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# Bristol Local Plan Examination

## Matter 5: Green Belt

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Written Statement Prepared by Savills  
on behalf of Taylor Wimpey

**Issue 5.3 – Whether the proposed site allocations are justified taking into account the reasonable alternatives, effective in terms of deliverability and consistent with national policy in enabling sustainable development?**

## Introduction

- i. As means of introduction to this Issue, Taylor Wimpey submits this Statement in support of the Plan’s identification of Land adjacent to Elsbert Drive, Bishopsworth in Policy DS11 as a residential allocation.
- ii. Taylor Wimpey are the freehold land owner of all land identified within the allocation, and have engaged at all stages of the emerging Plan process. A copy of Taylor Wimpey’s representations submitted in January 2024 to the most recent Reg. 19 consultation in relation to:
  - Policy DS10 (Green Belt) can be found [here](#)<sup>1</sup>; and
  - Policy DS11 (Development Allocations South West Bristol) can be found [here](#).
- iii. Although Taylor Wimpey support the principle of the site’s allocation, in earlier representations they have advocated for changes to the allocation’s wording as means of enhancing the site’s deliverability and ensuring consistency with other policies and allocations within the Plan.
- iv. A pre-application submission was made to Bristol City (the “Council”) in November 2024, and Taylor Wimpey will be working toward the submission of an outline planning application in 2025.
- v. Unless expressly stated, the comments below relate to the proposed allocation of Elsbert Drive in isolation.

**Q5.9: Taking each site in turn, how would development proposed by DS11 affect each of the five Green Belt purposes set out in paragraph 138 of the NPPF?**

- vi. The most recent assessment of Green Belt is EVEG01 (dated 2022). Elsbert Drive is considered as part of Parcel P96, which comprises a collection of non-contiguous areas of Green Belt land on

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<sup>1</sup> Hyperlink, linking to Bristol City Council’s website as part of REP01, REP02 and REP03.

the south-western edge of the Bristol urban fringe. These areas of land have different locations and characters and as a result Taylor Wimpey consider that they would have been best assessed at a more localised level than Parcel scale.

- vii. Nevertheless, the Assessment concludes that P96 as a whole makes only one “*significant*” contribution to the purposes of the Green Belt, which is in relation to Purpose 3 – “*to assist in safeguarding the countryside from encroachment*”.
- viii. Although not part of the evidence base for this Local Plan, Bristol City was one of the authorities involved in the production of the West of England Joint Spatial Plan, which was Examined in 2019. The evidence base for this Plan included a two stage Green Belt Assessment:
- Stage 1 (November 2015)
    - A strategic scale parcel appraisal.
  - Stage 2 (November 2016)
    - A second stage review considering parcels identified as low scoring against Green Belt purposes during Stage 1, at a more granular level (by cell).
- ix. Elsbert Drive was considered in Stage 2 as part of a 21ha cell (which is much smaller and more accurate than the more recent 2022 assessment), under the reference of 59b. As Figure 1 below shows, Bristol City’s own evidence determined the cell in question to not make any significant contributions toward Green Belt purposes.

Assessment location: Ashton Vale – South West Bristol

59b (21ha)		Green Belt Purposes 1, 3, 5
<b>Contribution to purpose 1</b>	<b>Limited contribution</b>	
Small area of farmland and recreation use between the urban edge of Bristol and the newly constructed South Bristol Link (SBL). New road forms a strong physical boundary feature 100-300m from the urban boundary which encloses the cell.		
<b>Contribution to purpose 2</b>	-	
Not applicable.		
<b>Contribution to purpose 3</b>	<b>Limited Contribution</b>	
The cell comprises mainly agricultural land immediately adjacent to the urban area. It is affected by the route of the South Bristol link which limits its connectivity with the wider countryside.		
<b>Contribution to purpose 4</b>	-	
Not applicable		
<b>Overall contribution</b>	<b>Limited contribution</b>	
The cell has played a role in checking the unrestricted sprawl of the nearby urban area however the construction of the SBL has created a more defensible boundary close to the urban area and resulted in a small area of countryside which is not well connected to the wider area.		

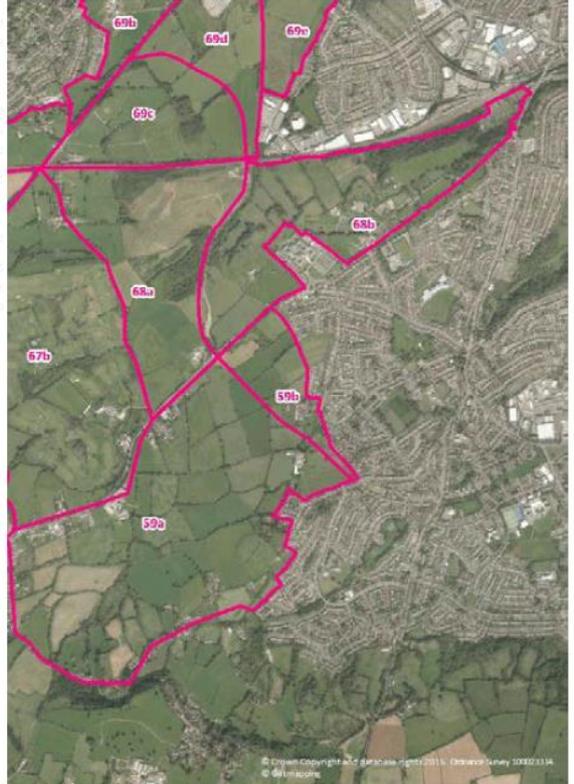


Figure 1: Extract from West of England Joint Spatial Plan Green Belt Assessment Stage 2 (November 2016)

- x. Taylor Wimpey consider that the overall conclusion reached above for the cell in the 2016 assessment is a more accurate assessment of the baseline contribution that land at Elsbert Drive makes to the purposes of the Green Belt, ie “*limited contribution*”.
- xi. Having established a limited contribution, this Statement now returns to the question posed, what impact will the proposed development of Elsbert Drive have on each Green Belt purpose? We address each in turn.
  - 1. Unrestricted sprawl –
    - a. Plan led development is the antithesis of unrestricted sprawl. Notwithstanding, the development of this modest scale site would have no meaningful impact on the

extent of the urban area, particularly given the urbanising influence of the South Bristol Link Road, which already sits further west of the site within the Green Belt.

2. To prevent merging of neighbouring towns –
  - a. This purpose is fundamentally about the coalescence of tier 1 settlements, ie Bristol and Bath. Given the location of the site on the western edge of Bristol, development of the site would have no impact on the gap between these two settlements.
3. To assist safeguarding countryside from encroachment –
  - a. Whilst development of the site would involve the use of land that is currently undeveloped, as set out in Figure 1 above, Elsbert Drive is already severed from the wider countryside by virtue of its position inside the South Bristol Link Road. Furthermore, it is relevant to note that land to the west and north of the site, which falls within the administrative boundary of North Somerset, is also proposed in an emerging Plan for release from the Green Belt for housing. Therefore, development at Elsbert Drive – either singularly or in combination with adjacent emerging North Somerset allocations – would not result in any meaningful encroachment into the wider countryside.
4. To preserve setting and special character of historic towns –
  - a. Given its location between the urban fringe and the Link Road and an absence of any nearby heritage assets, development of Elsbert Drive would have no impact on this purpose.
5. To assist in urban regeneration –
  - a. This site is greenfield and therefore its development would not contribute toward reuse of brownfield land. However, its proposed allocation is predicated on an exceptional circumstances case in a Plan which falls short of meeting objectively assessed needs for housing. Therefore it follows that development within the Green Belt and specifically at Elsbert Drive, is essential for sustainably meeting the needs of Bristol as a whole.

**Q5.10: Would Policy DS11 be effective in ensuring that the proposed Green Belt boundaries around the Ashton Vale and Elsbert Drive allocations area clearly defined using physical features that are readily recognisable and likely to be permanent?**

- xii. The outer boundaries of the proposed Elsbert Drive allocation are currently marked by mature hedgerows.
- xiii. Policy DS11 includes requirements for development at Elsbert Drive to accord with other policies of the Plan (which, as per the comments below in response to Q5.13 would apply even if it was not expressly stated), and, separately, to produce a detailed masterplan which addresses the layout and form of the development.
- xiv. When read alongside the policies of Chapter 9 of the emerging Plan (Biodiversity and Green Infrastructure), there is a requirement to conserve and enhance existing green infrastructure such as mature hedgerows.
- xv. With regard to masterplanning, Taylor Wimpey has already produced and submitted a masterplan for the site as part of Reg. 19 submission and their subsequent pre-application submission, which also included neighbouring land in North Somerset (which is outside of Taylor Wimpey's control). This masterplan shows the conservation and enhancement of the mature hedgerows, with only very limited breaks to provide access into neighbouring parcels.
- xvi. Therefore the effect of Policy DS11 when read alongside other policies of the Plan, would be to ensure that conserved and enhanced hedgerows would form clearly defined and lasting physical boundaries for the edge of the Green Belt.
- xvii. Notwithstanding the above, if the emerging allocations on adjacent land within North Somerset are progressed and built out, none of the boundaries of Elsbert Drive would directly border the Green Belt.

**Q5.11: Would Policy DS11 be effective in securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of removing the allocation from the Green Belt?**

- xviii. Following on from the above, Policy DS11 requires development at Elsbert Drive to be in accordance with a masterplan which addresses the layout and form of development including “*access and the relationship with surrounding areas*”. It is reasonable to interpret “*surrounding areas*” as reference to the surrounding Green Belt.
- xix. As set out above, Taylor Wimpey have produced a masterplan which includes neighbouring land (outside of Taylor Wimpey’s control). Through the creation and enhancement of improved pedestrian and cycle links, development would enhance accessibility to nearby Green Belt.
- xx. Therefore, this Statement considers that Policy DS11 is effective in securing requirements for improvements to the accessibility of remaining Green Belt land.

**Q5.12: Are the Ashton Vale and Elsbert Drive allocations suitably located, having regard to the Plan’s spatial strategy and the national aim of promoting a sustainable pattern of development?**

- xxi. With regard to spatial strategy and the Plan’s sustainability objectives as a whole, the allocation and development of Elsbert Drive positively differentiates it in comparison to other locations and allocations. Notably:
- It is located within South Bristol, which paragraph 3.3.3 of the Plan describes as “*a priority focus for development and regeneration under the new spatial strategy*”, including new homes. This is particularly important given that South Bristol has higher levels of socio-economic deprivation in comparison to other areas of the city within Bristol City’s administrative area.
  - Noting the above, outside of central locations in South Bristol, there are relatively few new major residential allocations within South Bristol, and there are no other major residential allocations in close proximity to Elsbert Drive.

- By virtue of Elsbert Drive's location and surrounding character, it is one of the few major emerging allocations that would deliver family housing led development, as opposed to higher density apartment led development, which is crucial to ensuring a diversified housing offer to meet need.

- xxii. With regard to sustainability more generally, we ask that the Inspectors review the submissions made by Taylor Wimpey in response to the Sustainability Assessment submitted at Reg. 19 stage, which are available [here](#) (see p3 to 6, under the heading of 'Sustainability Appraisal').
- xxiii. In summary, the Council took the approach of appraising the sustainability of both allocations proposed within Policy DS11 together, without separating them, which is unusual as the two have different characteristics and are in quite different locations.
- xxiv. As a result, we believe the Sustainability Appraisal's assessment of Policy DS11 undervalues the sustainability of Elsbert Drive in isolation and Taylor Wimpey included their own assessment of Elsbert Drive in isolation as means of evidencing this.
- xxv. Nevertheless, even on the basis of the Sustainability Appraisal, Bristol City deemed the site to be sustainable enough to propose the allocation of Elsbert Drive and therefore, if the assessment were to become more favourable as proposed by Taylor Wimpey's assessment, this only strengthens the case.

**Q5.13: Notwithstanding the extant planning permission, is Policy DS11 likely to be effective in dealing with any subsequent applications should they be submitted?**

- xxvi. Policy DS11 is relatively brief and defers to generic development management policies on most matters.
- xxvii. However, there are a limited number of Elsbert Drive specific requirements which we comment on below where Taylor Wimpey consider amendments are required to ensure they are effective in dealing with subsequent applications. These points are a repetition of comments made at Reg. 19 stage, however, no amendments were made by the Council prior to submission.

- xxviii. Firstly, the Policy identifies a need for development at Elsbert Drive to come forward pursuant to a detailed cross-boundary development framework or masterplan prepared in consultation with the local community, which addresses the layout and form of development, access and the relationship with surrounding areas.
- xxix. Taylor Wimpey do not object to the principle of this, and indeed are already in dialogue with the two adjacent land owners, Barratt and Wring, who control land proposed for allocation by North Somerset as part of their emerging plan. However, clarification should be inserted to confirm what the Council's expectations are for this process. North Somerset have a similar requirement within their emerging allocation policy, and given the cross boundary nature of framework plan / masterplan, Taylor Wimpey consider that the most practical way of addressing this requirement would be to allow for this document to be produced informally by the landowners, without requiring any formal approval by Bristol City or North Somerset Council. This is all the more important now as North Somerset's emerging Local Plan will not have reached revised Reg. 19 stage by the point of Examination of Bristol's Local Plan.
- xxx. Secondly, the Policy requires development to be designed to address the residential amenity of existing homes on Elsbert Drive. Taylor Wimpey do not object to this, however, the inclusion of this requirement as part of an allocation is unnecessary given the inclusion of requirements in Policy DPM1 (Delivering well-designed, inclusive places) which states:

*“To be considered well-designed, development will be expected to: ...*

- Be neighbourly, safeguarding the amenity and sustainability of existing development ...”*

- xxxi. Thirdly, the Policy requires that development should accord with all the other relevant policies in this Plan. Again, Taylor Wimpey do not object to the principle of this, however, this is not a requirement included in any other allocation, and no justification is provided for why this has been explicitly inserted in relation to the Elsbert Drive part of draft Policy DS11 only. In the absence of justification, Taylor Wimpey do not consider it necessary and effective for development management purposes.
- xxxii. Lastly, reference is made within North Somerset’s adjacent draft allocation to “*No vehicular access off Colliter’s Way*”. Taylor Wimpey’s land has the ability to fulfil this through delivering vehicular access for all three land ownerships via Elsbert Way, which falls within the administrative area of Bristol City. A note prepared by TPA, and submitted as part of Taylor Wimpey’s most recent representations (see Appendix B, available [here](#)) confirms that this single point of access would be appropriate for servicing Elsbert Drive and the emerging North Somerset allocations, with headroom over and above the estimated combined residential capacity.
- xxxiii. On the basis of the comments above, Taylor Wimpey consider that Policy DS11 should be amended as follows to ensure it is effective for the determination of planning applications in the future. Text in underlined green is proposed as new, and text in struck-through red is deleted. All other text is as set out in the submitted policy.

*“Policy DS11: Development allocations – south west Bristol*

*The following sites as shown on the Policies Map are proposed to be removed from the Green Belt and allocated as growth areas for new homes:*

- *Land at Ashton Vale (‘Longmoor Village’);*
- *Land adjacent to Elsbert Drive, Bishopsworth.*

*Development at Elsbert Drive should be in accordance with a detailed cross-boundary development framework or master plan prepared in consultation with the local community which addresses the layout and form of development, access (including a sole vehicular access point from Elsbert Drive) and the relationship with surrounding areas to be agreed between the developers within both Bristol City and any neighbouring land allocated in North Somerset. This plan does not require formal approval by either Council, provided it addresses the points above. ~~The development should be designed to address the residential amenity of existing homes on Elsbert Drive and accord with all the other relevant policies in this plan.~~”*

**Q5.14: With regard to Elsbert Drive, would the policy be effective in securing sustainable development? In particular with regard to:**

- a) A cross boundary masterplan or development framework. To what extent is the delivery of this allocation dependent on North Somerset’s Local Plan?**
- b) Scale and density of development.**
- c) Potential effects of development and expected mitigation.**

xxxiv. Please read in conjunction with the response to Q5.13 (above).

xxxv. With regard to question a), functionally, Elsbert Drive washes its own face and is not in any way reliant on the neighbouring emerging allocations within North Somerset. Most importantly, land proposed for allocation under Policy DS11 at Elsbert Drive is closest to the existing urban area and is therefore the logical first phase of development. Furthermore, the land within Taylor Wimpey’s control directly abuts the existing Elsbert Drive adopted highway and if a single point of access is to be used for all three land ownerships, then Elsbert Drive would need to come forward first. Logically therefore, it makes practical sense for it to be Phase 1.

xxxvi. With this in mind, as set out above in response to Q5.13, it is important that the masterplan / framework process does not unnecessarily delay this from happening, particularly as North

Somerset's emerging Plan is progressing slower than was anticipated at the time that the Council's wording of Policy DS11 was conceived.

- xxxvii. With regard to question b), Taylor Wimpey do not consider any additional wording is required to ensure that the policy is effective with regard to scale and density of development. This is adequately governed, by the estimated capacity for the site, as set out in supporting paragraph 3.3.30 and the Plan's generic development management policies.
- xxxviii. With regard to question c), again, Taylor Wimpey do not consider any additional wording is required to ensure that the policy is effective in securing sustainable development as this will be addressed through the Plan's development management policies and site specific assessment at application stage.

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**February 2025**