

**South Gloucestershire Council**

**Local Plan Examination Hearing  
Statement**

**Matter 5: Site Selection Methodology**

**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 5 (Site Selection Methodology) on behalf of Save our Green Spaces – South Gloucestershire (SOGS-SG).
- 1.2 The main issue identified by the Inspectors is whether the methodology for selecting sites is justified, effective 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), as confirmed by the Inspectors' Guidance Note (ID/08, 17 March 2026) and the transitional arrangements at paragraph 234 of the NPPF (February 2025).

## 2. Q.21: Is the methodology for selecting sites justified, effective and consistent with national policy?

- 2.1 The methodology for selecting sites is **not justified, not effective, and not consistent with national policy**. It is undermined by a **fundamental failure to properly integrate Green Belt considerations** into the site selection process.

### *Failure to integrate Green Belt evidence into site selection*

- 2.2 The site selection process relies on the HELAA, the Sustainability Appraisal (SA), and the Stage 1 and Stage 2 Green Belt Assessments. These strands of evidence are not properly integrated.
- 2.3 The HELAA assesses suitability, availability and achievability but does not assess Green Belt harm. The Green Belt Assessment is undertaken as a separate exercise and is not embedded within the comparative assessment of sites.

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### *Green Belt assessment has had no meaningful influence on site selection*

- 2.4 The Council's HELAA Methodology Report (February 2025) confirms that Green Belt was not considered at Stage 1, and sites were not discounted at Stage 2 because the Stage 2 Green Belt Assessment was being prepared concurrently.
- 2.5 This demonstrates that Green Belt considerations were not embedded in the site selection process.
- 2.6 This is evidenced in practice. HELAA site SG459 (land at Westerleigh, proposed allocation BV12) retains identical conclusions and a capacity of 2,000 dwellings between the 2023 and 2025 HELAA iterations. This indicates that the Stage 2 Green Belt Assessment had **no practical effect on site capacity or suitability conclusions**.
- 2.7 That is inconsistent with paragraph 31 of the NPPF (December 2023), which requires that preparation of policies is underpinned by relevant and up-to-date evidence that is adequate and proportionate. It is also at odds with the Planning Practice Guidance on Plan-making, which requires that site selection be supported by evidence showing how alternatives have been assessed in a consistent and transparent manner.
- 2.8 The methodology therefore fails to demonstrate that Green Belt harm has been properly taken into account in selecting sites.

### *Inconsistency within the Green Belt evidence base*

- 2.9 There is a clear inconsistency between the Stage 1 Green Belt Assessment (LUC, 2021), which identifies broad areas as making a significant contribution to the Green Belt, and the Stage 2 Green Belt Assessment (2023), which downgrades specific sites to **moderate Green Belt contribution**.
- 2.10 This is particularly evident in the Bristol East Fringe, where sites adjoining strong, defensible boundaries (e.g. the A4174/A4175) are assessed as making a reduced Green Belt contribution.
- 2.11 This approach is flawed because strong boundaries are a defining feature of **robust Green Belt function**, and they do not diminish the importance of the land in preventing sprawl or coalescence.

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- 2.12 The level of Green Belt harm arising from site release has been **systematically understated**, which has directly influenced which sites have been selected.

*Sustainability Appraisal does not provide a robust basis for site selection*

- 2.13 The Sustainability Appraisal explicitly states that it does not make recommendations on the release of Green Belt land.
- 2.14 As a result, there is **no mechanism within the evidence base that systematically weighs Green Belt harm against site suitability or alternatives**, representing a fundamental gap in the methodology.
- 2.15 That gap is material as a matter of law. The Environmental Assessment of Plans and Programmes Regulations 2004 and the authority in *Heard v Broadland DC* [2012] EWHC 344 (Admin) and *IM Properties v Lichfield DC* [2015] EWHC 2077 (Admin) require reasonable alternatives to be assessed on an equivalent and comparable basis to the preferred option. A Sustainability Appraisal that expressly declines to make recommendations on Green Belt release cannot meet that requirement and cannot, on its own, discharge the soundness test at paragraph 35(b) of the NPPF.
- 2.16 These methodological failings were identified in SOGS-SG's Regulation 19 representation (Context Planning Ltd, April 2025), in particular at paragraphs 2.86 to 2.91, which record that no site selection methodology enabling the Green Belt sites to be fed into the HELAA in a meaningful way was ever produced, that the Sustainability Appraisal no longer includes Green Belt within its consideration of sustainability issues or objectives, and that HELAA site SG459 (proposed allocation BV12) retains identical conclusions and capacity between the 2023 and 2025 iterations despite the Stage 2 Green Belt Assessment being undertaken in between. The evidence base before the Examination has not been updated to address those points.

*Failure to demonstrate that reasonable alternatives have been properly assessed*

- 2.17 The methodology does not demonstrate that all reasonable site options have been properly assessed or fairly compared.
- 2.18 Sites in more sustainable locations (e.g. Yate, Thornbury, transport corridors) have not been prioritised, despite better alignment with infrastructure, stronger job bases and reduced Green Belt impact.
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- 2.19** In addition, the methodology does not demonstrate that strategic-scale alternatives have been considered, including the Government's identification of a new town at Brabazon and the West Innovation Arc, further indicating that reasonable alternatives have not been fully examined.
- 2.20** Instead, sites in the Bristol East Fringe have been selected on the basis of a methodology that underestimates Green Belt harm and does not properly weigh alternatives.

### *Consequences for the Plan's spatial outcomes*

- 2.21** The flaws in the site selection methodology have led directly to the selection of sites that cause **significant Green Belt harm** and are located in **less sustainable areas**, and the rejection or under-utilisation of more sustainable alternatives.
- 2.22** This has contributed to the **unsound spatial strategy** identified under Matter 4, and the **failure to demonstrate exceptional circumstances** under Matter 6.

### *Conflict with national policy*

- 2.23** The methodology is inconsistent with the National Planning Policy Framework (December 2023), which requires policies to be based on **proportionate and up-to-date evidence** (paragraph 31), reasonable alternatives to be properly assessed and adverse impacts avoided where possible (paragraph 32) and plans to be justified and based on a robust and proportionate evidence base.
- 2.24** The methodology is not based on evidence that is adequate, proportionate or focused on justifying the proposed allocations, and does not demonstrate that the selected sites represent the most appropriate options.

### *Conclusion on Soundness*

- 2.25** The site selection methodology is:
- Not justified (alternatives have not been properly assessed and evidence is inconsistent and incomplete)
  - Not effective (leads to the selection of unsustainable sites and undermines delivery of a sound spatial strategy)
  - Not consistent with national policy (fails to comply with NPPF requirements on evidence and alternatives)
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## Remedy

- 2.26 The Plan is unsound unless:
- The site selection methodology is **revised** to fully integrate Green Belt considerations and apply a consistent and transparent assessment framework
  - The Sustainability Appraisal is updated to properly assess Green Belt harm and cumulative effects
  - Site allocations are reconsidered in light of a corrected methodology prioritising more sustainable locations and reducing Green Belt release

## 3. Overall Conclusion on Matter 5

- 3.1 The methodology for selecting sites is fundamentally flawed and does not meet the requirements of the National Planning Policy Framework (December 2023). In particular:
- Green Belt considerations have not been properly integrated into site selection (the HELAA process did not assess Green Belt harm at the point decisions were made; the Stage 2 Green Belt Assessment has had no meaningful influence on site capacity or suitability)
  - The **evidence base is incomplete and internally inconsistent** (different strands of evidence, such as the HELAA, Green Belt Assessment and Sustainability Appraisal, are not aligned; Green Belt harm has been systematically understated)
  - The **Sustainability Appraisal does not provide a robust comparative framework** (it does not assess or make recommendations on Green Belt release; there is no mechanism to weigh Green Belt harm against site suitability or alternatives)
  - The methodology **fails to demonstrate that reasonable alternatives have been properly assessed** (more sustainable locations have not been prioritised; site selection is not shown to reflect the most appropriate options)
- 3.2 As a result, the methodology is:
- Not justified: (it is not based on adequate, proportionate or properly integrated evidence)

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- Not effective (it leads to the selection of sites that are less sustainable and cause unnecessary Green Belt harm)
  - Not consistent with national policy (it fails to demonstrate that the proposed allocations are the most appropriate when considered against reasonable alternatives)
- 3.3** These deficiencies go to the **substance of the Plan’s strategy**. The flawed methodology has directly contributed to:
- the concentration of development in less sustainable locations
  - the selection of sites with significant Green Belt impacts
  - the failure to justify the spatial strategy (Matter 4) and exceptional circumstances for Green Belt release (Matter 6);
- 3.4** The Plan is unsound unless a **robust, integrated and transparent site selection methodology** is applied, which:
- properly incorporates Green Belt considerations
  - aligns all elements of the evidence base
  - provides a clear comparative assessment of alternatives, and
  - site allocations are **reconsidered accordingly**, to prioritise more sustainable locations and reduce reliance on Green Belt release
- 3.5** Without these changes, the Plan cannot demonstrate that its site allocations are based on a robust and proportionate evidence base, or the most appropriate options when considered against reasonable alternatives, and therefore **cannot be found sound**.
- 3.6** The deficiencies in methodology are not curable by minor wording changes to the Plan. They require the HELAA, the Green Belt evidence and the Sustainability Appraisal to be re-run as an integrated exercise, and the selected sites reconsidered against a corrected evidence base. That, in turn, bears directly on the unsound spatial strategy identified under Matter 4 and the failure to demonstrate exceptional circumstances under Matter 6.

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