

Briefing Note

Our ref 31538/10/AC/OW
Date 6 March 2025
To Inspectors Louise Gibbons, Steven Lee and Benjamin Clarke - Via Robert Young
From Lichfields
Copy Esteban Investments Limited

Subject ID 420 – Matter 5 – Esteban Investments Limited

1.0 Introduction

- 1.1 This Statement is prepared on behalf of Esteban Investments Limited ('Esteban'), the owner of the land subject to draft Policy DS11 - Land at Ashton Vale ('Longmoor Village') (herein referred to as 'Longmoor'), and applicant of the extant planning permission on the land ref: 21/03166/P for upto 500 dwellinghouses and 5,000sqm of commercial/community space¹.
- 1.2 Esteban has made representations to all previous consultation rounds of the Local Plan review process in respect of Longmoor.
- 1.3 This Statement considers the relevant questions raised within Matter 5.3 only.

Policy DS11 – Development allocations – south west Bristol Green Belt

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?

- 1.4 The proposed release of Longmoor from Green Belt follows from studies of the existing Green Belt around Bristol and its ability to meet the five purposes set out in paragraph 138 of the NPPF.
- 1.5 Detailed analysis was provided through the planning applications submission, which drew on earlier Green Belt Studies prepared by BCC, prior to the 2022 study (Doc ref: [EVEGo1](#)). In combination, the earlier studies provided a finer grained review of the issues, which we draw on below.
- 1.6 A Stage 1 Green Belt Assessment was prepared by BCC in November 2015 which highlighted areas of any significant change within the Green Belt since its designation. It noted that the construction of the South Bristol Link (Metrobus) had commenced and commented that whilst the construction of the link would not necessarily reduce the

¹ <https://pa.bristol.gov.uk/online-applications/applicationDetails.do?keyVal=QUDIBoDNHQKoo&activeTab=summary>

openness of the wider Green Belt *“it will result in the introduction of a new feature close to the western edge of the Bristol urban area. Some areas of open land to the east of the new route will be physically separated from open areas to the west”* (Page 10 of the 2015 assessment).

- 1.7 A Stage 2 Green Belt Assessment followed in November 2016 and provided a detailed appraisal of Longmoor’s contribution to the Green Belt objectives. Using the assessment, it is possible to draw the following conclusions in relation to each of the five Green Belt objectives in relation to the site:

Purpose 1: to check the unrestricted sprawl of large built-up areas

“Prevents the sprawl of Bristol towards Long Ashton and further west towards Nailsea. Further development would be limited by the Metrobus route, which could form a defensible Green Belt Boundary” (Page 160 of the 2016 assessment).

- 1.8 The review clearly found that whilst the Site may limit the expansion of Bristol towards the west, the Metrobus line formed a new defensible boundary limiting the potential for sprawl to a non-harmful extent, protecting the countryside and nearest settlements. In addition, the bus feeder road to the South Bristol Link also provides a further defensible boundary. As such, the release of this land would still allow the purpose of the Green Belt to be preserved and to prevent any further sprawl that may be unacceptable. There is no harm to this purpose.

Purpose 2: to prevent neighbouring towns merging into one another

“The area along with other sites in the parcel prevent the merger of Bristol and Long Ashton, although the cell is enclosed by existing development which extends further towards Long Ashton” (Page 160).

- 1.9 It is clear that release of this land would not result in Bristol moving closer to Long Ashton. The urban edge is already defined by the Park and Ride and the David Lloyd Health Club. Future development on the land would infill within a settlement rather than extend one settlement closer to another and threaten any strategic gap. Again, there is no harm to this purpose.

Purpose 3: to assist in safeguarding the countryside from encroachment

“Area separated from the wider countryside by the Metrobus link. Part designated as a Town or Village Green, has planning permission for a football stadium although this is no longer being pursued. Whilst open this cell surrounded on three sides by built form does not display characteristics of countryside and has become separated from the wider countryside to the west” (Page 160).

- 1.10 It is clear that the Green Belt Assessment did not consider this land to be countryside and therefore development would not be considered encroachment. It is already bounded on three sides by development and by the bus feeder road to the South Bristol Link and Metrobus, is lacking in countryside features, and, therefore, does not serve this purpose. Accordingly, there is no harm to this purpose.
- Purpose 4: to preserve the setting and special character of historic towns
- “N/A” (Page 160).
- 1.11 The assessment confirmed that this purpose was not considered applicable to Longmoor. As such, there is no harm caused to this purpose.
- Purpose 5: to assist in urban regeneration
- 1.12 This purpose was not formally assessed within the Stage 2 Green Belt Assessment. The land, through its planning permission, will make a significant contribution to housing supply and will not impact any other site coming forward around it, nor adversely impact any wider regeneration priorities – indeed given the link to Ashton Gate Sporting Quarter the redevelopment actively enables additional regeneration opportunities.
- 1.13 The Stage 2 Green Belt Assessment concluded that:
- “The cell makes a limited contribution to Green Belt purposes. The new Metrobus separates the cell from the wider countryside. Which may impact on whether the Green Belt boundary can endure beyond the plan period.” (Page 160).*
- 1.14 On site one can see the impact that the metrobus corridor has had in fundamentally changing the site’s context; the site now reads as a clear infill opportunity of the settlement. The metrobus infrastructure is now the clear defensible boundary and considered further in the next question.
- 1.15 It is evident from the Council’s own prior assessments over the past decade, and having regard for the land in the context of NPPF para 138, that Longmoor does not contribute 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?***
- 1.16 The area of release proposed at Longmoor has clearly defined boundaries. With built development on three sides (north, south and east), to the west it is bound by the Metrobus line. The Metrobus line creates a clear, strong and logical settlement boundary for the City

in this location, beyond which is a Town and Village Green – further protecting the remaining countryside from encroachment.

- 1.17 The Metrobus is a clearly defined physical feature, which has a very high degree of permanence. The boundary would endure beyond the Plan period.
- 1.18 In previous representation Esteban have suggested that the area of proposed release (figure 1) be extended to join the Metrobus and align with the red line for planning permission ref: 21/03166/P (Figure 2). Whilst the land currently 'left' between the proposed release and the Metrobus boundary is a Site of Nature Conservation Importance (SNCI), protecting it from built development, this is a separate consideration and in the interest of completeness Esteban continues to maintain that the Green Belt boundary should be amended to include this land given the metrobus corridor forms the clear new defensible boundary.

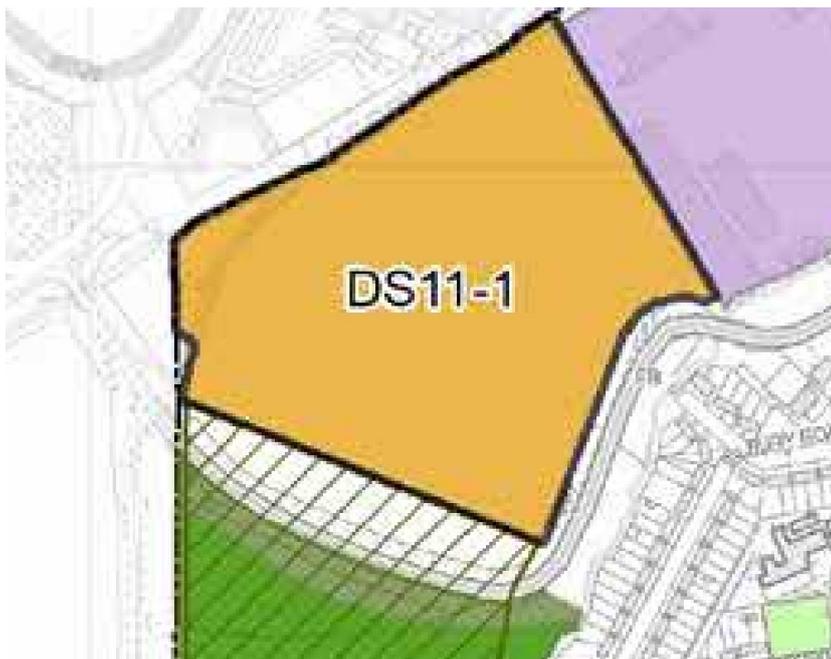


Figure 1: Draft Proposals Map allocation boundary

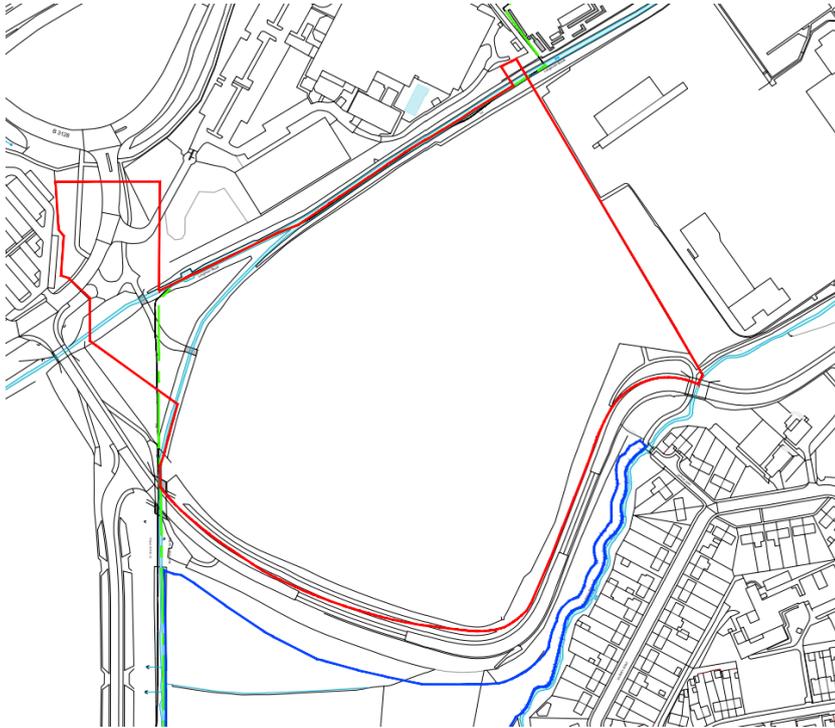


Figure 2: planning application red line

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?

- 1.19 In response to the Inspectors' Preliminary Question PQ56, BCC has confirmed that the Plan does not propose compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land as a result of the proposed release. According to their response, the Green Belt the Council plan to retain is in good condition and well-managed.
- 1.20 In the case of Longmoor, land is immediately adjacent to a publicly accessible Town and Village Green, which is also a SNCI.

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?

- 1.21 Yes. Longmoor lies to the south west of the urban area of Bristol. The draft Local Plan, at paragraph 3.3.3, states that “South Bristol will remain a priority focus for development and regeneration under the new spatial strategy” and that:
- “Thousands of new homes will be delivered in South Bristol within the plan period, with scope for increased growth where further interventions and delivery of infrastructure can unlock more potential.”*
- 1.22 Therefore, promoting Green Belt release for housing delivery in the South West of Bristol is entirely in accordance with the Plan’s spatial strategy. Furthermore, Longmoor is situated in a highly sustainable location, adjacent to a Park and Ride at the terminus of the M2 Metrobus route with high frequency services direct into the city. The access to the site, as defined by the planning permission, promotes a direct link to the Metrobus which will give all residents excellent opportunity to travel via non car modes into Bristol. Any development scheme at Longmoor can and will maximise opportunities for sustainable travel, capitalising on the Metrobus and Long Ashton Park and Ride links, making this a highly sustainable site with excellent access to jobs, local services and recreation opportunities .
- 1.23 In combination, therefore, Longmoor is suitably located and will promote a sustainable pattern of development. The grant of planning permission underlined the sustainable credentials of the site.

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?**

- 1.24 Throughout previous representation to the draft Local Plan Esteban have advocated for additional supporting text which sets out the broad parameters for future development at the site that would sit alongside the planning permission and provide a policy framework for the site.
- 1.25 The grant of planning permission at Longmoor for housing clearly informs the policy position for future development. Whilst unlikely, should the planning permission expire unimplemented, Esteban considers that DS11 will enable the Council, alongside its general development management policies, to deal with any subsequent application.
- 1.26 However, should Inspectors feel otherwise, as Esteban has expressed previously to BCC, they would be happy to input to a set of development principles and also agree a Statement of Common Ground to assist the Inspectors on this matter.

Q5.14: With regard to Elsbert Drive, would the policy be effective in 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.**

- 1.27 Not applicable

Word Count: 1,862