

South Gloucestershire Council Local Plan Examination Hearing Statement

Matter 6: The Green Belt

April 2026

For: Save our Green Spaces – South Gloucestershire

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1. Introduction

- 1.1 Context Planning Ltd have been instructed to prepare this Local Plan examination Hearing Statement regarding Matter 6 (the Green Belt) on behalf of Save our Green Spaces – South Gloucestershire (SOGS-SG).
- 1.2 The main issue identified by the Inspectors is whether the Plan is justified, effective and consistent with national policy in its approach to the Green Belt.
- 1.3 The soundness tests at paragraph 35 of the NPPF (December 2023) apply, the Plan being examined against that version of the Framework under the transitional arrangements at paragraph 234 of the NPPF (February 2025) and the Inspectors' Guidance Note (ID/08, 17 March 2026).

2. Q.23: Is Policy LPS1 consistent with national policy for Green Belts and would it be effective?

- 2.1 Policy LPS1 is **not consistent with national policy** and therefore the Plan is unsound. It fails to address key requirements of the NPPF (December 2023), including compensatory improvements and the need to give **substantial weight to Green Belt harm**.

Failure to address compensatory improvements (NPPF para 147)

- 2.2 Paragraph 147 requires plans to set out how Green Belt release will be offset through compensatory improvements. Policy LPS1 contains no such mechanism and is unsupported by the Infrastructure Delivery Plan, site allocations or the Sustainability Appraisal. **No strategy or delivery framework is provided.**

Insufficient weight to Green Belt harm

- 2.3 National policy requires that **substantial weight** is given to Green Belt harm when considering development affecting it.

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- 2.4 Policy LPS1 is undermined by an evidence base (including the Stage 2 Green Belt Assessment) that **systematically downplays harm** (see Q25).
- 2.5 This creates a disconnect between national policy requirements, and how harm has been identified and assessed within the Plan.
- 2.6 As a result, Policy LPS1 does not provide a **robust or policy-compliant framework** for decision-making.

Lack of effectiveness

- 2.7 Because Policy LPS1 does not secure compensatory improvements, has underestimated Green Belt harm, and is not supported by a clear delivery or assessment framework it cannot be relied upon to deliver outcomes that comply with national policy.

Conclusion on Soundness

- 2.8 Policy LPS1 is:
- Not justified: (no evidence-based mechanism for compensatory improvements)
 - Not effective: (lacks a clear framework for assessing and addressing Green Belt harm)
 - Not consistent with national policy: (fails to comply with NPPF paragraph 147; fails to properly reflect the requirement to give substantial weight to Green Belt harm)

Remedy

- 2.9 The Plan is unsound unless Policy LPS1 is modified to:
- explicitly require **compensatory improvements to the environmental quality and accessibility of remaining Green Belt land**, including defined measures, delivery mechanisms and monitoring arrangements
 - clearly embed the requirement to give **substantial weight to Green Belt harm**
 - link these requirements to site allocations, infrastructure planning and the wider evidence base

3. Q.24: What is the role of ‘grey belt’ land in the Plan?

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- 3.1 It is **not necessary for soundness** for the Plan to be amended to address “grey belt”. The concept is **not a material consideration** in this Examination and should be afforded **no weight**.

The Examination must be based on the applicable national policy

- 3.2 The Plan is examined against the NPPF (December 2023), which does not recognise “grey belt” or differentiate within the Green Belt beyond its established purposes. Under that framework, land is either within the Green Belt or not, and any alteration requires exceptional circumstances.
- 3.3 Introducing “grey belt” would apply a concept not before the Inspectors and risks undermining the requirement to give substantial weight to Green Belt harm. The submitted Plan does not rely on such a concept, and no modification is required for soundness.
- 2.10 For the avoidance of doubt, the concept of “grey belt” was introduced only in the NPPF of December 2024. Importing grey belt now would be contrary to the transitional arrangements and to basic fairness as between representors.

Conclusion

- 3.4 “Grey belt” is **not a material consideration** in this Examination. It should be afforded **no weight**, and no modification to the Plan is required.
- 3.5 Any attempt to introduce it would **unnecessarily protract the Examination** and apply policy that is **not before the Inspectors**.

4. **Q.25: At the strategic level, what are the exceptional circumstances for the alteration of Green Belt boundaries in the Plan?**

- 4.1 Exceptional circumstances have **not been demonstrated** at a strategic level. This is a **fundamental soundness failure**.

The Plan was not justified at Submission

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- 4.2 The Plan was not justified at submission. At Regulation 19 there was **no standalone exceptional circumstances case** and the justification for Green Belt release was fragmented and incomplete. The subsequent Topic Paper (March 2026) is post-submission evidence and cannot remedy this fundamental deficiency.
- 4.3 Paragraph 143 of the NPPF (December 2023) requires that exceptional circumstances are fully evidenced and justified. The leading authority on exceptional circumstances, *Calverton Parish Council v Nottingham City Council* [2015] EWHC 1078 (Admin), identifies a number of relevant considerations: the acuteness of need, the inherent constraints on supply, the consequences for sustainable development of meeting need in other ways, the nature and extent of harm to the Green Belt, and the extent to which compensatory enhancement would ameliorate harm. The Topic Paper does not work through those considerations in a structured way.
- 4.4 In the absence of such analysis, it is not evident from the submitted evidence base how the conclusion that exceptional circumstances exist has been robustly justified.

The March 2026 Topic Paper does not demonstrate exceptional circumstances

- 4.5 **The Topic Paper does not demonstrate exceptional circumstances.** It relies on an evidence base that understates Green Belt harm, does not show that all reasonable alternatives have been exhausted, and fails to demonstrate that the scale of release is the minimum necessary.

Failure to demonstrate that all reasonable alternatives have been examined

- 4.6 National policy requires that Green Belt boundaries are altered only where all reasonable alternatives have been fully examined.
- 4.7 The Council's own evidence demonstrates that alternatives exist. Lens 1 identifies capacity for approximately 8,353 dwellings without Green Belt release, and Lens 3 up to 11,890 dwellings along transport corridors. **These options would significantly reduce, or potentially avoid, the need for Green Belt release.** The Plan does not adequately explain why they were rejected.

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- 4.8 The Plan does not adequately explain why these alternatives were rejected and instead concentrates approximately **44% of total proposed site allocations to the Bristol East Fringe**.

Strategic-scale alternatives have not been considered

- 4.9 Since submission, the Government has confirmed its intention to bring forward a **new town at Brabazon and the West Innovation Arc**, with capacity for up to **40,000 homes**.
- 4.10 This demonstrates that large-scale, infrastructure-led alternatives exist within South Gloucestershire, and that housing needs can be met through **strategic planning rather than dispersed Green Belt release**.
- 4.11 The Topic Paper does not engage with this or demonstrate why such options could not form part of the strategy.
- 4.12 This further undermines the claim that Green Belt release at the scale proposed is **necessary**.

Green Belt evidence base is flawed

- 4.13 The Stage 2 Green Belt Assessment downgrades sites adjoining strong boundaries (A4174/A4175) and treats defensible boundaries as reducing contribution to Purpose 1. This is flawed because strong boundaries are a defining characteristic of a **robust and enduring Green Belt**, and they reinforce, rather than diminish, the role of land in preventing sprawl.
- 4.14 The Stage 1 Assessment (LUC, 2021) correctly identified these areas (in Bristol East Fringe) as making a **significant contribution**.
- 4.15 These concerns about the Stage 2 scoring were set out in SOGS-SG's Regulation 19 representation (Context Planning Ltd, April 2025), in particular at paragraphs 2.51 to 2.78, which compare the Stage 1 and Stage 2 conclusions on Purposes 1, 3 and 4 at the Bristol East Fringe and explain why applying the Stage 2 scoring rules properly produces a significant, rather than moderate, overall Green Belt contribution. Paragraph 2.78 of that representation concludes that the majority of the Bristol East Fringe sites make a significant contribution to the Green Belt. No subsequent evidence has been produced by the Council to rebut that analysis.

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- 4.16** As a result, Green Belt harm at Bristol East Fringe has been **systematically understated** in the Stage 2 assessment, and the Exceptional Circumstances case is built on **incorrect assumptions**.

Failure to account for cumulative harm

- 4.17** The Plan releases multiple sites in a single location (Bristol East Fringe) which creates cumulative Green Belt harm greater than individual assessments suggest, and erosion of Green Belt function at a strategic scale.
- 4.18** The Exceptional Circumstances case does not properly assess or account for this cumulative effect.

Housing need does not justify Green Belt release

- 4.19** The Plan adopts a housing requirement above the standard method and is planning to exceed the minimum housing need figure by 2,150 homes.
- 4.20** Additionally, unmet need from Bristol is not clearly quantified.
- 4.21** There is therefore no clear evidence that Green Belt release is necessary to meet housing needs.
- 2.11** On the first of the *Calverton* factors (the acuteness of need) the evidence points the other way. The Plan already plans for a surplus above the standard method (see Matter 7), so there is no acute unmet need that Green Belt release is required to address. That substantially weakens, rather than supports, the exceptional circumstances case.

Conclusion on Q25

- 4.22** The Plan fails to demonstrate exceptional circumstances because:
- the Plan was not justified at submission
 - the Topic Paper does not provide a robust EC case
 - reasonable alternatives have not been exhausted
 - strategic-scale alternatives exist and have not been considered
 - the Green Belt evidence base is flawed and understates harm
 - cumulative impacts have not been properly assessed
 - housing need does not necessitate Green Belt release

Conclusion on Soundness

4.23 The Plan is:

- **Not justified** (alternatives not properly assessed; flawed evidence)
- **Not effective** (unsustainable spatial strategy)
- **Not consistent with national policy** (failure to meet NPPF para 146: reasonable alternatives to Green Belt release)

Remedy

4.24 The Plan is unsound unless:

- The spatial strategy is reconsidered
- Green Belt release at Bristol East Fringe is significantly reduced or removed, and/or
- A fully evidenced exceptional circumstances case is provided, demonstrating exhaustion of alternatives, correct assessment of Green Belt harm and a sustainable and justified distribution of growth.

5. Q.26: What are the exceptional circumstances for the inseting of all or parts of the villages and settlements set out in LPS1 criterion 15?

- 5.1 The Plan does not demonstrate that **exceptional circumstances exist** for the proposed inseting of villages. While the Council has produced a methodology in the **Green Belt Exceptional Circumstances Topic Paper (March 2026)**, this does not amount to a robust or policy-compliant exceptional circumstances case. The approach is therefore **not justified** and **not consistent with national policy**.

Inseting requires the same exceptional circumstances test

- 5.2 Village inseting alters Green Belt boundaries and must therefore meet the full exceptional circumstances test, including demonstration of necessity, consideration of alternatives and that the extent of change is the minimum required.

The Topic Paper provides a methodology, but not an exceptional circumstances case

- 5.3 The Topic Paper introduces a methodology based on National Planning Policy Framework paragraph 149, including assessment of village character, contribution to Green Belt openness and whether protection should be achieved through other means.
- 5.4 However, this is an **assessment of Green Belt function**, not a demonstration of exceptional circumstances. The Topic Paper does not demonstrate:
- why insetting is **necessary** for each settlement
 - why development needs **cannot be met without insetting**
 - why alternative approaches (e.g. limited infilling within existing boundaries or development elsewhere) are not suitable or appropriate

Absence of necessity and alternatives testing

- 5.5 The Topic Paper does not demonstrate that insetting is necessary or that alternatives have been fully examined. Instead, it assumes that villages should be inset because they form part of the spatial strategy, which is circular and does not satisfy national policy.

Lack of a robust, settlement-specific exceptional circumstances case

- 5.6 While the Topic Paper includes assessment proformas, these focus on Green Belt characteristics and settlement form. They do not provide a **settlement-specific exceptional circumstances case**, including necessity, alternatives or proportionality of boundary change.

Conclusion on Soundness

- 5.7 The approach to village insetting is:
- Not justified: (no robust exceptional circumstances case, necessity not demonstrated, alternatives not properly assessed)
 - Not consistent with national policy: (fails to meet the requirements for altering Green Belt boundaries)

Remedy

- 5.8 The Plan is unsound unless a **clear and robust exceptional circumstances case** is provided for each proposed insetting, demonstrating:
- necessity
 - consideration of reasonable alternatives
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- that the extent of change is the minimum required and/or
 - unjustified inseting proposals are **removed** from the Plan

6. Q.27: What are the exceptional circumstances for the alteration of Green Belt boundaries arising from changes to settlement boundaries?

- 6.1 The Plan fails to demonstrate that **exceptional circumstances exist** for settlement boundary changes. The approach is **not justified, not consistent with national policy**, and represents a **fundamental soundness failure**.

Requirement for a coherent and comprehensive exceptional circumstances case

- 6.2 Settlement boundary changes constitute **alterations to Green Belt boundaries**. They must therefore meet the same test as all Green Belt release, namely that exceptional circumstances are fully evidenced and justified.
- 6.3 This requires a **clear, consistent and comprehensive framework**, and application of that framework across strategic allocations, village inseting and non-strategic site allocations.

The Plan does not provide a unified or consistent approach

- 6.4 The Plan treats different types of Green Belt boundary change inconsistently:
- **Strategic allocations** rely on a high-level justification linked to housing need and spatial strategy (see Q25);
 - **Village inseting** is assessed through a separate methodology focused on Green Belt function (see Q26);
 - **Non-strategic site allocations** are justified on a more limited, site-by-site basis
- 6.5 There is no single, coherent exceptional circumstances framework, and no consistent methodology applied across all types of boundary change.

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- 6.6 As a result, the justification is **fragmented** and it is not possible to understand how decisions have been made consistently; or whether the overall scale of Green Belt release is justified.

The March 2026 Topic Paper does not resolve this deficiency

- 6.7 The **Green Belt Exceptional Circumstances Topic Paper (March 2026)** attempts to draw together elements of the justification but does not provide a **single, unified exceptional circumstances case**.
- 6.8 In particular, it does not reconcile the strategic justification for large-scale releases, the methodology for village inseting, or the approach to non-strategic sites.
- 6.9 Nor does it demonstrate that all boundary changes are necessary, proportionate and the minimum required.
- 6.10 The result remains a **piecemeal and inconsistent approach**.

Absence of a proper case at submission is a fundamental soundness issue

- 6.11 At the Regulation 19 stage there was **no comprehensive exceptional circumstances case**. Justification for boundary changes was dispersed across multiple documents and was incomplete and inconsistent.
- 6.12 This is a **fundamental defect**. The Plan must be **justified at the point of submission**. Post-submission evidence cannot remedy the absence of a proper case.
- 6.13 The Topic Paper therefore does not overcome the original soundness failure.

Failure to demonstrate necessity and alternatives

- 6.14 Across all types of boundary change, the Plan does not demonstrate that Green Belt alteration is **necessary** and that all **reasonable alternatives** have been fully examined.
- 6.15 As set out under Q25, alternative spatial strategies exist. The scale and distribution of Green Belt release is not shown to be the **minimum required**. This applies equally to settlement boundary changes.

Conclusion on Soundness

6.16 The Plan is:

- Not justified: (absence of a coherent and comprehensive exceptional circumstances case; inconsistent and fragmented approach)
- Not consistent with national policy: (failure to demonstrate exceptional circumstances for altering Green Belt boundaries)
- Not effective: (lack of clarity and consistency in approach)

Remedy

6.17 The Plan is unsound unless a **single, comprehensive exceptional circumstances framework** is prepared and applied consistently across all Green Belt boundary changes, and each proposed boundary change is supported by:

- a clear, evidence-based justification
- demonstration of necessity
- consideration of reasonable alternatives
- evidence that the extent of change is the minimum required

7. Q.28: What if any compensatory improvements to the environmental quality and accessibility of remaining Green Belt land would take place as a result of the proposed Green Belt boundary alterations?

7.1 The Plan fails to secure compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. This is a **clear and fundamental failure**, rendering the Plan **not positively prepared, not effective**, and **not consistent with national policy**.

7.2 NPPF para 147 requires compensatory improvements to environmental quality and accessibility: *“Where Green Belt land is released, plans should set out ways in which the impact of removal will be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”*

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- 7.3 The Plan does not identify any **specific compensatory improvement measures**, where they will be delivered, how they will be funded and when they will be delivered.
- 7.4 This absence applies across Policy LPS1 (Green Belt), site allocation policies (including LP7 and LP8), the Infrastructure Delivery Plan and the Sustainability Appraisal.
- 7.5 The Exceptional Circumstances Topic Paper does not address the requirement.
- 7.6 Policy LPS11 (Strategic Green and Blue Infrastructure) provides a **general framework for environmental enhancement** but is not framed as compensatory improvement for Green Belt release. It does not link improvements to specific Green Belt losses or ensure that enhancements are proportionate to the harm caused or delivered in connection with development. As such, it **cannot be relied upon** to meet the requirements of paragraph 147.
- 7.7 The absence of compensatory improvements means that the Plan is:
- Not positively prepared (it does not include a strategy to offset identified harm)
 - Not effective: (there is no mechanism to deliver required mitigation)
 - Not consistent with national policy (it fails to comply with NPPF paragraph 147)
- 7.8 No compensatory improvements are identified or secured by the Plan. Accordingly: Green Belt release is **not properly justified**, and the Plan fails to meet a **key national policy requirement**.

Remedy

- 7.9 The Plan must include a **clear compensatory improvements strategy**, including defined projects, spatial identification of improvement areas, delivery mechanisms, funding sources and a monitoring framework. Policy LPS11 must be modified to explicitly link green infrastructure provision to **compensatory improvements for Green Belt release** and ensure that improvements are proportionate and secured alongside development.
- 7.10 Without this, Green Belt release cannot be justified, and the Plan cannot be found sound.

8. Overall Conclusion on Matter 6

- 8.1 The Plan's approach to the Green Belt is fundamentally flawed and fails to meet the requirements of the NPPF (December 2023).
- 8.2 **Exceptional circumstances have not been demonstrated:**
- the Plan was not justified at submission
 - the March 2026 Topic Paper does not provide a robust or policy-compliant case
 - reasonable alternatives have not been exhausted
 - the scale of Green Belt release is not shown to be the minimum necessary
- 8.3 The **evidence base is flawed and inconsistent:**
- Green Belt harm has been systematically understated
 - cumulative impacts have not been properly assessed
 - different forms of boundary change are treated inconsistently, without a coherent framework
- 8.4 The Plan **fails to comply with a clear national policy requirement:**
- No compensatory improvements are identified or secured, contrary to NPPF
- 8.5 These deficiencies are not isolated. They go to the **heart of the Plan's strategy.**
- 8.6 The reliance on extensive Green Belt release, particularly at the Bristol East Fringe, is therefore **not justified and not necessary**, and is based on:
- a flawed assessment of harm
 - an absence of a coherent exceptional circumstances case
 - and a failure to consider more sustainable alternatives
- 8.7 The Plan is unsound unless the Green Belt strategy is **fundamentally reconsidered**, and a **robust, comprehensive and policy-compliant exceptional circumstances case** is provided, demonstrating:
- that all reasonable alternatives have been exhausted
 - that Green Belt release is necessary
 - that the scale and distribution of release is the minimum required, and
 - a **clear and deliverable compensatory improvements strategy** is introduced, consistent with NPPF paragraph 147;

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- 8.8** Without these changes, Green Belt release cannot be justified, and the Plan cannot be found sound.
- 8.9** The defects identified are not marginal. They concern whether exceptional circumstances have been demonstrated to the standard required by the NPPF and the *Calverton* line of authority, whether the sequential approach has been properly worked through, and whether the mandatory requirement for compensatory improvements has been met. On each of those points the Plan falls short. Those shortcomings are, on any fair view, unlikely to be capable of cure by limited main modification; a materially revised evidence base is required.

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