

# **South Gloucestershire Council**

## **Local Plan Examination Hearing Statement**

### **Matter 4: Spatial Strategy**

**April 2026**

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

**By: Mark Reynolds BSc (Hons) MSc MRTPI, Context  
Planning Ltd**

## 1. Introduction

- 1.1 Context Planning Ltd have been instructed to prepare this Local Plan examination Hearing Statement regarding Matter 4 (Spatial Strategy) on behalf of Save our Green Spaces – South Gloucestershire (SOGS-SG).
- 1.2 The main issue identified by the Inspectors is whether the spatial strategy is justified, effective, positively prepared and consistent with national policy.
- 1.3 This Statement is made against the four tests of soundness at paragraph 35 of the NPPF (December 2023), which applies to this Examination under the transitional arrangements at paragraph 234 of the NPPF (February 2025) and as confirmed in the Inspectors' Guidance Note (ID/08, 17 March 2026).

## 2. Q.17: What is the justification for the locational strategy as set out in Policy LPS2, is it positively prepared, consistent with national policy and would it be effective?

- 2.1 The spatial strategy does not provide an appropriate basis for the distribution of development. It is **not justified, not effective, and not consistent with national policy**.

### *Disproportionate concentration of growth at Bristol East Fringe*

- 2.2 The Plan directs approximately **44% of total proposed site allocations to the Bristol East Fringe** (4,466 on strategic and non-strategic Green Belt sites, and 720 within the existing urban area). This level of concentration is **disproportionate** in spatial terms, and unsupported by a clear evidence-based rationale.

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- 2.3 The Plan does not adequately explain why this location has been prioritised over alternatives, and why such a high proportion of development is appropriate.

*The strategy directs growth to an unsustainable location*

- 2.4 The Bristol East Fringe is characterised by **significant jobs/homes imbalance**, as evidenced by the Council’s own Data and Access Profiles (DAPs). Oldland Common has a 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. Warmley has a 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.
- 2.5 This indicates that the majority of new residents would be required to **commute out of the area**, primarily to other parts of Bristol.
- 2.6 Directing a substantial proportion of new housing to a location with limited local employment and a high reliance on out-commuting is not consistent with the objective of **sustainable development**, which requires alignment between homes, jobs and infrastructure.
- 2.7 The approach is also directly inconsistent with paragraph 105 of the NPPF (December 2023), which requires significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The DAP evidence relied on above demonstrates that the East Fringe, as currently constituted, cannot meet that test, and the Plan does not explain how it would be made to meet it within the plan period.

*Infrastructure constraints undermine the strategy*

- 2.8 The Bristol East Fringe is already subject to **significant infrastructure pressures**, including congestion on the strategic and local road network, limited public transport connectivity and pressure on local services. By way of example, Warmley has a single pharmacy with no co-located GP or dental practice.
- 2.9 The Plan relies on **future infrastructure improvements but** does not demonstrate that these are deliverable in a timely manner or that they will adequately mitigate impacts.

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**2.10** This creates a **significant risk to delivery and sustainability**.

*The strategy fails to reflect the existing settlement hierarchy*

- 2.11** The adopted Core Strategy directs growth to **more self-contained and sustainable settlements**, including Yate and Thornbury. These locations have stronger job bases and provide better opportunities for **balanced growth**.
- 2.12** **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. **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. Yate also benefits from established local social infrastructure, including four GP practices, a Minor Injuries Unit, the Skylark Rehabilitation Unit and a railway station, none of which is matched within the East Fringe.
- 2.13** These locations have stronger employment bases and offer greater potential for **balanced, self-contained growth**.
- 2.14** The submitted Plan departs from this approach without robust justification and without demonstrating why these locations are less suitable.
- 2.15** The Council's suggestion that Yate and Thornbury require time to "integrate" recent development is not supported by evidence. In particular:
- infrastructure at **North Yate** was planned through the Core Strategy specifically to improve self-sufficiency;
  - there is no clear basis for concluding that further growth could not be accommodated sustainably.
- 2.16** In addition, **Buckover Garden Village**, located outside the Green Belt and benefiting from proximity to the M4/M5 strategic road network, represents a **masterplanned alternative** with the potential to deliver growth alongside a coordinated and sustainable transport strategy.

*Failure to properly consider reasonable alternatives*

- 2.17** The 'justified' test at paragraph 35(b) of the NPPF (December 2023) requires an appropriate strategy "taking into account the reasonable alternatives, and based on proportionate evidence". That requirement is reinforced by the Environmental Assessment of Plans and Programmes Regulations 2004 and by the Planning

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Practice Guidance on Strategic Environmental Assessment and Sustainability Appraisal, which requires reasonable alternatives to be identified, described and evaluated on a comparable basis with the preferred approach. The *Heard v Broadland DC* [2012] EWHC 344 (Admin) line of authority confirms that reasonable alternatives must receive equivalent, balanced and comparable scrutiny to the preferred approach. That has not occurred here.

- 2.18** These points were made in detail in SOGS-SG's Regulation 19 representation (Context Planning Ltd, April 2025), in particular at paragraphs 3.10 to 3.11 on the Lens 1 and Lens 3 alternatives, paragraphs 3.20 to 3.21 on the continuing relevance of the Core Strategy (2006 to 2027, paragraph 4.21) finding that the Bristol East Fringe is unsuitable for development, and paragraphs 3.22 to 3.24 on the Council's own Data and Access Profiles for Oldland Common and Warmley. None of those points has been answered in the Plan as submitted.
- 2.19** The Council's own evidence demonstrates that reasonable alternatives exist. In 2023, the Council consulted on three different 'lenses' for how development could be accommodated.:
- **Lens 1 (urban intensification / brownfield-led growth):** ~8,353 dwellings
  - **Lens 3 (transport corridor-led development):** up to ~11,890 dwellings
- 2.20** 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.
- 2.21** Despite this, the Plan does not adequately explain why these options were rejected. 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 in the Green Belt.
- 2.22** This is a strategy which increases reliance on Green Belt release and results in less sustainable spatial outcomes.
- 2.23** This is contrary to national policy, which requires reasonable alternatives to be properly assessed and justified, and the most appropriate option to be selected.

### ***Failure to consider strategic-scale alternatives***

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- 2.24** Since submission of the Plan, 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**.
- 2.25** This represents a **strategic, infrastructure-led alternative** to the dispersed pattern of Green Belt release proposed in the Plan.
- 2.26** The Brabazon / West Innovation Arc announcement is a material change in circumstances that post-dates submission of the Plan. The Inspectors are respectfully invited to consider, pursuant to paragraph 35(a) of the NPPF (December 2023), whether a Plan which does not engage with this strategic-scale alternative can properly be regarded as ‘positively prepared’.
- 2.27** The identification of this location reinforces that large-scale, coordinated growth options exist within South Gloucestershire, and that the Plan has not adequately explored **reasonable alternatives at a strategic scale**.
- 2.28** This further undermines the justification for concentrating development at the Bristol East Fringe.

### *Relationship with Green Belt release*

- 2.29** The spatial strategy is intrinsically linked to the release of large areas of **Green Belt land at the Bristol East Fringe**. As set out under Matter 6, exceptional circumstances for this release have not been demonstrated. Therefore, the spatial strategy itself is fundamentally flawed.
- 2.30** Paragraph 143 of the NPPF (December 2023) sets a high bar: exceptional circumstances for Green Belt alteration must be fully evidenced and justified. Where sustainable non-Green Belt alternatives demonstrably exist (Lenses 1 and 3, and the Brabazon / West Innovation Arc), that bar is not met. The sequential approach to Green Belt release at paragraph 145 requires consideration of previously-developed land, under-utilised land within settlements and land well-served by public transport before any release is contemplated. The Plan’s evidence does not demonstrate that those steps have been exhausted.

### *Soundness*

- 2.31** The spatial strategy is:
- Not justified: reasonable alternatives have not been adequately assessed, and there is no clear rationale for the chosen distribution

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- Not effective: it relies on uncertain infrastructure delivery and directs growth to unsustainable locations
  - Not consistent with national policy: it fails to promote sustainable patterns of development

### *Remedy*

- 2.32** The Plan is unsound unless the spatial strategy is reconsidered to:
- Distribute growth more evenly across the district
  - Prioritise locations with stronger job bases and areas with existing infrastructure capacity
  - Reduce reliance on large-scale Green Belt release at the Bristol East Fringe
  - Properly assess reasonable alternatives, including strategic-scale growth options such as those identified through the Government’s New Towns Programme at Brabazon and the West Innovation Arc.

## 3. Q.18: What is meant by ‘additional protection’ in 4 b?

- 3.1** Policy LPS2(4)(b) is **not justified** and **not effective**. While it identifies the need to protect employment areas in the East Fringe, it does not demonstrate how this “additional protection” will meaningfully address the **jobs/homes imbalance**, nor how it influences the scale or form of development proposed.

### *The policy correctly identifies a structural imbalance*

- 3.2** Policy LPS2(4)(b) states that “*Additional protection will be applied to existing safeguarded employment areas in the East Fringe... to assist in addressing the imbalance of jobs to population...*”
- 3.3** This reflects a well-established issue that the Bristol East Fringe has **low job-to-worker ratios** (c.0.3–0.6) and that there is a clear reliance on **out-commuting**.

### *The policy does not demonstrate how the imbalance will be addressed*

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- 3.4 Despite identifying this issue, the Plan does not explain what “additional protection” entails in practice, or how it will increase employment provision and improve job accessibility.
  - 3.5 There is no evidence that the policy will generate additional jobs, improve the job/worker ratio, or reduce the need for commuting.

*Internal inconsistency with the spatial strategy*

- 3.6 There is a clear inconsistency between Policy LPS2(4)(b), which seeks to address jobs imbalance; and the spatial strategy, which directs approximately **44% of total proposed housing site allocations** to this same area.
- 3.7 In practice, the scale of housing proposed will **significantly increase the population**. Without a corresponding increase in employment, this will **worsen**, not improve, the imbalance.
- 3.8 The Plan does not demonstrate that employment growth will keep pace with housing delivery or offset the increased demand for out-commuting.

*No evidence of practical effect on development*

- 3.9 There is no evidence that the “additional protection” has influenced site selection, or quantum of development. Nor is it linked to specific policy requirements, delivery mechanisms, monitoring or outcomes.
- 3.10 As such, it appears to have **no meaningful effect** on the development proposed.

*Policy does not justify the chosen strategy*

- 3.11 Rather than supporting the spatial strategy, this criterion highlights a **fundamental weakness** in the chosen location.
- 3.12 The need to “protect employment areas” to address imbalance reinforces that the East Fringe is **not a sustainable location for large-scale housing growth**.
- 3.13 More sustainable alternatives exist, including settlements with stronger job bases; and strategic-scale growth options such as the **Brabazon / West Innovation Arc new town**, which are explicitly intended to align housing and employment growth.

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### Conclusion on Soundness

#### 3.14 Policy LPS2(4)(b) is:

- Not justified (no evidence that it will address the identified imbalance)
- Not effective (lacks clear mechanisms or outcomes; does not influence development in practice)

### Remedy

#### 3.15 The Plan is unsound unless the policy is clarified to:

- define what “additional protection” entails
- demonstrate how it will improve the jobs/homes balance and influence development outcomes
- and the Inspectors are satisfied that the spatial strategy does not exacerbate the identified imbalance; or is revised to direct growth to more sustainable locations.

## 4. Overall Conclusion on Matter 4

#### 4.1 The spatial strategy is fundamentally flawed and fails to meet the requirements of the National Planning Policy Framework (December 2023).

#### 4.2 In particular, it:

- directs a **disproportionate level of growth (approximately 44% of total proposed housing site allocations)** to the Bristol East Fringe, a location characterised by significant jobs/homes imbalance and a high reliance on out-commuting;
- results in a pattern of development that is **inherently unsustainable**, failing to align homes, jobs and infrastructure;
- relies on **uncertain infrastructure delivery**, with no clear evidence that necessary mitigation can be secured or delivered within the plan period
- fails to properly consider and justify **reasonable alternatives**, including brownfield-led growth, transport corridor-based development and/or growth at more sustainable settlements with stronger employment bases;
- is intrinsically dependent on **large-scale Green Belt release**, for which exceptional circumstances have not been demonstrated (see Matter 6).

#### 4.3 Furthermore, since submission of the Plan, the Government has confirmed its intention to bring forward a **new town at Brabazon and the West Innovation**

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**Arc**, with capacity for up to **40,000 homes**. This represents a **strategic, infrastructure-led alternative** to the dispersed pattern of Green Belt release proposed in the Plan, and clear evidence that **reasonable alternatives exist at a strategic scale** within South Gloucestershire.

**4.4** The Plan does not take account of this emerging strategy and therefore cannot be said to be **positively prepared** and is not based on the **most appropriate spatial strategy when considered against reasonable alternatives**.

**4.5** Accordingly, the spatial strategy is:

- Not justified: (alternatives have not been properly assessed, the chosen distribution lacks a clear and robust rationale)
- Not effective: (delivery is dependent on uncertain infrastructure, and development is directed to locations that are not sustainable in practice)
- Not consistent with national policy: (fails to promote sustainable patterns of development, and fails to minimise environmental harm, including Green Belt loss)
- Not positively prepared: (does not reflect the most appropriate strategy in light of emerging strategic growth opportunities)

**4.6** The Plan is unsound unless the spatial strategy is fundamentally reconsidered to:

- deliver a **more balanced and sustainable distribution of growth**
- prioritise locations with stronger job bases with existing or deliverable infrastructure capacity
- significantly reduce reliance on **Green Belt release at the Bristol East Fringe**
- properly assess and respond to reasonable alternatives; and **strategic-scale growth options**, including the Government's New Towns Programme at Brabazon and the West Innovation Arc.

**4.7** These soundness failings are strategic and fundamental. They go to the spatial strategy itself, and are unlikely to be capable of cure through limited main modifications. A fundamental reconsideration of the strategy, informed by a proper sustainability appraisal of reasonable alternatives (including Lenses 1 and 3 and the Brabazon / West Innovation Arc opportunity), is required before the Plan can properly be found sound.

**Mark Reynolds BSc MSc MRTPI (Chartered Town Planner)**  
**Context Planning Ltd, Cambridge House, Henry Street, Bath, BA1 1BT**