


<b>CITY DESIGN GROUP</b>	Urban design
<b>Application No:</b>	<b>22/01878/P</b>
<b>Address:</b>	Land At Broom Hill/Brislington Meadows, Broomhill Road, BS4 4UD
<b>Description:</b>	Application for Outline Planning Permission with some matters reserved - 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. Approval sought for access with all other matters reserved.
<b>Case Officer:</b>	Richard Sewell
<b>Date:</b>	19 Oct 2022

No Objection -	<b>NOOBJECT</b>	
No Objection subject to Conditions described below -	<b>CONDITION</b>	
Not acceptable in the current form. See comments suggestions below -	<b>NAICF</b>	
Object, Please see comments below -	<b>OBJECT</b>	

Hello Richard,

Apologies for delay in providing comments on the case. Further information from the applicants and comments from colleagues from ecology, arboriculture, landscape and archaeology disciplines were needed to help formalise the comments from urban design perspective.

### The site

The site covers an undeveloped parcel of land known as Brislington Meadows in a suburban location. It is surrounded by suburban housing to north and east, with light industrial/warehouse uses to west and park to the south.

It hosts a number of valuable assets in form of ancient hedgerows, matured vegetation, ecological habitats hosting rich biodiversity, landscape settings, archaeology, and public footpaths.

The proposal benefits from prior pre-application engagement where above-mentioned aspects, need for improved connectivity to the neighbouring areas and design considerations were highlighted.

The comments below build on the prior feedback and information submitted with the planning application.

### Movement and connectivity

At the pre-application stage, difficulties with delivery of connection with School Road which was sought by the allocation policy were highlighted. Adverse topography along the short frontage was the key reason preventing the connection. The engagement probed possible options and concluded the benefits of the vehicular link will be outweighed by the harm caused by engineering and enabling works. However, further consideration for strengthening the pedestrian and cycle links to the surrounding areas were emphasised.

The proposal has positively responded to the recommendation by creating links along Bloomfield School. Further, improvements and strengthening of existing pedestrian links to Bonville Road, Belroyal Avenue and School Road are proposed.

The proposed enhancements to pedestrian and cycle connectivity are welcome but the routes remain constrained by unwelcoming/unkept boundaries and settings. Thorough consideration for effective design and management of the connections will be needed at an early stage to address the concerns.

Further consideration also needs to be given to possible pedestrian connection between the western end of site on higher ground and School Road.

### Existing features

The site hosts a number of noteworthy features in form of mature ancient hedgerows, mature trees, bio-diversity rich habitats, mature natural landscape settings and archaeological interest. The pre-application feedback emphasised the need to agree baseline position and appropriate response on these aspects with concerned officers at LPA prior to designing the layout.

It is disappointing that the issues relating to these key considerations have not been addressed. The comments from the arboriculture, ecology and landscape officer highlight severe concerns about the excessive disruption of the valued assets.

Thorough reconsideration of the baseline assessment, its interpretation and its retention/enhancement need to be agreed. The applicants are recommended to prioritise resolution of these issues with concerned officers to help establish agreeable baseline position and set parameters for designing the site.

### Urban Design considerations

From urban design perspective, the mapping of potential and constraints is essential to determine the context to which the design needs to respond. The lack of established baseline position on the above-mentioned aspects presents a significant urban design risk and non-compliance with policies BCS21 and DM26.

It raises questions about the validity of the constraints map presented on Page 71 of Design and Access Statement which sets baseline for designing the layout in response to the consideration.

A different potential and constraints map will generate a different design. As an example, the illustrative masterplan on page 76 of DAS offers better response to the existing hedgerows when compared to the current layout.

Lack of agreed baseline position presents a fundamental urban design risk which needs to be addressed on a priority.

### Comments on the Proposed Layout

Notwithstanding the above issues, the current layout presents some unresolved aspects.

The application seeks outline approval and limited information has been presented. As a result, the comments cover the scheme in limited details.

- The layout and blocks appear to be orthogonally arranged. The site may benefit from a more flexible blocks which offer better relation to the contours and natural features of the site.
  - o The hedges running in N-S direction can be better retained with minor changes to the blocks and layout.

- The hedges running in E-W direction can be retained by redesign of the blocks and roads. Layout presented on page 76 of DAS can be a good starting point to develop this option.
  - The N-W corner of the site can better address the site boundaries and features
  - The lower/southern edge of the site can benefit from more organic and softer interface with the landscape space.
- The proposal presents significant cut and fill, some of which are near the existing trees/hedges. And flood attenuation ponds require significant groundworks in area of high archaeological interest and area of retained natural landscape.
  - Feedback from arboriculture and ecology officers has highlighted concerns about the development/groundworks and its impact on the vegetation and ecological habitats.
  - Further the impact of the reprofiling on the natural landscape setting along the South and East edges of the site are of concern.
  - The groundworks need to be moved away from the natural landscape features and areas of retained landscape.
- Redesign the house types as split-level units to accommodate part of the level changes needs to be considered. The current arrangement places all the level changes to outdoor areas and exerts excessive pressure on the landscape to absorb the level changes. The approach is against DM 26 which seeks development to respond appropriately to existing landform.
  - The Sections Drawing provided on 29 July 2022 and Contour and Retaining Walls plan provided on 12 April 2022 illustrate the issue. The areas of tightly packed contours show level changes of 2 to 3 meters near the proposed buildings. the level changes are especially significant near south and east edge of development.
  - The Isopachytes drawing provided on 29 July 2022 further confirm the intensity of groundworks noted above.
  - It is recommended that split level house styles should be considered areas with steeper contours and the pressure on outdoors/landscape areas is reduced.
- Split level units will present a considerably better solution for managing level changes and
- There are concerns about the 4-storey high island apartment blocks near Bonville Road. These risks appearing as unsympathetic and abrupt insertion into the landscape settings.
  - The form, scale and massing of the apartment blocks will be significantly larger than immediate suburban context and it will rise abruptly against the leafy settings. The impact on views from the south and east direction are of particular concern. The TVIA views which were agreed during the pre-app engagement have not been provided. The blocks present a high risk of non-compliance with policy DM26. The lack of information is unhelpful and impedes comprehensive assessment to be concluded.
  - Further, the ecology led rationale for the layout is unconvincing as enabling parking and ground works will fundamentally alter the space between the blocks. The design of the replacement landscape between the buildings will be driven by access and urban considerations while ecological value will be of secondary importance and of a limited value.
  - A review of the proposed blocks is recommended to address the issue.
- The policy DM27 seeks blocks and plots with public fronts and private backs. The single rows of houses along the southern/lower edge address public road and green space on its front and back.

- The concerns about the arrangement were raised during pre-application stage and a review of the design was sought. The planning application does not address the concerns that were previously raised and as such the arrangement remains non-compliant with policy DM27.

### Streets and spaces

The intended design arrangement for delivery of SUDS, utilities and GI as outlined in the design code document has been challenging to deliver. The challenges will be further compounded if the spaces are expected to be managed by the Council as the adoption standards are strictly defined and may not allow the needed flexibility. Further the costs of delivering the technical solution for arrangement and the ongoing management can be significant.

There is uncertainty about feasibility of delivering the intended infrastructure arrangement along adopted highways. Policies DM27 and DM28 seek clear resolution of the issues which will need further work.

It is recommended that the ownership and management of the public realm and green space needs to be clarified. Further, early discussions with highway adoption and management team are recommended to determine the feasibility of delivering the intentions presented in the design code.

The discussion can present significant changes to design appearance of the streets. The biggest risk being removal of street trees and greening which will fundamentally alter the character of the streets.

### TVIA

It is disappointing that majority of photomontages for TVIA has not been provided. These views were agreed at the pre-application stage upon request of the applicants. However out of the 16 views that were identified only 2 have been developed into photomontages. The photomontages for remainder of the views needs to be provided to make full assessment of the case. These photomontages should show the proposed groundworks with and without soft landscaping to assess the impact of the proposed changes.

The 2 photomontages that has been provided, illustrate the dominance of the buildings on top of steeply raising topography. The observers experiencing the views will be higher state of sensitivity while enjoying mature landscape settings of parkland to the south. The regimented 3 storey high gable end houses present an unsympathetic response to the setting. The arrangement is not in keeping with policy DM28 and needs to be reconsidered.

The comments above have highlight elevated concerns about the potential impact of the 4 storey high apartments blocks in similar settings. The lack of photomontages for identified views is disappointing and further information is sought on this front on a priority.

Special attention needs to be given to managing the impact of building in such sensitive settings by carefully revising the height, scale and massing as well as the landscaping of the proposed scheme. Further, more can be done to ease the transition between the built edge and landscaped areas in foreground with careful public realm and landscape design.

### Closing comments

The application seeks outline consent for access to be determined and all other matters are reserved for latter stage. However, the supporting material illustrate the design arrangement that is

envisaged for delivery and the impact of the development on the features of the site and the surroundings.

The comments above highlight significant concerns about the lack of established baseline position with arboriculture and ecological considerations. These presents fundamental Urban Design risk for designing the site and non-compliance with policies BCS21 and DM26.

Further the layout and design raise questions about the orthogonal and regimented design arrangement which sits uncomfortably in the mature and sensitive landscape settings. The approach does not ahead to policies BCS21, DM26, DM27 and DM28.

Also, the delivery and adoption of the complex road, services, infrastructure, and landscaping needs to be discussed and confirmed with the responsible departments at the LPA to ensure delivery of intended arrangement as per policies DM27 and DM28.

The application cannot be supported from Urban Design point of view due to the concerns explained above and not compliance with eh adopted policies. Revisions to the baseline position established on the basis of arboriculture and ecology assessments and changes to the design response are recommended to address the issues.