



**Bristol Local Plan Examination**

**Matter 5: Green Belt**

**Written Statement Prepared by Blue Fox  
Planning and Neil Brant Consulting on behalf  
of the Wring Family Trust**

**March 2025**

**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.**

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1. This Statement has been prepared by Blue Fox Planning and Neil Brant Consulting on behalf of the Wring Family Trust (“Wring”).
2. The Wring family owns part of a proposed allocation for circa 215 dwellings in the emerging North Somerset Local Plan 2040 known as “*Land North of Colliter’s Way, Long Ashton*”. Specifically, the Wrings own land in the northern part of that allocation immediately adjoining the A38 Bridgwater Road as shown in the below figure.



Figure 1: Land Ownerships and Administrative Boundary

3. The proposed allocation in the emerging North Somerset Local Plan immediately adjoins the proposed allocation at Elsbert Drive under Policy DS11 of the submitted Bristol Local Plan. Both of the emerging Local Plans require that the proposed allocations are brought forward in a comprehensive manner requiring cross boundary working. For example, paragraph 3.3.30 of the Bristol Local Plan states:

*“...the emerging North Somerset local plan proposes to take a similar approach to Green Belt land inside Colliters Way. Bristol City Council will engage with North Somerset to ensure a comprehensive approach to development.”*

4. The emerging North Somerset Plan also requires a comprehensive approach to development but provides far greater detail as to what is required including, relevant to this Examination Session:

*“No vehicular access off Colliters Way. Investigation of main access into the site from Bridgwater Road/ A38 to the east of Lime Kiln roundabout.*

*Active travel links to all local roads and public rights of way.*

*Active travel provision improvements to link into local facilities.*

*To coordinate development, including the design, masterplanning, approach to vehicular access and delivery across the entire allocation, including that part proposed for residential development on adjoining land off Elsbert Drive within the Bristol City Council administrative area, in order to facilitate a comprehensive development with land in Bristol City.”*

(page 228 of North Somerset Local Plan 2040 Reg.19 – Executive Committee Version July 2024 – Blue Fox emphasis)

5. The Wring Family Trust supports the principle of development at Elsbert Drive and the adoption of a comprehensive approach to its delivery in the context of the wider allocation. However, for reasons set out in representations made at Regulation 19 stage, we believe that the Bristol Local Plan should, in order to be effective, be more

prescriptive on the coordinated approach to development akin to the approach taken by North Somerset.

6. Specifically, and as elaborated upon in our response to the Inspectors' comments below, this relates to concerns that, in highways terms, Elsbert Drive is unlikely to be suitable as an access for the level of development envisaged in policy DS11. For this to be achieved, the Bristol Plan should confirm that the main highway access should be taken from the A38 as part of a comprehensive and coordinated approach with land in North Somerset.

**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?**

7. The most up to date assessment considering the Green Belt and forming the evidence base of the BLP is the West of England Combined Authority Strategic Green Belt Assessment – September 2022 (EVEG01). The land at Elsbert Drive falls within Parcel P96 at the edge of the Bristol urban fringe which includes a significant quantity of land to the east of the site subject of this allocation in the BLP.
8. Table 4.1 lists the ratings for strategic contribution to the Green Belt purposes for each of the defined assessment parcels. The assessment concludes that Parcel P96 receives '*two significant ratings*' when considering the contributions to the key terms and concepts outlined at paragraph 2.37. The assessment considers that P96 as a whole makes only one "*significant*" contribution to the purposes of the Green Belt, which is in relation to Purpose 3 – "*‘Encroachment’ was defined as built development and/or pressure from activities associated with the urban fringe, such as outdoor recreation*".
9. The Development Allocations and Designations Process Topic Paper (TPC001), continues to consider the allocation of the site and its removal from the Green Belt. This assesses that the site subject of the BLP allocation, has a more moderate

distinction from the urban area, making a less significant contribution to Purpose 3 than parcel 96 as a whole.

10. The assessment concludes that the release of land here would not in isolation, be strategic in scale, and would cause a knock on weakening of adjacent land in North Somerset. In considering the allocation of adjacent land within the emerging North Somerset Local Plan (Policy LP6) it would be more appropriate to consider the site in the context of the comprehensive development of the land at Elsbert Drive and the land allocated within the North Somerset emerging plan. We agree with the topic papers' conclusion that the A4174 would form a strong boundary to a release of Green Belt that encompassed land in both local authorities.

11. In considering the allocation in the context of the purposes of the Green Belt, NPPF paragraph 143:

*a) to check the unrestricted sprawl of large built-up areas;*

Plan led development and strategic release of Green Belt land ensures that unrestricted sprawl of urban development is prevented.

*b) to prevent neighbouring towns merging into one another;*

The BLP is fundamentally concerned with 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.

*c) to assist in safeguarding the countryside from encroachment;*

Whilst development of the site would involve the use of land that is currently undeveloped, Elsbert Drive and the wider North Somerset allocation is severed from the wider countryside by virtue of its position inside the South Bristol Link Road and Bridgewater Road, forming the north and western boundaries when considered as a whole. Thus the allocation of land within the emerging adjoining

local plan provides a clear and strong boundary for the release of land from the Green Belt, without setting any precedent for any further encroachment into the wider countryside.

*d) to preserve the setting and special character of historic towns; and*

The allocation is located on the urban fringe of Bristol, the wider allocation (including NS allocation) is not the subject of an historic or landscape designations. Given the site and wider location between the urban fringe and the Link Road and surrounding highways infrastructure, the development of Elsbert Drive within the context of the wider NS allocation, would have no impact on this purpose.

*e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

The allocation is a greenfield site and would not contribute to the reuse of brownfield land. The proposed allocation is considered in the context of a strategic release of Green Belt site and the need to deliver housing, both considering the exceptional circumstances in the case of the BLP falling short of objectively assessed housing need, and the recent changes to the NPPF and focus on housing delivery.

***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?***

12. As read in isolation, the BCC allocation of land at Elsbert Drive is currently demarked by field boundaries and mature hedgerows. The context of the allocation and strategic Green Belt release should be read in the context the adjacent land allocated within the emerging NS Local Plan and the comprehensive development that this can deliver. This would result in the boundary of the allocation being the

surrounding road network of the A4174 and Bridgewater Road which would form a clear limit to further development.

13. The Allocations Topic Paper (TCP001) supports and concludes that the A4174 would form a strong boundary to a release that encompasses land in both North Somerset and Bristol City.

***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?***

14. Wring is supportive of a comprehensive, cross boundary approach to development it is therefore relevant in the context of both the requirement within Policy DS11 for a “detailed cross-boundary development plan” and also the statement at paragraph 3.3.30 of the Publication version of the plan that:

*“...the emerging North Somerset local plan proposes to take a similar approach to Green Belt land inside Colliters Way. Bristol City Council will engage with North Somerset to ensure a comprehensive approach to development.”*

15. It is considered that a comprehensive approach to the development of the allocations in both North Somerset and Bristol City, would deliver the most effective use of land in responding to the site opportunities and constraints. This includes associated biodiversity net gain, landscaping, and associated infrastructure to deliver a coordinated approach, maximising the development potential of the site and providing enhanced opportunity for compensatory improvements.

***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?***

16. It is considered that the allocation of the land at Elsbert Drive, and the allocation of land within the emerging NS Local Plan is well placed to assist in delivering the Plan’s Vision, Strategic Priorities and Sustainability Objectives.

17. In so far as land at Elsbert Drive is concerned a more sustainable development will be achieved through Policy DS11 in securing comprehensive development across the authority boundary. To not do so will lead to piecemeal and ineffective development in so far as sustainable development objectives of the Plan and NPPF are concerned.
18. In considering the Sustainability Appraisal (CSD004) assess the release of Green Belt land at the south east of the city the overall appraisal considered the release of land to be appropriate in the growth agenda the city, in particular in an area that is considered as having limited constraints by the assessment.

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

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

**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.**

19. Wring is supportive of a comprehensive, cross boundary approach to development. In the context of both the requirement within policy DS11 for a “*detailed cross-boundary development plan*” and also the statement at paragraph 3.3.30 of the Publication version of the plan that:

*“...the emerging North Somerset local plan proposes to take a similar approach to Green Belt land inside Colliters Way. Bristol City Council will engage with North Somerset to ensure a comprehensive approach to development.”*

20. In comparison to the allocation within the emerging North Somerset Plan, Policy DS11 is relatively brief and refers to generic development management policies. It is considered that a comprehensive approach to the development site would deliver the most effective use of land in responding to the site opportunities and constraints. We consider that the BLP should, in order to be effective, be more prescriptive in the coordinated approach to development, akin to the approach of North Somerset, which would assist in driving subsequent applications on the site.
21. In so far as land at Elsbert Drive is concerned, the effectiveness of securing development through subsequent applications will be achieved through the thoroughness of Policy DS11 in securing comprehensive development across the authority boundary. To not do so will lead to piecemeal and ineffective development in so far as sustainable development objectives of the Plan and NPPF are concerned.
22. Considering the BLP allocation in isolation, access off Elsbert Drive is constrained in delivering a suitable means of access to a comprehensive development. In our consideration, it is also possibly unable to deliver for the full development potential of the land identified within the BLP, that is to say, it may not be suitable to accommodate the 150 dwellings envisaged by DEV11. Our position on this is explained further below.
23. The highway width, carriageway, footway & verge, of Elsbert Drive falls short of that required to provide an adequate level of provision in respect of being the single point of access to comprehensive development. Applying the guidance contained within the BCC Street Design Matrix<sup>1</sup>, the highway width of Elsbert Drive (9.1m at its

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<sup>1</sup> Bristol City Council, Bristol Transport Development Management Guide: *Street Design Matrix – Adoption standards for new residential streets.*

narrowest and 10.1m at its widest) would place it as a *Type 3 – Tertiary Street* limited to serving ‘Typically up to 100 dwellings’.

24. A *Type 2 – Secondary Street* limited to serving ‘Typically up to 300 dwellings from a single point of access’ would require a highway width greater than that available on Elsbert Drive.
25. The highway geometry is not the only constraint on access, with the amenity of existing residents on Elsbert Drive a further consideration, as is already provided for within DS11.
26. Local active travel, walking and cycling, desire lines will dictate that access via Elsbert Drive focuses on a good level of dedicated infrastructure connecting to local amenities and services east of the site. This would typically require the provision of a segregated cycleway (3.0m min.) and footway (2.0m min.), but inadequate highway width on Elsbert Drive may require its downgrading to *Type 4 – Tertiary Street with a shared surface*, limited to serving ‘Typically up to 30 dwellings’ and possibly inclusive of the existing dwellings on Elsbert Drive.
27. In conclusion of the above, the existing highway width constraint of Elsbert Drive will limit the scale of development served off it to an amount substantially smaller than the overall comprehensive development, and therefore make it unable to serve as the primary or single point of access. Alternatively, it could serve as a secondary access to a smaller quantum of development and focusing on good active travel connections to the east.
28. Vehicular access to the site off the A4174 Colliters Way (South Bristol Link) would unnecessarily impact upon the freeflow of traffic on a link road of city wide strategic importance. This is reflected in the emerging North Somerset allocation which specifically notes ‘*No vehicular access off Colliters Way.*’

29. Alternatively, comprehensive development can be served by a primary multi-modal access off the A38 Bridgwater Road<sup>2</sup>, which is a suitable standard of road from which comprehensive development access could be taken, because:
- i. The primary vehicular desire route would be to/from the A38 Bridgwater and the Lime Kiln roundabout.
  - ii. Traffic flows would be immediately and better dissipated at the site access and adjacent Lime Kiln roundabout thereby minimising traffic impacts on the local community.
  - iii. It could be integrated into proposals for the BSIP bus priority works at the Lime Kiln roundabout and A38 Bridgwater Road.
  - iv. It has the opportunity to make immediate connections, footways and cycleways, to existing primary active travel routes as part of the access junction works.
  - v. It has the opportunity to provide for new bus stop provision, on an existing high frequency bus route, and pedestrian crossing facilities between inbound and outbound bus services as part of the access junction works.
30. Proportionately and in real terms, the level of additional vehicular traffic is most likely to be accommodated by a new access junction if used as the primary or single means of vehicular access, when compared to either Elsbert Drive or Colliters Way.
31. With regard to question a) we conclude that the cross-boundary masterplan or development framework and delivery of the allocation in North Somerset in coordination with DS11 is required to secure a sustainable and deliverable scheme which maximises the development potential and use of the allocated land.
32. Wring have been instrumental in leading cross boundary working, coordinating discussions with both adjacent landowners, Taylor Wimpey and Barrat. It is considered that the landowners are best placed to prepare a development strategy for the combined landholdings, which should be emphasised in the policy wording.

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<sup>2</sup> This is referenced in the emerging North Somerset Plan allocation with 'Investigation of main access into the site from Bridgwater Road/ A38 to the east of Lime Kiln roundabout'

Wring also organised a meeting with both officers of North Somerset and Bristol City in April 2024 to discuss the emerging policies and delivery of the site. Wring are committed to a coordinated approach to development across the allocations.

33. With regard to questions b) and c), again, we consider that in order to be effective, the BLP should be more prescriptive on the coordinated approach to development akin to the approach taken by North Somerset.

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