

Land at Broom Hill / Brislington Meadows,  
Broomhill Road, Brislington, Bristol

# Proof of Evidence Urban Design

PINS REF: APP/Z0116/W/21/3308537

1-10-2023  
Nitin Bhasin  
Bristol City Council  
Planning Ref: 22/01878/P

## Table of Contents

1.	Introduction .....	2
2.	Scope of evidence .....	3
3.	The site and policy considerations .....	5
4.	Appeal Proposal and Urban Design Considerations .....	5
5.	Policy References .....	6
6.	Excessive disruption to the existing trees and hedges.....	9
7.	Design arrangements and principles established in the Parameter Plans and Design Codes .....	15
8.	Height Parameter Plan.....	21
9.	Observations on the landscape and bio-diversity corridors .....	24
10.	Summary and conclusion .....	25

## 1. Introduction

- 1.1. My name is Nitin Bhasin. I am Principal Urban Designer at Bristol City Council.
- 1.2. I hold a Bachelor of Architecture Degree from Sir JJ College of Architecture and Master of Arts in Urban Design from Cardiff University.
- 1.3. I have over 20 years' professional experience, which includes working as a Project Architect and Urban Designer for private architectural practice; as an Urban Designer in Urban Regeneration Company to develop and deliver regeneration projects; and in Local Planning Authorities on policy formation and assessment of development proposals.
- 1.4. I have provided evidence and been an expert witness at planning appeals and public inquiries. The most recent experience was as an expert witness for refusal of development for 146 residential units on 493-499 Bath Road (APP/Z0116/W/21/3283037), Brislington, Bristol at an informal hearing. The Council successfully defended reasons for refusal which included adverse impact of the proposed development on the character and appearance of the surrounding area and poor living conditions of the future residents.
- 1.5. I confirm that the facts stated in my evidence are within my own knowledge, I have made clear what they are, and I believe them to be true. The opinions I have expressed represent my true and complete professional opinion.

## 2. Scope of evidence

- 2.1. This proof of evidence focuses on 4<sup>th</sup> deemed reason for refusal, which states

*The proposed development fails to adhere to the landscape and urban design policy considerations by virtue of excessive damage to the existing features on the site. The proposed plans and supporting documents present unsympathetic responses to the natural assets on the site and surrounding context and would prejudice the future design and delivery of an appropriate scheme. The proposal will fail to meet the requirements of the NPPF; policy BCS21 of the Core Strategy 2011; and policies SA1, DM26, DM27, DM28 and BSA1201 of the Site Allocations and Development Management Policies 2014.*

- 2.2. I am familiar with the site and its surrounding area, and I have studied the relevant National and Local Plan policy background. I have considered the following documents for this evidence.

- CD1.2 - Land Use Parameter Plan
- CD1.3 - Height Parameter Plan
- CD1.4 - Access and Movement Parameter Plan
- CD1.5 - Landscape Parameter Plan
- CD1.10 - Illustrative Masterplan
- CD1.13 - Design and Access Statement
- CD1.14 - Design Code
- CD1.19 - Arboricultural Impact Assessment
- CD2.3 - Applicant's response to initial urban design comments received from the Council's City Design Group
- CD2.3a - Site sections
- CD2.3b - Isopachtyes Plan Formation Against Topsoil Strip Tree Survey Overlay

- CD2.3c - Drawing 3: Tree Conflict Plan
- CD2.6b - Indicative Contour and Retaining Wall Plan
- CD2.7 - Applicant's response to the statutory consultation comments the Council's Landscape Team
- CD5.1 - NPPF
- CD5.2 - Site Allocations and Development Management Policies
- CD5.3 - Site Allocations and Development Management Policies – Annex: Site Allocations Information – Site Ref. BSA 1201 extract
- CD5.4 – Policies Map
- CD5.5 – Core Strategy
- CD5.6 - Bristol Urban Living SPD
- CD7.1 - BCC Pre-Application Response
- CD7.2 - Design West Response
- CD8.3 - Sustainability Appraisal Main Report - Site Allocations and Development Management Policies
- CD9.1 - Brislington Meadows Appellants Statement of Case
- CD9.2 - Appendix A – Site Boundary and BCC Policies Map overlay
- CD10.1 - LPA Statement of Case
- National Model Design Code

2.3. My evidence is confined to urban design considerations. Expert evidence in domains of Arboriculture, Ecology and Landscape will be covered by expert witnesses in the specific domains.

2.4. Some overlap with evidence provided by landscape officer is unavoidable, however the overlap has been minimised to present complementary set of considerations from respective points of view.

2.5. It is to be noted that this evidence focuses on specific aspects of the proposal in limited details and has assessed matters in

accordance with the nature of the outline application and the scope of the appeal.

### 3. The site and policy considerations

- 3.1. Brislington Meadows comprises of sloping landform with a collection of small fields enclosed by mature hedgerows, areas of trees and vegetation and high voltage overhead electric cables with pylons along the lower southern boundary of the site. It is surrounded by suburban housing to the north, suburban housing and allotments to the west, light industrial/warehouse uses to east and Victory Park to the south.
- 3.2. The site is an undeveloped parcel of land in a suburban location. The site is allocated for development under the site allocation policy (CD5.3) BSA1201. I rely upon the evidence from Mr Collins in relation to planning policy considerations for the appeal.

### 4. Appeal Proposal and Urban Design Considerations

- 4.1. The site benefits from an allocation for housing and its development is supported in principle. However, it is important to satisfactorily address the considerations set out in the site allocation policy as well as the national and local planning policies while designing and assessing the proposal.
- 4.2. The application seeks outline planning consent with only access to be determined. And, the application seeks approval for Design Codes (CD1.14) and 4 parameter plans [Land Use (CD1.2), Height (CD1.3), Access and Movement (CD1.4), and Landscape (CD1.5)]. The supporting documents provide evidence base for the proposal

and/or illustrate the foreseeable design resolution that may emerge at subsequent stages.

- 4.3. The documents put forward for approval, establish important design arrangements and principles which in my view do not conform with relevant national and local plan policies.
- 4.4. The design arrangements and principles that are established in the documents put forward for approval will govern future assessment and negotiations at detailed design stages. The Council will be obliged to honour the parameters established in the approved documents. It is therefore necessary to address the concerns emerging from the documents that are listed for approval at the outline planning stage.
- 4.5. The key Urban design related issues with the current appeal are;
  - Excessive disruption to the existing trees and hedges
  - Design arrangements and principles established in the parameter plans and design codes
  - Height parameters plan and its impact on the surrounding area
- 4.6. The details of the considerations, policy references and recommendations are explained further in sections 6 to 8.

## 5. Policy References

- 5.1. While assessing the site for allocation in the current Local Plan, sections 4.88.8, 4.88.9, 4.88.10, 4.91.4, 4.91.5 and 4.91.6 of the Sustainability Appraisal supporting the Site Allocations and Development Management Policies (CD8.3) highlights the sensitivity of the site. The assessment acknowledged the risks relating to Local Ecology; Conservation and Wise Use of Land; and Green infrastructure which resulted in specific Development

considerations listed in the allocation policy BSA1201 of the Site Allocations Policy (CD5.3).

- 5.2. I refer to the evidence from Mr Collins to expand on the details of (CD8.3) the Sustainability Appraisal.
- 5.3. The site allocation policy (CD5.3) BSA1201 seeks to *"retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey"*, as part of the development considerations.
- 5.4. The site allocation policy (CD5.3) BSA1201 also noted the site to be of *"city-wide importance for nature conservation due to the presence and condition of particular species, habitats and / or features"*. The policy calls for the development *"to be informed by an ecological survey of the site."*
- 5.5. I refer to and rely upon the evidence from Mr Forbes-Laird and Mr Higgins relating to trees and ecology and the respective considerations.
- 5.6. Further, the policy also highlights the need for *"a comprehensive masterplan of the whole site, guided by community involvement."*
- 5.7. Site Allocations and Development Management Policies document of the Local Plan (CD5.2) sets out overarching policies for design and development in Bristol.

The design policy DM26: Local Character and Distinctiveness states *"design of development proposals will be expected to contribute towards local character and distinctiveness by:*

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



*The policy further states "development will not be permitted where it would be harmful to local character and distinctiveness or where it would fail to take the opportunities available to improve the character and quality of the area and the way it functions".*

5.8. The design policy DM27 expands further by stating *"Development will be expected to:*

- *Incorporate existing and new green infrastructure to reinforce the character of streets and spaces.*

*The policy further states under the Landscape Design section, "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."*

5.9. Policy DM28 states,

*iii. Provide an appropriate relationship with the building edge and a suitable transition between clearly defined public and private spaces;*

5.10. The detailed policies are consistent with the higher level policies like BCS9, BCS21 and NPPF paras 8c, 130, 131, 134, 174 and 180.

5.11. Paras 126 and 127 of NPPF emphasise the importance of setting out a clear vision and expectations from development which has been set out in the adopted local plan and as highlighted in the above noted policy references.

## 6. Excessive disruption to the existing trees and hedges

- 6.1. The pre-application feedback (CD7.1) highlighted the policies noted above, emphasised the need for ecology and trees surveys to be prioritised, and early engagement with Arboriculture and Ecology officers to clarify baseline position on existing features on the site in order to inform the design of the proposal. The response also highlighted the need to redesign the layout to retain and incorporate the identified features in the proposed scheme.
- 6.2. Section-3 (pg.42-71) of the Design and Access Statement (CD1.13) shows noteworthy features of the site. The findings of the section are summarised in two Opportunities and Constraints maps which forms the basis for designing the proposal. Pg.42 of the document confirms the same (standard urban design process) by stating "*The chapter follows with a detailed analysis of the site itself by explaining its topographical, ecological and landscape features and the opportunities and constraints are summarised. This thorough analysis and understanding of the site and its context ensures the proposals are informed and shaped by the existing characteristics.*"
- 6.3. Section 3.6 (pg.61-62) Arboriculture Survey identifies 7 trees, 2 groups, 1 woodland and 1 Veteran Tree to be present on the site. The information is inaccurate as over 12 more Veteran Trees have been found on site. In addition, the section does not note the presence of important hedgerows on site. I refer to the evidence from Mr Forbes-Laird and note that additional veteran trees and important hedgerows have been identified on the site. These need to be retained and incorporated in the design of the proposal.
- 6.4. The findings of the site assessment summarised in Sections 3.12 and 3.13 (pg.68-71) of the Design and Access Statement (CD1.13)

as Opportunities and Constraints considerations and maps does not cover the important hedgerows and underreports the trees covered by veteran tree status. The exercise not only fails to deliver the objective of *thorough analysis and understanding of the site and its context* but also establishes an inaccurate baseline position of the *existing characteristics to inform and shape* the design of the proposal.

- 6.5. Applicant's response to the statutory consultation comments (CD2.7) confirm that 74% of hedgerows will be removed by the proposal. Removal of large proportion of important hedgerow, along with veteran trees is not compliant with the design policy considerations noted above and detrimental to the character of the area.
- 6.6. In view of above explained considerations, the proposal is deemed to be not compliant with policy DM26 noted in Section-5 above.
- 6.7. Section 3.4 (pg.54-57) of the Design and Access Statement (CD1.13) assesses the retention and incorporations of existing trees and hedgerows along the perimeter of the site from design perspective and establishes intended design arrangements.
- 6.8. A completely different methodology is employed for hedges within the site. No assessment for retention and incorporation of the important hedges and veteran trees from design perspective has been shown.
- 6.9. The inconsistency in design methodology is not convincing especially considering the hedges within the site are relatively more significant owing to larger widths, undisturbed settings and most importantly presence of veteran trees.

6.10. My independent assessment of the site shows that width in excess of 50 meters is available between the overgrown hedges in most instances. The distance is likely to increase by several meters once the overgrowth has been cleared.



Diagram showing the distance between hedges on OS imagery

6.11. Extract from the National Model Design Code (NMDC) included below shows that parameter block is deliverable in such instances.

**34. Types of Block:** There are a wide variety of perimeter block forms that can accommodate housing and other uses:



**1. Perimeter block:** A strip of development around a private courtyard/gardens. The private interior is not accessible to people from outside the scheme. It includes private and communal gardens and car parking.



**2. Informal block:** Blocks like this can be found in many modern housing schemes. The housing faces outwards onto the surrounding streets with front and back gardens. The extra width allows a parking court to be included alongside houses and garage blocks within the courtyard to provide natural surveillance.



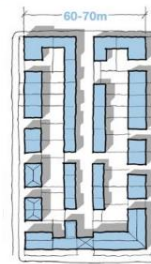
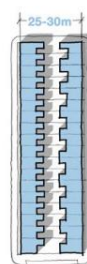
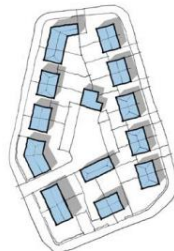
**3. Terrace:** The most common form is the typical English terrace which may include a rear alleyway. Codes for area types that include existing terraced housing need to consider reductions in back-to-back distances, compared to common practice so that new development relates to the context.



**4. Mews block:** Mews streets run through blocks, originally accommodating stable blocks to the rear of large houses. Now they have generally been converted to separate homes and workspaces. Modern versions of mews blocks include smaller single aspect homes above garages within the block.



**5. Courtyard block:** Sometimes buildings join to each other (party wall) not just on either side but also to the rear. This is a characteristic form of many historic cities (like York on the previous page). There are also modern versions of this type of block with deep housing types with an internal courtyard.



Pg. 34 from National Model Design Code – Guidance Notes  
showing block depths

6.12. It is noted the block in the NMDC extract does not include dimension for external roads, but this can be accommodated while designing the proposal.

Section-6 of the Design Code (CD1.14) show 5.5m wide carriageway and 2m wide footpath for access and movement which reflects standard practice. As per the dimensions, standard arrangement of carriageway with footpath on both sides will be 9.5m. For single aspect roads, it is possible to design the footpath on the side with housing while maintaining soft verge on the opposing inactive edge, which will reduce the width of street to 7.5m. Addition of 2m wide parallel parking/landscape strip alongside the standard road will result in width of 11.5m.

To summarise, the above exercise illustrates the street width that will be needed to serve the blocks to be between 7.5m to 11.5m wide.

- 6.13. Areas with tighter separation distances between the hedges which are unable to accommodate model parameter blocks can consider Terrace or Mews blocks, these can be designed with tighter block dimensions and street widths.
- 6.14. If the suggested approach is adopted, the retained hedgerows can form the setting for the blocks, providing enclosure and context for designing the character areas. The retained hedges will also reduce the visual impact of the proposal by registering their presence between the layers of development blocks on rising topography.
- 6.15. It is acknowledged the design approach outlined above is by no means fully formed or resolved. It is acknowledged that confirmation of multiple factors e.g. confirming the distances between the hedges after clearance, development of character areas, street typologies, house design etc. need to be undertaken before the design can be confirmed.
- 6.16. The exercise is a proof of concept to demonstrate that the trees and hedges can be retained and incorporated in the development proposal. And the blocks can be developed to be in compliance with the adopted policy and its objectives and achieve a policy compliant design proposal of parameter blocks presenting active frontages to the sites assets and public realm.
- 6.17. Such approach will minimise removal of hedges and trees in areas where roads and infrastructure connections are needed. The resultant loss of hedges and trees will be significantly smaller than the appeal scheme.

- 6.18. In view of above explained rational, the proposal is deemed to be non-compliance with policy DM27 noted in para 5.8 above.
- 6.19. It is acknowledged that the housing numbers may be different than the policy estimate or the current proposal, but the context (site conditions and settings) should determine the design of the proposal rather than a number led approach. This is particularly important for this site to address the deliberations in the Sustainability Appraisal of the Local Plan noted above and the resulting Development Considerations noted in the site allocation policy BSA1201 (CD5.3).
- 6.20. The estimated number of 300 units in the allocation was based on a high level desk top assessment which was not informed by detailed site assessments. It does not assess form, location and extent of development, these considerations are not priced into allocation. The allocation relies on further assessment and engagement through development management process to balance these aspects.
- 6.21. The appeal scheme itself is for fewer number of units (up to 260). This illustrates flexibility needs to be afforded to the housing numbers.
- 6.22. It is not possible to estimate the exact number of units that can be delivered at current stage. Design process which places the retention and incorporation of existing trees and hedges need to be undertaken to develop a policy compliant design solution. The appropriate quantum of housing will emerge from the exercise.



6.23. NPPF para 130c, 131 and policies DM 26 and 27 of the Local Plan noted above call for sensitive design response to the landscape settings and features. The applicant's assessment does not accurately document the important hedgerows and veteran trees on site. And design led consideration for incorporation of the existing trees and hedgerows in the design is missing.

6.24. The application is considered contrary to policies NPPF para 130c, 134, BCS21, DM26, DM27 and BSA1201 as identified in the Section-5.

## 7. Design arrangements and principles established in the Parameter Plans and Design Codes

7.1. As noted above the Parameter Plans seek to set the Access and Movement, Landscape, Heights and Land Use for the proposed development, and the Design Codes set out arrangements and principles for designing spaces, streets, levels, parking, public realm details and on-plot details. Collectively the documents that are put forward for approval will establish many key aspects of design.

7.2. If the current appeal is allowed, the arrangement and principles established in the approved documents will be formalised and gain relevance for future planning considerations. The council will not be able to seek changes to the arrangements and principles established in the approved documents.

7.3. The Council's assessment of the detailed design at subsequent stages will be governed by the approved documents. Subsequent design stages will be expected to show compliance with the



approved documents thereby having reduced scope and flexibility for making material changes at later design stages.

7.4. It is therefore necessary to assess the design arrangements and principles set out in the parameter plans and the design code at this stage and test its compliance with the planning policy and site conditions.

7.5. Considering the above the parameter plans and the design codes give rise to the following issues;

7.6. Policy DM27 seeks blocks and plots that;

*ii. Create distinct public fronts and private backs with clear and obvious ownership and responsibility for external spaces provided; and*

*iii. Enable active frontages to the public realm and natural surveillance over all publicly accessible spaces;*

7.7. The Access and Movement parameter plan (CD1.4) allow width for only a single row of houses along the southern/lower edge of development. The Illustrative masterplan (CD1.10) confirms the same. The row of houses will address public road to its north and public green space to the south. The houses will face public realm on its front as well as the back where the residents should legitimately expect privacy and inactive defensive space. The arrangement does not comply with the policy cited above.

7.8. The 4 storey high apartment blocks towards the eastern edge of the site appear as isolated islands surrounded by public realm on all sides. The blocks are randomly placed in the landscape and perched on engineered platforms with significant level changes.

7.9. Policy DM26 seeks proposals to:

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

- 7.10. The Access and Movement Parameter Plan (CD1.4) shows the streets and development area of the proposal are orthogonally arranged which in places sit awkwardly against the existing landform. Whereas more flexible block arrangement which offer better relation to the existing features like contours, hedgerows and trees is required as per the policy
- 7.11. The Design Code (CD1.14) formalise the relation between the buildings and landscape which will further establish the arrangement and curtail Council's ability to seek meaningful changes at subsequent stage.
- 7.12. The Illustrative Masterplan (CD1.10) provide greater clarity on the proposed arrangement.
- 7.13. For example, the N-W corner of the site can be arranged with better alignment with the site boundaries and topography. The parameter plans establish the angled alignment of the street and block creating leftover space. And the design codes establish the principle for designing the incidental left over space created by the unresolved arrangement.
- 7.14. The parameter plan and the design code establish the formal orthogonal arrangement for the lower/southern edge of the site. This is most evident in the block of single houses facing Meadows to the east of the existing allotments. The straight building line along with repetitive massing and architecture present an abrupt and contrasting interface with the meadow landscape to the south. The contrast will be further accentuated by the level difference between the meadow and the development block as well as lack of

trees in the meadow character area. The resultant impact of the proposed development with the prominent landscape space on the lower/southern edge of the site will be abrupt and stark. The edge can benefit from more organic and softer interface with the landscape space.

- 7.15. Section 7 of the Design Code establish the principle for accommodating level changes in landscape areas throughout the scheme. This is further confirmed by the Proposed Contours & Retaining Walls Plan (CD2.6b) which illustrated the extent of level changes that will be engineered as a result of the approach. The proposal presents high volume of cut and fill causing significant changes to the landform.

The above cited design approach and principles are contrary to DM26 which seeks development to *respond appropriately to and incorporating existing land forms*.

And policy DM28 which states

*iii. Provide an appropriate relationship with the building edge and a suitable transition between clearly defined public and private spaces;*

- 7.16. The issues arising from the orthogonal layout noted above will further exacerbate by steep level that emerge from the principles established Section-7 of the design code and best presented in Proposed Contours & Retaining Walls Plan (CD2.6b). Some examples of the changes are;

- 7.17. Significant cut and fill proposed along the lower/southern edge of the proposed development addressing the wetland meadow. The resultant steep embankments and retaining walls places house on top of tightly packed contours with 3.5 meters level difference.
- 7.18. Flood attenuation ponds immediately to the south of development requires significant excavation in area set out as biodiverse wetland meadow will further add to the perceived height difference between the landscape and the development block.
- 7.19. The resultant arrangement will present development which is elevated about 10 meters (equivalent to 3.5 residential floors) above the adjacent areas that is retained as natural landscape for public use and enjoyment.
- 7.20. The Height Parameter Plan shows building height of 3 storeys along the frontage. The arrangement will result in combined height of 6.5 storeys when viewed from landscape meadows to the south.
- 7.21. The design code establishes principle of meadow planting which is low level in scale for the Meadow character area, thereby offering limited scope for use of soft landscaping to soften the interface.
- 7.22. Groundworks proposed around the 4 storey high apartment blocks along the eastern edge of development creates series of engineered platforms on rising topography. The platform presents a height difference of 2.3 meters (ceiling height of an average house) between the base of the block and the public realm.
- 7.23. The arrangement results in combined height of the platform and building to be 5 storeys at certain points in the vicinity of the blocks.

- 7.24. Fill proposed in NW corner of the site addressing the allotments to its south adds 2.5 meters on top of already elevated position over a steeply rising topography.
- 7.25. The proposal further places 2.5 storey high residential units on top of the raised fill. The resultant combined height of the topography and building will be 3.5 storeys high.
- 7.26. Expert statements from Mr Forbes-Laird on arboriculture and Ms. Whatmore on Landscape have highlighted concerns about the development/groundworks and its impact on the vegetation and ecological habitats.
- 7.27. Redesigning 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 contrary to DM26 which seeks development to respond appropriately to existing landform. Split level house types should be considered in areas with steeper contours to reduce the pressure on outdoors/landscape areas.
- 7.28. The detailed plans and design arrangements submitted to support the current application satisfactorily addressed the criteria set out in the parameter plans and the design codes. In effect the Council will find itself committed to the design and unable to refuse or seek

meaningful changes on the issues highlighted above at subsequent stages.

7.29. The issues therefore are highlighted for policy non-compliance and reason for refusal at this stage.

## 8. Height Parameter Plan

8.1. Local Plan policy DM26 states *"the design of development proposals will be expected to contribute towards local character and distinctiveness by:*

- *iv. Retaining, enhancing and creating important views into, out of and through the site; and*
- *vi. 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;"*

The policy further states *"development will not be permitted where it would be harmful to local character and distinctiveness or where it would fail to take the opportunities available to improve the character and quality of the area and the way it functions."*

8.2. Local Plan policy 27 states *"height, scale and massing of development should be appropriate to the immediate context, site constraints, character of adjoining streets and spaces, the setting, public function and/or importance of the proposed development and the location within the townscape."*

8.3. The Height Parameter Plan (CD1.3) seeks to establish the scale of the proposal. The Design Code (CD1.14) sets out principles for designing the blocks of the defined scale.

8.4. The pre-app engagement had highlighted concerns about appropriateness of the proposed height, scale and massing and the

potential visual impact from the development in the suburban context. The 4 storey high apartment blocks were of particular concern due to the larger footprints resulting in accentuation of the scale and massing to the proposed height.

- 8.5. The engagement led to a discussion about TVIA and viewpoints were subsequently agreed. The email exchange has been documented in the Appendix 7 of TVIA Assessment (CD1.20) of the appeal scheme.
- 8.6. Most of photomontages for TVIA agreed with the applicants upon special request have not been provided. Out of the 16 views that were identified only 2 have been developed into photomontages. No photomontages showing the impact of the 4 storey high apartment blocks have been presented. The partial evidence makes it difficult to assess the impact of the proposal.
- 8.7. The 2 photomontages that has been provided illustrate the dominance of the buildings on top of steeply rising topography which is exacerbated by the proposed cut and fill and lack of trees along exposed frontages. The regimented 3 storey high gable end houses present an abrupt response to the suburban informal and verdant setting.
- 8.8. As noted in Section-7 above the design code sets principles for managing the level difference in the landscape and delivery of house types at single level. The parameter plans and supporting documents also support the same. The Indicative Contour and Retaining Wall Plan (2.6b) is most effective in showing the expected changes of level.

- 8.9. Further, Section 10.7 of the Landscape evidence by Ms. Whatmore cites the substantial surplus soil from cut-and-fill exercise which needs to be managed. Some of the surplus soil may need to be managed on the site to reduce disposal costs.
- 8.10. Section-7 above highlights examples of the level changes and the combined height of the level changes in the foreground with the building placed on top. The combined building height resulting from combination of the earthworks and the buildings is significantly taller than the indicated height of the blocks by themselves.
- 8.11. While examples of houses on steep hill/escarpment can be found in Bristol, examples of accommodating the changes within the buildings envelop are often used in the city as well. Accommodating the changes within the building allows for better integration of the development with landscape settings and reduces the visual impact.
- 8.12. Suburban context of the site addressing Victory Park to its south and gradually sloping topography (no escarpments) requires a calmer and less intensive response than currently proposed.
- 8.13. Observers will experience the views in a suburban context and will be in a higher state of sensitivity against dramatic changes especially while enjoying mature landscape settings of parkland to the south.
- 8.14. The proposed arrangement established in the Parameter Plans and the design codes are not in keeping with policy and context considerations explained above. The Height Parameter plan cannot be supported as it is contrary to policies NPPF para 130c, 134, BCS21, DM26 and DM27.



## 9. Observations on the landscape and bio-diversity corridors

- 9.1. Evidence presented in this section is not promoted as reason for refusal from design point of view. However, the points are noted to present design commentary and context for the evidence presented by other expert witnesses.
- 9.2. Section 7.2 of the Design and Access Statement shows ecological corridors.
- 9.3. The design considerations from the development as well as service and amenity of the residents will take precedence in areas that is immediately surrounding the development blocks and within private ownership. The biodiversity benefits offered by such areas will be of secondary priority and offer limited ecological value.
- 9.4. The landscape planting in the curtilage of the properties, i.e. front, side and rear gardens will be managed and maintained by for benefit of the residents. Usually, the residents manage the private space as per their own interest and the ecological/bio-diversity benefits cannot be assured.
- 9.5. The areas under management company that are adjacent to the development blocks, access routes, parking and services will be designed with human considerations as the primary drivers for its design and management. The areas can offer some benefit as bio-diversity habitats but these will be of secondary priority and of a limited value.
- 9.6. As an example, the ecology led rational for Bonville Glade offers limited scope for bio-diversity led design. The enabling ground

works for the 4 storey high apartment blocks, parking and services will fundamentally alter the space between and areas that are immediately adjacent to the blocks.

- 9.7. Design of the replacement landscape between and immediately adjacent to the buildings will be driven by level changes, access, amenity and service considerations while ecological value will be of secondary importance and offer a limited benefit.
- 9.8. The arrangement will allow for a limited width of landscaped area between the blocks and Bonville Road where biodiversity and ecological considerations can be prioritised. However, these will also face pressure from outlook, access and amenity provision for the residents of the blocks and the users of the path running through the space. Overall, the ecological value from the corridor will be limited by such factors.

## 10. Summary and conclusion

- 10.1. The application seeks outline consent for access to be determined along with approval of Design Codes and 4 Parameter Plans (Access and Movement, Land-Use, Landscape and Height). The supporting documents present the evidence base for the proposal or illustrate the foreseeable design resolution that can be expected at subsequent stages.
- 10.2. The proposal causes excessive disruption to the existing trees and hedges, which is contrary to the policies in NPPF, BCS21, DM26, DM27 and site allocation policy BSA1201
- 10.3. The documents put forward for approval set out principles and intended design arrangements which do not conform with policies set out in NPPF, BCS21, DM26, DM27 and DM28. The documents

will gain precedence and establish design arrangement and principles for design and development of subsequent stages.

- 10.4. Reservations regarding the height, scale and massing of the proposal are partially confirmed by the available evidence. The council maintains its reservations about the proposed height, scale and massing which cannot be supported with current evidence. The proposal is deemed contrary to policies set out in NPPF, BCS21, DM26 and DM27.
- 10.5. The application cannot be supported from urban design perspective due to the issues explained above.