford, and to the west of the A4018 at Cribbs Causeway
- Policies, Sites and Places Plan (2017): Sites allocated within the Green Belt for Park and Ride/Share facilities at Nibley, Yate and Tormarton

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## *Legal Case Law and Implications*

- 2.18** The courts have suggested that to be exceptional, more should be required than “general planning concepts” or the re-assessment of a site’s planning merits, and that **the test is “very stringent”**.
- 2.19** The 2014 Gallagher Homes Judgement confirmed that once a Green Belt has been established and approved, **it requires more than general planning concepts to justify an alteration**.
- 2.20** The 2015 Calverton Case set out a 5-point plan for those seeking to justify an exceptional circumstances case on the meeting of housing need. Having quantified the local area’s housing need, the Council should then consider whether exceptional circumstances exist in the light of:
- **the acuteness/intensity of the objectively assessed need** (matters of degree may be important);
  - **the inherent constraints on supply/availability of land** that are, on the face of it, suitable for sustainable development;
  - **the consequent difficulties in achieving sustainable development without impinging on the Green Belt**;
  - **the nature and extent of the harm to this Green Belt** (or those parts of it which would be lost if the boundaries were reviewed); and
  - **the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced** to the lowest reasonably practicable extent.

## *Green Belt Assessment in South Gloucestershire*

- 2.21** There is currently no nationally prescribed methodology for assessing variations in Green Belt contribution. However, there are a series of established areas of good

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practice informed and updated by changes in national planning policy, planning practice guidance and associated case law and planning inspector reports.

**2.22** Green Belt assessments focus on drawing out strategic variations in the performance of Green Belt land to each of the Green Belt purposes, referred to as Green Belt contribution. Green Belt is rated against each of the five purposes of Green Belt with variations against any one being used to define variations in contribution across a study area. Common factors influencing judgements on Green Belt contribution to each Green Belt purpose include:

- Variations in Green Belt Openness – Case law makes it clear that Green Belt openness relates to a lack of ‘inappropriate development’, with the definitions of appropriate development contained within the closed lists in the NPPF being used to determine whether openness can be considered to be affected.
- Variations in Green Belt Function – Each of the Green Belt purposes target a different aspect of the relationship between urban areas and Green Belt land. The applicability of each of the Green Belt purposes to any given area of land depend on the nature of the urban area with which that land is associated.
- Variations in Green Belt Distinction – The extent to which land can be considered to relate to an urban area or to the wider countryside. Land that is related more strongly to urbanising development typically makes a weaker contribution to most of the Green Belt purposes.

**2.23** Consultancy studies that assess variations in Green Belt contribution must be:

- Bespoke – tied to the unique pattern of development in each plan area, with clear definitions for what constitutes the ‘large built-up area’ relevant to Purpose (a), ‘towns’ relevant to Purpose (b), ‘countryside’ relevant to Purpose (c) and ‘historic towns’ relevant to Purpose (d).



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- Consistent – using detailed assessment criteria to ensure all judgements are consistent and justified.
  - Robust – founded in the latest relevant planning policy and associated case law.
  - Transparent – communicating assessments findings clearly using maps and accessible use of colour. Both planning professionals and the public need to be able to clearly understand judgements have been made, to save confusion and avoid unnecessary challenges.

**2.24** The Local Plan Reg 19 online consultation portal includes links to a range of evidence and technical documents that have been produced to inform and support the development of the Local Plan.

**2.25** A Stage 2 Green Belt assessment has been produced by Arup, dated January 2025. This forms a secondary stage to the Strategic Green Belt assessment produced by LUC (November 2021), which was included as evidence supporting the previous Reg 18 stage of the Local Plan (and was originally commissioned by the West of England Combined Authority to support the now abandoned SDS).

**2.26** These two studies are crucial documents, as they should provide a proportionate, objective, transparent, comprehensive and consistent assessment of the strategic role and function of the Green Belt within South Gloucestershire.

**2.27** The Stage 2 assessment recognises that **it does not in itself function as a policy or decision-making document that can determine whether areas of the Green Belt should be released for growth.**

**2.28** Instead, this must be balanced amongst other elements of up-to-date Local Plan evidence, assessed against the Environment Assessment of Plans and Programmes Regulations 2004, and, **the Council must demonstrate through the Plan that there are exceptional circumstances which exist to justify the release of Green Belt land.**

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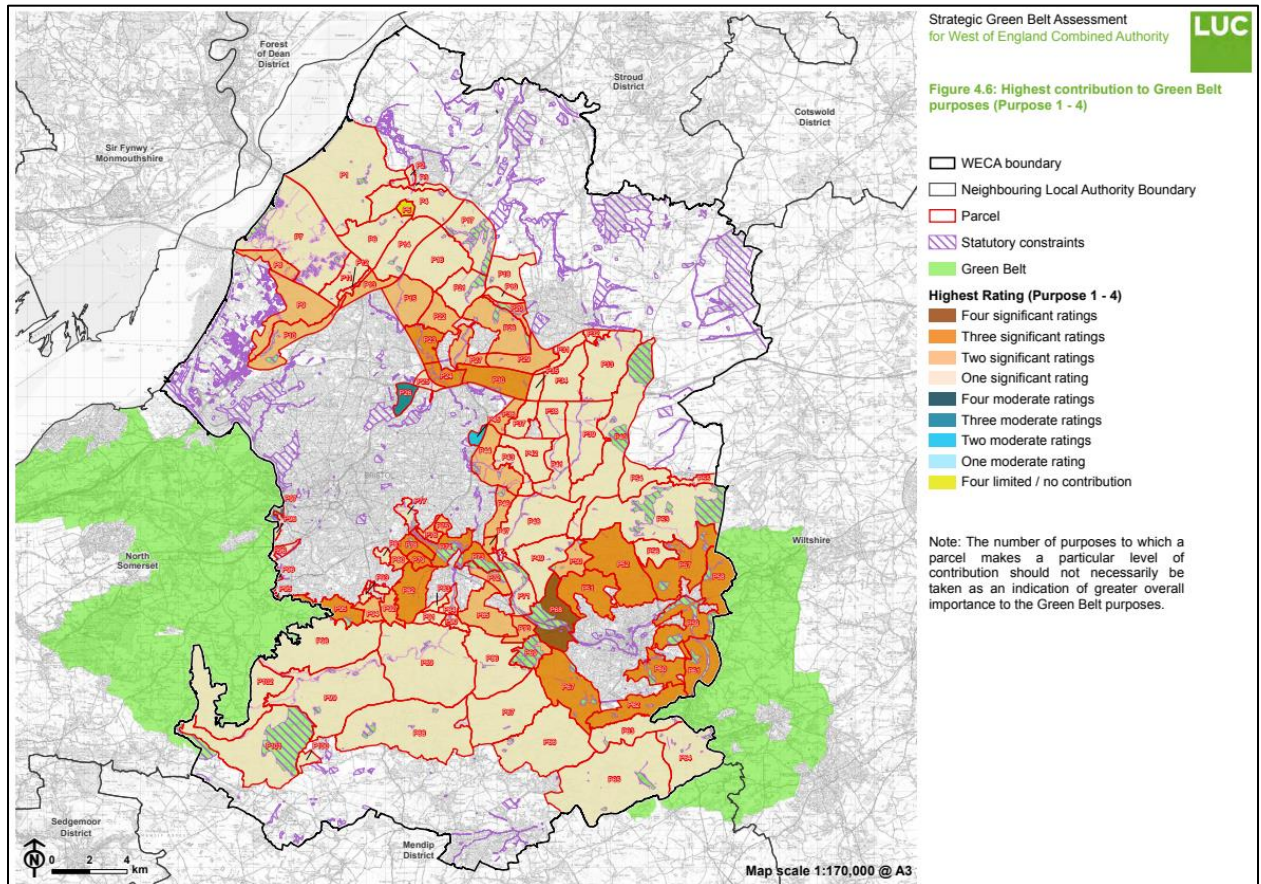
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- 2.29** Despite the halting of work on the WECA Spatial Development Strategy, the constituent WECA authorities have confirmed that **the Stage 1 Strategic Green Belt Assessment remains proportionate and effective, and therefore it is considered to form a component of the new South Gloucestershire Local Plan evidence base.**
- 2.30** The purpose of the Stage 2 Green Belt Review is stated to be as assisting the Council in providing evidence on how sites emerging through the HELAA perform against the Green Belt purposes to inform plan-level considerations regarding sustainable patterns of development. The Stage 2 study does not consider whether a site is in a sustainable location as this is considered as part of other evidence in the Plan.
- 2.31** The Stage 2 Green Belt Review takes the same basic assessment criteria from the Stage 1 Strategic Green Belt Assessment and further refines this based on the need to achieve consistency for a finer grain site specific analysis.
- 2.32** Importantly, the Stage 2 Green Belt Review states that the Council will need to demonstrate the exceptional circumstances case if they intend to release sites from the Green Belt – an admission **that the existence of the study in of itself is not enough to demonstrate exceptional circumstances.**
- 2.33** The Stage 2 Green Belt Review expand further on this point. It says that **the Stage 1 and Stage 2 Green Belt Review will only provide the starting point, and it will be necessary for the Council to develop the exceptional circumstances case, both at strategic and site level,** as part of the wider Local Plan process.
- 2.34** The Stage 2 Green Belt Review also makes clear the importance of **enhancement to the Green Belt and compensatory improvements to the quality and accessibility of the remaining Green Belt to offset any loss of Green Belt,** as required by the NPPF.
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## *Differences between the Stage 1 and Stage 2 Green Belt Assessments in South Gloucestershire*

- 2.35** The Stage 1 Study aims to provide a proportionate, objective, transparent, comprehensive and consistent assessment of the strategic role and function of the Green Belt within the WECA authorities' boundaries.
- 2.36** This has been achieved by establishing variations in the strategic contribution of the WECA authorities' Green Belt land to the Green Belt purposes, as defined in the National Planning Policy Framework (NPPF). The assessment of strategic contribution identifies broad variations in the role of land in relation to each of the NPPF Green Belt purposes, defining parcels of land with ratings and supporting text.
- 2.37** The Stage 1 Strategic Green Belt Assessment sets out that there is a very clear pattern of contribution to Purpose 1. Most of the Green Belt and adjacent to Bristol and Bath is assessed as having sufficient openness and distinction from the urban areas to make a significant contribution to Purpose 1. Exceptions to this are noted at parcels around the Bristol urban area. Some of this land is contained by the built-up area and recently constructed transport infrastructure.
- 2.38** Land identified as making the greatest contribution to Purpose 2 lies between Bristol and Bath and between the Bristol urban area and Yate. The gap between Bristol and Bath is noted to be more fragile than would be the case if it was separating smaller towns.
- 2.39** The majority of Green Belt land is stated to make a significant contribution to Purpose 3. Exceptions to this have been identified where there is built development present at Almondsbury and Alveston, as well as several areas on the fringes of the Bristol urban area that are largely surrounded by urban development.
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- 2.40** Land making the most significant contribution to Purpose 4 is identified around the city of Bath. All parcels adjacent to the city make a significant contribution to this purpose. Land to the south of Bristol at Dundry Hills is assessed as making a significant contribution to the setting of the city. Other areas of high ground are identified as being prominent in Bristol's setting and make a moderate contribution to this purpose. Modern development on the urban fringe of Bristol, and development at Keynsham and Saltford, have a significant impact on the character of the approach to Bristol along the Avon Valley.
- 2.41** To assist in urban regeneration by encouraging the recycling of derelict and other urban land: The Stage 1 Strategic Green Belt Assessment found that all Green Belt land in the study area is considered to make an equal contribution to Green Belt Purpose 5, given the strong distinction between urban and open land.
- 2.42** Figure 4.6 of the Stage 1 study (shown below in Figure 1) combines the contribution ratings for Purposes 1-4 to illustrate how many Green Belt purposes each parcel contributes towards. Whilst it is recognised that land doesn't have to serve multiple Green Belt purposes to be playing a significant role in constraining development, it is reasonable to assume that land which makes a significant contribution to multiple purposes will often represent a stronger constraint.
- 2.43** **Land on the Bristol East Fringe is mainly assessed as making a significant contribution to two purposes (Purpose 1 and Purpose 3). Land around the Avon Valley on the approach to Bristol (south of Longwell Green and Willsbridge), and land to the north of Lyde Green, makes a significant contribution to three purposes (Purpose 1, Purpose 2 and Purpose 3).**
- 2.44** Away from the fringes of Bristol and Bath, most parcels make a strong contribution to only one purpose, in almost all cases Purpose 3. The exception is land forming the gap between Bristol and Yate, where some land also makes a significant contribution to Purpose 2.
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**Figure 1: Figure 4.6 of the Stage 1 Study combines contribution rankings for Purposes 1-4, illustrating how many Green Belt purposes each parcel contributes towards.**

- 2.45** Although, as a strategic-scale assessment, the study has not considered the harm of Green Belt release in detail, the parcel assessments give some indication of the potential for releases that could demonstrate some limiting of harm. However, **any such development will constitute sprawl of a large built-up area as well as encroachment on the countryside and will typically cause a knock-on weakening of adjacent Green Belt land.**
- 2.46** The Stage 1 study notes that it is important that if the decision is taken that land does need to be removed from the Green Belt, the local authorities consider where and how the Green Belt can be enhanced through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.





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**Figure 2: Green Belt Stage 2 Study - Overall contribution of HELAA sites to Green Belt purposes**

- 2.51** HELAA sites on the Bristol East Fringe, around the Avon Valley on the approach to Bristol (south of Longwell Green and Willsbridge), and land to the north of Lyde Green are all assessed as making a moderate overall contribution to Green Belt purposes in the Stage 2 study. A large site to the west of Pucklechuch is the only exception, which is assessed as making a significant contribution.
- 2.52** There is a marked contrast in the overall conclusions of the same areas of land in the Stage 1 and Stage 2 studies.
- 2.53** We are of the view that the Stage 2 study introduces different interpretations of how to assess contributions to purposes which in some cases has produced entirely different conclusions that completely alter the strategic conclusions of the Stage 1 study. This is not consistent with the methodology aims, which are to apply the same basic assessment criteria as the Stage 1 strategic work, however at finer grain of geography, being site specific rather than looking at larger parcels of land. We would expect to see variations in the scoring from the Stage 1 work because of the finer grain of assessment – and we would expect this to be reflected in the overall assessment of the different HELAA sites. Instead, we are presented with a uniform finding that all of the HELAA sites on the Bristol East Fringe only make a moderate contribution to Green Belt contribution.
- 2.54** This warrants a closer inspection of the scoring. Firstly, it is important to understand how the sites are marked, and the threshold between a site making a moderate contribution to a significant one.

- 2.55** The Stage 2 study uses a qualitative scoring / rating system (significant, moderate, limited, no contribution) which is applied to each of the five purposes. This is then used for the overall assessment, as explain on page 38 of the study.
- 2.56** Whilst many combinations of score are presented, the main conclusion appears to be that if a site is assessed as making a significant contribution to at least two Green Belt purposes, it is assessed as making a significant contribution overall to the Green Belt.

Where there was a 3 / 2 split – the majority contribution should always be applied unless the ‘2’ contributions are ‘significant’. In this case, the overall should be ‘significant’. If the majority contribution is ‘no contribution’, the overall should be ‘limited’.

Example:

Limited	Limited	Moderate	Limited	Moderate	Limited
Moderate	Limited	Moderate	Limited	Moderate	Moderate

Exception:

Moderate	Significant	Moderate	Significant	Moderate	Significant
No	No	Moderate	No	Moderate	Limited

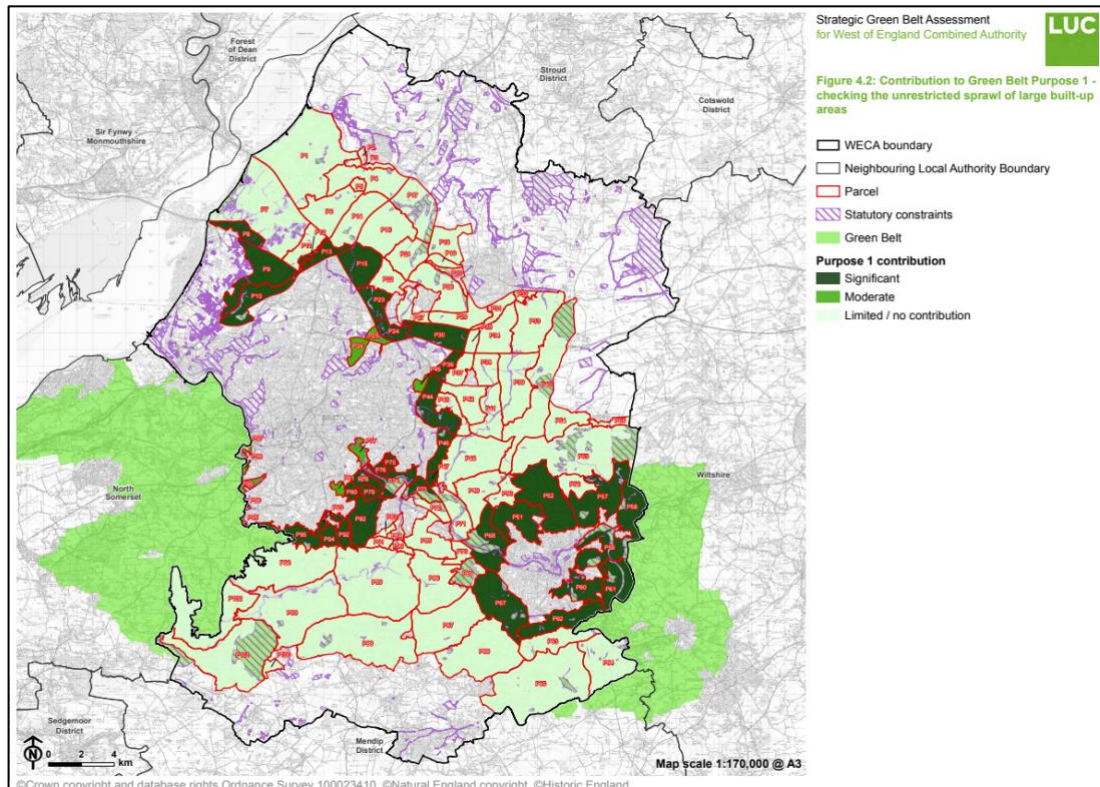
**Figure 3: Example of the scoring system in the Stage 2 Study**

- 2.57** The majority of the sites assessed on the Bristol East Fringe are only assessed as making one significant contribution of the Green Belt in the Stage 2 study – to Purpose 3 (safeguarding the countryside from encroachment). The other Green Belt purposes are in general scored at only moderate to limited contribution, with the exception of Purpose 4 (preserving the setting and special character of historic towns), where all the sites are assessed as making no contribution. **We disagree with some of these conclusions, for reasons which we set out below.**

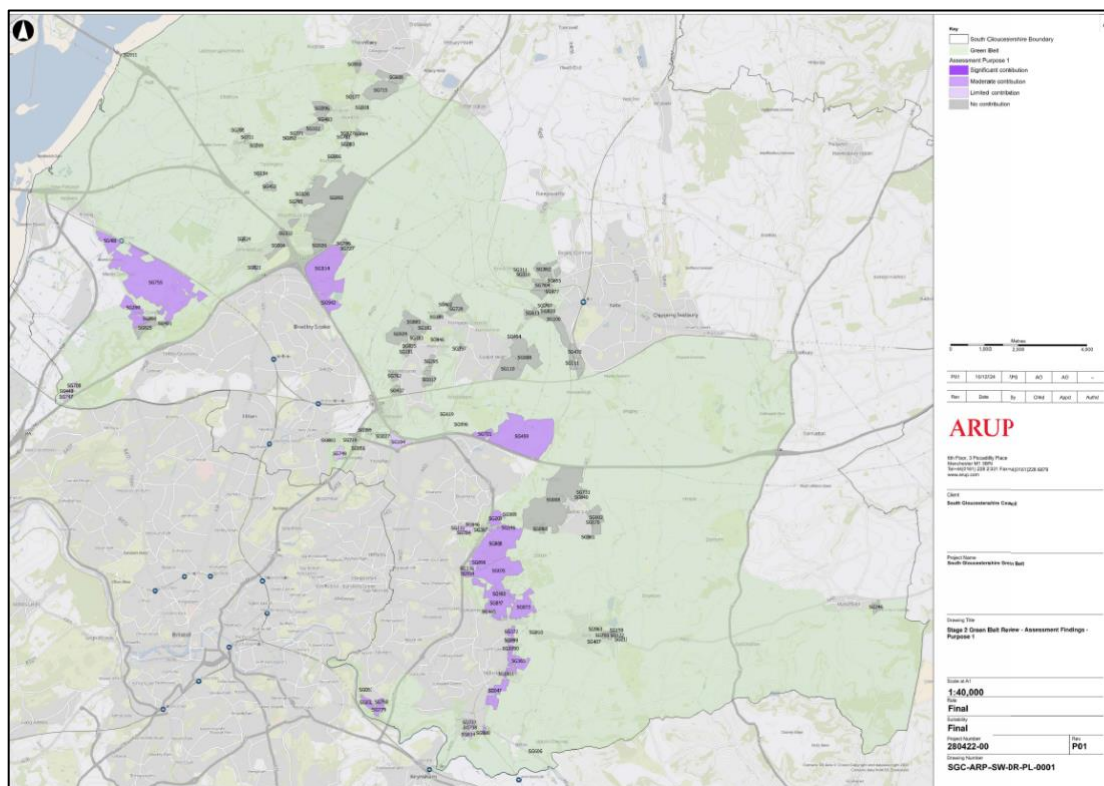
*Purpose 1: Checking the unrestricted sprawl of large built up areas*

- 2.58** The Stage 1 Study scored the entirety of the Bristol East Fringe (parcels that immediately adjoin the Bristol urban area) as making a significant contribution.





**Figure 4: Stage 1 Assessment of Green Belt Purpose 1**



**Figure 5: Stage 2 Assessment of Green Belt Purpose 1**

- 2.59** The Stage 2 Study scored the entirety of the Bristol East Fringe (parcels that immediately adjoin the Bristol urban area) as only making a moderate contribution.
- 2.60** As can be seen by comparing the two maps, despite the fact that Stage 2 is assessing individual sites, the cumulative area assessed is comparable to the parcels assessed in Stage 1. It is erroneous therefore that the overall scoring is uniformly divergent between the two stages.
- 2.61** This appears to be because of the way that the Stage 2 consultants have assessed individual sites potential to prevent sprawl, and the way they have applied granularity to definitions such as how defensible the new inner Green Belt boundary would be. Perversely, many of the sites on the Bristol East Fringe have been penalised because they adjoin main roads such as the A4174 and A4175 (which are ironically, themselves, currently very strong and defensible boundaries

to the Green Belt, which prevent sprawl). The system scores sites as making a significant contribution if the inner boundary is 'less defensible, lacking in durability, or undefined', or making a moderate contribution if the 'inner boundary is defensible'.

**2.62** We agree with the findings of the Stage 1 study. This defines strategic contribution criteria for Purpose 1 as being:

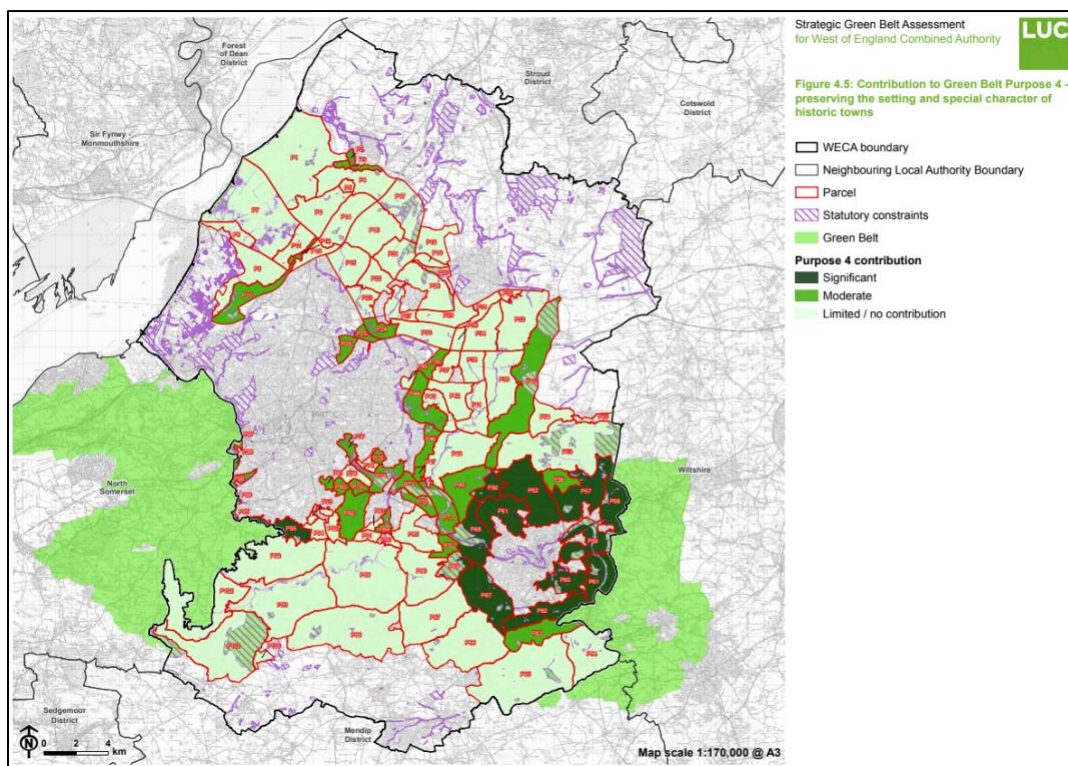
- Open land that is close enough to have a relationship with the large built-up area but is not contained by it, and which includes at least some land with strong distinction from it; or
- Open land that has some distinction from urban development, and which maintains separation between the large built-up area and a smaller settlement, preventing the latter from being perceived as part of the former.

**2.63** The majority of the proposed site allocations at Bristol East Fringe lie directly adjacent to the large built-up area of Bristol, or close enough that any strategic scale development would be associated with the urban area. The A4174 and A4175 at the inset edge and the steep slopes to the east provide strong distinction between these sites and the urban area, and **development would constitute significant sprawl.**

**2.64** We therefore disagree with the scoring of the HELAA sites in the Stage 2 Study against the contribution they make to Purpose 1. **We agree with the Stage 1 study and consider that the Stage 2 Study should have scored the majority of the sites at Bristol East Fringe as making a significant contribution to Green Belt Purpose 1.**

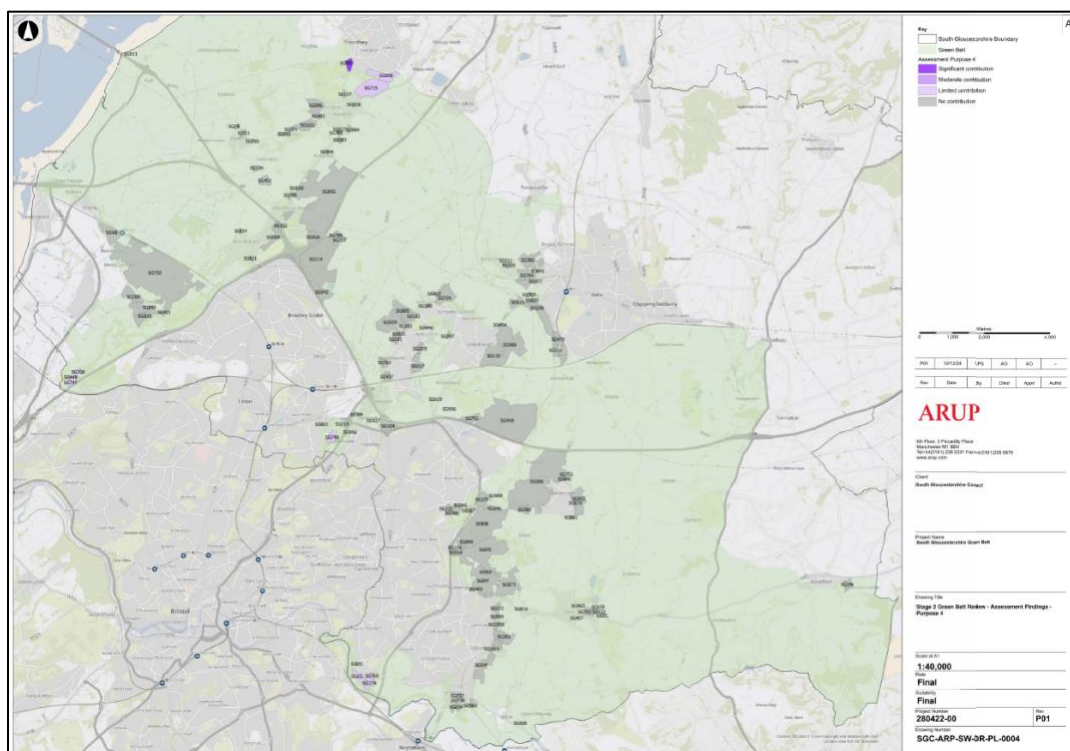
*Purpose 4: Preserving the setting and special character of historic towns*

- 2.65** The Stage 1 Study scored the entirety of the Bristol East Fringe (parcels that immediately adjoin the Bristol urban area) as making a moderate contribution.
- 2.66** The Stage 2 Study scored the entirety of the Bristol East Fringe (parcels that immediately adjoin the Bristol urban area) as making no contribution.
- 2.67** The assessment of Purpose 4 is where the two studies diverge significantly in both method and conclusions.
- 2.68** It would appear from the stage 2 methodology that sites will score as making no contribution if they are not located adjacent to a historic town, or provide views to a historic town, or being a significant distance away from the historic core.
- 2.69** We are of the view that this is scoring methodology is too high level and broad, and underestimates the contribution that sites make to Purpose 4.



**Figure 6: Stage 1 Assessment of Green Belt Purpose 4**





**Figure 7: Stage 2 Assessment of Green Belt Purpose 4**

**2.70** We agree with the methodology of the Stage 1 study, which states (para 3.67) that *“The connection between a historic town’s historic character and the wider countryside does not have to be physical; indeed, successive waves of development often isolate core historic areas from the surrounding countryside, meaning it is often more a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement”*.

**2.71** Bristol is identified in the Stage 1 study as being a settlement to which Purpose 4 is applicable:

*“Bristol is a historic port city set largely within a strong landscape framework of river valleys and hills. It has a concentration of Conservation Areas at its historic core reflecting the survival of heritage assets and the topography also means that panoramic views beyond the urban area into the Green Belt contribute to the special character of a number of these designated areas”*.

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- 2.72** The majority of the proposed site allocations at Bristol East Fringe form part of the Bristol urban area's visual setting, but because most development on the urban edge in this area is relatively modern, sites lack a relationship with the historic city core. **Land here therefore makes a moderate contribution to Green Belt Purpose 4.**
- 2.73** In addition, land to the south of Longwell Green and Willsbridge has a relationship to Keynsham, another settlement to which Purpose 4 is applicable:
- “Keynsham’s historic setting is dominated by watercourses, with the town located to either side of the steep-sided valley of the River Chew just south of its confluence with the Avon.”*
- 2.74** HELAA sites to the south of Longwell Green and Willsbridge lacks relationship with the historic core of Bristol, but openness along the Avon Valley, perceived from major approach routes to Bristol along the A4 and railway, and from high ground to the east, is a contributing element to the historic setting of both Bristol and Keynsham. Land within this part of the parcel therefore makes a contribution to the setting and special character of both. **Land here therefore makes a moderate contribution to Green Belt Purpose 4.**
- 2.75** We therefore disagree with the scoring of the HELAA sites in the Stage 2 Study against the contribution they make to Purpose 4. **We agree with the Stage 1 study and consider that the Stage 2 Study should have scored the majority of the sites at Bristol East Fringe as making a moderate contribution to Green Belt Purpose 1.**
- 2.76** In conclusion, we believe that the Stage 2 study underestimates the contribution to Green Belt Purposes that sites at Bristol East Fringe make. For the reasons set out above, we are of the view that the majority of these sites make at least two significant contributions to Green Belt purposes (Purpose 1 and
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3). In addition, we believe that other purposes, such as Purpose 4, are also underscored.

**2.77** Utilising the scoring system adopted in the Stage 2 assessment, sites that are assessed as contributing significantly to at least two Green Belt purposes are considered to make a significant overall contribution to the Green Belt.

**2.78** **It is therefore our view that the majority of sites at Bristol East Fringe make a significant contribution to the Green Belt, rather than a moderate contribution.** This is important when considering the potential Green Belt harm caused when considering amendments to the Green Belt boundary at Bristol East Fringe, as land here would have a greater degree of harm than is assessed in the Stage 2 study.

## *Exceptional Circumstances Case*

**2.79** Whilst we disagree with the scorings that are associated with the Stage 2 Green Belt assessment, we do agree with the next steps that were identified within it that were required to be followed by the Council in developing the Local Plan.

**2.80** The study states that in identifying Green Belt land for release, the Council will need to develop an exceptional circumstances case to justify altering Green Belt boundaries.

**2.81** In developing the exceptional circumstances case it will be necessary to demonstrate that all other reasonable options for meeting identified development needs have been fully examined, in accordance with paragraph 146 of the NPPF. The Council will also need to demonstrate that their strategy makes as much use as possible of suitable brownfield sites and underutilised land, optimises the density of development, and has been informed by discussions with neighbouring authorities. As required by paragraph 147 of the NPPF, plans should give first

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consideration to land which has been previously-developed and/or is well-served by public transport.

- 2.82** As stated in the Stage 2 study, the lower performing selected HELAA sites will have the greatest potential (in purely Green Belt terms) to form part of the land supply, where exceptional circumstances exist. **Higher performing selected HELAA sites can also be considered for release, however a greater exceptional circumstances case will need to be made which outweighs the benefits of these sites remaining in the Green Belt (the justification and accompanying evidence required would be greater in such circumstances).**
- 2.83** We have reviewed the evidence base that has been published alongside the Local Plan for consultation and can find no standalone Green Belt exceptional circumstances case, which is surprising. It is standard practice for a Local Planning Authority wishing to amend the Green Belt boundary to be able to justify clearly and definitively what the exceptional circumstances are considered to be in a separate Exceptional Circumstances document or topic paper.
- 2.84** **In this case, the Local Plan itself merely states that the strategic case for exceptional circumstances is considered to exist, without stating what the exceptional circumstances are.** An explanation is given that the initial strategy to focus sites within the urban area and market towns was found to not meet the standard method housing requirement; and that in the phase 3 consultation, a strategy approach of including the sites and locations beyond the Green Belt was tested and consulted on but not considered the most appropriate strategy in terms of meeting the plans objectives. The locational strategy has therefore looked to utilise sites on areas of Green Belt which accord with plan objectives and would not undermine the Green Belt's overall purpose, have ability to create revised Green Belt boundaries which endure beyond the plan period, and **wherever possible utilise sites located in lower performing areas of the Green Belt.** We have already argued above that the Council has undervalued the importance of the Green Belt at Bristol East Fringe.
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- 2.85** We are of the view that the exceptional circumstances case has not been explicitly made or proven by the Council, which has soundness issues for the Local Plan.
- 2.86** The Green Belt Stage 2 study also states that, as well as the Stage 2 study itself, the Council will also need to develop a site selection methodology that will enable the Green Belt sites to be fed into it and assist as ‘top up’ for the housing and employment land supply. This will need to align with the strategic and site-specific exceptional circumstances case once established.
- 2.87** We can find no evidence of any such site selection methodology that enables the Green Belt sites to be fed into it in a meaningful way.
- 2.88** The Sustainability Appraisal no longer includes Green Belt within its consideration of sustainability issues or as a sustainability objective (earlier versions of the SA did). **The SA is clear that it does not make recommendations about the release of Green Belt land.**
- 2.89** The HEELA (Feb 2025) does note if sites are located within the Green Belt (within the suitability section), but it is not explained how a Green Belt designation affects the scoring of suitability, how the significance of Green Belt contribution or Green Belt harm is considered for any particular site, or how any of this feeds into a suitability conclusion or an estimated site capacity.
- 2.90** **The HEELA method report (Feb 2025) states that Green Belt was not considered at all in stage 1 of the assessment, and that sites were not discounted in Stage 2 for Green Belt either, because the Stage 2 Green Belt assessment was being developed at the same time.**
- 2.91** Examination of some of the proposed local plan site allocations at Bristol East Fringe would suggest that the Green Belt Stage 2 assessment, it’s assessment of
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Green Belt contribution, and consideration of Green Belt harm, did indeed have no effect on the assessment of suitability, or if site capacities should be amended. For example, HELAA site SG459 (land at Westerleigh, proposed site allocation BV12) has the same HELAA assessment conclusions (almost word for word) in the 2023 and 2025 versions, with no amendments to site capacity (2,000 homes).

- 2.92** The Calverton Case, and it's suggested process for those seeking to justify Green Belt exceptional circumstances, now needs to be reviewed in light of the shortcomings identified above. The next section focuses on this.

### 3. CALVERTON CASE CONSIDERATIONS

- 3.1** The 2015 Calverton Case set out a 5-point plan for those seeking to justify a Green Belt exceptional circumstances case on the meeting of housing need. Having quantified the local area's housing need, the Council should then consider whether exceptional circumstances exist in the light of the following themes.

#### *The Acuteness/Intensity of the Objectively Assessed Need*

- 3.2** The Local Housing Need for South Gloucestershire for the period 2026/27 to 2040/41 is stated in the Local Plan to be 20,423 new homes, or 1,362 per annum.
- 3.3** To ensure this number of new homes is delivered, the Local Plan makes provision for the supply of 22,573 new homes over the plan's 15 year period.
- 3.4** This means that the Local Plan is planning to exceed the minimum housing need figure by 2,150.
- 3.5** Existing commitments will continue to deliver new homes during the new Local Plan period (totalling 7,306 homes). The Local Plan's locational strategy and

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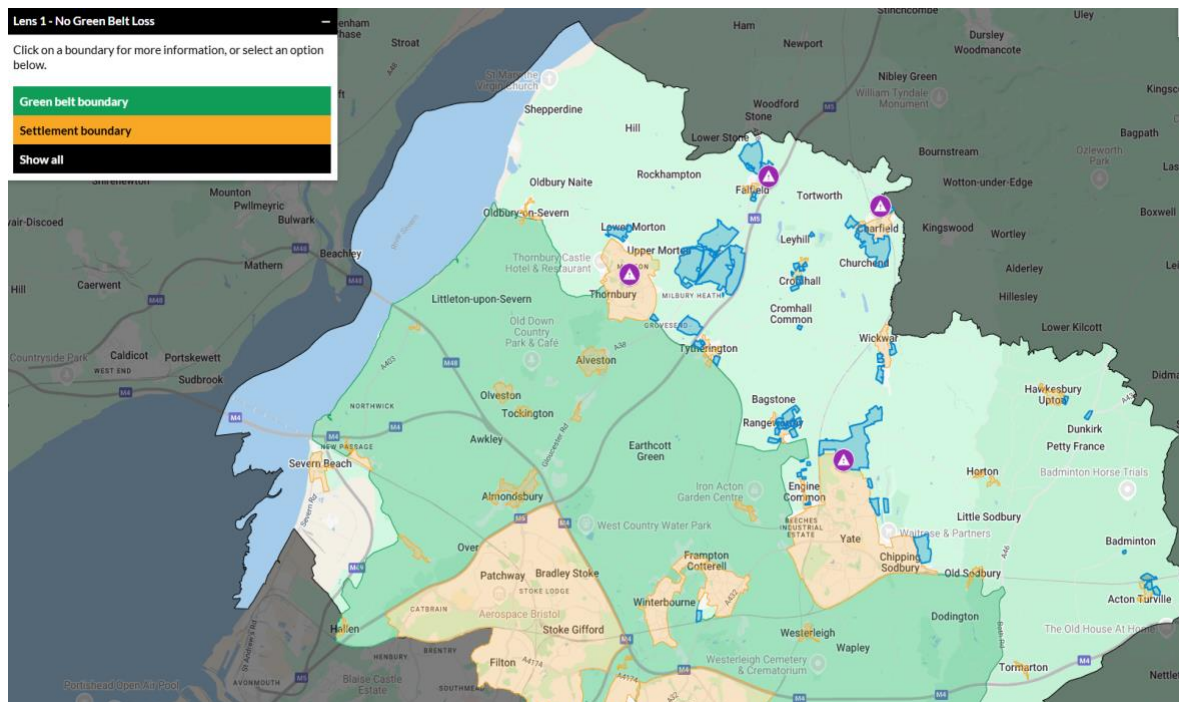
policy framework will need to deliver 15,267 new homes, through both site allocations (11,817 homes) and sustainable and appropriately located small sites windfalls (3,450 homes).

- 3.6** 4,466 of the 11,817 new homes on site allocations are proposed to be built on strategic and non-strategic Green Belt sites at Bristol East Fringe. Bristol East Fringe will be accommodating around 38% of the new site allocations on green field/green belt sites. In addition, 720 new homes on site allocations are proposed to be built within the existing East Fringe urban areas. This means that the East Fringe in total will be accommodating 5,186 new homes on site allocations (44% of the 11,817 total).
- 3.7** In comparison, locations such as Thornbury (55 new homes on site allocations on green field/green belt sites) and Yate (0 new homes on site allocations on green field/green belt sites) are proposed to accommodate a disproportionately small number of new homes (0.5% of the 11,817 total). This rises when urban site allocations are included (175 in Thornbury and 662 in Yate) and existing commitments (613 in Thornbury and 349 in Yate) but only for a total of 16% of the 11,817 total.

### *Constraints on supply/availability of land that are potentially suitable for sustainable development*

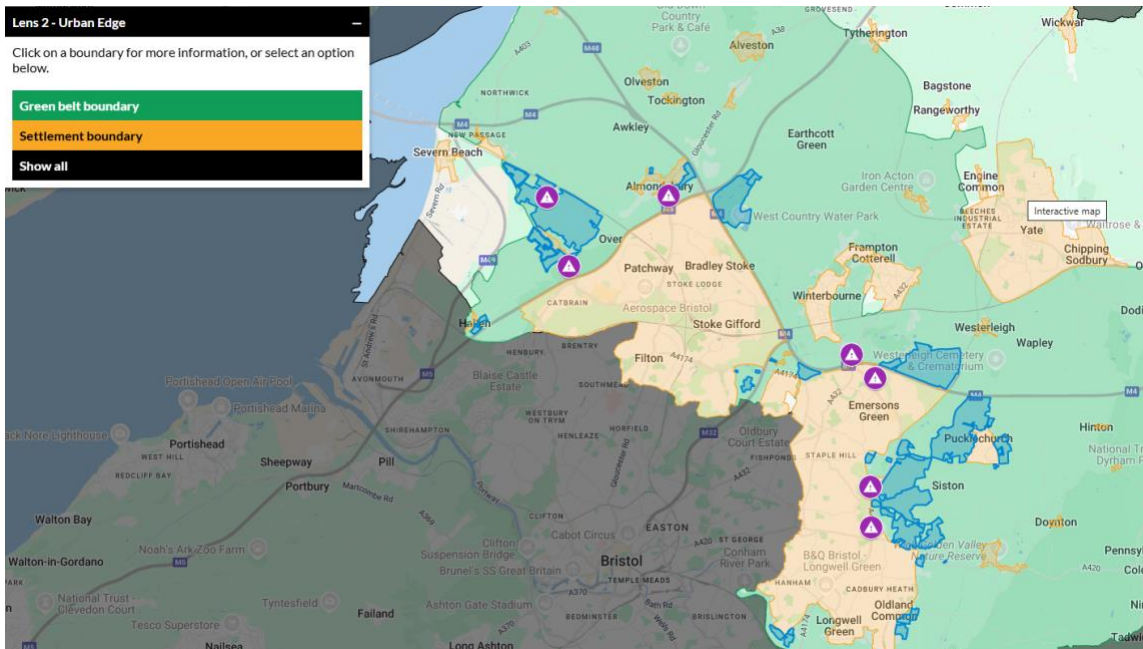
- 3.8** 60% of South Gloucestershire is situated outside of the Green Belt.
- 3.9** In 2023, the Council consulted on three different 'lenses' for how development could be accommodated. One of these lenses included significant amounts of development outside of the Green Belt (Lens 1 – No Green Belt Loss). Lens 1 was estimated to be able to deliver 8,353 new homes without losing a single hectare of Green Belt. Lens 3 (Transport Corridors) involved significant Green Belt

development, but this was mainly focused on sustainable transport corridors towards Thornbury and Yate rather than the Bristol urban edge. Lens 3 was estimated to be able to deliver up to 11,890 new homes in the plan period.



**Figure 8: Lens 1 - No Green Belt Loss**

**3.10** Ultimately, the Council chose to base the Local Plan strategy on one that closely resembles Lens 2 (Urban Edge), with significant amounts of development at Bristol East Fringe.



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- 3.11** However, Lens 1 and 3 demonstrate how it is feasible to deliver in excess of the 11,817 total new homes on site allocations, either entirely outside of the Green Belt, or on sustainable transport corridors between Bristol and the market towns, or a combination of both. The result would be, at the very least, a large reduction in the requirement to release Green Belt sites, on sustainable sites.

### *Consequent difficulties in achieving sustainable development without impinging on the Green Belt*

- 3.12** The Council state that the reason for not focusing more development at the market towns is because Yate and Thornbury have played a key role in delivering new homes over the last 5 years. In recognition of this, and also that the level of growth currently coming forward will need further time to integrate and establish social and economic cohesion into these established communities, currently the emerging preferred strategy seeks to allocate only a small additional amount of new sites at Yate and Thornbury.
- 3.13** This is despite the fact that there is significant potential for large scale development on the edge of or in close proximity to both Thornbury (e.g. Buckover Garden Village – 1,500 homes; north of Buckover – 750 homes) and Yate (e.g. North Yate/Tanhouse Meadows) outside of the Green Belt.
- 3.14** Development at Buckover is not reliant on breaching high-value Green Belt land. It is consistent with the Council's 'Lens 1' alternative development strategy, and would form a logical extension to the proposals in 'Lens 3'. It is in close proximity to the A38 which is benefitting from significant funding from WECA as a strategic sustainable transport route, and the M4. Development at Buckover has the advantage of being capable of being masterplanned holistically, through the ownership of the Tortworth Estate, integrating new homes, jobs, schools, and services, ensuring that it enhances current levels of infrastructure provision in the

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area, rather than becoming an additional burden. This in sharp contrast to the incremental proposals at Bristol East Fringe, with its disparate collection of Green Belt sites, which threaten already overburdened local services in East Bristol communities.

- 3.15** We note that PJA, the transport consultants for Buckover, dispute the Council's contention that development at Buckover would increase Green Belt commuting to the Bristol urban area. Buckover, through its masterplanning, is proposing a net zero transport strategy as a central theme of the vision for the new settlement.
- 3.16** There are further opportunities for growth in the vicinity of Buckover, which could benefit from shared infrastructure, in villages such as Wickwar, Charfield, Falfield, Tytherington and Cromhall, and the market town of Thornbury, all outside the Green Belt.
- 3.17** Thornbury (and the A38 corridor) was noted (in Lens 1) as an opportunity to deliver homes in relative proximity to a key service centre which could support existing services and facilities and offer some opportunities for sustainable travel to access local services; and (in Lens 3) delivering homes along the main transport corridor of the A38 and at Thornbury which would provide the opportunity to support existing public transport connections and in some cases may support the case for an expanded service, taking advantage of the active travel route along the A38 and potentially support further investment to promote active travel and reduce car dependency.
- 3.18** Yate and Chipping Sodbury (and the A432 corridor) was noted (in Lens 1) as an opportunity to deliver new homes including affordable housing at the main market town in South Gloucestershire, with potential to access Yate Station and Yate and Chipping Sodbury Town Centres to access shopping, commercial retail and employment and services and facilities locally and through train and public transport access wider opportunities in our main urban areas and Greater Bristol; and (in Lens 3) an opportunity to deliver homes along the main transport corridor
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of the A432 and Transport Hubs of Yate and Chipping Sodbury which would provide the opportunity to support existing public transport connections and in some cases may support the case for an expanded service, taking advantage of recent improvements to the active travel route along the A432 and potentially support further investment to promote active travel and reduce car dependency. However, the Council has chosen not to focus any significant new growth at Yate, suggesting that the town has been somehow overwhelmed by the new north Yate development, despite the fact that this, and its associated infrastructure, was planned for as part of the Core Strategy, contributing to Yate's self-sufficiency and inherent sustainability characteristics.

**3.19** In contrast, the Bristol East Fringe was identified (in Lens 2) as having an imbalance in jobs, creating a reliance on other areas of the district for work opportunities so creating a higher need for travel and private car use, with it being unclear whether, or to what scale, new employment provision will genuinely support the rebalancing of homes and jobs; the level of growth would likely put significant pressure onto existing local and strategic road network (for example key arterial routes into Bristol (i.e. A432, A420) as well as known network pinch points; the level of development would create challenges in delivery of the infrastructure necessary to accommodate this number of homes and jobs and it is unlikely that the infrastructure could be in place to allow the homes to be delivered in the plan period.

**3.20 The extant Core Strategy (2006-27) established (para 4.21) that the Bristol East Fringe was unsuitable for development because of major constraints:**

*"The designated Green Belt in this area will remain. This area is not considered to be suitable for development because of major constraints, specifically the importance of the open countryside, hillside and ridgelines that establish the setting and help define the extent of the urban area, the current limited employment opportunities, the lack of potential for integrating new development and the extreme difficulty of delivering essential transport improvements".*

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- 3.21** We believe this statement, and each constraint identified, to still hold true.
- 3.22** The Council has produced ‘Data and Access’ profiles (DAPs) to support production of the Local Plan. Bristol East Fringe is covered by DAPs such as Oldland Common and Warmley where a lot of the Green Belt allocations are proposed to be located. The DAPs provide a good illustration of the imbalance in jobs at Bristol East Fringe, and the commuting issues this creates. Oldland Common has a poor Job/Worker ratio of 0.3 (818 jobs and 3,231 workers), with only 4% of the 3,231 working in the area, and a further 18% working from home/no fixed workplace. 25% work in Bristol and 12% work in B&NES. Warmley has a slightly better, but still imbalanced Job/Worker ratio of 0.6 (2,974 jobs and 4,908 workers), with only 6% of the 4,908 working in the area, and a further 16% working from home/no fixed workplace. 27% work in Bristol, 8% work in B&NES, and 8% work elsewhere.
- 3.23** This is in stark contrast to areas such as Yate and Thornbury. **Yate has an excellent Job/Worker ratio of 0.7** (11,024 jobs and 16,125 workers), with 27% of the 16,125 workers working in the area, and a further 16% working from home/no fixed workplace. Only 14% work in Bristol, and only 4% work in the north fringe. **Thornbury has an even better Job/Worker ratio of 1.0** (5,915 jobs and 5,904 workers), with 26% of the 5,904 workers working in the area, and a further 16% working from home/no fixed workplace. Only 15% work in Bristol, and only 4% work in the north fringe.
- 3.24** **The argument that development at Bristol East Fringe will somehow result in less commuting than development at places such as Yate and Thornbury is self-evidently flawed.**
- 3.25** Another argument put forward by the Council for not focusing development outside the Green Belt in locations such as Buckover is that this would rely on ‘big ticket’ infrastructure items that have no certainty of being delivered in the short to medium term. Logic would dictate that the options that *are* proposed, such as Bristol East
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Fringe, would either not need any ‘big ticket’ infrastructure, or that the infrastructure required has certainly of being delivered. A review of the evidence does not reassure us that this is the case.

- 3.26** The Infrastructure Delivery Plan (Part 2, Infrastructure Schemes) states that development at Bristol East Fringe relies on a ‘Ring Road Package’ costing £48.3m, consisting of a series of active travel and bus prioritisation measures along the A4174, including new and higher frequency services to serve existing communities and new major developments. This is stated to only be at ‘concept stage’ with an unknown delivery date. A plethora of potential funding pots are identified. We would describe this scheme as a ‘big ticket’ infrastructure item that has no certainty of being delivered in the short to medium term.
- 3.27** Each strategic development site has its own identified costly infrastructure requirements, including transport. For example, North Warmley New Neighbourhood has included a package of £18.75m of transport upgrades, and Carsons Green £18.2m.
- 3.28** Based on the DAPs, this infrastructure is required due to the job’s imbalance at Bristol East Fringe. We are concerned that current congestion and air pollution issues at Bristol East Fringe will get significantly worse if the Local Plan Green Belt allocations are brought forward.
- 3.29** **We are therefore of the view that a greater amount of development should be planned for in the vicinity of the market towns outside of the Green Belt, which are in relatively more sustainable locations than Bristol East Fringe. Yate and Thornbury are sustainable locations, as recognised by the Core Strategy and supported by evidence. Buckover Garden Village has significant potential for a new sustainably located settlement in close vicinity to Thornbury.** This would help balance housing numbers more equitably across the district, easing pressure on overdeveloped and congested communities in Bristol East Fringe.
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**3.30** In the event that Green Belt land is still required to be released, we are of the view that it is a more sustainable strategy to focus this on the transport corridors of the A38 and A432 corridors, including on Green Belt around Yate and Thornbury, reducing the need to consider the Bristol East Fringe, which already suffers from an imbalance in jobs and homes, out-commuting, and infrastructure pressures. This would be in line with the NPPF, which states (para 147) that:

*“Where it has been concluded that it is necessary to release Green Belt land for development, **plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.**”*

### *Nature and extent of harm to the Green Belt*

- 3.31** As noted in section 2, we disagree with the assessment of Green Belt contribution (and consequent Green Belt harm) of sites at Bristol East Fringe.
- 3.32** It is our view, based on the evidence, that the majority of sites at Bristol East Fringe make a significant contribution to the Green Belt. Release of each individual Green Belt site would cause significant Green Belt harm. In combination, release of a large number of Green Belt sites at Bristol East Fringe would have much larger significant effects on Green Belt harm.
- 3.33** The plan would set a dangerous precedent for development breaching the long established and strong Green Belt boundaries such as the A4174 and A4175, encroaching on the Green Belt and threatening further Green Belt loss in the future because the new boundaries would be much weaker.

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- 3.34 The plan for Bristol East Fringe constitutes sprawl of a large built-up area as well as encroachment on the countryside and will cause a knock-on weakening of adjacent Green Belt land.**
- 3.35** Green Belt harm has either not factored into the Council's considerations when deciding on the Local Plan's overall strategy, or has been a secondary consideration to other issues, which downplays the importance given to the Green Belt in national planning policy. The Council had clearly already decided upon major Green Belt release prior to the Green Belt stage 2 assessment being completed, and the results of the stage 2 assessment have not resulted in any major changes to the preferred Local Plan strategy put forward in the 2023 consultation. The Sustainability Appraisal does not factor in Green Belt harm, and the HEELA gives minimal information as to how Green Belt harm was factored into individual site assessments.

### *Compensatory Improvements to the Remaining Green Belt/Reducing Impacts to Remaining Green Belt*

- 3.36** As stated in the Stage 2 study, **if Green Belt sites are taken forward, the Local Plan will need to identify compensatory improvements to the environmental quality and accessibility of remaining Green Belt land in order to offset the impact of removing land from the Green Belt** (as required by paragraph 147 of the NPPF).
- 3.37** **There is no explicit or specific mention in the Local Plan at all about how compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The plan is unsound in this respect** and has not been positively prepared. The plan is undeliverable as it does not identify what

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offsetting measures are required to offset the impact of removing land from the Green Belt.

- 3.38** Policy LPS1 (Strategy Principles) merely states that allocated sites are expected to deliver new or enhanced Green Belt boundaries. The proposed site allocations similarly only focus on enhanced Green Belt boundaries.
- 3.39** Policy LPS11 (strategic green and blue infrastructure and the natural environment) provides protection for the strategic Green Infrastructure (GI) network at a landscape scale. South Gloucestershire's Strategic Green Infrastructure Network comprises nine corridors and is strongly linked to the West of England Local Nature Recovery Strategy (LNRS). This policy is supported, but we consider that it should be strengthened to ensure that it also contributes to compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

## *NPPF Requirements*

- 3.40** Turning to the NPPF requirements on Exceptional Circumstances, the Council needs to be able to demonstrate, **before it can conclude that exceptional circumstances exist to justify changes to Green Belt boundaries**, that it has examined fully all other reasonable options for meeting its identified need for development (para 146). This is assessed through the examination of its strategic policies, and whether the strategy:
- makes as much use as possible of **suitable brownfield sites and underutilised land**;
  - **optimises the density of development** including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
  - has been **informed by discussions with neighbouring authorities** about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

- 3.41** Previous rounds of consultation on the Local Plan highlighted, amongst many respondents, major concerns that the Local Plan was not making as much use as possible of suitable brownfield sites and underutilised land, and that there are viable, deliverable urban sites being overlooked in favour of greenfield alternatives.
- 3.42** We are comforted that the Council has produced a Density and Character Study which has evidenced Policy LP1, which introduces an ambitious range of densities for the ‘urban and town hubs’, seeking to optimise density of new development in these areas. We note however that **no prescribed densities are included for any of the new site allocations**. Instead, the plan seeks to ‘optimise’ density or to seek ‘high-density’ or ‘higher-density’ new development, without saying what these actually are. We are concerned that these policies, with their vague wording, will not ensure a significant uplift in minimum density standards.
- 3.43** We can find no evidence in the evidence submitted as part of the Reg 19 consultation that the Council has formally asked neighbouring authorities about whether they could accommodate some of the identified need for development as an alternative to developing Green Belt land within South Gloucestershire. If this is the case, then there is a soundness issue, and the exceptional circumstances case is further undermined.

## Conclusion

- 3.44** It is our view, for the reasons set out above, having considered the Calverton Case 5-point plan for those seeking to justify an exceptional circumstances case on the meeting of housing need, and the NPPF requirements, that **exceptional circumstances do not exist for justifying Green Belt releases at Bristol East Fringe**.

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- 3.45 This is in the context that the NPPF states that there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated (para 145).**
- 3.46 We are of the view that a greater amount of development should be planned for in the vicinity of the market towns outside of the Green Belt, which are in relatively more sustainable locations than Bristol East Fringe. Yate and Thornbury are sustainable locations, as recognised by the Core Strategy and supported by evidence. Buckover Garden Village has significant potential for a new sustainably located settlement in close vicinity to Thornbury.** This would help balance housing numbers more equitably across the district, easing pressure on overdeveloped and congested communities in Bristol East Fringe. In the event that Green Belt land is still required to be released, we are of the view that it is a more sustainable strategy to focus this on the transport corridors of the A38 and A432 corridors, reducing the need to consider the Bristol East Fringe, which already suffers from an imbalance in jobs and homes, and infrastructure pressures.

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