

South Gloucestershire Council

Local Plan Examination Hearing Statement

Matter 27: Sites in Appendix 1 – North and East Fringe Urban Area

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 27 (Sites in Appendix 1 – North and East Fringe Urban Area) on behalf of Save our Green Spaces – South Gloucestershire (SOGS-SG).
- 1.2** The main issue identified by the Inspectors is whether the individual allocations in Appendix 1 are justified, effective and consistent with national policy.
- 1.3** SOGS-SG did not submit detailed, site-specific representations on the allocations addressed in this Matter as part of the Reg19 consultation. Accordingly, this response is necessarily general in nature, focusing on whether the Plan provides a sound and policy-compliant basis for these allocations.
- 1.4** This draws on the overarching concerns set out under the SOGS-SG Hearing Statements on Matter 4 (Spatial Strategy), Matter 5 (Site Selection Methodology), Matter 6 (Green Belt / Exceptional Circumstances) and Matter 7 (Housing Requirement).
- 1.5** The soundness tests applied in this Statement are those at paragraph 35 of the NPPF (December 2023), which governs this Examination under the transitional arrangements at paragraph 234 of the NPPF (February 2025) and the Inspectors' Guidance Note (ID/08, 17 March 2026). The grey belt provisions and paragraph 149 of the current Framework do not apply; the December 2023 NPPF tests at paragraphs 142 to 148 govern Green Belt release for the Appendix 1 allocations.
- 1.6** Sites of specific interest to SOGS-SG include:
- BOC1: Land to the rear of Park Farm Barry Road Oldland Common (304)
 - BOC2: Land at 12 The Park Willsbridge (150)
 - BOC 3: Jarretts Garden Centre Bath Road (95)
 - BOC 4: Jarretts Yard Oldland Common (140)
 - BOC 5: Willsbridge Nursery off Keynsham Road (A41745) (62 + employment)
 - BOC 6: Land adjacent to Bitton Sports and Social Club (33)
 - BOC 7: Land adjoining Bath Road Bridgegate (59)
 - BOC8 Land on the east side of Bath Road North Common Warmley (64)
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- BV14: Land on the east side of Bath Road North Common Warmley (41)
 - BV 16: Glenfern and land to the east of Carsons Road (employment)
 - EG1: Land at Shortwood Mangotsfield (65)
 - EG2: Land at Cossham Street Mangotsfield (150)
 - EG3: The Hayfields off Cossham Street (65)
 - EG4: Promphrey Hill Mangotsfield (7)

1.7 SOGS-SG may wish to attend the Hearing Sessions regarding any/all of these specific sites.

2. Soundness concerns with the allocations

2.1. The site allocations considered under this Matter are affected by **systemic issues** in the Plan's evidence base and strategy.

2.2. In particular:

- **Exceptional circumstances have not been demonstrated to justify removal from the Green Belt:** no site-specific EC cases are provided; reliance on strategic-level justification is insufficient
- **Green Belt boundaries are not robust or enduring:** many rely on weak or arbitrary features; do not ensure long-term defensibility
- **Infrastructure delivery is uncertain:** reliance on major schemes (including the A4174 Ring Road Package); funding and delivery mechanisms are not secured
- **Cumulative impacts on the Green Belt have not been assessed:** particularly for clusters such as the BV sites, resulting in understated Green Belt harm

2.3. On exceptional circumstances, paragraph 145 of the NPPF (December 2023) provides that, once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated, and that exceptional circumstances must be fully evidenced and justified for any release. Paragraph 146 requires the strategic policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting its identified need before concluding that exceptional circumstances exist. The Council's evidence base before the Examination contains no site-specific exceptional circumstances case for the BOC, BV or EG allocations identified above.

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- 2.4.** The Green Belt Exceptional Circumstances Topic Paper (March 2026) is post-submission evidence and operates at the strategic level, not at the level of individual non-strategic allocations. Our Regulation 19 representation (paragraphs 2.83 to 2.91) drew attention to the absence of any standalone exceptional circumstances document, and to the fact that HELAA Stage 1 did not consider Green Belt at all and Stage 2 did not discount sites for Green Belt because the Stage 2 Green Belt Assessment was being prepared concurrently.
- 2.5.** On boundary robustness, paragraph 148 of the NPPF (December 2023) requires plans to use Green Belt boundaries that follow physical features that are readily recognisable and likely to be permanent, and to demonstrate that boundaries will not need to be altered at the end of the plan period.
- 2.6.** The existing A4174 and A4175 are long-standing, defensible Green Belt boundaries that have constrained the Bristol urban edge for decades. Several of the Appendix 1 allocations (including BOC sites at Oldland Common and Willsbridge, the BV cluster at North Common Warmley and the EG cluster at Mangotsfield) breach those boundaries and replace them with weaker, less enduring features such as field hedgerows, lanes and back garden lines. That is in conflict with paragraph 148 and with the Calverton Parish Council v Nottingham City Council [2015] EWHC 1078 (Admin) factor on the nature and extent of harm to the Green Belt. The cumulative effect across multiple non-strategic allocations sets a precedent for further encroachment, contrary to the requirement that boundaries should endure beyond the plan period.
- 2.7.** On infrastructure deliverability: paragraph 110 of the NPPF (December 2023) permits development that generates significant transport movements only where the residual cumulative impacts on the road network and transport modes are not severe. Many of the Appendix 1 allocations are dependent on the wider A4174 Ring Road Package, which the Infrastructure Delivery Plan describes as £48.3m in cost, currently at ‘concept stage’ with an unknown delivery date and a plethora of potential funding pots. Without secured funding and a deliverable programme, the residual cumulative transport impact cannot be shown to fall below the paragraph 110 threshold. That is also relevant to the ‘effective’ soundness test at paragraph 35(c), which requires a Plan to be deliverable over the plan period. Reliance on uncommitted strategic infrastructure to make non-strategic site-level allocations sound is not a sustainable position.
- 2.8.** On cumulative Green Belt harm, the line of authority on reasonable alternatives in *Heard v Broadland DC* [2012] EWHC 344 (Admin) and *IM Properties v Lichfield DC* [2015] EWHC 2077 (Admin) requires that alternatives are assessed
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on an equivalent and comparable basis to the preferred option, including their cumulative effects. The HELAA assessed each Appendix 1 site individually and the Stage 2 Green Belt Assessment did the same. Neither evidence layer captures the cumulative harm of releasing multiple Bristol East Fringe sites at one location, and the Sustainability Appraisal expressly declines to make recommendations on Green Belt release.

- 2.9.** Cumulative harm has therefore been systematically understated, in line with the conclusion in our Regulation 19 representation at paragraphs 3.32 to 3.34 that the release of a large number of Green Belt sites at the Bristol East Fringe in combination would have significant effects considerably greater than the sum of the individual site assessments.
- 2.10.** In addition, it is noted that the Environment Agency specifically identified BOC7 and BV14 as having issues regarding flood risk, sequential test, and access/egress to site. In addition, BV14 was also flagged as having issues regarding flood plain compensation and flood modelling, flood risk activity permit, and overall suitability of development.
- 2.11.** The Environment Agency's concerns engage paragraphs 173 to 175 of the NPPF (December 2023), which require the application of the sequential test to direct development away from areas at higher risk of flooding wherever possible, and that allocations should be informed by a strategic flood risk assessment and a sequential test undertaken at the plan-making stage. The fact that the Environment Agency has identified residual concerns of this kind for BOC7 and BV14 indicates that the sequential test has not been adequately discharged at the allocation stage, and also that the Plan's evidence is not yet capable of demonstrating that those allocations satisfy the exception test where flood risk is engaged.
- 2.12.** Paragraph 191 of the NPPF (December 2023) requires plans to sustain and contribute towards compliance with relevant air quality limit values and objectives, taking into account the presence of Air Quality Management Areas, and to contain policies that avoid new or existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- 2.13.** Several of the BOC and BV allocations lie within or adjacent to the Kingswood/Warmley AQMA. Our Regulation 19 representation (paragraph 3.22) drew attention to the evidence in the Council's own Data and Access Profiles for Oldland Common (job-to-worker ratio 0.3) and Warmley (0.6), with around a
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quarter of residents commuting out to Bristol. The combination of an existing AQMA and embedded out-commuting means that air quality impacts have not been adequately assessed at the allocation level, and compliance with paragraph 191 has not been demonstrated.

- 2.14.** The NPPF (December 2023) requires plans to set out a positive strategy for the conservation and enjoyment of the historic environment, to give great weight to the conservation of designated heritage assets, and to require any harm to the significance of designated heritage assets to be clearly and convincingly justified. Several of the Appendix 1 allocations have a documented relationship with designated and non-designated heritage assets in their settings, including the Siston Conservation Area and Siston Court (in proximity to the BOC and BV clusters), and the Mangotsfield/Cossham Street historic core (relevant to the EG cluster). The plan-stage evidence does not assess the significance of those assets or the impact of the allocations on their settings to the level required by the NPPF and is therefore not consistent with national policy.

3. Conclusion

- 3.1.** As a result, the allocations are:
- Not justified: lack of site-specific evidence and alternatives testing
 - Not effective: dependent on uncertain infrastructure delivery
 - Not consistent with national policy: failure to demonstrate exceptional circumstances; failure to define durable Green Belt boundaries
- 3.2.** The Plan is unsound unless:
- exceptional circumstances cases are provided
 - Green Belt boundaries are revised to ensure durability and defensibility
 - infrastructure requirements are clearly defined, fully funded and demonstrably deliverable, and cumulative Green Belt impacts are properly assessed and addressed

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