

Planning Statement



Homes
England

Brislington Meadows, Broomhill, Bristol

Planning Statement (including Affordable Housing Statement)
April 2022

A 4B, 36 King Street
Bristol
BS1 4DZ
United Kingdom
T 0117 2033 628

W www.lda-design.co.uk

LDA Design Consulting Ltd
Registered No. 09312403
17 Minster Precincts, Peterborough, PE1 1XX

7456_Brislington Meadows

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This document has been prepared and checked in accordance with ISO 9001:2015.

1.0 Introduction

LDA Design has been instructed by Homes England ('the Applicant') to prepare and submit an Outline Planning Application ('OPA'), with all matters reserved except access, for the development of land known as Brislington Meadow in southeast Bristol (grid reference: 362615 (eastings); 171114 (northings) (referred to in this document as 'the Site').

The Site is located in Brislington (Brislington East Ward) and within the administrative boundary of Bristol City Council. The application is submitted to Bristol City Council ('BCC') as the Local Planning Authority ('the LPA').

The proposed scheme comprises the development of up to 260 dwellings with pedestrian, cycle and vehicular access, cycle and car parking, public open space and associated infrastructure. This planning application is submitted in outline and all matters except access are reserved. Matters of layout, scale, appearance and landscaping are all reserved for future determination.

The proposed development will provide much needed new housing, including affordable housing, in a sustainable location in accordance with the strategic site allocation in the Council's adopted Development Plan. The illustrative development proposals have been designed to be landscape-led, to protect and enhance existing landscape and biodiversity where possible, and to respond positively to the mixed character of the local area. Further details of the application proposals are provided in the enclosed Design and Access Statement and Design Code prepared by LDA Design.

1.1. The Applicant

Homes England is the Government agency responsible for accelerating new residential development, to help meet the recognised local and national need for new homes, and to improve neighbourhoods and grow communities. Homes England is committed to helping unlock land where the market will not and, as a national agency, is able to take on difficult sites across the country that have not come forward in the commercial market.

Homes England are currently delivering a number of successful residential schemes across Bristol including; Filwood Park and Marksbury Road in Knowle West, Anstey's Road in Hanham and Castle View Park in the City Centre.

Following discussions with BCC, Homes England was encouraged to purchase the application site and step in to assist in the delivery of new homes in this sustainable location and on an allocated site. The Site, formerly and predominantly in BCC and Olympic and Hammersmith ownership, was acquired by Homes England in March 2020. Since this time Homes England has been seeking to progress the development proposals, including undertaking pre-application discussions with the Council, as well as extensive stakeholder and local resident engagement.

Subject to outline planning permission being granted, Homes England would remain involved with the Site and would look to appoint a development partner to prepare the detailed proposals for reserved matters approval and to deliver the development on the Site.

1.2. Description of Development

This planning application seeks planning permission for the following development:

“Outline planning application for development of up to 260 new residential dwellings (Class C3 use) together with pedestrian, cycle and vehicular access, cycle and car parking, public open space and associated infrastructure. All matters reserved apart from access.

The purpose of this Planning Statement is to demonstrate that the proposed development is acceptable when assessed against the provisions of the Development Plan and all material considerations relative to the nature and merits of the proposed development.

1.3. Pre-Application Engagement and Consultation

Prior to the submission of this outline planning application, the applicant has engaged in extensive pre-application discussions with BCC since 2019. The focus of these meetings has helped to establish the scope of the OPA, to understand the landscape and ecological qualities of the Site, to refine the scale and quantum of development proposed and to discuss the proposed access arrangements for the development.

The applicant has also consulted with local residents and stakeholders. Two public consultation events were held in December 2021, comprising a virtual webinar presentation and Q&A sessions, as well as an in-person event where consultation boards were presented and members of the project team were available to discuss comments or concerns. Both events were well attended.

The applicant invited members of the local community, stakeholders and ward councillors to join a specially formed Brislington Meadows Advisory Group which then met on eight occasions. The purpose of these meetings was to discuss the progress of the application proposals as well as local issues or concerns to try to address these as part of the design process. A number of changes have been made to the scheme following this consultation, as referenced in the Design and Access Statement.

The applicant and design team also presented the scheme proposals to Design West, the independent design review panel, in January 2022. The Panel were particularly supportive of the proposed landscape-led masterplan approach and the improved pedestrian and cycle connections through the Site to the surrounding area. The report raised a number of matters which the submitted Illustrative Masterplan seeks to respond to, including:

- revisit the heights and layout of development shown, including around the entrance of the site;
- routing of the primary road and opportunities to improve pedestrian routes and crossings;
- terminology and design of the ‘Village’ Green; and
- improved landscaping around communal parking areas.

Many of the comments received addressed detailed design that are not a matter for consideration at outline. However, some have informed the content of the Design Code that accompanies the application.

Details of all the engagement activity undertaken prior to submission of this OPA is provided in the submitted Statement of Community Involvement, prepared by Cadence. Details of the design evolution of the scheme is set out in the submitted Design and Access Statement, prepared by LDA Design.

1.4. Environmental Impact Assessment Screening

The Applicant submitted an Environmental Impact Assessment (EIA) Screening Request to BCC in November 2020 (LPA ref. 20/05675/SCR). The Screening request considered that the proposed development does not constitute Schedule 1 development and is considered to be Schedule 2 development, as defined by the EIA Regulations. The likely effects of the proposed development were discussed along with proposed mitigation measures to control and minimise impacts to an acceptable level.

The Council issued its Screening Opinion in December 2020 and concluded that the proposed development is not EIA development for which an Environmental Statement would need to be submitted.

1.5. Scope of the Application

The application comprises the following documents and plans:

Reports:

- Application Form & Certificate
- Planning Statement (to include affordable housing statement)
- Design and Access Statement
- Design Code
- Transport Assessment
- Framework Travel Plan
- Outline Construction Environmental Management Plan
- Archaeological Survey
- Historic Environment Assessment
- Arboricultural Impact Assessment
- Townscape and Visual Impact Assessment
- Ecology Impact Assessment and Habitat and Species Surveys
- Outline Biodiversity Net Gain Assessment
- Noise Impact Assessment
- Air Quality assessment
- Sustainability and Energy Statement
- Contamination – Land Quality Statement

- Flood Risk Assessment and Drainage Strategy (including SUDS strategy)
- Health Impact Assessment
- Statement of Community Involvement
- Utilities Assessment
- DRAFT Section 106 Heads of Terms

Drawings

- Location Plan (for approval)
- Existing Site Plan
- Parameter Plans (for approval)
 - Land Use
 - Heights
 - Access and Movement
 - Landscape
- Access Layout Details (for approval)
 - Broomhill Road Preliminary Access Layout Plan (KTC No. 1066-007.D)
 - Bonville Road Emergency Vehicle Access (KTC Drawing No. 1066-014)
 - School Road Pedestrian and Cycle Link (KTC Drawing No. 1066-016)
 - Allison Road Pedestrian and Cycle Link (KTC Drawing No. 1066003.H)
- Illustrative Masterplan (for information and illustrative purposes only)

1.6. Structure of the Planning Statement

The remainder of the Planning Statement is structured as follows:

- Chapter 2 describes the site context, setting out the location and description of the site and its planning history;
- Chapter 3 provides an overview of the proposed development;
- Chapter 4 outlines planning policies that are relevant to the proposed development;
- Chapter 5 provides an assessment of the site in planning terms, focussing on the principle of development, and taking into account the findings of technical assessments of landscape, ecology, heritage, flood risk and drainage, noise, arboriculture and traffic impacts;
- Chapter 6 provides a conclusion of the assessment.

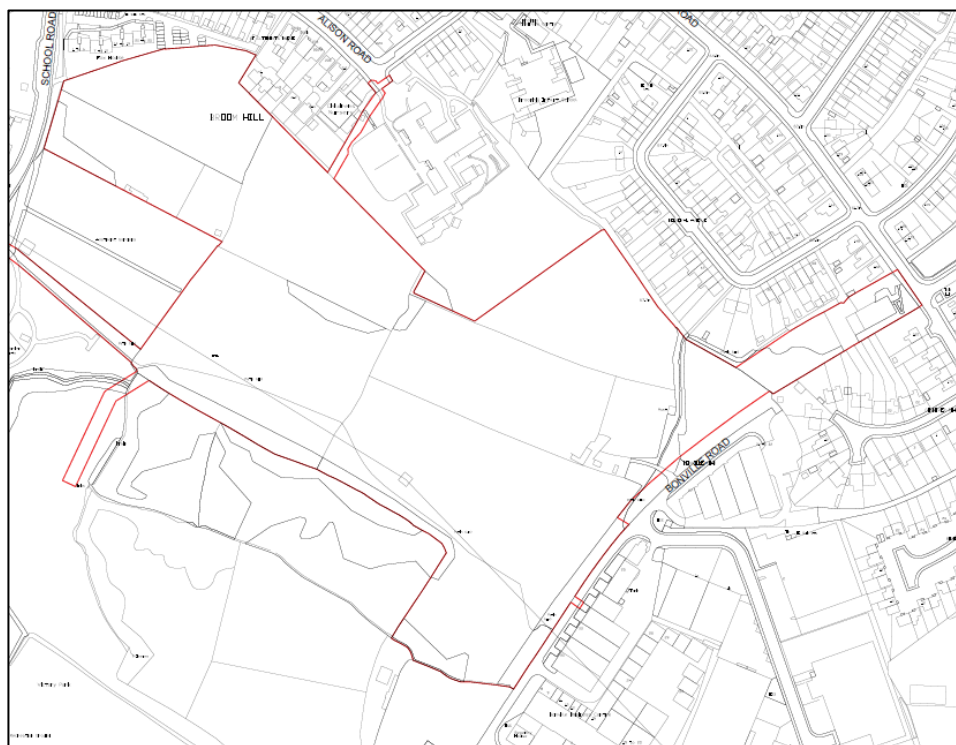
2.0 Site Description

2.1. Site Location and Context

The Site comprises an irregular shaped parcel of land extending to 9.6 hectares and known as Brislington Meadows, shown on Drawing: No. 7456_016 (Site Location Plan).

To the northeast, the Site is bound by Broomhill Road and residential properties on Condoover Road. To the north the Site is bound by residential dwellings on Belroyal Avenue and an associated rear access lane, alongside Broomhill Junior School and Mama Bear's Day Nursery and residences accessed off Allison Road. To the east the site is bound by Bonville Road and the protected employment area comprising the Brislington Trading Estate. To the west of the site is School Road and existing allotment gardens. To the south of the site lies Victory Park and paddocks which comprise protected open space and a Site of Nature Conservation Interest.

The Site currently comprises open fields crossed by two public rights of way and a network of informal trodden paths. The Site is not subject to specific environmental or landscape designations and has an allocation for housing development in the Council's adopted Local Plan for circa. 300 homes.



Site Location Plan (Drawing No. 7456_016)

The Site is characterised by a steeply sloping topography from the northern boundary down to the southern boundary, with the gradient reducing towards the east. There are overhead electricity cables and a pylon on the lower slopes towards the southern boundary of the Site. A telecommunications mast towards the northeast of the Site will be relocated following the grant of planning consent for the proposed development.

The Site is well located to make use of existing services and facilities. Broomhill Infant School, Broomhill Junior School and Mama Bear's Day Nursery are all located adjacent to the Site's northern boundary. Within the wider area, Holymead Primary School is located approximately 700m west of the site, St Brendan's Sixth Form College is located approximately 750m south-east of the site and Oasis Academy is located approximately 1.2km south of the site.

Broomhill local centre, including a small convenience store, public house, salons and takeaway shops, is located approximately 200m north of the Site. Brislington local centre is located approximately 650m south-west of the site at the bottom of School Road and comprises additional shops, services and amenities. Brislington Retail Park is also located approximately 830m south of the site on Bath Road.

There is no public vehicular access into the Site at present. There are two public rights of way across the Site, one running east-west along the southern boundary connecting Bonville Road and School Road, and one north-south between Belroyal Avenue and Bonville Road. In addition, a network of informal trodden paths crosses the Site. The Applicant is in the process of formalising the public rights to use those informal paths, followed by a process of formally diverting them to align with the proposed development to ensure a strong network of interconnecting public pedestrian and cycle access routes through, around and within the Site.

The Site is highly accessible from the local highway network, with direct access to Broomhill Road. Bath Road lies approximately 700m south of the Site and the A4174 is located approximately 1.7km east of the Site, which provides connection to Bristol to the west, Bath and Keynsham to the southeast and Bristol's eastern neighbourhoods to the northeast

The Site is already served by public transport with bus stops on Broomhill Road and School Road. Brislington Park and Ride is located 1km south of the site on Bath Road.

In terms of access to open space, the Site has a direct informal connection to Victory Park to the south. Eastwood Farm Local Nature Reserve is located approximately 150m north of the Site on the northern side of Broomhill Road. Nightingale Valley Park is located approximately 600m west of the Site off Allison Road.

There are no statutory or locally listed buildings, or scheduled ancient monuments, on the Site or within the immediate vicinity.

There are numerous trees and hedgerow on the site, a number of which are covered by Tree Preservation Order (TPO). In total, 16 trees, 3 groups of trees and 1 woodland within the site are protected by TPO 1404 (Land at Broom Hill). An allocation for up to 300 homes on open fields will inevitably have an impact on the former farmland and natural assets, but existing hedgerows and trees, including those protected by the TPO, should be maintained where possible whilst still delivering new homes.

According to the Environment Agency the Site is located in Flood Zone 1, considered to be at low risk from flooding and suitable for residential development.

2.2. Planning History

There have been no previous planning applications for the comprehensive redevelopment of the Site.

In February 2021 an outline application was submitted for the laying of a new pedestrian footpath, ecological enhancements and provision of a temporary construction compound within the site (LPA ref. 21/00550/P). The application relates to land west of Broomhill Road and south of Belroyal Avenue, including vacant land at the site of the demolished Sinnott House. The purpose of this application was to protect this area of land from any other designation or development proposals, in order to ensure access can be provided to the site from Broomhill Road. This application will be withdrawn should outline consent pursuant to this submission be granted approval.

3.0 The Proposed Development

The following section summarises the Proposed Development.

3.1. Overall Proposed Development

The red line Site Location Plan (Drawing No. 7456_016) denotes the extent of the outline planning application boundary.

The proposals seek the comprehensive redevelopment of the Site to deliver up to 260 residential dwellings (Class C3 use) together with pedestrian, cycle and vehicular access, cycle and car parking, public open space and associated infrastructure. All matters except access are reserved.

Full details of the application scheme are set out in the Design and Access Statement, Design Code, Parameter Plans and other illustrative material submitted in support of this application. The submission of the planning application in outline provides sufficient information to demonstrate that the proposals will respect the character and context of the Site and surrounding area.

3.2. Proposed Residential Use

The Site is allocated for residential use in the Council's adopted Local Plan (Site Allocations and Development Management Policies, 2014). The scheme will seek to deliver 260 quality residential dwellings. The scheme proposes a mix of dwellings, including the provision of family housing as well as smaller units to suit all ends of the market.

The Illustrative Masterplan currently shows 257 units as noted below but we are applying for permission for up to 260 homes on the site. Additional dwellings could be accommodated on site as part of the detailed design proposals. The indicative housing mix (as represented on the Illustrative Masterplan) is set out below:

Unit Type	No.	%
1 Bed Flat	51	20%
2 Bed Flat	32	12%
2 Bed House	108	42%
3 Bed House	57	22%
4 Bed House	9	4%
Total	257	100%

The Applicant is committed to delivering affordable housing in line with policy requirements. As such, 30% of the dwellings will be affordable.

The development will comprise a mix of flats and houses and all the residential units proposed will be compliant with the minimum space standards. All the homes will be designed to meet the Future Homes Standard in terms of energy efficiency as a minimum.

3.3. Access

Detail of the proposed access arrangements to serve the development are provided as part of this submission. All other detailed matters are reserved for future determination. The general alignments of key movement and access routes through the Site are shown on the Access and Movement Parameter Plan (Drawing No. 7456_101).

Convenient pedestrian and cycle access is at the heart of the proposed development. The parameter plan and Illustrative Masterplan demonstrate that connections are proposed within, across and through the site, including direct links to Victory Park, Bonville Road, School Road and to Allison Road and Broomhill local centre. This enables the development to make best use of the site's sustainable location, improving connections between the variety of land uses and facilities that are required on a daily basis and promoting the idea of a '20 minute neighbourhood', facilitating access to a range of amenities and facilities within a '20 minute' vicinity of the site.

Vehicular access into the site will be provided from Broomhill Road only. This access point will serve the main primary road running through the site. Details of the proposed junction and access onto Broomhill Road are provided on the submitted Preliminary Access Layout Plan (KTC No. 1066-007.D) prepared by KTC. The access has been designed to accommodate 2-way traffic movements into and out of the site and is appropriately sized to accommodate refuse and emergency vehicles.

An emergency vehicle access is also proposed on the south-eastern boundary of the site from Bonville Road (KTC Drawing No. 1066-014). This will be restricted using bollards and used only by emergency vehicles as needed.

Pedestrian and cycle access is proposed to be retained and enhanced to provide access to Victory Park to the south and School Road (KTC Drawing No. 1066-016). A new connection is also proposed from the north of the site, between Mama Bear's Day Nursery and Broomhill Junior School to connect to Allison Road and Broomhill Local Centre to the north (KTC Drawing No. 1066003.H). Homes England has discussed these proposed works with both parties who were supportive of improved accessibility from the site in principle.

Parking will be provided in accordance with the Council's parking standards. The majority of the parking spaces for the residential properties will be within the curtilage of the dwellings, with some safe and secure communal parking courts for some houses and the apartments. Communal parking courts will be integrated through planting. All houses will have provision for electric vehicle charging points. Further details are provided within the Transport Assessment prepared by KTC and the Design Code, submitted in support of this application.

Cycle parking will be provided for all the dwellings as well as for visitors to the site, in line with the Council's cycle parking standards.

3.4. Layout / Design Approach

The detailed layout of the site is reserved for future approval. An Illustrative Masterplan has been prepared to show how development of the site could look.

In planning the proposed development, we have considered the site-specific opportunities and constraints, and the immediate context and this has informed the overall design approach and the parameter plans. The surrounding context is mixed in character, comprising residential and community uses to the north and west, open space to the south and an industrial employment area to the east. The masterplan seeks to provide a landscaped and environmentally responsible response to the different character areas surrounding the site.



Illustrative Masterplan

The layout encapsulated in the parameter plans has been designed to provide links to and actively address the neighbouring uses to the site and enhance permeability and sustainable travel connections through the site to these adjacent spaces. Green links are proposed to connect the site with Victory Park to the south and Eastwood Farm to the north.

The proposed building heights and areas of different scale and density have been designed to respond to the neighbouring uses.

3.5. Scale

Full details of building height and scale is reserved for future determination. However, this outline application provides maximum building height parameters that future detailed design proposals must comply with.

Height has been carefully considered across the site, taking into account the local character and context and the feedback received from consultation with the local community and other stakeholders.

The Heights Parameter Plan (Drawing No. 7456_104) identifies that the taller elements of the scheme, comprising the apartment blocks of up to 4 storeys, will be located towards the lower eastern boundary of the site, responding to topography and the larger built form of the industrial units on Bonville Road.

Along the northern boundary of the site with Allison Road and Belroyal Avenue where there is the most direct relationship with existing residential dwellings, heights of up to 2 storeys are proposed.

Across the remainder of the site, a maximum height of 2.5 - 3 storeys is permitted for the dwellings. This allows for appropriate frontage to the open space to the south of the site and looking beyond to Victory Park.

The proposed scale of building across the site is considered to be appropriate. Further details are provided in the submitted Design and Access Statement and Design Code. The Landscape and Visual Impact Assessment (LVIA) submitted with this application demonstrates how the scale of development proposed would be viewed from various locations and viewpoints in the surrounding area. The key views in which to test the development and included in the LVIA were agreed with the Council during pre-application discussions.

3.6. Appearance

Brislington Meadows has been strongly shaped by the topography and existing landscape features. The masterplan establishes a pedestrian and cycle friendly, permeable layout that provides access to green space in a more inclusive way compared to the current condition of the routes through the site. Three main residential parcels respond to the existing key features, whilst setting a pattern of development that represents sensitive assimilation of built form within its immediate context.

Full details relating to the appearance of the proposed development and the future dwellings are reserved for future approval. Notwithstanding this, key principles are set in the DAS and also the Design Code which is submitted for approval as part of this outline application. The following lessons were drawn from the analysis of the site and its surrounds and have been implemented in the illustrative masterplan:

- Outlook onto landscape from homes.
- Parking located away from public open space.
- Ensure there is natural surveillance of green spaces and streets.
- Avoid long sections of side boundary along a street.
- Simple dwelling form with a consistent approach to roof form.
- Street trees to add interest to the streetscene and break up visual impact of parking.

Further design principles are embedded within the accompanying Design Code which identifies and characterises a series of key spaces across the site. The Design Code sets key design principles relating to the landscape and public realm, built form and boundary treatment and parking strategy for each space:

- Brislington Green
- Wetland Meadow

- Brislington Heights
- Bonville Glade
- The Gate
- The Greenway
- The Wild Edge
- Incidental Space

Any future detailed design proposals submitted as part of the reserved matters process will need to accord with the design principles set out in the Design Code. The overarching aims of the Design Code is to ensure that end development is of high quality and contributes to healthy and sustainable placemaking and which ties the landscape and public realm with the built form of the dwellings proposed.

This application is also supported by a preliminary Building for Healthy Life assessment (contained in the DAS) of the proposal's performance against the criteria, based on the parameter plans and illustrative masterplan. The outline assessment considers the site and parameters and proposals set out perform well against the 12 key criteria.

If outline planning permission is granted, Homes England will appoint a development partner, a developer to work up the detailed proposals for the site and who will deliver the housing. During the appointment process, Homes England will look to ensure that any bids put forward by potential development partners are compliant with the Design Code and design parameters submitted with this outline application. Homes England also use the 12 Building for a Healthy Life considerations as part of its evaluation process for selecting bidders for its land disposal programme and those not compliant with the assessment criteria would not be successful.

3.7. Landscape

Full details of landscaping proposals are reserved for future approval. However, the Illustrative Masterplan demonstrate how the parameters set and overall design approach has been designed to be landscape-led, giving priority to connecting people and nature through the landscape. The illustrative scheme and Landscape Parameter Plan shows that retention of existing vegetation and habitats where possible has driven the overall indicative layout and helps to provide landscape features across the site.

A number of design approaches have been developed to ensure that the landscape elements of the masterplan are coherent, integrated with other land uses and are both functional and deliverable. These include:

- Delivering a green infrastructure that will create habitats, provide climate resilience, enhance people's enjoyment, learning and interaction with nature, providing play, recreation and sustainable drainage.
- Providing a mixture of green spaces for play, recreation, relaxation and socialising.
- Prioritising retention and enhancement of high quality habitats and trees.
- Creating a network of pedestrian and cycle routes
- New hedgerow and tree planting
- Creating a liveable place for the local community where residents and nature co-exist.

- Delivering green links with local natural green spaces such as Victory Park and Eastwood Farm and amenity.
- Creating new habitats such as the wet meadows, increasing flora and fauna diversity and managing existing habitats

The landscape vision for Brislington Meadows draws on the inherent characteristics of the landscape setting including the topographical changes, and existing features. The approach takes advantage of the opportunities for views, in a meaningful and positive manner, promoting a highly sustainable approach to the environment, creating a diversity of spaces needed to nurture a thriving social infrastructure.

The DAS further details of the proposed landscape strategy and green infrastructure and open space proposals across the site. This includes a network of green corridors that link the areas of green open space of different character provided across the masterplan. The landscape strategy includes opportunities for formal and informal playspace and this will provide the required space in line with the Council's Urban Living SPD (10sqm per child) and based on final housing and tenure mix.

4.0 Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.1. The Development Plan

The Site falls within the administrative area of Bristol City Council. The development plan for BCC comprises the Core Strategy (2011) and the Site Allocations and Development Management Policies Local Plan (2014).

4.1.1. Site Allocations and Development Management Policies Local Plan (2014)

The Site Allocation and Development Management Policies Plan was adopted in 2014 to support the Core Strategy (2011) and set out detailed planning policies which will be used by the council when assessing planning applications as well as identifying sites to be allocated for development.

Under Site Allocation Ref. BSA1201 the Brislington Meadows site (known as 'Land at Broomhill') is allocated for up to 300 new homes. The Council consider the site is a sustainable location for new housing and that the allocation is appropriate for the following reasons:

- The site is in a sustainable location close to the supermarket and shops of Broomhill Road / Fermaine Avenue Local Centre, shops on the Brislington Retail Park, community facilities, employment areas and public transport infrastructure, with a residential context to the north and west.
- It will contribute to meeting the Core Strategy minimum target of providing 26,400 new homes in the period 2006-2026.
- It reflects the Core Strategy approach to the location of new housing by developing new homes on land which does not need to be retained as part of the city's green infrastructure / open space provision

The Allocation identifies a number of considerations that development proposals for the site should comply with, including:

- Led by a comprehensive masterplan for the whole site, guided by community involvement;
- provide suitable access;
- be informed by an ecological survey of the site and make provision for mitigation and compensation measures;
- retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey;
- provide a green infrastructure link with Eastwood Farm Open Space to the north-east;
- take account of the overhead power lines;
- retain and where appropriate improve the public rights of way on the site and provide pedestrian / cycle links with Brislington Trading Estate;

- seek to provide pedestrian / cycle links with Eastwood Farm Open Space to the north-east via the site of Sinnott House Police Station;
- ensure that any scheme provides for any necessary improvements to the surrounding highway / transport network;
- address any potential noise, pollution and nuisance issues from nearby industrial uses through the design and layout;
- be informed by a site-specific flood risk assessment as the area of the site is greater than 1 hectare;
- be informed by a Health Impact Assessment. This should include how the proposals have been discussed with local primary health care providers regarding impacts on primary health care services.

Other relevant detailed Site Allocation and Development Management Policies (SADMP) are considered in the Planning Assessment chapter below (Section 5).

4.1.2. Core Strategy (2011)

The Bristol Development Framework Core Strategy was adopted in June 2011. The Core Strategy sets out the overarching approach for planning in Bristol. This is supported by the detailed planning policies contained in the Site Allocation and Development Management Policies Plan (2014). Relevant Core Strategy (CS) policies are considered in the Planning Assessment chapter below (Section 5).

The Local Plan documents will be replaced as work progresses on the Council's Local Plan Review and once the new Plan is adopted (currently anticipated in 2024).

4.1.3. Bristol Local Plan Review

The Council have started work to undertake a Local Plan Review. The updated Plan will set out how Bristol will develop over the next 20 years and help to ensure the delivery of homes and employment opportunities needed across the city, as well as measures to protect and enhance biodiversity and respond to the climate crisis.

The latest update from the Council suggests the first publication of the Plan (Issues and Options, Regulation 18 stage) will be published for consultation in Spring 2022. It is anticipated that subject to further consultation, the Plan would be submitted for independent examination in Summer 2023, and adopted early 2024.

The Council undertook some consultation on the Local Plan Review in 2019. The application site was retained as a housing allocation at this time.

4.1.4. Material Considerations

The Council have also adopted a number of Supplementary Planning Documents (SPD) to support the Local Plan. These include the following documents, which are referenced in this Planning Statement as needed:

Bristol Urban Living SPD (2018)

The Council adopted the Urban Living Supplementary Planning Document in November 2018 which is now an important material consideration in the determination of planning

applications. The Urban Living SPD adds further guidance and detail to the design policies contained within the adopted Local Plan. The includes guidance around appropriate housing density, provision of open space and playspace, designing quality streetscapes, and for internal and external quality of new dwellings and considering impact on the amenity of existing neighbours. Regard has been had to the detailed design guidance in preparing the illustrative masterplan and parameters plans for Brislington Meadows, as well as informing principles in the Design Code.

Affordable Housing SPD

The Council adopted the Affordable Housing SPD in April 2019. This provides further guidance as to the application of the affordable housing policies in the Local Plan and the affordable tenures that will be sought. This is further supported by the Delivery of First Homes Addendum Note (November 2021) also published by the Council which sets out how First Homes will now be secured as part of the overall mix of affordable units.

Planning Obligations SPD

The Council adopted the Planning Obligations SPD in September 2013. This sets out the Council's overall approach to planning obligations and the types of obligations that may be sought from new development. The full set of obligations and contributions from the proposed development of Brislington Meadows is to be discussed and agreed with the Council as part of the outline application process.

4.2. Other Material Considerations

4.2.1. National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) is a material consideration in planning decisions. The NPPF was revised on 20 July 2021 and sets out the Government's planning policies for England and how these are expected to be applied.

At the heart of the NPPF is a presumption in favour of sustainable development. This means approving development proposals that accord with the Development Plan without delay (paragraph 11).

Section 2 Achieving Sustainable Development

Achieving 'sustainable development' in the context of the NPPF, means pursuing the following three overarching objectives, outlined at Paragraph 8:

- Economic objective: to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- Social objective: to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- Environmental objective: to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy.

The objectives should be delivered through the application of the policies of the NPPF.

Paragraph 11 outlines that plans and decisions should apply a presumption in favour of sustainable development. It is clarified that, for decision taking, this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are the most important for determining the application are out of date, granting permission, unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Footnote 8 in the NPPF provides further explanation on the meaning of ‘where the policies which are most important for determining the application are out of date’. For applications involving the provision of housing, this includes situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites. It is noted that BCC cannot currently demonstrate a five year supply of deliverable housing sites – 3.7 years only according to the Bristol City Council Five Year Housing Land Supply Assessment 2020 to 2025 (June 2021).

It also applies where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. The HDT 2021 results demonstrate that BCC only delivered 74% of the housing required last year.

Taken together, this means that the presumption in favour of sustainable development should be applied to the proposals for Brislington Meadows. The relevant Development Plan policies allocates the site for development and the need for new housing in this location is heightened given the Council’s lack of a five year housing land supply and given the under delivery of housing in the City.

Section 5: Delivering a sufficient supply of homes

Paragraph 60 affirms that in order to support the Government’s objective to significantly boost the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.

Paragraph 68 requires LPA's to have a clear understanding of the land available and to identify a sufficient supply and mix of sites to deliver the homes needed. Planning policies should identify a supply of specific, deliverable sites for a five year period.

Paragraph 79 states that housing should be located where it will enhance or maintain the vitality of rural communities to promote sustainable development in rural areas. Planning policies should also identify opportunities for villages to grow and thrive, especially where this will support local services.

Section 8 Promoting healthy and safe communities

Paragraph 92 stipulates that planning decisions should aim to achieve healthy, inclusive and safe places. Paragraph 98 confirms that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

Paragraph 100 states that planning decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks.

Section 9: Promoting sustainable transport

Paragraph 104 outlines that transport issues should be considered from the earliest stages of development proposals. Amongst other things, this will ensure that opportunities to promote walking, cycling and public transport use are identified and pursued.

Paragraph 105 clarifies that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Paragraph 110 requires that safe and suitable access to the site can be achieved for all users and states that it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Paragraph 111 directs that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Section 11: Making effective use of land

Paragraph 124 supports development that makes efficient use of land. Planning policies and decisions should take into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

Paragraph 125 states that area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

Section 12: Achieving well-designed places

Paragraph 126 acknowledges that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 128 requires local planning authorities to prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code which development should refer to.

Paragraph 130 outlines that planning decisions should ensure that developments function well and add to the overall quality of the area over the lifetime of the development. They should be visually attractive as a result of good layout and appropriate and effective landscaping. Furthermore, they should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

Paragraph 131 acknowledges that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. It also requires appropriate measures to be in place to secure the long-term maintenance of newly-planted trees and requires existing trees to be maintained wherever possible.

Section 14: Meeting the challenge of climate change, flooding and coastal change

Paragraph 152 identifies that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It states that it should shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, and support renewable and low carbon energy and associated infrastructure.

Paragraph 167 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.

Paragraph 169 clarifies that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: take account of advice from the lead local flood authority; have appropriate proposed minimum operational standards; have maintenance arrangements in place to ensure an acceptable standard of operation for lifetime of the development; and where possible, provide multifunctional benefits.

Section 15: Conserving and enhancing the natural environment

Paragraph 174 states that planning policies and decisions should contribute to and enhance the natural and local environment including by protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland, minimising impacts on and providing net gains for biodiversity and preventing new development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air or noise pollution.

Paragraph 180 sets out the principles that local planning authorities should apply with regard to habitats and biodiversity when determining planning applications including refusing applications where significant harm to biodiversity cannot be mitigated/compensated for; protecting SSSIs; refusing developments that result in the loss or deterioration of irreplaceable habitats unless there are wholly exceptional; and encouraging opportunities to incorporate biodiversity improvements especially where this can secure measurable gains for biodiversity.

Paragraph 186 stipulates that planning policies and decisions should 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 Clean Air Zones, and the cumulative impacts from individual sites in local areas

4.2.2. National Model Design Code

The Government published the National Model Design Code (NMDC) in July 2021 which provides detailed guidance on the production of design codes, guides and policies to promote successful design.

The National Model Design Code forms part of the government’s planning practice guidance and expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government’s priorities and provides a common overarching framework for design.

The NMDC sets a baseline standard of quality and practice, which local planning authorities are expected to take into account when determining applications. This includes: the importance of streets being tree lined; and factors to be considered when determining whether ‘facades of buildings are sufficiently high quality’. It also suggests the place-making balance has now firmly shifted to appearance becoming one of the key factors in delivering well-designed places.

4.2.3. WECA Strategic Plan

The West of England Combined Authority (WECA) is also preparing a Spatial Development Strategy, a 20-year strategic-level plan that will set out where homes, jobs and infrastructure (including green infrastructure) are needed to provide the right jobs, homes and transport links for communities.

Some initial consultation has already taken place. The current timeline for the Spatial Development Strategy suggests further statutory consultation on the draft Plan is anticipated in Spring 2022.

4.2.4. Bristol One City Climate Strategy

BCC was the first authority to declare a Climate Emergency. Bristol's Environmental Sustainability Board came together to develop a climate strategy for the city. The result is the One City Climate Strategy (2020) – a strategy for a carbon neutral, climate resilient Bristol by 2030. This is a city-wide, shared vision and not owned by any single organisation.

The strategy details ten key areas where climate action is needed to achieve the vision for Bristol in 2030. These are:

- 1. Transport: switching to significantly more walking, cycling and zero carbon public transport modes; converting the remaining vehicles to zero carbon fuels
- 2. Buildings: retrofitting and building them to become carbon neutral and resilient to a changing climate
- 3. Heat decarbonisation: implementing a carbon neutral energy method for heating and hot water.
- 4. Electricity: make our electricity use as smart and flexible as possible, maximise local renewable energy generation and increase system resilience
- 5. Consumption and waste: responsible buying of goods and services, alongside zero carbon from waste management
- 6. Business and the economy: Bristol businesses move to be carbon neutral and climate resilient, capturing job opportunities for all through the transition
- 7. Public, voluntary, community and social enterprise services: carbon neutral public and VCSE services and supply chains
- 8. Natural environment: restoring, protecting and enhancing these spaces and wildlife within them as the climate continues to change
- 9. Food: a resilient supply chain, with food and drink produced locally and sustainably
- 10. Infrastructure interdependencies: collaboration in running vital services to improve their climate resilience and embed carbon neutrality across different systems.

4.2.5. Bristol One City Ecological Emergency Strategy

In February 2020, the Council and One City partners declared an ecological emergency in response to the decline in wildlife in Bristol. In September 2020, a task group of Bristol's One City Environmental Board developed an ecological emergency strategy for the city.

In response to the One City Ecological Emergency strategy, BCC produced the Ecological Emergency Action Plan. This action plan is a council-wide programme of activities to deliver on the ambitions of the One City Ecological Emergency Strategy and relevant aspects of the One City Climate Strategy.

4.2.6. Biodiversity Net Gain

The Environment Act 2021 received Royal Assent on 9th November 2021 and includes a mandatory 10% biodiversity net gain on all Town and Country Planning Act 1990 developments. The 10% requirement will not become mandated across England until statutory instruments and regulations have been agreed and the Town and Country Planning Act 1990 has been amended. Mandatory 10% net gain is currently anticipated to become law in Autumn 2023.

BCC does not yet have local policy in place relating to Biodiversity Net Gain, however this will likely be included as part of the BCC Local Plan Review. As part of the pre-application discussions, Homes England's appointed ecologists consulted with BCC Nature Conservation Officer to confirm the ecological scope of the submission and assessment of BNG. Homes England are committed to achieving a 10% biodiversity net gain as a result of this development, relying on both on and off-site measures. This outline application submission includes an Outline BNG assessment. The site was assessed using Biodiversity Metric 3.0 as per current best practice.

5.0 Planning Assessment

This chapter explains details the assessment work that has been undertaken to inform the initial design and consideration of compliance with relevant Development Plan policies.

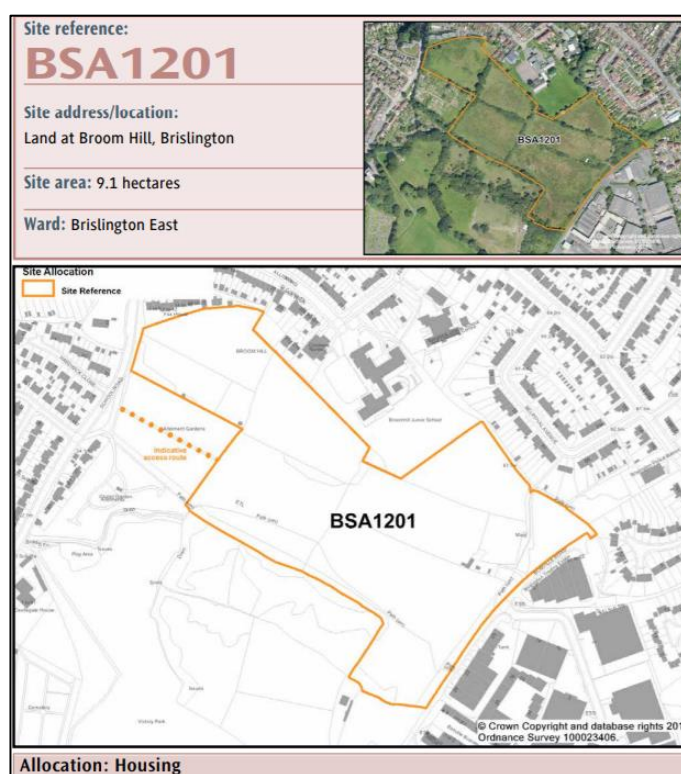
5.1. Principle of Residential Development

One of the primary objectives of the NPPF is to significantly boost the supply of homes. Paragraph 60 highlights that *“it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”*.

Local planning authorities are charged with delivering a wide choice of high-quality homes and to significantly boost the supply of housing by identifying sites for development, maintaining a supply of deliverable sites and to generally consider housing applications in the context of the presumption in favour of sustainable development in accordance with NPPF.

The adopted Core Strategy (2011) aims to deliver new homes within the built-up area. The Strategy states *“it is envisaged that 30,600 new homes will be provided in Bristol between 2006 and 2026. Additional provision which accords with the spatial strategy may be appropriate within the plan period. The minimum target will be 26,400 homes between 2006 and 2026”*.

The Site Allocations and Development Management Policies (2014) Plan identifies sites needed to help deliver the new homes (and employment opportunities) required. This includes land allocated for housing at Brislington Meadows – Site Ref. BSA1201.



BCC Site Allocations and Development Management Policies Plan (2014) Extract

The Site Allocations and Development Management Policies Plan, and allocation of the site, was adopted following rigorous consultation and independent examination by a Planning Inspector.

The allocation suggests the site has capacity for 300 homes. The Council concludes that the site was an appropriate location for allocation for new housing for the following reasons:

- The site is in a sustainable location close to the supermarket and shops of Broomhill Road / Fermaine Avenue Local Centre, shops on the Brislington Retail Park, community facilities, employment areas and public transport infrastructure, with a residential context to the north and west.
- It will contribute to meeting the Core Strategy minimum target of providing 26,400 new homes in the period 2006-2026.
- It reflects the Core Strategy approach to the location of new housing by developing new homes on land which does not need to be retained as part of the city's green infrastructure / open space provision.

The Allocation also identifies a number of considerations which development proposals for the Site must comply with. We comment on these below:

- *Led by a comprehensive masterplan for the whole site, guided by community involvement* - the application is supported by parameters plans and a comprehensive Illustrative Masterplan, this sets out an indicative layout for the site which has been designed to be landscape-led and appropriately respond to the site conditions and context. The scheme proposals and overall masterplan layout have been consulted upon and amended following feedback from public consultation, discussions with the Brislington Meadows Action Group and following the Design West presentation.
- *provide suitable access* – the main point of access into the site for vehicles will be from Broomhill Road. This has been designed to accommodate two-way vehicle movements and larger refuse and emergency vehicles. Details of access are submitted in full. A number of additional points of access for pedestrians and cyclists are provided across the site to ensure connectivity to the surrounding area and to encourage active travel.
- *be informed by an ecological survey of the site and make provision for mitigation and compensation measures* – The potential effects of implementing the allocation of housing on open fields clearly include loss of biodiversity. The Applicant has made considerable effort to understand the nature and scale of the potential impact and to provide appropriate mitigation. An Ecological Impact Assessment and a comprehensive suite of surveys have been completed to fully understand existing habitats and species on site. Details are submitted with this application. Potential impacts have been mitigated and habitats retained where possible. The Applicant is committed to delivering 10% biodiversity net gain through a combination of on and off-site enhancements.
- *retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey* – A full Arboricultural survey has been completed and is submitted with this application. A significant amount of existing planting is being retained on the site and provides key features within the landscape, including providing green active travel links. The identification of retained trees and

hedgerows was informed by a combination of arboricultural, ecological and historical survey results. Retained trees and hedgerows will be protected throughout construction of the development.

- *provide a green infrastructure link with Eastwood Farm Open Space to the north-east* – a key feature of the masterplan is the green corridor along the eastern boundary of the site. This has been kept free from development or the provision of vehicular access to provide a strong green link and ecological corridor between Victory Park to the south and connecting to Eastwood Farm to the north and is informed by discussion with BCC.
- *take account of the overhead power lines* – the parameter plans taken account of the existing overhead powerlines and the associated ‘no build’ zone beneath them. The area beneath the lines along the southern boundary of the site will be retained as green space with ecological, recreational, educational and wellbeing value.
- *retain and where appropriate improve the public rights of way on the site and provide pedestrian / cycle links with Brislington Trading Estate* – Existing public rights of way across the site are being formalised and diverted as needed, to improved and retain public access across the site as part of the proposed development. Existing trodden paths are being formalised and dedicated as public rights of way. Public access through the site will be retained and the scheme proposes improved pedestrian and cycle connections to Victory Park, School Road, Brislington Local Centre and Bonville Road.
- *seek to provide pedestrian / cycle links with Eastwood Farm Open Space to the north-east via the site of Sinnott House Police Station* – Access is applied for in detail. The proposed main access and only vehicular access into the site is provided from Broomhill Road, via the site of the former Police Station. As well as pedestrian access there will be a landscaped pedestrian and cycle route into the site that connects to existing infrastructure on Broomhill Road, including the crossing point which facilitates access towards Eastwood Farm.
- *ensure that any scheme provides for any necessary improvements to the surrounding highway / transport network* – the submitted Transport Assessment details in full the proposed impacts of the development. This will be assessed by the Council’s Highways officer to agree the need for and any contribution towards local highways improvements. Investment in off-site highways measures to improve safety for pedestrians and cyclists is anticipated.
- *address any potential noise, pollution and nuisance issues from nearby industrial uses through the design and layout* – the parameters plans respond to neighbouring uses. In the south east of the site, new homes will be set back from the boundary by the proposed landscape buffer and green corridor along the eastern boundary of the site. A Noise Impact Assessment has been prepared and submitted with this application and confirms that the development will not result in adverse noise levels and any outside noise impacts can be appropriately mitigated. An Air Quality Impact Assessment has also been provided and confirms that air quality impacts of the proposed development scheme are considered to be acceptable, and mitigation is not required.
- *be informed by a site-specific flood risk assessment as the area of the site is greater than 1 hectare*; A Flood Risk Assessment has been prepared and submitted with this

- application. This confirms the development would not result in increased flood risk in the vicinity of the site. In terms of drainage on site, this will be managed by SUDS *be informed by a Health Impact Assessment. This should include how the proposals have been discussed with local primary health care providers regarding impacts on primary health care services.* A Health Impact Assessment has been prepared and submitted with this application and demonstrates that the development has been discussed with local healthcare services and would not result in unacceptable impacts and that principles of healthy placemaking have been complied with.

It is therefore clear the development proposals accord with the principles and requirements set out under Site Allocation Ref. BSA1201.

Furthermore, we note that BCC are currently unable to demonstrate a five year supply of deliverable housing sites. According to the Bristol City Council Five Year Housing Land Supply Assessment 2020 to 2025 (June 2021), the Council can only demonstrate 3.7 years worth of supply. Furthermore, the Housing Delivery Test 2021 results for BCC show that the Council only delivered 74% of the housing required last year.

The NPPF states that where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites, the presumption in favour of sustainable development applies. The presumption also applies where the delivery of housing was substantially below (less than 75% of) the requirement under the Housing Delivery Test. According to NPPF Paragraph 11 (and Footnote 8) this means that for applications involving the provision of housing, these should be approved unless policies that protect areas of particular importance provide a clear reason for refusing the development, or, any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

The site is not protected for any environmental or landscape designations and is allocated for development in the adopted Local Plan, therefore there are no clear reasons for refusing the development in terms of the principle of residential development on the site. Furthermore, as outlined in this Statement and in the supporting application material there are not considered to be any adverse impacts associated with the proposed development that cannot be appropriately mitigated or that cannot be outweighed by the benefits associated with the scheme:

Social

The proposals will result in the delivery of significant number of new residential dwellings being provided in the borough, including the provision of 30% affordable housing.

The redevelopment of the site for residential dwellings will introduce new residents to the area and expand the local community, with convenient and direct walking and cycling connections helping to access and sustain local services and business.

The provision of a range of dwelling sizes and types will meet the needs of different occupiers and will assist in creating a strong and balanced community.

The scheme will provide a significant amount and variety of landscaped open space and enhanced links to the existing public open space to the south of the site comprising Victory Park and to the north, comprising Eastwood Farm. The Applicant acknowledges the character of the site will change significantly, but the majority of existing routes within and

through the site will be retained and improved and public spaces with seating and play facilities created for use by existing and future residents, encouraging on-going social interaction and recreational activities.

Economic

The proposals will also contribute to the economic role of sustainable development by delivering land to improve choice and competition in the residential marketplace.

The increase in local population with easy access to Broomhill local centre and employment centres should help to sustain business and to drive investment in the area.

The proposed development will contribute to economic growth both during construction and over the life of the development. Construction of the development will support jobs directly on site as well as indirect support to additional jobs in the supply chain. Additionally, during the construction phases, the development of the site will support the construction sector which will include local businesses.

The construction of new housing creates a range of employment opportunities within the local and wider economy and has been acknowledged by the Government as a key driver for boosting housing delivery as required by the NPPF.

The proposed development and introduction of new residents will generate funds through additional Council Tax payments.

The development will also be liable for the Council's Community Infrastructure Levy from which the funds generated will be spent on Council services. The development may also be subject to specific S106 financial contributions towards specific improvement works directly associated with the development of the site. This is to be agreed with BCC during the determination of the application.

Environmental

Local Plan policy acknowledges that environmental compensation and mitigation measures will be necessary. The proposals seek to formalise a variety of soft landscaping areas within the site to provide a significant amount and variety of public open space (c.45% of the site area) and which will deliver ecological and environmental benefits to the site and surrounding area. Existing landscape, vegetation and habitats on the site have been retained and protected where possible. The scheme will deliver 10% biodiversity net gain through the on and off-site measures proposed.

The proposals have also been developed with sustainable design and construction in mind. All homes will be designed to comply with the Future Homes Standard and homes will be provided with cycle parking and electric vehicle charging points.

The proposed development therefore comprises sustainable development, as defined by NPPF Paragraph 11 and should be supported.

Summary

Bristol has a number of challenging and sometimes competing priorities that it must address; ecology, climate change and housing emergencies being just three. This scheme is ideally suited for responding positively to both the housing crisis and the climate emergency, and

through careful management, the ecology emergency too by delivering 10% biodiversity net gain overall.

The site is allocated for development in the Council's adopted Local Plan (2014), with indicative capacity for up to 300 homes. The allocation of the site for residential use was considered to be appropriate noting the site's sustainable location, close to facilities and services of Broomhill local centre, and encouraging further investment here, as well as the shops on the Brislington Retail Park, community facilities, green spaces, employment areas and public transport infrastructure.

The development will provide much needed new housing, including a mix of private and affordable dwellings. The site makes an important contribution towards the housing required in Bristol, noting the Council are currently unable to demonstrate that they have delivered the number of homes needed, or that they have a five year supply of land to provide the number of homes needed. This has had troubling impacts on the housing market in Bristol, with demand for housing across the market now severely greater than the supply of homes available. Development at Brislington Meadows will provide up to 260 high quality new homes, comprising family homes and smaller dwellings and providing choice to the market.

Through careful on and off-site design and management, the scheme will also be able to achieve an overall gain in biodiversity value which responds to the ecological emergency. Homes England is committed to see a 10% biodiversity net gain (through on and off-site measures) and the application is supported by an extensive arboricultural and ecological impact assessment that independently considers wildlife sites, habitats, flora and fauna. In addition to the biodiversity commitments, bespoke mitigation for wildlife will be included where required or recommended by the impact assessment and this is discussed in the Design Code.

The application therefore provides a balanced response to the City's priorities as part of the overall scheme design and approach and accords with the Development Plan, and therefore should be supported. S.38(6) of the Planning and Compulsory Purchase Act 2004 states planning applications must be determined "in accordance with the development plan unless material considerations indicate otherwise". NPPF paragraph 11 reiterates s.38(6), stating that applications which are in accordance with the development plan must be "approved without delay" unless material considerations indicate otherwise.

5.2. Affordable Housing Statement

The NPPF supports the provision of affordable housing and Paragraph 65 states "*Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes be available for affordable home ownership*".

At the local level, Core Strategy Policy BCS17 states 'affordable housing will be required in residential developments of 15 dwellings or more'. The Policy states "*Where scheme viability may be affected, developers will be expected to provide full development appraisals to demonstrate an alternative affordable housing provision*". In Brislington, 30% of the units would be sought as affordable dwellings.

In 2018 the Council published its Affordable Housing SPD (April 2018). The SPD seeks to provide additional detail to support the application of the affordable housing policies in the Local Plan. This includes setting an indicative citywide tenure split for affordable housing provision of 77% Social Rented affordable housing (as owned by the Council, Registered Social Landlord or similar) and 23% Intermediate affordable housing (including Shared Ownership which provides opportunity for affordable home ownership).

In November 2021 the Council published an Addendum to the Affordable Housing SPD to cover the application of the First Homes requirement introduced by the Government. The Addendum suggests the Council will seek a proportion of First Homes from all development, comprising 25% First Homes (discounted market rent) and 75% Social Rent (as owned by the Council, Registered Social Landlord or similar).

In 2021 the Mayor of Bristol also pledged to implement 'Project 1,000' in the city, a scheme to set out how the council will try to ensure 1,000 affordable homes are built each year from 2024.

The Applicant is committed to delivering affordable housing as part of the development of Brislington Meadows and to help meet the identified need. In accordance with Core Strategy BCS17, 30% of the houses delivered on site will comprise affordable home. The development makes an important contribution towards the affordable housing targets in Bristol.

The exact mix of affordable units would be confirmed at detailed design stage. However, as required by the policies identified above, this will comprise a mix of unit types and sizes, including houses and apartments. The affordable dwellings will be located across the site and indistinguishable from the private dwellings.

The S106 that will be prepared and attached to any outline consent for the site will ensure the affordable contribution is fixed for the detailed design and delivery stages of the development.

The development is therefore compliant with Core Strategy Policy BCS17 and the provisions of the adopted Affordable Housing SPD.

5.3. Housing Mix

Core Strategy Policy BCS18 requires all new residential development to provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities. Residential developments should provide sufficient space for everyday activities and to enable flexibility and adaptability by meeting appropriate space standards.

Detailed layout and design of the proposed dwellings is a matter for future approval at reserved matters stage. However, the layout and design shown on the Illustrative Masterplan incorporates an indicative mix of houses and apartments and mix of unit types and sizes across the site.

The Illustrative Masterplan currently shows 257 units as noted below but we are applying for permission for up to 260 homes on the site. Additional dwellings could be accommodated on site as part of the detailed design proposals which may seek to amend the illustrative

layout or scales shown, albeit within the parameters set by the submitted suite of parameter plans.

The indicative housing mix (based on the Illustrative Masterplan) is set out below:

Unit Type	No.	%
1 Bed Flat	51	20%
2 Bed Flat	32	12%
2 Bed House	108	42%
3 Bed House	57	22%
4 Bed House	9	4%
Total	257	100%

On the basis of local market intelligence and soft market testing provided on behalf of the Applicant, it is considered that this mix provides variety and choice for the local market, as required by the NPPF.

The smaller one- and two-bedroom units provide opportunities for individuals, couples or small families, including first time buyers or those looking to downsize. The larger three- and four-bedroom dwellings provide a mix of family homes, all with access to private amenity space.

Development Management Plan Policy DM4 requires 2% of dwellings (on schemes of 50+ units) to be wheelchair accessible or adaptable. The Council's Space Standards Guidance Note (2020) confirms that the 2% wheelchair units should comply with Part M4(3). Accordingly, 5 dwellings will be provided as wheelchair adaptable on the scheme and this would be confirmed at reserved matters stage.

The development is compliant with the relevant Development Plan policies including Core Strategy Policy BCS18 and Development Management Plan Policy DM4.

5.4. Design

Paragraph 126 of the NPPF acknowledges that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 130 outlines that planning decisions should ensure that developments function well and add to the overall quality of the area over the lifetime of the development. They should be visually attractive as a result of good layout and appropriate and effective landscaping. Furthermore, they should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

At the local level, Core Strategy Policy BCS21 requires all new development in Bristol to deliver high quality urban design, including to: contribute positively to an areas character; to promote accessibility, permeability and legibility; safe, healthy and attractive built environments comprising high quality inclusive buildings and spaces that incorporate green

infrastructure; and safeguards the amenity of existing development and delivers a high quality environment for future occupiers.

Core Strategy Policy BCS15 states sustainable design and construction should be integral to new development, seeking to maximise energy efficiency and integrate the use of renewable and low carbon technology. Development should address the need conserve water resources, recycle materials and be adaptable and accommodating for future generations.

Development Management Plan Policy DM26 states new development will be required to contribute towards local character and distinctiveness, including by responding appropriately to and incorporating existing landforms, green infrastructure assets and historic assets and features and responding appropriately to the height, scale, massing, shape, form and proportion of existing buildings. Development will not be permitted where it would be harmful to local character and distinctiveness.

5.4.1. Layout

Development Management Plan Policy DM27 states the layout, form, pattern and arrangement of streets, open spaces, development blocks, buildings and landscapes should contribute to the creation of quality urban design and healthy, safe and sustainable places. It should make efficient use of land, provide inclusive access and take account of local climatic conditions. Development will be expected to create or contribute towards a simple, well-defined and inter-connected network of streets and spaces that allows for convenient access to a choice of movement modes and routes, ensure that the layout, scale and enclosure of streets and spaces are appropriate to their function, character, capacity, hierarchy and local climatic conditions and incorporate existing and new green infrastructure to reinforce the character of streets and spaces.

The Illustrative Masterplan shows an indicative layout and one way in which development could be positioned on the site. At detailed design stage, this will be controlled in part by the Land Use, Landscape and Access and Movement Parameter Plans that are submitted for approval and which further reserved matters applications must comply with.

The layout has been informed by the points of access, which are applied for in detail, and the key movement and routes across the site. A number of pedestrian and cycle connections to the surrounding area are provided, including a new link to Allison Road and towards the local centre, and the illustrative layout seeks to frame and activate these routes.

The layout of development seeks to work with the topography of the site, providing residential dwellings to the north of the site and has been landscape led, retaining a significant amount of open space along the southern boundary. The layout has been informed by retaining existing vegetation and hedgerow where possible, as shown on the Landscape Parameter Plan.

The Illustrative Masterplan has applied a number of key design principles to inform the quantum of development that can be applied on the site, including compliance with the Council's maximum parking standards, provision of private amenity space for all the houses and appropriate back-to-back distances of c. 21m between dwellings, to demonstrate both the quantum and the quality of the housing that can be delivered.

The density of the scheme (51 dwellings per hectare based on proposed developable area) is considered to be appropriate, noting the site constraints and also to reflect the character and density of the existing surrounding residential area.

5.4.2. Scale

Development Management Plan Policy DM27 states the height, scale and massing of development should be appropriate to the immediate context.

The proposed scale of the buildings on the site will be fixed through the Building Heights Parameter Plans which is submitted for approval. The building heights have been fixed following consideration of the sites context and following feedback received during the public engagement.

Building heights on the site can be categorised as follows:

- Residential dwellings to the north of the site and along the boundaries with existing dwellings on Belroyal Avenue and Allison Road will extend to 2 storeys;
- Elsewhere on the site residential dwellings will extend up to 2.5/3 storeys;
- Apartment blocks on the eastern boundary of the site comprising the flats will extend to 4 storeys, responding to the more urban context of the trading estate to the east.

A series of indicative views and sections through the masterplan are provided in the submitted DAS and Design Code and demonstrate how the scale of and heights of the buildings will look across the site, including the relationship with existing residential dwellings surrounding.

5.4.3. Appearance

Detailed appearance of the proposed dwellings will be confirmed at detailed design (reserved matters) stage. However, this outline application is supported by a Design Code which sets out design rules to guide future reserved matters application(s). It has been prepared to ensure future detailed proposals reflect the character of the local area and retain the key structuring elements of the design established through the outline parameters. The Design Code submitted provides indicative information and principles that will inform the design and appearance of the dwellings within the key character areas and spatial typologies identified across the site. This includes guiding principles for each space in relation to landscape and public realm, built form and boundary treatments and parking strategy.

This application is also supported by a preliminary Building for Healthy Life assessment (contained in the DAS) of the proposal's performance against the criteria, based on the parameter plans and illustrative masterplan. Building for a Healthy Life is a Design Code to help people improve the design of new and growing neighbourhoods. The outline assessment considers the site and parameters and proposals set out perform well against the 12 key criteria.

If outline planning permission is granted, Homes England will appoint a development partner, a developer to work up the detailed proposals for the site and who will deliver the housing. During the appointment process, Homes England will look to ensure that any bids

put forward by potential development partners are compliant with the Design Code and design parameters submitted with this outline application. Homes England also use the 12 Building for a Healthy Life considerations as part of its evaluation process for selecting bidders for its land disposal programme and those not compliant with the assessment criteria would not be successful.

5.4.4. Design Summary

Despite the outline nature of these proposals, a clear vision for the site and design principles to ensure a high quality, sustainable, landscape-led approach to the final detailed design of the scheme are provided and to be fixed through this application. It is considered that the development therefore complies with the relevant Development Plan Policies identified.

5.5. Landscape

Development Management Plan Policy DM27 states development will be expected to contribute to a sense of place with safe and usable outdoor spaces which are planned as an integral part of the development. Proposals for the landscape design and planting of development will be expected to integrate sustainable urban drainage systems and allow sufficient space for safeguarding valuable existing vegetation and the healthy establishment of trees.

Core Strategy Policy BSC9 states the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced. Opportunities to extend the coverage and connectivity of the existing strategic green infrastructure network should be taken. Development should incorporate new and/or enhanced green infrastructure of an appropriate type, standard and size.

Development Management Plan Policy DM15 states new green infrastructure assets will be expected to be designed and located to maximise the range of green infrastructure functions and benefits achieved. New residential development should be designed and located to facilitate opportunities for local food growing.

The design of the proposed development is 'landscape-led' and a strong landscape structure is integral to the parameters and illustrative masterplan. The design of the proposed development delivers a substantial network of multi-functional green infrastructure. Minimal vegetation loss has been sought, and where vegetation has been removed, this has been compensated (in so far as possible) through new planting throughout the Site in newly created green and accessible spaces.

The design of the proposed development delivers a substantial network of multi-functional green infrastructure that maximises the range of green infrastructure functions and benefits possible, and connect to existing area of green infrastructure off-site, such as Victory Park (to the south-west) and Eastwood Farm Local Nature Reserve (to the north-east).

The design process has considered how green infrastructure linkages (within and off-site) would be delivered; and where new public spaces and new areas of planting would be best placed. A number of design approaches have been developed to ensure that the landscape elements of the masterplan are coherent, integrated with other land uses and are both functional and deliverable. These include:

- **The retention and enhancement of existing green corridors**

The creation of north-south green corridors throughout the Site will place green infrastructure at the heart of the development and links other spaces and habitats. The landscape-led design place homes within a network of green spaces offering a range of recreation and recreational opportunities. Existing tree and hedgerow vegetation will be retained (in so far as possible) to form this network of green infrastructure; and the enhancement of existing hedgerows on the boundaries of the Site will provide visual containment and define parcels for development. This will also create opportunities for suitable edge habitats / buffers to development, that will with be ecologically beneficial.

- **Creation of a wetland meadow**

Create a new semi-natural greenspace landscape ‘destination’ to the south of the Site that integrates SuDS and provides biodiversity, educational and recreational benefits for the new and existing community.

In total a significant amount of landscaped open space will be provided across the site (c.45% of the site remains undeveloped).

Full details of the landscape proposals will be applied for in detail at reserved matters stage. The key landscape principles outline above will be fixed via the Landscape Parameter Plan (Drawing No. 7456_102) which is submitted for approval.

The proposed development is therefore considered to comply with Development Management Plan Policies DM15 and DM27 and Core Strategy Policy BSC9.

5.6. Townscape and Landscape Visual Impacts

NPPF Paragraph 130 outlines that planning decisions should ensure that developments function well and add to the overall quality of the area over the lifetime of the development. They should be visually attractive as a result of good layout and appropriate and effective landscaping. Furthermore, they should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

At the local level, Core Strategy Policy BCS9 states the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced. Development should incorporate new and/or enhanced green infrastructure of an appropriate type, standard and size.

Core Strategy Policy BCS21 states new development in Bristol should deliver high quality urban design and is expected to contribute positively to an area’s character and identity, creating or reinforcing local distinctiveness.

Development Management Plan Policy 26 also states new development should contribute towards local character and distinctiveness including responding appropriately to the height, scale, massing, shape, form and proportion of existing buildings, building lines and set-backs from the street, skylines and roofscapes.

This application submission is supported by a Townscape and Visual Impact Assessment (TVIA) prepared by LDA Design. The TVIA describes the existing townscape, landscape and views and considers their sensitivity to change and identifies the changes likely to arise from the proposed development and the significance of these impacts.

Effects on townscape character would be at their greatest within the Site itself, owing to the change from an area of open semi-improved grassland with new housing, albeit placed within a new network of green infrastructure and on a site that is allocated for housing development in the Local Plan. Beyond the Site's boundaries, effects on townscape and landscape character would reduce with distance due to the limited visibility of the proposed development from the wider townscape / landscape.

Overall effects on the townscape / landscape character are judged to be of a Negligible Magnitude, Minimal and Neutral. It has been assessed that the intrinsic and prevailing characteristics would not be discernibly affected through the introduction of the proposed development.

Effects on visual receptors would be at their greatest on users of the Public Rights of Ways which traverse the Site. Effects would be adverse given the visible change from an area of open grassland to that of new development, albeit seen within the existing townscape of Broom Hill and Brislington.

From further afield of the Site's immediate context, visual effects would rapidly reduce as a result of intervening vegetation, buildings and landform screening views to the site. Effects at most would be Negligible Magnitude, Minimal and Neutral.

The TVIA also concludes that the proposal would not give rise to 'overbearing' or 'overwhelming' effects on existing residential properties.

5.7. Ecology and Biodiversity

The NPPF identifies the need to conserve and enhance the natural environment. Paragraph 174 states new development should seek to minimise impacts on and provide net gains for biodiversity. Development should, wherever possible, help to improve local environmental conditions.

Paragraph 180 states significant harm to biodiversity resulting from a development should be avoided, adequately mitigated, or, as a last resort, compensated for, otherwise planning permission should be refused.

At the local level, one of the key objectives identified in the Core Strategy is to ensure delivery of a high-quality natural environment where valued open spaces and biodiversity are conserved and enhanced and a green infrastructure network is maintained. Policy BCS15 states new development should take opportunity to incorporate measures which enhance the biodiversity value of development.

An Ecological Impact Assessment has been prepared by TEP and submitted with this application. This report identifies the statutory and non-statutory wildlife and ecology sites within the proximity of the development site, as well as describing existing conditions of the site itself and any associated impacts of the proposed development. The Assessment is supported by a full suite of technical appendices comprising the required species and habitat

surveys that have been undertaken between September 2019 and January 2022. All surveys were completed in the correct season in accordance with industry standards and guidance.

The site is not subject to any specific environmental designations. The site is no longer designated as a local Site of Nature Conservation Importance (SNCI), since its allocation for housing in the Local Plan. The site is strategically located within the local network of wildlife sites, being adjacent to the Brislington Meadows SNCI and linking with other local sites Eastwood Farm and St. Annes Valley. The impact on these sites is considered.

The Ecological Impact Assessment summarises the ecological features of value identified within the site and provides an assessment of the potential impacts associated with the development proposals upon these features of value, as well as requirements for ecological avoidance and mitigation measures and recommendations for compensation and enhancement that should be complied with during construction and at detailed design stage.

The Environment Bill was passed at the end of 2021. This seeks to introduce a mandatory requirement for all new development to deliver a 10% net gain in biodiversity, above the base value of the site. The Government are currently consulting on the how the mandatory requirement will apply to planning applications, and the relevant changes to legislation required. Whilst the 10% net gain requirement is not currently planning policy, Homes England are committed to delivering this as part of the Brislington Meadows development.

An outline Biodiversity Net Gain (BNG) assessment has been undertaken to support this application and based on the outline scheme landscape parameters provided. This report details the ecological surveys undertaken to establish a baseline position, and what the anticipated impacts are. Biodiversity Metric 3.0 Metric has been used to inform the outline BNG assessment, as per current best practice.

The assessment confirms that the post-development habitat unit value represents a net loss of - 24.12% in habitat unit value (-14.23 habitat units), meaning a deficit of 20.14 habitat units compared to a 10% net gain position.

Based on the hedgerow losses estimated from the outline Parameter Plans and Illustrative Masterplan and accounting for the enhancement and planting opportunities presented by the Illustrative Masterplan, a net gain of up to 530m hedgerows should be achievable within the site. The Outline BNG assessment calculates a +132.12% net gain in hedgerow unit value (an estimated gain of 5.84 hedgerow units) could be delivered within the site.

A final outline BNG impact assessment will be required, once masterplan proposals are fixed. In accordance with the biodiversity mitigation hierarchy, all reasonable measures will be undertaken to achieve biodiversity enhancements on site, whilst also ensuring sufficient quantum of housing can come forward to meet the identified housing need. Reducing losses of existing habitats during detailed design will be the preferred solution to maximising BNG delivery onsite. However, in order to achieve 10% net gain, some off-site enhancement work will be required. Any offsetting mechanisms proposed are to be discussed and agreed with BCC.

Homes England are also committed to achieving Building with Nature (BWN) accreditation and have appointed an independent assessment of the scheme. An initial independent assessment has been carried out and confirms that the proposed scheme, which is recognised as being designed to be landscape-led, performs well, despite existing ecological and

landscape constraints. The assessment will now be submitted to BWN for audit and confirmation of accreditation.

Considering the above the development is considered to comply with the relevant provisions of the NPPF as well as the key objectives identified in the Core Strategy and Policy BCS15.

5.8. Arboriculture

NPPF Paragraph 131 acknowledges that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. It also requires appropriate measures to be in place to secure the long-term maintenance of newly-planted trees and requires existing trees to be maintained wherever possible.

At the local level, Development Management Plan Policy DM15 states the provision of additional and/or improved management of existing trees will be expected as part of the landscape treatment of new development. The design, size, species and placement of trees provided as part of the landscape treatment will be expected to connect the development site to the Strategic Green Infrastructure Network, as well as to create a strong framework of street trees to enclose or mitigate the visual impact of a development.

Development Management Plan Policy DM17 states all new development should integrate important existing trees. Development which would result in the loss of Ancient Woodland, Aged trees or Veteran trees will not be permitted. Where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided, in accordance with the Council's standards.

There is Tree Preservation Order (TPO 1404) in place on the site which covers 16 trees, 3 groups of trees and 1 area of woodland. The site is not located in a Conservation Area.

An Arboricultural Impact Assessment has been prepared by TEP and submitted with this outline application. This includes full survey of existing trees on the site which concludes that the majority of canopy cover is evenly divided between moderate (Category B) and low (Category C) quality with a slightly greater amount of Category C. They are evenly distributed throughout the site with no area dominated by any one category. The value of trees on this site is mainly for their landscape and visual quality, and habitat provision. The linear outgrown hedgerows are notable for providing good habitat links between large areas of continuous canopy cover. There is one veteran tree on the site and this will be retained as part of the development.

Final details of the site layout and landscaping arrangements will be fixed at reserved matters stage. However, the site layout shown on the Illustrative Masterplan shows how the loss existing tree cover and vegetation can be minimised and a significant amount retained as part of the development. The existing trees and hedgerow to be retained are shown on the Landscape Parameter Plan (Drawing No. 7456_102) which is submitted for approval and means these features would have to be retained as part of future detailed design.

New planting around the site will look to introduce new landscape or amenity values that do not currently exist and replace those trees that are lost as a result of the development. The outline schemes shows that 4.48ha of green infrastructure including public open space,

sustainable drainage and landscape buffers are included. This will provide the opportunity for an increase in the number, variety and age profile of tree cover on site and to comply with the Council's standards.

Overall, it is considered that the loss of trees to facilitate the proposed development and the access points into the site would be acceptable and mitigated through replacement planting and a high quality landscape strategy across the site. The development is considered to comply with Development Management Plan Policies DM15 and DM17.

5.9. Access and Highways

NPPF Paragraph 105 states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Paragraph 110 requires that safe and suitable access to the site can be achieved for all users and states that it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Paragraph 111 directs that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Core Strategy BCS10 states development proposals should be located where sustainable travel patterns can be achieved and close to main public transport routes. Proposals should minimise the need to travel, especially by private car, and maximise opportunities for the use of walking, cycling and public transport. Developments should be designed and located to ensure the provision of safe streets and reduce as far as possible the negative impacts of vehicles such as excessive volumes, fumes and noise. Proposals should create places and streets where traffic and other activities are integrated and where buildings, spaces and the needs of people shape the area.

Site Access

Development Management Plan Policy DM23 states development should not give rise to unacceptable traffic conditions and will be expected to provide safe and adequate access for all sections of the community within the development and onto the highway network. This includes access for pedestrians and cyclists and development will be expected to protect and enhance the function and amenity of public rights of way.

Access is being applied for in detail as part of this outline application. Full details are provided in the submitted Transport Impact Assessment and drawings prepared by Key Transport Consultants.

Vehicular access to the site is proposed from Broomhill Road only. This has been designed to meet the relevant highways design standards and to accommodate two-way traffic movements and emergency and refuse vehicles (KTC No. 1066-007.D). A secondary access for emergency vehicles only is proposed from Bonville Road but this will be controlled and not accessible on a day-to-day basis by other users (KTC Drawing No. 1066-014).

Alternate and additional means of main vehicular access from School Road or Bonville Road have been considered and discounted for reasons relating to the topography of the site, impact on landscape and loss of further areas of existing vegetation, the ability to create the ecological corridor along the eastern boundary of the site and issues related to 'rat running' through the site with vehicles cutting between the A4 and Broomhill Road.

The masterplan also seeks to focus on enhancing connectivity to the surrounding area by sustainable travel modes such as walking and cycling. This includes a new pedestrian and cycle connection from the site to Alison Road (KTC Drawing No. 1066003.H) and improved routes connecting to Victory Park, School Road and Bonville Road (KTC Drawing No. 1066-016).

NPPF Paragraph 100 states that planning decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks. Existing public rights of way on the Site are currently being formalised as part of a separate application process and the routes will be diverted to align with the key routes proposed across the site, as shown on the Access and Movement Parameter Plan.

Traffic Impact

Development Management Plan Policy DM23 states proposals should be supported by a Transport Assessment where development is likely to have a significant traffic impact. This outline application is supported by a full Transport Assessment prepared by Key Transport Consultants.

The Transport Assessment includes details of the proposed trip generation and traffic impacts assessments undertaken.

The development is forecast to generate 279 two-way movements in the morning peak, including 166 movements by private car or van, and 249 two-way movements in the evening peak including 148 movements by private car or van.

The junction modelling shows no junctions over capacity in future years with the development fully occupied.

Car Parking

Development Management Plan Policy DM32 states development proposals will be expected to provide an appropriate level of safe, secure, accessible and usable parking provision having regard to the parking standards, the parking management regime and the level of accessibility by walking, cycling and public transport.

The Council's maximum parking standards for new residential development are as follows:

- 1 space per 1-bed flat / house
- 1.25 spaces per 2-bed flat / house
- 1.5 spaces per 3-bed+ dwellings
- The Parking Standards require a passive electrical vehicle charging point to be provided for every dwellinghouse with dedicated parking or garage, and one charging point per five spaces for shared communal parking.

- In terms of accessible parking, the Standards require 5% of the parking standard to be provided as accessible spaces for blue badge holders.

The proposed development will be designed to comply with the Council's parking standards. Final parking numbers and layout of the parking spaces will be determined as part of the future reserved matters application.

Cycle Parking

The Council's minimum cycle parking standards for new residential development are as follows:

- 1 space per studio /1-bed dwelling
- 2 spaces per 2-bed / 3-bed dwellings
- 3 spaces per 4-bed+ dwellings
- Visitor cycle parking at a ratio of 1 space per 10 dwellings

All of the proposed dwellings will be provided with private, secure cycle parking in accordance with these standards. Visitor cycle parking will be provided within the public realm and integrated with the landscaping.

Full details of the cycle parking strategy will be submitted as a part of the future reserved matters application.

Construction

An outline Construction and Environmental Management Plan (CEMP) has also been prepared by Campbell Reith and is submitted with this application. The Outline CEMP provides a framework, which governs the construction works associated with the proposed development for all contractors and sets out, in broad terms, methods to avoid, minimise and mitigate construction phase effects on the environment including specific ecological and arboricultural mitigation measures.

The Outline CEMP identifies an indicative phasing strategy for the construction of the development, with main construction access proposed to be from Broomhill Road for the first phase and from Bonville Road for later phases. It is not yet possible to estimate in detail the number and types of construction vehicles that will be generated by construction activities and final phasing strategy is to be confirmed. Full details will be provided in the detailed CEMP and a Construction Traffic Management Plan to be provided ahead of works starting on site.

This Outline CEMP is a live document, which will be updated and reviewed at key milestones as the project progresses, to account of changes in working practices, regulatory requirements, personnel and equipment. Responsibility for adherence to its requirements will be the responsibility of the appointed principal contractor.

Summary

The proposed development is considered to be acceptable with regards to transport impact and highways safety and has been designed to promote healthy lifestyles and encourage walking and cycling where possible. Appropriate provision for car and cycle parking will be required and detailed at reserved matters stage.

The development is therefore considered to comply with the relevant Development Plan policies identified above.

5.10. Energy and Sustainability

NPPF 154 requires new development to be planned in a way that helps to reduce greenhouse gas emissions, such as through its location, orientation and design. Paragraph 157 states in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

At the local level, Core Strategy BCS13 requires new development to both mitigate and adapt to climate change. Core Strategy BCS14 states development in Bristol should include measures to reduce carbon dioxide emissions from energy use in accordance with the following energy hierarchy:

1. Minimising energy requirements;
2. Incorporating renewable energy sources; and
3. Incorporating low-carbon energy sources.

Development will be expected to provide sufficient renewable energy generation to reduce carbon dioxide emissions from residual energy use in the buildings by at least 20%. New development will be expected to demonstrate that the heating and cooling systems have been selected according to the heat hierarchy.

Core Strategy Policy BCS15 states sustainable design and construction should be integral to new development, seeking to maximise energy efficiency and integrate the use of renewable and low carbon technology. Development should address the need conserve water resources, recycle materials and be adaptable and accommodating for future generations.

Site Allocations and Development Management Policy DM27 requires new development to respond appropriately to climatic conditions including solar orientation to maximise opportunities for energy efficient design and access to sunlight.

An initial Sustainability and Energy Statement has been prepared by Kovia Consulting and is submitted to support this outline application. The Statement identifies the sustainable placemaking principles that have informed the current proposals and detailed parameter plans, as well as setting out future measures relating to sustainable design and construction that will need to be considered at reserved matters stage.

The measures set out in Statement demonstrate how the proposed development would be designed to comply with the relevant policies contained within the Bristol Local Plan and also Building Regulations and the Future Homes Standards as a minimum.

A full Energy Strategy would be provided at detailed design stage, once full details of the proposed scheme are confirmed.

The proposed scheme will be compliant with the relevant Development Plan policies.

5.11. Archaeology

NPPF Paragraph 130 outlines that new development should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Paragraph 194 states where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

At the local level, Core Strategy Policy BCS22 states new development should safeguard existing heritage assets, including historic buildings, conservation areas and archaeological remains.

Development Management Plan Policy DM31 states scheduled monuments and other non-designated archaeological sites of equivalent importance should be preserved in situ. In those cases where this is not justifiable or feasible, provision should be made for excavation and record with an appropriate assessment and evaluation. The appropriate publication/curation of findings will be expected.

A historic environment desk-based assessment has been carried out of the site and 1km buffer in order to assess the potential impact of development on the historic environment.

The baseline historic environment conditions suggested a low potential for the presence of archaeological remains of the prehistoric and Roman periods, as well as the early medieval and medieval periods, and a moderate potential for archaeological remains of the postmedieval and modern periods. Any such remains were considered likely to be of a low (local) heritage significance.

Due to the archaeological potential, and following consultation with the BCC archaeological advisor, it was recommended that further evaluation work be carried out at the predetermination stage in order to assess the below-ground conditions within the site.

Following the completion of the geophysical surveys a programme of archaeological evaluation was carried out in order to provide further information on the likely archaeological resource including to confirm its presence or absence, its character, extent, date, and state of preservation. The work was carried out in accordance with a Written Scheme of Investigation submitted to and approved by the BCC archaeological advisor.

A copy of the Archaeological Evaluation Report and the Geophysical Survey Report are also submitted with this application.

The development is considered to comply with the provisions of the NPPF and Core Strategy Policy BCS22 and Development Management Plan Policy DM31.

5.12. Historic Environment

NPPF Paragraph 130 outlines that new development should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Paragraph 194 states that in determining applications, local planning authorities should require an

applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

Core Strategy Policy BCS22 states new development should safeguard existing heritage assets, including historic buildings, conservation areas and archaeological remains.

Development Management Plan Policy DM31 states development that has an impact upon a heritage asset will be expected to conserve and, where appropriate, enhance the asset or its setting. Development proposals that would affect heritage assets will be expected to demonstrate, by a thorough understanding of the significance of the asset, how any change proposed would conserve and, where appropriate, enhance that significance.

A Historic Environmental Desk-based Assessment has therefore been prepared by TEP and is submitted with this application.

There are no listed buildings within the Site boundary and the Site is not subject to any historic designations. However, within the immediate vicinity of the site there are a number of designated heritage assets. The designated heritage assets of greatest significance comprise the Registered Park and Garden of Brislington House and the Grade II* Listed buildings which include the medieval Church of St Luke and associated post medieval vicarage, as well as both the Avon Valley Conservation Area and the Brislington Conservation Area.

The report concludes that in terms of impact on the Avon Valley Conservation Area and the Brislington Conservation Areas, whilst these have high heritage significance, development within the proposed development site is likely to represent a minor adverse change to the setting of this asset by removing agricultural landscape and field systems which provide understanding of these assets and their former rural setting. The magnitude of change to in terms of the way they are experienced and understood, would therefore at most be minor. The significance of effect is assessed as, at most, minor adverse.

The proposed development is also not considered to contribute to the heritage significance of the Grade II* Listed Church Hill House (LB2). The magnitude of change to these assets in terms of the way they are experienced and understood, would be none. The significance of effect is assessed therefore assessed as none.

In terms of historic hedgerows on the site, the hedgerows are of low heritage significance; the magnitude of effect would be moderate to high and the impact would be minor adverse.

The development is therefore considered to comply with the provisions of the NPPF and Core Strategy Policy BCS22 and Development Management Plan Policy DM31.

5.13. Air Quality

Core Strategy Policy BCS23 states new development should be sited and designed so as to avoid adversely impacting on the environmental amenity of the surrounding area by reason of air pollution. Account should also be taken of the impact from existing sources of noise or other pollution on the new development proposed.

Development Management Policy DM33 states development that has the potential for significant emissions to the detriment of air quality, particularly in designated Air Quality

Management Areas (AQMA), should include an appropriate scheme of mitigation which may take the form of on-site measures or, where appropriate, a financial contribution to off-site measures. The Site is not located in a designated an AQMA.

Air Quality Impact Assessment has been prepared by Accon UK Environmental Consultants and has been submitted with this application.

The Assessment concludes that during the operational phase of the development, the modelling predicts that there will be no exceedances of the nitrogen dioxide or particulate matter objectives at the sensitive development receptors on the proposed development site.

There are no existing sensitive locations which will exceed the AQAL, as a result of the proposed development. Accordingly, air quality impacts of the proposed development scheme are considered to be acceptable, and mitigation is not required and the development is considered compliant with Core Strategy Policy BCS23 and Development Management Plan Policy DM33.

5.14. Noise

As above, Core Strategy Policy BCS23 states new development should be sited and designed so as to avoid adversely impacting on the environmental amenity of the surrounding area by reason of noise pollution. Account should also be taken of the impact from existing sources of noise or other pollution on the new development proposed.

Development Management Plan Policy DM35 states noise-sensitive development in locations likely to be affected by existing sources of noise such as busy roads, railway lines, aerodromes, industrial/commercial developments, waste, recycling and energy plant and sporting, recreation and leisure facilities, will be expected to provide an appropriate scheme of mitigation to ensure adequate levels of amenity for future occupiers of the proposed development. In areas of existing noise, proposals for noise-sensitive development should be accompanied by an assessment of environmental noise and an appropriate scheme of mitigation measures.

A Noise Impact Assessment has been prepared by Accon UK Environmental Consultants and has been submitted with this application.

External Noise

The initial site noise risk assessment has identified that the site is generally at a negligible risk of adverse noise effect during the daytime period and at a negligible to low risk of adverse noise effect during the night-time period.

Daytime external noise levels across the majority of the proposed development site are generally within or below the target noise level range of 50 dB to 55 dB LAeq, 16hr. Therefore, no specific noise mitigation measures are likely to be required to proposed external amenity areas for the majority of the site.

For areas within 62 m of School Road, external noise levels are likely to exceed 55 dB LAeq, 16hr. Following consideration of the good acoustic design hierarchy, localised noise mitigation measures may be required to external amenity areas within this area of the development site.

Depending on the location of external amenity areas in relation to the industrial area, localised noise mitigation measures may be required to external amenity areas, subject to the layout of dwellings and gardens and setback from the noise sources.

Internal Noise

The majority of the proposed dwellings are unlikely to require specific noise mitigation measures to achieve the target internal noise levels.

Subject to the setting back of dwellings from the primary sources of noise, orientation of dwellings and internal layout of dwellings, a small number of receptors close to School Road and Bonville Road are likely to require specific noise mitigation measures to achieve the target internal noise levels. This is likely to take the form of building façade noise mitigation such as the specification of appropriate levels of glazing sound reduction and suitable means of ventilation.

Summary

Details of proposed noise mitigation measures that may be required will be confirmed at detailed design stage, once the final layout of the development is confirmed and when applying for details of the appearance of the proposed dwellings.

The initial Noise Impact Assessment concludes that there should be no objection to granting outline planning consent for the proposed development on noise grounds. The development is considered compliant with Core Strategy Policy BCS23 and Development Management Plan Policy DM35.

5.15. Flood Risk and Drainage Strategy

NPPF Paragraph 167 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Paragraph 169 clarifies that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

Core Strategy Policy BCS16 states priority should be given to development of sites with lowest risk of flooding. All development will also be expected to incorporate water management measures to reduce surface water run-off and ensure that it does not increase flood risks elsewhere. This should include the use of sustainable drainage systems (SUDS).

The site is located entirely within Flood Zone 1 as shown on the Environment Agency mapping. Whilst much of the site is at very low risk from surface water flooding, a very small slither of land in the south of the site is highlighted to be at low risk, however this follows the exact same route as the unnamed tributary. The site is at low risk of flooding from groundwater.

As the application site is larger than 1ha in size, a Flood Risk Assessment and Drainage Strategy has been prepared by Campbell Reith and is submitted with this application, as required by NPPF Paragraph 168.

The proposed surface water drainage strategy will incorporate 4 surface water catchments (A,B,C and D) and will discharge all flows generated from the proposed development off

site at the greenfield Qbar equivalents for rainfall events up to and including the 1 in 100 year +40% climate change.

Surface water flows from the Catchment A will discharge its flows into the 225mm public surface water sewer in School Road. Catchments B and C will discharge their surface water flows into the unnamed tributary south of the site. Catchment D will discharge its surface water flows into the 225mm public surface water sewer in Broomhill Road.

Sustainable Drainage Systems (SuDS) will be introduced for the proposed development to attenuate surface water flows to the required rainfall events. In addition, the SuDS will also improve water quality in line with the recommendations within the NPPF.

Adequate space has been provided on the site to store storm water flows generated by the 1 in 100 year +40% climate change event. By adequately sizing the SuDS storage facilities on site, adequate measures will be provided to minimise flood risk on the site.

The development is therefore considered compliant with the provisions of the NPPF and relevant Development Plan policies in relation to managing flood risk and providing an appropriate drainage strategy.

5.16. Health Impact Assessment

The NPPF promotes healthy and safe communities. Paragraph 91 states new development should promote social interaction and enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.

At the local level, the site-specific allocation (BSA1201) requires the development should be informed by a Health Impact Assessment. This should include how the proposals have been discussed with local primary health care providers regarding impacts on primary health care service.

Accordingly, a Health Impact Assessment has been prepared by Kovia Consulting to inform the development and is submitted with this outline application, to demonstrate how the scheme has been designed to align with principles around healthy placemaking and to promote health and wellbeing, as well as any impacts the proposed development may have on health care provision in the local area.

The Assessment identifies that consultation was undertaken with local GP surgeries and the South Bristol Clinical Commissioning Group prior to the submission of this application. There was no demand for additional practice space as part of the development and many were considering expansion or investment elsewhere as part of wider strategy.

The assessment of impact on schools, health social care and wider community facilities has identified that generally there is capacity for school places at local facilities and needs that are created by the development will be further supported by developer contributions (e.g. CIL payment).

The masterplan has been designed to achieve a positive impact upon the health of new and existing residents through:

- Meeting the housing needs, including the delivery of affordable homes, of local people is an essential positive impact of the proposal
- Improvements to circulation and connectivity to local services and facilities and elements that will promote walking and active transport are welcome and needed
- Despite loss of some open space, a significant amount of high quality landscape open space will be retained for use by the public and also enhancing connectivity to other local open spaces
- Access will be important and this will include improved security in some locations around the site with improved accessibility and surveillance

The development is therefore compliant with the aspirations of the NPPF and has addressed the requirements of the Site Allocation in the Local Plan.

5.17. Planning Obligations

The NPPF recognises that development should not be subject to a scale of obligation and policy burdens to which viability is put under strain. In the context of ensuring viability and deliverability, Section 56 of the NPPF states that planning obligations must only be sought when they meet all of the following tests:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

The Council's Planning Obligations SPD provides further guidance as to the types of contributions that may be requested and how these would be secured.

It is anticipated that the proposed development will be subject to relevant planning obligations to be secured through S106 legal agreement. Based on the pre-application discussions with officers prior to the submission of this application we have scoped out the headline contributions to form the draft Heads of Term of the S106 agreement, submitted with this application. The S106 Heads of Term are to be discussed and agreed further BCC during the determination of the application.

The development will also be liable for a Community Infrastructure Levy payment, as standardised charge for new floorspace created. The Council adopted their CIL Charging Schedule in 2013. For residential development in Brislington East (outer zone) there is a charge of £50 per sqm.

This will be payable to the Council who will then allocate funding - 15% to Area Committees to spend on local schemes and 80% to strategic infrastructure projects to support the growth of Bristol. The site is located in Brislington East (Area Committee 5). The relevant CIL Form (CIL Form 1) has been submitted with the outline application however the final CIL liability will be calculated at reserved matter stage once final details of the scheme proposed floorspace are known.

6.0 Conclusion

This Planning Statement has been prepared in support of an outline planning application, with all matters reserved, submitted to the BCC by Homes England for the redevelopment of Brislington Meadows.

The site comprises land measuring approximately 9.6 hectares and that is allocated for residential development in the Council's adopted Development Plan.

This planning application is submitted in outline with all matters reserved apart from access. The proposals will result in the comprehensive redevelopment of the site to deliver up to 260 new residential dwellings alongside associated parking, landscaping and infrastructure works.

This outline application is accompanied by a set of Parameter Plans and Design Code which seek to establish design principles for future detailed planning application. This includes maximum parameters for building heights, setting the orientation of key access and movement routes and the retention of existing vegetation and other landscape features. The Design Code also demonstrates how the wider aspirations for the site in terms of open space strategy design quality can be provided, in order to achieve the density proposed and ensure there is a significant benefit on the amenity of the existing local environment.

The proposals have been developed following extensive pre-application engagement with the local community, in addition to frequent meetings of the site's established community liaison group and formal pre-application discussions with BCC offices. Throughout this process, the proposals have been gradually refined and developed, including amendments to proposed heights as reflected by the heights parameters plan and design quality as set out in the Design Code. The scheme has also been presented to the independent Design West panel where the scheme was well received and the landscape-led nature of the proposals supported and encouraged to be fixed as per the parameters of the outline application.

Bristol has a number of competing issues that it must address; ecology, climate change and housing emergencies being just three. This scheme is ideally suited for responding positively to both the housing crisis and the climate emergency, and through careful management, the ecology emergency too.

The site is allocated for development in the Council's adopted Local Plan (2014), with indicative capacity for up to 300 homes. The allocation of the site for residential use was considered to be appropriate noting the site's sustainable location, close to the supermarket and shops of Broomhill Local Centre, as well as the adjacent employment areas and public transport infrastructure.

The site makes an important contribution towards the housing required in Bristol and will provide a mix of private and affordable dwellings. The Council are currently unable to demonstrate that they have delivered the number of homes needed, or that they have a five year supply of land to provide the number of homes needed. This has had devastating impacts on the housing market in Bristol, with demand for housing across the market now severely greater than the supply of homes available. Development at Brislington Meadows will provide up to 260 high quality new homes, compromising family homes and smaller dwellings and providing choice to the market.

Through careful on and off-site design and management, the scheme will also be able to achieve an overall gain in biodiversity value which responds to the ecological emergency. Homes England is committed to see a 10% biodiversity net gain (on and off site).

The application therefore provides a balanced response to the City's priorities as part of the overall scheme design and approach and accords with the Development Plan, and therefore should be supported.