

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

Rebuttal to Evidence by Mr. Crawford – Urban Design

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

1-20-2023
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Bristol City Council
Planning Ref: 22/01878/P

1. Introduction

- 1.1 This rebuttal responds to some of the points raised in the evidence presented by Mr. Charles Crawford from urban design perspective.
- 1.2 At the outset, it is clarified that this rebuttal is not exhaustive. It deals with certain points where it is considered appropriate and helpful to respond in writing at this stage. The points that have not been covered in this rebuttal should not be taken as accepted, these may be addressed further at the Public Inquiry as needed.

2. Site and Design considerations

- 2.1 Mr. Crawford's evidence lays emphasis on estimated number of 300 dwellings in BSA1201.
- 2.2 I refer you to evidence from Mr. Collins to clarify the high-level assessment that informed the estimated housing number and associated considerations which informed the site allocation policy BSA1201.
- 2.3 Apart from estimate of 300 units, Mr. Crawford's evidence does not address in any detail the other Development Considerations listed in the allocation policy BSA1201.
- 2.4 The Development Considerations have been specially drafted for the allocation site and establishes the site-specific priorities which should form the basis for design and development on the allocated site.
- 2.5 The Development Considerations in the allocation policy BSA1201 include;
The 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);*
- *retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey;*

2.6 However, Mr. Crawford's evidence focuses on the design teams deliberations and exploration of options based on the applicant's site assessment and estimate of 300 units.

2.7 Appendix 2 of the evidence documents the iterative design process and considerations which led to the current scheme. And in section 7.1.6 concludes "*that the approach taken in the Outline application is appropriate. Given the steeply sloping topography and the strong network of hedgerows with associated trees, it is not possible to deliver the allocated development without significant change to the existing natural features of the Appeal Site, and to the character of the site.*"

2.8 The application poses loss of 74% of important hedgerows which includes several veteran trees along with significant reprofiling of the topography as changes to existing natural features that are necessary for development.

2.9 I do not agree with Mr. Crawford's conclusion and highlight the important hedgerows and veteran trees need to be prioritised for retention and incorporation into the proposal as per the policy.

- 2.10 The applicants adopt a quantum and design led approach to designing the site instead of a context led approach that is required as per the policy and site conditions.
- 2.11 The allocation policy lays clear expectations for retention of the important trees and hedgerows which should underpin development of the site. The retention of the features should form the basis for context led design and development of the site.
- 2.12 A scheme for a reasonable quantum of housing can be developed on the site with retention and incorporation of the important hedges and trees as per the policy requirements.
- 2.13 In terms of possible design arrangements, my evidence already cites development blocks from National Model Design Code which can be accommodated in the fields while retaining the hedgerows. The options dated Nov'2020 and Dec'2020 in Appendix 2 of Mr. Crawford's evidence also shows urban blocks accommodated within partially retained hedges.
- 2.14 Further, bespoke design solutions can be developed as per the site requirements if needed. Examples included in the Appendix of Ms. Whatmore's evidence shows instances of bespoke design arrangement that have been delivered.
- 2.15 I agree that houses facing hedgerows will need to maintain some parity in levels with existing ground levels near the hedgerows and minimise earthworks into root protection areas. I consider this to be manageable and highlight sections on page 46 and 47 of Appendices from Mr Crawford's evidence which confirm the same. Sections CC, DD and EE show development with partially retained hedges with parity in levels.

- 2.16 Sections AA and BB (page 46 of Appendix 2 of Mr. Crawford's evidence) do highlight steeper topography in the eastern part of the site. The issue is limited to specific portion of the site. The levels in western corner of the site are partially resolved in the Section AA and BB (CD2.3 a) of the application document, although adjustments to reduce the cut and fill and review of blocks are recommended.
- 2.17 This leaves only a relatively small portion of the site where a design solution is not readily apparent and needs further exploration. I am confident that a reasonable design solution can be attained in this area while retaining the hedges.
- 2.18 In relation to the above-mentioned area where the design resolution is not readily apparent, it should be noted that Sections DD, EE and FF in Appendix 4 of Mr. Crawford's evidence provides visual confirmation of the issues emerging from a combination of sweeping level changes and the development volumes as explained in my Urban Design evidence. The proposed arrangement presents an unsympathetic and unacceptable response to the context and reconsideration of the arrangement is recommended in any event.
- 2.19 Based on above considerations, the current proposal does not meet the policy requirements.

3. LVIA viewpoints and visualisations

- 3.1 I refer you to evidence from Ms. Whatmore in relation to the analysis of the visual impact assessment and its conclusions.
- 3.2 I also refer the excerpts of GLVIA guidance included in Appendix 6 of Mr. Crawford's evidence and Technical Guidance Note 'TGN 06/19

Visual Representation of development proposals' from Landscape
Institute.