



Responses in relation to **Bristol Local Plan – Draft Matters, Issues and Questions**.

These comments are submitted on behalf of SAVE (Save Ashton Vale Environment - <https://save-21.co.uk/>)

Matter 5: Green Belt.

Issue 5.3: Whether the Green Belt allocations are justified, consistent with national policy and whether the policies would be effective in delivering sustainable forms of development.

In relation to: "**Policy DS11 – Development allocations – south west Bristol**", focusing specifically on the proposed **Ashton Vale** allocation.

- 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?

The five green belt purposes are:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Building on this allocation will bring the edge of housing within the city of Bristol ever closer to edge of Long Ashton in North Somerset. This seems to challenge green belt purposes a, b and d. Specifically a: it allows the sprawl of Bristol, b: Ashton Vale starts to merge with Long Ashton, and d: it potentially damages the setting and character of Long Ashton.

Exceptional circumstances for removing this allocation from the green belt still have not been established and this allocation could be saved from development if development on existing brown field sites or density of development on other allocations were prioritised.

Moreover, sections of the green belt in this area fall in North Somerset as well as Bristol. There seems to be a lack of coordination between the two councils about the green belt in this area. North Somerset have recently approved a "large office campus" on land south west of Long Ashton Park and Ride off the Gurney Roundabout (A370) and Colliters Way, Long Ashton (see: 23/P/2185/FU2 - <https://planning.n-somerset.gov.uk/online-applications/applicationDetails.do?activeTab=map&keyVal=S29EEHLP00G00> / <https://www.bbc.co.uk/news/articles/clyzmmjz4o>). This is very close to the Ashton Vale allocation within the city of Bristol (see map in the North Somerset planning portal above).

Allowing building in both of these locations will extend the sprawl of the city of Bristol up to the A370, essentially merging Long Ashton and Bristol - in direct contradiction to the purposes of the green belt.

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

No. Such boundaries are unlikely to be permanent. Also see answer to Q5.9 above in terms of the other proposed developments on the green belt in this area by the next door council (North Somerset). Without co-ordinated action between the two councils concerning the green belt in this area, any suggested physical features defining the green belt in this area are unlikely to be permanently adhered to.

- 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?

No. Bristol City Council have not stated that it is not possible to provide compensatory improvements to the environmental quality and accessibility of remaining Green Belt land that would offset the impact of removing this allocation from the Green Belt. We disagree - we feel this issue has not been adequately addressed in the local plan.

- Site Selection and Location

- 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?

No. There are important environmental and transport considerations which should constrain development on this allocation. The Environment Agency, North Somerset Council and to lesser extent Natural England highlight ongoing issues with this specific allocation.

The Environment Agency note that this is Flood Zone 3b land and a former landfill site. North Somerset note that land within the allocation will need to be set aside to enable sustainable rail links between Portishead and Bristol in the future. Final funding and permission for re-opening of the rail link between Portishead and Bristol was approved in February by the West of England Mayoral Combined Authority (<https://www.westofengland-ca.gov.uk/news/full-steam-ahead-for-bristol-portishead-line/>) - and a road will need to be built on this allocation to avoid knock on traffic delays in South Bristol (see below). Natural England highlight the need for a further Habitat Regulations Assessment (HRA) in any future planning applications. This is likely because the entire allocation is a wildlife corridor, and also contains a Site of Nature Conservation Interest (SNCI).

In their comments to the local plan review, the Environment Agency objected to this allocation noting:

"3.3.28 Land next to park and ride Metrobus

We object to this development allocation shown adjacent to the Long Ashton Park and Ride. A flood storage area was constructed in this area as mitigation for the Metrobus scheme, however this is not yet shown on the Flood Map for Planning: Rivers and Sea. It was a condition of the planning permission to update the flood modelling to include this flood storage area, which will enable us to update our flood map. However, this has not yet been done. We recommend that the developer of the MetroBus scheme updates this modelling and that an alternative location for development is found. This area is designated as a flood storage area for the Metrobus and will be Flood Zone 3b once the Flood Map is updated. As such this area is designed to flood and prevents flooding to the surrounding area. Therefore, we object to any development here in line with the National Planning Policy Framework.

In addition, this site is on top of phase 3 of the former Long Ashton landfill site. It is also located adjacent to phase 1 and 2 of the former landfill"

(ID 465, p. 1498, https://files.smartsurvey.io/3/1/Z3KXRQ7W/237407650_20966066_3192330.pdf)

North Somerset commented:

"Land at Ashton Vale ('Longmoor Village'). Land at Ashton Vale has outline planning permission for around 500 homes. This site adjoins the North Somerset boundary near Long Ashton with the site being accessed via the B3128 slip road off the A370, at or close to the junction access to David Lloyd's Leisure Centre, in North Somerset. The North Somerset Pre-submission Local Plan includes, under Policy LP8 (Transport infrastructure, allocations, and safeguarding) an access road to Longmoor Village as a proposed major transport scheme to reflect this requirement. This is included under 'Schedule 7: Transport infrastructure, allocations and safeguarded routes' and as scheme TR10 in the Draft Infrastructure Delivery Plan that supports the pre-submission plan. This access is not only required for access to Longmoor Village site but also as an alternative access into Ashton Vale Trading Estate if the Portishead to Bristol railway line upgrades from a 60-minute to a 30-minute frequency, as aspired to in the West of England Joint Local Transport Plan 4 (JLTP4) and WECA Ten Year Rail Strategy. This access to the Ashton Vale Trading Estate via the B3128 slip road from the A370 in North Somerset, along the alignment(s) set out in the NSC Local Plan, is required because modelling has shown that the current access from the Trading Estate on Ashton Vale Road, onto Winterstoke Road, would cause unacceptable queueing and delay as the current level crossing arrangement at the junction would be shut much more frequently to allow trains to pass.

North Somerset Council commented on the outline application for this site recommending that permission only be granted if certain conditions were attached namely, the set aside of a 13m wide access route for future connection to Ashton Vale Trading Estate and the main access and structures to be designed to serve a connection to Ashton Vale Industrial Estate. These conditions were not included in the permission and will need to be addressed through the reserved matters application".

(ID 188, p.365, https://files.smartsurvey.io/3/1/RCCMY06K/236257368_20966066_3236456.pdf)

Natural England commented:

"Longmoor Village, Ashton Vale. A HRA was undertaken for this application. Planning permission has been granted for this site, if for any reason another application is submitted at this site, the proposed development will need to be assessed through a HRA."

(ID 489, p.1644, <https://files.smartsurvey.io/a/H1C0RE7W/NE%20Rep%20Letter.pdf>)

Moreover, it should also be noted that any housing on this allocation would form an isolated pocket of housing, poorly connected to other communities, without limited support from already strained local infrastructure.

- Development Requirements

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

No. Important matters were not dealt with when outline planning permission was granted. See comments from the Environment Agency and North Somerset above.

Moreover, the building on both this allocation and the other green belt allocation in North Somerset would set a likely precedent for further planning applications on this and other nearby sites in the green belt leading to a further erosion of the green belt and its core purposes in this area.

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The original representations by SAVE at the submission stage of the local plan review can be found here (ID 235, p.475, https://files.smartsurvey.io/3/1/J5OKCR1Q/236328113_20966066_3195127.pdf).

Word count: 1548.