

## **Brislington Hill Landscape Comments Application number 22/01878/P**

### **1.0 Landscape and Policy context**

- 1.1 The Brislington Meadows site is the northern part of a large area of landscape in the eastern part of Brislington. It is made up of agricultural fields, park, cemetery, woodland areas and brook with landscaped edges. This area of landscape forms part of a green infrastructure continuum from the green belt through Brislington to the wooded Brislington Brook valley and the River Avon landscape edge. The site remains an SNCI although allocated for development in the 2014 Local Plan.
- 1.2 The site itself is a topography steep green hillside. The north part of which is a high point within the cityscape at approximately 60m AOD, which affords extensive view over the city and to Dundry Hill beyond. It is made up of a collection of small-scale agricultural grazing fields with generous hedgerow boundaries, which have remained largely unchanged since the 1840's field pattern.
- 1.3 As stated in the ecology comments these hedgerows are defined as 'Ancient Hedgerows', which are irreplaceable natural assets that create the field pattern landscape character. This makes this site a sensitive landscape, accordingly Section 174 of the NPPF applies, it states;

*'Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);'*

- 1.4 The SNCI status of this site requires a high level of protection and enhancement of this high value landscape. It is acknowledged that the site is allocated for development through the Bristol City Council adopted Local Plan 2014 (Site Reference BSA1201. The allocation prevents the site's nature conservation status from being a reason for refusal in accordance with the section of DM19 while parts of DM19 remain relevant and should be applied.
- 1.5 It should also be noted that the NPPF states in Section 134 states;

*'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design...'*

Accordingly, Bristol Local Plan Policies are applied and referenced as part of the response.

### **2.0 Sustainability Appraisal in support of the Local Plan and Site Allocation BSA1201 development considerations**

- 2.1 The site's status as an SNCI and the 'Ancient Hedgerows' within the site are recognised within the Sustainability Appraisal prepared in support of the Local Plan and the Site Allocation development considerations:

Section 4.91.5.1 Sustainability Appraisal states:

*'The development considerations now effectively require compensation and mitigation to re-provide, offsite and nearby, the type of habitat which might be lost to development. This is considered to reduce the potential for negative effect from harm or net loss of SNCI land in the city, creating an implementation dependent effect conservation and wise use of land.'*

2.2 The site allocation information states that development should;

*'be informed by an ecological survey of the site and make provision for mitigation and compensation measures, including enhancement to the grazing land adjacent to Victory Park and compensation for the loss of semi-improved neutral grassland and damp grassland (the site currently has city-wide importance for nature conservation due to the presence and condition of particular species, habitats and / or features)'*

And

*'retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey'.*

**3.0 Principle of Development**

- 3.1 In accordance with the site allocation, it is accepted that Brislington Meadow is a development site for housing but recognises Brislington Meadows is a sensitive landscape with high value landscape assets that remains an SNCI with ancient hedgerows.
- 3.2 The 300 units in the site allocation is an estimate. Accordingly, the appropriate number of houses that can be accommodated on site need to be consistent with the site allocation design considerations. With the provision of information that provides confidence the primary constraint of the natural features and landscape character deliver the appropriate balance between built form, landscape and movement infrastructure.
- 3.3 Correctly, the vision set out in the Design and Access stated the approach to the site should be 'The landscape-led'. However, the stated aim of the Design and Access statement is not considered to have been delivered within the information under consideration.
- 3.4 The key concerns in respect of the landscape issues relates to the information set out in the Landscape Parament Plan and Design Code. The principle landscape concerns are as follows;
1. Access point to the allocated site through an area of Important Open Space;
  2. Removal of a majority of the hedgerows which undermines the first principle in the Design Code to 'retain and enhance existing green corridors';
  3. Impact on landscape character and recreation value created by the earthworks for the SUDs features set out in design principle 2 in the Design Code 'Create a biodiverse wetland meadow';
  4. Relationship between the apartment blocks, landscape and Bonville Road set out in Principle three of the Design Code 'Set homes within the landscape'
  5. Approach to the setting of housing into the topography and Earthworks proposals related to Section 7 of the Design Codes;
  6. Street Codes Section 6 of Design Codes - Efficient use of land to reduce impacts on landscape character.

#### **4.0 Access point to allocated site through an area of Important Open Space**

- 4.1 There single multi-modal access point into the site is from Broomhill Road. The access road crosses an area of Important Open Space to reach the allocated site boundary. The Important Open space local plan policy , Policy DM17 states;

*'Important Open Spaces: Development on part, or all, of an Important Open Space as designated on the Policies Map will not be permitted unless the development is ancillary to the open space use'.*

Accordingly, the access point through the Important Open Space fails to comply with DM17.

- 4.2 The site allocation extends to edge of Bonville Road and would not require development within an Important Open Space should an access point be delivered from Bonville Road. This option would comply with planning policy.

#### **5.0 Comments on the Masterplan Principle 1. 'retain and enhance existing green corridors'**

- 5.1 The proposals remove 74% of the existing hedgerows and associated trees throughout the site. This approach runs contrary to site allocation development consideration which states;

*'retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey'.*

And Policy DM17 Development Involving Existing Green Infrastructure which states;

*'Proposals which would harm important features such as green hillsides, promontories, ridges, valleys, gorges, areas of substantial tree cover and distinctive manmade landscapes will not be permitted.'*

- 5.2 The fragmentation of three retained green corridors indicated on page 11 of the Design Code and Landscape Parameter Plan within the internal part of the site would undermine these hedgerows as green corridor continuums as the Masterplan Principle propose. These areas of hedgerow are referred to as Brislington Heights, The Gate, Brislington Green on the Landscape Parameter Plan. Parts of these green corridor hedgerow features are so reduced it would no longer be perceived as a hedgerow feature.
- 5.3 Further, these hedgerows are poorly integration into proposed topography, housing layout and movement routes. See comments in section 13,14 and 15.
- 5.4 The regulating plan and landscape parameter plan shows no areas of new hedgerow. It should be understood that retaining the existing hedgerow in the first instance is preferable to planting new hedgerow due to the maturity, biodiversity value and visual prominence of the existing hedgerows. Although no new hedgerows have been proposed as mitigation for the removal of exiting hedgerows.

- 5.5 The loss of such a large percentage of hedgerows which act a key landscape features and green corridor forming a green continuum to adjacent site is negatively impacted by the proposals and detrimental to the landscape character. This is exacerbated due to the poor integration of retained hedgerows into the proposed scheme shown on the Illustrative Masterplan. This approach fails to comply with planning policy DM26 Local Character and Distinctiveness, which states;

*The design of development proposals will be expected to contribute towards local character and distinctiveness by:*

*i. Responding appropriately to and incorporating existing land for as, green infrastructure assets and historic assets and features;*

And DM27 Layout and Form which states under the heading Landscape Design;

*In contributing to green infrastructure, design should incorporate valuable existing natural and manmade landscape features, while reinforcing it with new structural tree planting where appropriate.*

## **6.0 Comments on the Masterplan Principle 2. 'Create a biodiverse wetland meadow'**

- 6.1 The Wetland Meadow along the southern edge of the site proposes two large areas with extensively engineered slopes to deliver a 'Wetland Meadow' that acts as SUDs attenuation basins.

- 6.2 The severe cut and fill to achieve the attenuation basins impacts the landscape character as;

- a) The banking earthworks are adjacent to the Brook and the associated tree belt running the length of the southern boundary. The banking severs this landscape feature physically from the site lacking integration of this feature appropriately into the southern edge landscape strip. This approach is detrimental to this positive landscape feature. Therefore contrary to Policy DM27: Layout and Form which states:

*'Through high quality landscape design, 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 and respond to and reinforce the character of the context within which it is to be set.'*

And DM22 which states;

*'Development which is adjacent to, or contains, waterways will be expected to: Take opportunities to enhance the recreation and leisure role of on-site waterway(s)..''*

- b) The engineered earthwork to create the basins are poorly integrated into the existing landform requiring cut into the slope of 4m raising up to banking up of approximately 2m above existing ground level. This approach creates an unnatural landform that runs contrary to the prevail slope.
- c) The earthworks are poorly integrated into the existing landform. This delivers an engineered character to the basin planted with predominantly neutral grassland. Gentler sloped SUDs features would integrate positively into the landscape allowing additional plant variety, tree planting to visually enhance this area of public realm with increasing multifunctionality and recreational use. The proposed approach is not efficient use of land in accordance with the Section 120 of the NPPF which states decisions should;

*'recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*

- d) The approximately 3m depth of the basin and likely hood the basin being filled with water would create a potential hazard for children as the depth would potentially mean poor visibility/overlooking from the houses.

## **7.0 Comments on the Masterplan Principle 3. 'Set homes within the landscape'**

- 7.1 The masterplan principle 3 'Set homes within the landscape' proposes a landscape edge along Bonville Road connecting an area of Broad leave woodland with an area of mixed scrub altering the 'modified grassland landscape' in between to enhanced woodland.
- 7.2 The proposed tree planting within this landscape edge seeks to replace lost tree planting from within the site. This approach is contrary to conservation hierarchy of retaining existing natural assets in the first instance and fails to retain the existing trees within the site which detrimentally impacts the landscape character of the site.
- 7.3 It is considered that the 'homes within landscape' creates apartment blocks that relate poorly to Bonville Road and proposed road internal to the site. The interface of the apartments and Bonville Road and proposed road structure is ill-defined and incoherent. See further comments in section 14.

## **8.0` Approach to the setting the housing into the topography and Earthworks proposals covered in Chapter 7 of the Design Code**

- 8.1 To accommodate a traditional housing typology with single flat finish floor level the site is proposed to be reprofiling with substantial earthworks as shown in the Isopachytes Plan. Only small areas around retained area of hedgerow remain without reprofiling. This has resulted in an engineered approach to the sloping topography of site with extensive;
  - retaining walls and tanking to the buildings faces;

- earthworks throughout the site fundamentally altering the landform.

8.2 This approach runs contrary to the Bristol context for housing running along the contour. There are numerous examples of the distinctive approach to visually prominent steep sites both historically and recent, with a saw tooth profile following the topography retaining the existing landform designing out the need for retaining walls as much as possible. The most recent examples are the Kingswear and Bridge View schemes. These housing schemes on steep sloped sites have understood the Bristol context delivering housing types with a split-level housing typology with a visually distinctive repetitive rhythm of terrace house that reflect the historical context substantially reducing the need for retaining walls.

8.3 Accordingly, the overly engineered approach required to accommodate a standard housing typology delivering extensive retaining walls with cut and fill impacts;

- the character of the site defined by the topography;
- the existing landscape structure of hedgerows and trees requiring removal of the majority of these elements;
- the usability the garden areas with:
  - Increased overshadowing;
  - Privacy issues for the garden and internally to the houses from the houses on the upper levels looking down on the lower level housing;
  - Reduced sunlight penetration;
  - Reduced usability of gardens due to the gradients;
  - Overbearingly large retaining wall and fence in the worse cases.

8.4 It should be noted that the Novers Hill development raised similar concerns from Design West and well as Bristol City Council.

## **9.0 Street Codes Section 6 of Design Codes - Efficient use of land to reduce impacts on landscape character**

9.1 The Design Codes shows a streetscape with predominately on-plot car parking for the housing and perpendicular parking dominating housing frontages.

9.2 On-street parking is preferred as it plays an important role in activating the street and;

- is an efficient use of land.
- requires less earthwork to achieve correct levels;
- establishing a prominent building front not dominated with car parking;
- allows for street tree planting and greening of front gardens;
- reduces speeds in the road;
- creates a safe area between the parking space and house without driveway crossovers over the footway;

- Creates a single level footway without needing lower kerbs that create an undulating footway creating issues for wheelchair users.

9.3 The approach to car parking with increase car parking on-street would increase efficient use of land in line with Section 11 of the NPPF. Car parking on street is more land efficient and would require less land to be developed leave more land as green infrastructure. Accordingly this approach is more appropriate to this site.

## **10. Landscape comments on the character areas outlined in the Design Code.**

10.1 The next sections of the report relate to the design intension of the Design Code set out for each landscape character area.

## **11. Assessment of Landscape Proposals appropriateness**

11.1 The landscape proposals have been described as character areas, including, Wetland Meadow, The Gate, Brislington Green, Brislington Heights Pocket Park, The Greenway, Woodland and Bonville Glade. Below are comments on each of the character areas.

## **12. Wetland Meadows - Southern edge landscape strip see comment on 'Wetland Meadow principle'**

## **13. The Gate - Retained Central hedgerow and northern boundary hedgerows**

13.1 The Isopachytes plan within The Gate landscape character area shows it is likely that more of the centrally retained hedgerow/trees running north/south will require removal than currently shown due to the proximity of the earthworks and impact on the root protection zones.

13.2 The Gate landscape character edged with house side elevations with central raised walkway providing limited space for play and a poor relationship between the footpath and small areas of play. The lack of visual permeability from the houses, topography and limited space for play makes this area inappropriate as a LAP (a local area of play for very young children).

13.3 Concern is raised that this area would attract anti-social behaviour as it is poorly overlooked with an indistinct amenity function beyond the visual of the retained central hedgerow.

## **14. The Greenway, Woodland and Bonville Glade**

14.1 The Bonville Glade and Woodland is a stripe of broadly retained areas of existing landscape planting. The proposals fail to define the amenity value of this area and lacks road edge tree planting definition. It is considered the side elevations of the flats edging the Bonville Glade fail to comply with secure by design principles with

poor overlooking. The proposals need to demonstrate that this ecological strip and associated animal species are robust to likely human activity from the residents of the flats, especially as these residents have not been provided with garden space.

- 14.2 The Greenway is accommodated within an Important Open space see Section 4 for comments. Further to this key concern the proposals needs to ensure both street trees and utilities can be accommodated within the space without impacting the ecology and how a footpath/cycleway will be integrated into the proposals.

## **15. Brislington Heights and Brislington Green**

- 15.1 The Brislington Green is a small area of green surrounded by houses with centrally retained trees/hedgerow.
- 15.2 It is unclear if the retained planting within Brislington Green would be appropriate to this more formal area of space surrounded by housing and how this is compatible with this area as a play space. The central planting would potentially limit visual permeability of the space and therefore contrary to secure by design principles.
- 15.3 The steep topography of the Brislington Heights space will limit the amenity use of this area, particularly as play space. Concern is raised that this area would attract anti-social behaviour as it is poorly overlooked with an indistinct amenity function beyond the visual amenity of the retained trees. It should be shown that the area would comply with the design requirements for a LEAP.
- 15.4 The 'Homes within the landscape' masterplan principles locates the largest apartment edging this area of landscape along Bonville Road. This area of landscape lacks a distinct definition that relates to the road edge and delivers taller buildings more visually prominent on the higher part of the site.
- 15.5 It should be noted that the site has delivered no areas suitable for children to play ball games on a flat area.

## **16.0 Back Gardens**

- 16.1 The back gardens have been proposed as part of the ecology network throughout the site. This cannot be considered as providing a green corridor with native garden trees species as there is no control on how these areas will be managed. Some residents will choose to remove trees and pave over gardens which will undermine the ecological value and fail to provide the continuum of a green corridor.

## **17. Streetscape**

- 17.1 The streets proposed inadequate numbers of street trees for some streets to provide sufficient tree canopy to ensure urban heat resilience.



## **18. Landscape summary**

- 18.1 While it is acknowledged that the site is allocated for development, in light of the Climate and Ecological Emergencies declared by the city in 2022 and progress towards the national environmental goals. A high level of consideration needs to be given the natural assets on site and the SNCI status to ensure the proposals contribute to the sense of place. Although this application is an outline application seeking approval of the access only, information needs to be provided at this stage that gives confidence that a high degree of consideration has been given to the landscape character, natural assets and SNCI status of the site.
- 18.2 The information within the Landscape Parameter Plan and Design Codes should deliver proposals recognising the landscape sensitivity of the site due to the SNCI and Important Open space designation with 'Ancient Hedgerows'. A 'landscape lead approach' is necessary for this sensitive landscape to retain the key landscape features expected in accordance with the Design Considerations of the Site Allocation. However, the proposals seek to remove most of the hedgerows and build road infrastructure within an Important Open space. This approach is contrary to policy and the design considerations of the site allocation failing to deliver the landscape led approach set out in the Design Code vision.
- 18.3 Three of the four Masterplan Principles are detrimental the landscape character with the proposed SUDs and apartments poorly integrated into the existing landscape.
- 18.3 Further, although the planning submission is outline, the information submitted for approval provides insufficient confidence that the design intent set out in Section 5 of the Design Code – 'Space codes' will be achievable and raises related landscape concerns.
- 18.4 The proposals fail to employ an appropriate housing typology and layout that is land efficient and minimizes earthworks reducing the need for the engineered approach of retaining walls that fundamentally changes the landform and landscape character of Brislington Meadows.
- 18.5 The current landscape proposals rely heavy on areas of existing landscape infrastructure to provide amenity space without providing information that shows that these areas of ecology would be robust to these dual uses of ecology and amenity.
- 18.6 For the reasons set out above, an objection is recommended related to the landscape issues.