

South Gloucestershire Council

**Local Plan Examination Hearing
Statement**

**Matter 9: Bristol East Fringe
Allocations**

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 9 (Bristol East Fringe Allocations) on behalf of Save our Green Spaces – South Gloucestershire (SOGS-SG).
- 1.2 The main issue identified by the Inspectors is whether the proposed allocations at the Bristol East Fringe are justified, effective, positively prepared and consistent with national policy.
- 1.3 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).

2. Q.79: What is the justification for the overall number of dwellings to be provided by Policy LP7, and from the individual component sites?

- 2.1 The overall number of dwellings proposed under Policy LP7, and the distribution across its component sites, are **not justified**. The quantum of development is not supported by proportionate evidence, particularly when assessed against **Green Belt harm, infrastructure constraints and the absence of a justified housing requirement** (see Matter 7).

The quantum of development is not derived from a robust comparative assessment

- 2.2 The Plan does not clearly demonstrate how the **overall capacity figure** for Policy LP7 has been derived; or why this level of development represents the **most appropriate outcome** when compared to reasonable alternatives.

The capacity must be read in the context of Green Belt harm

- 2.3 All sites within Policy LP7 are located within the **Green Belt**.
- 2.4 As set out under Matter 6:
- the **extent of harm has been understated**, due to flaws in the Stage 2 Green Belt Assessment, and inconsistent treatment of strong boundaries (e.g. A4174/A4175).
 - the sites form part of a **larger cluster of allocations**, resulting in significant **cumulative harm** and erosion of Green Belt function at a strategic scale.
 - the Plan does not demonstrate that the **scale of development proposed is the minimum necessary**; nor does it show that a reduced quantum could achieve the Plan's objectives with **less harm**
- 2.5 This is contrary to the requirements of the National Planning Policy Framework (December 2023), which require that Green Belt release is justified only in **exceptional circumstances**; and harm is properly understood and weighed.

The capacity must be read in the context of infrastructure risk

- 2.6 The delivery of the proposed number of dwellings is dependent on significant **transport infrastructure interventions** and wider infrastructure provision (including education, health and utilities).
- 2.7 However, there is **no clear evidence** that funding is secured, delivery mechanisms are in place, or that infrastructure will be delivered in step with development.
- 2.8 The number of dwellings assumes that infrastructure constraints can be fully mitigated. This is not demonstrated.
- 2.9 If infrastructure is delayed or not delivered, development will exacerbate congestion, worsen accessibility and undermine sustainability. This directly affects whether the proposed quantum is realistic, deliverable or appropriate.

No clear relationship between site capacity and constraints

2.10 The Plan does not demonstrate that individual site capacities have been adjusted to reflect Green Belt sensitivity, infrastructure constraints or environmental limitations.

Failure to demonstrate that a lower quantum would not be preferable

2.11 There is no evidence that the Council has tested whether a **reduced level of development** within Policy LP7 would still meet some housing needs but with significantly reduced Green Belt harm and infrastructure pressure.

2.12 Given that the overall housing requirement includes a **surplus** (see Matter 7), and reasonable alternatives exist (see Matter 4), it is entirely plausible that a lower quantum of development could deliver a more sustainable outcome.

2.13 The Plan already provides for a surplus of housing (see Matter 7), which further indicates that the scale of development proposed under Policy LP7 is not necessary.

Conclusion on Soundness

2.14 The number of dwellings proposed under Policy LP7 is:

- Not justified (no robust explanation of quantum, and no proper testing against constraints)
- Not effective (reliant on uncertain infrastructure delivery, not demonstrably deliverable)
- Not consistent with national policy (fails to properly account for Green Belt harm, does not demonstrate exceptional circumstances for the scale of release)

Remedy

2.15 The Plan is unsound unless:

- The quantum of development under Policy LP7 is **reassessed**, with a clear, evidence-based justification, with explicit testing against Green Belt harm and infrastructure capacity
- Site capacities are reduced to reflect constraints; and
- Consideration is given to alternative spatial distributions and lower levels of development that would reduce harm and risk

-
3. Q82: What are the exceptional circumstances for the proposed alteration of the Green Belt boundaries, and are the proposed alterations justified?
- 3.1 The Plan fails to demonstrate that **exceptional circumstances exist**, and therefore the proposed alterations to the Green Belt boundaries are **not justified**.
- 3.2 At submission, the Plan did not include a coherent exceptional circumstances case. The justification remains inadequate, as it does not demonstrate that alternatives have been exhausted, that development needs cannot be met without Green Belt release, or that the scale of release is the minimum necessary.
- 3.3 As set out under Matters 4, 5 and 7, more sustainable alternatives exist, the housing requirement is not robustly justified, and the evidence base is inconsistent and incomplete.
- 3.4 In addition, the level of **Green Belt harm has been understated**, and the **cumulative impact** of multiple releases has not been properly assessed.
- 3.5 The proposed Green Belt alterations are not justified and are **not consistent with national policy** in the NPPF (December 2023), which requires that Green Belt boundaries are altered only where **exceptional circumstances are fully evidenced and justified**.
- 3.6 The Plan is unsound unless a robust and comprehensive exceptional circumstances case is provided; and the scale and location of Green Belt release are **reconsidered and reduced accordingly**.

-
4. Q83: Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 148 of the NPPF?
- 4.1 The proposed Green Belt boundaries are **not justified** and are **not consistent with national policy**, as they are not robust or enduring.
- 4.2 Paragraph 148 of the NPPF (December 2023) requires that Green Belt boundaries should be **clearly defined**; and should use **physical features that are readily recognisable and likely to be permanent**.
- 4.3 The proposed Green Belt boundaries will be much weaker than the current boundaries, which are formed by major roads.
- 4.4 The proposed boundaries in a number of locations rely on **weak or arbitrary features**, rather than strong, defensible edges, and do not consistently follow durable infrastructure such as major roads or established landscape features. For example, Site A relies on a tree and hedge buffer to be enhanced and strengthened.
- 4.5 As a result, the boundaries are **not robust** and are unlikely to endure beyond the plan period or prevent further incremental encroachment.
- 4.6 This is particularly significant given the cumulative effect of multiple allocations at the Bristol East Fringe, which further undermines the durability of the revised boundary.
- 4.7 The proposed Green Belt boundaries are **not justified**; and **not consistent with national policy**.
- 4.8 The Plan is unsound unless Green Belt boundaries are redrawn to follow **strong, permanent and defensible features**; and ensure long-term durability and clarity.

5. Q84: What is the evidence that any significant impacts from the proposed development on the transport network or on highway safety, can be cost effectively mitigated to an acceptable degree?

- 5.1 There is **insufficient evidence** that transport impacts can be cost effectively mitigated to an acceptable degree. The allocations are therefore **not demonstrably deliverable within the plan period**.
- 5.2 Mitigation relies on significant strategic and local highway interventions. There is no clear evidence that funding is secured, delivery is guaranteed or mitigation will be effective in practice. Existing congestion indicates the network is already under pressure. This reliance on uncommitted infrastructure is inconsistent with the requirement for plans to be deliverable.
- 5.3 That is relevant to the ‘effective’ soundness test at paragraph 35(c) of the NPPF (December 2023), which requires a Plan to be deliverable over the plan period. The NPPF supports development that generates significant transport movements only where the residual cumulative impacts on the road network and transport modes are not severe. The cumulative transport impacts of the LP7 and LP8 allocations have not been demonstrated to fall below that threshold.
- 5.4 The Plan is **not effective**, as mitigation cannot be guaranteed and deliverability is uncertain.

6. Q85: Are the proposed transport requirements set out in Policy LP7 justified and would they be effective?

- 6.1 The transport requirements are **not justified** and would **not be effective**.
- 6.2 Requirements are dependent on uncertain infrastructure delivery and not clearly linked to demonstrable outcomes. The requirements are not supported by secured funding, clear phasing or enforceable delivery mechanisms.
- 6.3 There is no assurance that mitigation will be delivered in step with development.

6.4 The Plan is **not effective** and fails to provide a robust transport strategy.

7. Q93: Is Policy LP7 consistent with national policy for the historic environment?

7.1 Policy LP7 is **not consistent with national policy** in relation to the historic environment.

7.2 The Plan does not adequately demonstrate that the **significance of heritage assets** has been fully understood and that impacts have been properly assessed. This is contrary to national policy, which requires that great weight is given to the conservation of designated heritage assets and that harm is clearly and convincingly justified.

7.3 The scale of development risks harm to the **setting of designated assets**.

7.4 The Plan also fails to meet the plan-making requirements of paragraph 196 of the NPPF (December 2023), which requires plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk. The approach to LP7 does not demonstrate how the significance of designated and non-designated heritage assets in and around the allocation has been assessed, nor how their settings will be safeguarded. That falls short of the Framework requirement that great weight be given to the conservation of designated heritage assets, and that any harm needs to be clearly and convincingly justified.

7.5 The Plan is **not justified** and **not consistent with national policy**.

8. Q95: Are the requirements in respect of development forms and site levels justified and effective? What is the evidence that the impact of the proposed allocations on visually important hillsides has been carefully considered?

- 8.1 These requirements are not justified and would not be effective.
- 8.2 There is insufficient evidence that impacts on visually important hillsides have been properly assessed, and the proposed scale and form of development would result in significant landscape and visual harm.
- 8.3 The Plan is **not justified** and lacks a robust evidential basis.

9. Q98: What is the justification for the overall number of dwellings to be provided by Policy LP8, and from the individual component sites?

- 9.1 The number of dwellings proposed under Policy LP8 is **not justified**. The quantum of development is not supported by a robust or proportionate evidence base, particularly when considered in the context of **Green Belt harm, site constraints, and infrastructure risk**.
- 9.2 The Plan does not clearly explain how the overall capacity for LP8 has been derived; or how individual site capacities reflect environmental and infrastructure constraints.
- 9.3 As with Policy LP7, the proposed quantum must be assessed alongside the **extent of Green Belt harm**; and the **deliverability of supporting infrastructure**.
- 9.4 Development of the scale proposed would result in **substantial harm to Green Belt openness and function**, and would appear as an **incongruous extension**

of urban development into open countryside, rather than a contained or defensible expansion.

- 9.5** The land forms part of a wider area that makes a **strong contribution to Green Belt purposes**, particularly in preventing urban sprawl. The proposed quantum therefore exceeds what could reasonably be accommodated without significant harm.
- 9.6** In addition, the scale of development assumes that significant transport and infrastructure interventions will be delivered and that modal shift away from private car use can be achieved.
- 9.7** The Plan does not demonstrate that a **lower quantum of development** has been tested or that the proposed number represents the **minimum necessary** to meet housing needs.
- 9.8** Given that the Plan already provides for a surplus of housing (see Matter 7), there is no justification for maintaining the proposed quantum at this location.
- 9.9** The proposed number of dwellings under Policy LP8 is:
- Not justified: no clear or transparent derivation of capacity, and not properly tested against Green Belt harm or constraints
 - Not effective: reliant on uncertain infrastructure delivery and not demonstrably achievable within the plan period
- 9.10** The Plan is unsound unless the quantum of development under Policy LP8 is **reassessed**, with a clear, evidence-based justification, explicit testing against Green Belt harm / infrastructure capacity, and consideration is given to a **reduced level of development** that would minimise harm and improve deliverability.

10. Q101: What are the exceptional circumstances for the proposed alteration of the Green Belt boundaries, and are the proposed alterations justified?

- 10.1** Exceptional circumstances have **not been demonstrated**, and the alterations are **not justified**, for the following reasons:
- No robust exceptional circumstances case presented
 - Alternatives not exhausted

-
- Green Belt harm understated
 - Proposed boundaries are not robust
- 10.2** The land makes a strong contribution to Green Belt purposes, particularly preventing sprawl, and cannot reasonably be regarded as lower-value land. The proposal would represent a clear outward expansion of Bristol into open countryside, contrary to the fundamental purposes of the Green Belt.
- 10.3** The Plan is **not justified** and not **consistent with national policy**

11. Q102: Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 148 of the NPPF?

- 11.1** The boundaries are **not justified** and are **not consistent with national policy**.
- 11.2** The proposed release would create an **incongruous and irregular urban edge**, extending development into open countryside without clear containment. This would weaken the long-term defensibility of the boundary and increase the risk of further encroachment.
- 11.3** Boundaries do not consistently follow strong, permanent features, and they are not robust or enduring.
- 11.4** Paragraph 148 of the NPPF (December 2023) requires that, when defining Green Belt boundaries, plans should use physical features that are readily recognisable and likely to be permanent, and demonstrate that boundaries will not need to be altered at the end of the plan period. The existing A4174 and A4175 are long-standing, readily recognisable and highly defensible Green Belt boundaries that have effectively prevented sprawl of the Bristol urban area for decades.
- 11.5** The proposed LP7 allocation breaches those boundaries and replaces them with a weaker, more permeable edge that follows field boundaries, lanes and other less enduring features. As set out in our Regulation 19 representation (Context Planning Ltd, April 2025, paragraphs 3.33 to 3.34), this sets a precedent for further encroachment and a knock-on weakening of adjacent Green Belt land beyond the plan period, contrary to paragraph 148.

11.6 This fails requirements of the NPPF (December 2023).

12. Q103: What is the evidence that any significant impacts from the proposed development on the transport network or on highway safety, can be cost effectively mitigated to an acceptable degree?

12.1 There is **no robust evidence** that impacts can be mitigated. The allocation is **undeliverable within the plan period**.

12.2 The transport impacts would be severe. The development would generate substantial additional vehicle trips placing significant pressure on already congested routes including Warmley High Street, Siston Hill and Webbs Heath Road.

12.3 The allocation is assessed as requiring an **£18.75 million transport package to mitigate this impact and** also has a dependency on the **A4174 Ring Road Package**.

12.4 These interventions are not guaranteed and lack secured funding and delivery certainty. They also require aspirational modal shift assumptions lacking empirical support. This undermines confidence in deliverability within the plan period.

12.5 There is no guarantee that these measures will be delivered or effective, and without them the residual impacts would be severe.

12.6 The Plan is **not effective** and delivery is highly uncertain.

13. Q104: Are the proposed transport requirements set out in Policy LP8 justified and would they be effective?

-
- 13.1** They are **not justified** and would **not be effective**, for the following reasons:
- Dependence on uncertain infrastructure
 - No clear evidence of delivery or timing
- 13.2** The requirements rely heavily on **future, unfunded and uncommitted transport interventions**, including strategic corridor improvements and bus service enhancements. These are understood to be aspirations rather than secured schemes, and therefore cannot be relied upon to ensure effective mitigation.
- 13.3** The Plan is **not effective**.

14. Q106: What is the evidence that the impact of the proposed allocations on the historic environment has been carefully considered?

- 14.1** The Plan does **not provide sufficient evidence** that impacts on the historic environment have been properly considered.
- 14.2** The area has a **strong functional and visual relationship with heritage assets**, including Siston Court and the Siston Conservation Area, whose significance derives in part from their rural setting and surrounding landscape. This relationship is not adequately assessed or evidenced. This relationship is a key component of the assets' significance and must be properly evidenced and assessed.
- 14.3** The evidence base is incomplete, including absence of key viewpoints (e.g. from within the Conservation Area) and insufficient assessment of setting and intervisibility.
- 14.4** The Plan is **not justified** and **not consistent with national policy**.

15. Q111: What is the evidence that the impact of the proposed allocations in terms of noise and air quality has been carefully considered?

-
- 15.1** The Plan does **not demonstrate** that noise and air quality impacts have been adequately addressed.
- 15.2** The area is affected by the Kingswood/Warmley Air Quality Management Area (AQMA). Existing issues include congestion and poor air quality.
- 15.3** Development would significantly increase traffic flows and exacerbate congestion on key corridors.
- 15.4** The Plan does not convincingly show that impacts will not worsen or that they can be mitigated.
- 15.5** The presence of an existing AQMA is a clear constraint which the Plan must address convincingly, which it does not.
- 15.6** Paragraph 191 of the NPPF (December 2023) requires plans to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas, and to contain policies to avoid new or existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- 15.7** Our Regulation 19 representation (paragraph 3.22) drew attention to the evidence in the Council's own Data and Access Profiles (DAPs) for Oldland Common and Warmley, which record job-to-worker ratios of 0.3 and 0.6 respectively, with only 4 to 6 per cent of residents working locally and around a quarter commuting to Bristol. The result is an embedded pattern of private car out-commuting that, in combination with the Kingswood/Warmley AQMA, demonstrates that air quality impacts have not been adequately assessed, nor has compliance with paragraph 191 been demonstrated.
- 15.8** The Plan is not justified and not effective.

16. Overall conclusion on Matter 9

- 16.1** The Bristol East Fringe allocations (Policies LP7 and LP8) are fundamentally flawed and fail to meet the requirements of the NPPF (December 2023). They are:

16.2 Not justified:

- The scale of development is not supported by a robust or transparent evidence base
- The quantum of development has not been properly tested against Green Belt harm or infrastructure constraints
- The Plan already provides for a surplus of housing (see Matter 7), meaning the scale of development is not necessary
- Reasonable alternatives have not been adequately considered

16.3 Not effective:

- Delivery is dependent on significant infrastructure, including major transport interventions, for which funding is not secured and delivery is uncertain
- The scale and timing of development are therefore **not realistic within the plan period**

16.4 Not consistent with national policy:

- Exceptional circumstances for Green Belt release have not been demonstrated
- Proposed Green Belt boundaries are not robust or enduring
- Impacts on the transport network, the historic environment, landscape and visual receptors, and air quality (including the Kingswood/Warmley AQMA) have not been adequately assessed or mitigated

16.5 The allocations represent a **concentration of large-scale development in a constrained and unsustainable location**, resulting in

- significant and unjustified Green Belt harm
- unacceptable infrastructure and environmental risks
- substantial uncertainty as to delivery

16.6 The Plan is unsound unless

- The scale of development at the Bristol East Fringe is **significantly reduced or removed**; and
- The spatial strategy is **reconsidered**, to prioritise more sustainable locations, reduce reliance on Green Belt release and align development with deliverable infrastructure.

-
- 16.7** This conclusion is reinforced by the Council's own adopted Core Strategy (2006 to 2027, paragraph 4.21), which found the Bristol East Fringe to be unsuitable for development because of major constraints: the importance of the open countryside, hillside and ridgelines that establish the setting of the urban area; limited local employment opportunities; the lack of potential for integrating new development; and the extreme difficulty of delivering essential transport improvements.
- 16.8** As set out in our Regulation 19 representation (paragraphs 3.20 to 3.21), each of those constraints still holds true. The Plan does not explain what has materially changed, and the evidence on transport, air quality, Green Belt contribution and infrastructure delivery confirms that they have not. Taken together with the soundness failings identified under Matters 4, 5, 6 and 7, the Plan in its current form is incapable of being found sound in relation to Policies LP7 and LP8 unless the scale of development at the Bristol East Fringe is significantly reduced or removed, the Green Belt allocations are re-tested against a properly evidenced exceptional circumstances case, and the spatial strategy is re-cast to direct growth to genuinely more sustainable locations with deliverable infrastructure.

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