

# Land at Broom Hill / Brislington Meadows, Broom Hill, Bristol

**Appendices – Planning Rebuttal Evidence of  
Paul Connelly BA (Hons) DipUP MRTPI  
on behalf of the Appellant**

**Appeal Ref: APP/N4205/W/22/3299644**

## **Volume 4 - Rebuttal Appendices**

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**Appendix A: Homes England Representations  
to Bristol City Council's Local Plan Review  
Regulation 18 Consultation, January 2023**

## **Homes England Representation to the Bristol Local Plan Review Draft Policies and Development Allocations Further Consultation November 2022 (Regulation 18)**

### **Brislington Meadows (Land at Broom Hill Brislington - Policy SA1) - Adopted Site Allocation Ref BSA1201**

#### **1.0 Executive Summary**

- 1.1. These representations have been prepared on behalf of Homes England with regard to their interest in land at Broom Hill / Brislington Meadows, Broom Hill Road, Brislington (adopted site allocation ref. BSA1201).
- 1.2. Homes England object to the proposed de-allocation of this Site in the 2022 Local Plan Review consultation document, and also wish to raise objections related to the calculation of housing need and proposed development strategy set out.
- 1.3. In calculating housing need, the Council has opted to use an alternative approach to the standard method, an approach which is clearly contrary to national policy and guidance. However no exceptional circumstances have been identified that justify that departure. By reducing housing need as the Council intend, and pursuing a strategy which mirrors the failed delivery of recent years, the existing problems within the housing market in terms of under delivery and affordability, will not be resolved. The approximate delivery targets in the draft policy text are 600-700 units per annum short of BCC's own housing need as estimated in the Housing Need Paper (and considerably short of the standard method requirement). The Council are following an approach that does not seek to significantly boost the supply of housing, or even meet identified need, contrary to national policy.
- 1.4. In direct contrast, the development of land at Brislington Meadows, as allocated for an estimated 300 homes in the adopted Plan, will provide a significant contribution of new affordable and market dwellings in a sustainable location. The proposed de-allocation of this Site has not been justified and there has been no material change to the Site since it was allocated in 2014. The key material change in context is the worsening housing crisis in Bristol, which places even more emphasis on the need for sustainable housing sites to come forward for development. It is demonstrated within these representations how the development of

Brislington Meadows meets the three objectives of sustainable development as set out in paragraph 8 of the NPPF.

- 1.5. In the absence of an appropriate estimate of housing need and an identified supply of sites to demonstrate capacity to deliver the homes needed, the Council cannot justify removing existing allocated housing sites from the next Local Plan.

## 2.0 Introduction

- 2.1. These representations have been prepared by LDA Design on behalf of Homes England with regard to their interest in land at Broom Hill / Brislington Meadows, Broom Hill Road, Brislington (the Site).
- 2.2. The documents that are the subject of the Local Plan Review Regulation 18 consultation, as published on Bristol City Council's (BCC) website comprise:
  - Bristol Local Plan Review: Draft Policies and Development Allocations (Further Consultation - November 2022) (hereafter referred to as the '2022 DPDA Consultation Document'.)
  - Reviewing the Demographic Evidence for the City of Bristol to Establish Local Housing Need (Opinion Research Services, November 2022) (referred to as the "Housing Needs Paper")
- 2.3. This consultation follows an earlier Regulation 18 consultation that was undertaken between March and May 2019, for which the following documents were published:
  - Bristol Local Plan Review: Draft Policies and Development Allocations (Consultation - March 2019) (hereafter referred to as the '2019 DPDA Consultation Document')
  - Bristol Local Plan Review: Annex Draft Development Allocations (Consultation - March 2019)
  - Bristol Local Plan Review: New Protection for Open Space (Consultation - March 2019)
  - Sustainability Appraisal Scoping Report (February 2018).
- 2.4. It is clarified on BCC's website that the 2019 Local Plan review consultation documents are not part of the current consultation but are available for information.
- 2.5. 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.

- 2.6. The Site benefits from an allocation for development under the adopted Site Allocation and Development Management Policies Plan 2014, Site Allocation Ref. BSA1201 ('Land at Broom Hill' but also known as Brislington Meadows) and is allocated for an estimated 300 new homes. The Site has never been delivered and was previously retained as an allocation for residential development in the 2019 DPDA Consultation Document.
- 2.7. Following discussions with BCC, Homes England was encouraged to purchase land at Brislington Meadows 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. Subsequently Homes England has been seeking to progress the development proposals, including undertaking pre-application discussions with the Council, as well as stakeholder and local resident engagement.
- 2.8. On behalf of Homes England, LDA Design submitted an application for Outline Planning Permission with some matters reserved on the Site in April 2022. The proposed development comprises: *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 (LPA ref. 22/01878/P) (hereafter referred to as the Appeal Scheme).*
- 2.9. The statutory determination date for this application was 27 July 2022 (13 weeks). No decision on the application was made in this timeframe. In October 2022 an appeal was made pursuant to s. 78 of the Town and Country Planning Act 1990 against BCC's failure to determine an outline planning application for the development.
- 2.10. BCC now proposes, in paragraphs 11.20 and 11.21 of the 2022 DPDA Consultation Document, that the Brislington Meadows site allocation (BSA1201) should no longer be allocated for residential development.
- 2.11. Homes England object to this de-allocation and also have objections related to the calculation of housing need and proposed development strategy set out in the 2022 DPDA Consultation Document as discussed in the following sections.

## 3.0 Housing Need

- 3.1. BCC has failed to deliver the housing needs identified in the extant development plan, for both market and affordable housing. BCC has also consistently failed to deliver sufficient homes to meet identified Local Housing Need, in recent years and has failed the Housing Delivery Test in successive years, most recently only achieving the delivery of 74% of homes needed in the past three years. Government categorises such a poor level of housing delivery as substantially below the required level of need.
- 3.2. Government is clear in the National Planning Policy Framework (NPPF) that Local Housing Needs should be calculated using the standard method and that urban centres, such as Bristol, have an important role to play in meeting housing needs. In the 2022 DPDA Consultation Document, BCC has mistakenly opted to use an alternative approach to calculate housing needs, however this is misguided and no exceptional circumstances have been identified by BCC to warrant such a move. This approach is clearly contrary to national policy and guidance.
- 3.3. BCC's failure to plan for the correct number of homes, as identified using the standard methodology, will surely exacerbate the housing market issues seen in Bristol today. The extant development plan should have delivered market and affordable homes in far greater numbers of, and also a wider choice of housing mix and tenure. By reducing housing need and pursuing a strategy which mirrors the failed delivery of recent years, these problems within the housing market will not be resolved by BCC, Bristol will continue to be an unaffordable place for people to live and will not provide the right types of properties that households need.

### **National Planning Policy Framework and Guidance**

- 3.4. The NPPF sets out the Government's planning policies for England and how these are expected to be applied.
- 3.5. At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision-taking (paragraph 11).



## Plan Making

- 3.6. Paragraphs 15 to 37 of the Framework relate specifically to ‘plan-making’.
- 3.7. Paragraph 15 states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 3.8. Paragraph 16 requires that plans are prepared with the objective of contributing to the achievement of sustainable development, and positively, in a way that is aspirational but deliverable.
- 3.9. Paragraph 23 states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.
- 3.10. Paragraphs 24 to 27 require local planning authorities to cooperate with one another, and with other relevant bodies, to address strategic matters and whether or not development needs that cannot be met wholly within a particular plan area could be met elsewhere. Statements of common ground should be prepared to document progress on addressing cross-boundary matters.
- 3.11. Paragraph 31 requires that the preparation of policies should be underpinned by relevant, up-to-date, adequate and proportionate evidence.
- 3.12. Paragraph 32 states that local plans should be informed throughout their preparation by a sustainability appraisal that meets legal requirements and demonstrates how the plan has addressed relevant economic, social and environmental objectives. Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed.
- 3.13. Paragraph 35 states that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with

legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

## Calculating Housing Need

- 3.14. In the context of calculating housing need, the NPPF is clear. Paragraph 61 states that the local housing need (LHN) should be calculated using the standard method unless there are exceptional circumstances to justify an alternative approach:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

- 3.15. LHN is defined by reference to Annex 2 of the Framework which states that the Local Housing Need is:

"The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context

of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework)."

3.16. The PPG sets out the standard method at paragraph 005 Reference ID: 2a-005-20190220 as follows:

- a) Step 1 – Setting the baseline – The projected average annual household growth over the next 10 year period using the 2014-based household projections.
- b) Step 2 – An adjustment to take account of affordability – where the median affordability ratio is above 4, an adjustment factor should be applied. The adjustment factor is to be calculated using the formular below:

$$\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

- c) Step 3 – Capping the level of any increase – where a local authority adopted a local plan more than 5 years ago and has not reviewed their housing requirement figure since then, the cap is set at 40% above the higher of the most recent average annual housing requirement figure or household growth.
- d) Step 4 – A 35% uplift is applied for urban local authorities in the top 20 cities and urban centres list. As of December 2020, the list of urban local authorities was as follows; Birmingham, Bradford, Brighton and Hove, Bristol, Coventry, Derby, Kingston upon Hull, Leeds, Leicester, Liverpool, London, Manchester, Newcastle upon Tyne, Nottingham, Plymouth, Reading, Sheffield, Southampton, Stoke-on-Trent, and Wolverhampton.

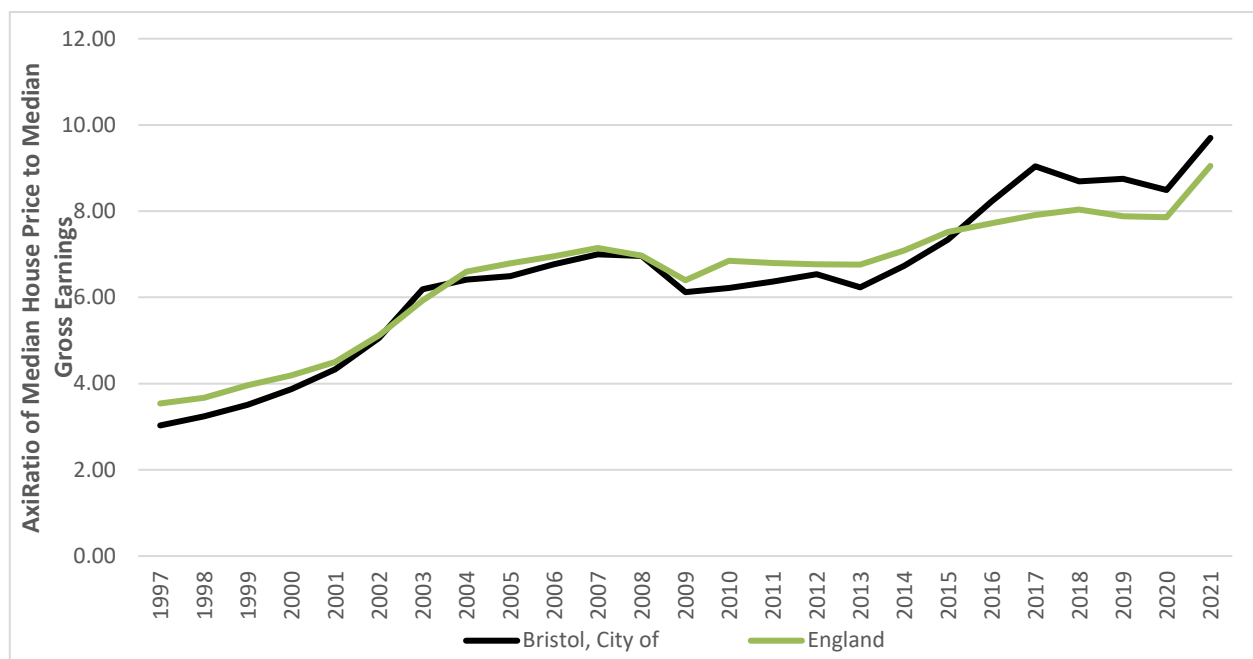
## **The National Housing Crisis and Implications in Bristol**

3.17. The most recent set of proposed changes to National Planning Policy and the 2023 consultation on wider reforms, seeks to deliver 300,000 new homes a

year and places the 20 largest urban areas in England, of which Bristol City is one, at the centre of these plans.

- 3.18. Within Bristol, there has been a chronic under delivery of market and affordable housing for a number of years. The effect of this has been to worsen affordability ratios in the city (as illustrated in Figure 1 below), and also to make it the least affordable area within the wider housing market area, pushing the need for affordable housing to an even greater level.
- 3.19. Figure 1 below demonstrates that since 1997 affordability in Bristol had been better than the rest of England, increasing at a comparable rate, until around 2003 when they became similar. This continued roughly to 2013 and then began to change. The rate of increasing (worsening) affordability ratios in Bristol outpaced that of England, sharply in 2015 and experienced another sharp rise in 2021. The affordability ratio in Bristol is now almost 10.00, almost triple the level in 1997. In simple terms, this means that in 1997 a household would need three times their annual income to purchase a property, on average. This has now worsened to a household needing on average ten times their annual income to purchase a property.

- 3.20. Figure 1 - Housing affordability in Bristol and England



Source: Office of National Statistics

- 3.21. Paragraph 60 of the NPPF confirms that “To support the Government’s objective of significantly boosting the supply of homes, 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.”

- 3.22. To help support this objective, the Housing Delivery Test was established and is the annual measurement of housing delivery produced by the Department for Levelling Up, Housing and Communities (DLUHC) to help local authorities maintain the supply of housing. Paragraphs 74 and 76 of the NPPF set out the consequences of not meeting local authorities housing requirement. In summary:
  - 1) Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.
  - 2) The five year housing land supply should in addition include a buffer of 20% where there has been significant under delivery of housing over the previous three years. This is measured against the Housing Delivery Test where this indicates that delivery was below 85% of the housing requirement.
- 3.23. NPPF paragraph 11 applies the presumption in favour of sustainable development to decisions for planning applications involving the provision of housing 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.
- 3.24. The Housing Delivery Test results for Bristol City over the last three years are as follows:
  - The 2019 results showed that Bristol had achieved 87% of the requirement;
  - The 2020 Housing Delivery Test results showed that Bristol had achieved 72% of the Requirement; and
  - The 2021 Housing Delivery Test results showed that Bristol had achieved 74% of the requirement.
- 3.25. Therefore, all three of the Housing Delivery Test consequences apply to Bristol in these years: prepare an action plan (below 95% of the requirement); apply the 20% buffer to the five year housing land supply (below 85% of the

requirement); and apply the presumption in favour of sustainable development (below 75% of the requirement).

- 3.26. The need for Affordable Housing in Bristol is particularly chronic and the delivery of new affordable housing has fallen drastically short year after year for at least the last 16 years. Since the adoption of the Core Strategy, only 4,500 affordable homes have been delivered. This is on average 325 new affordable homes each year compared to the target of 1,500 per year and accounts for only c. 17% of total housing delivery in Bristol since 2006/07. In a latest statement from the Mayor, it was confirmed that BCC currently has 19,000 people on the housing waiting list<sup>11</sup>. However, there is no assessment of Affordable Housing need which accompanies the Local Plan consultation.
- 3.27. The chronic housing shortage in the city is recognised in BCC's most recent Housing Delivery Test (HDT) Action Plan produced in July 2022. The HDT Action Plan outlines the actions that BCC is taking to increase housing delivery. The actions include:
  - Bristol Local Plan – Prioritising the development and delivery of a revised Local Plan in order to support the delivery of homes in the area.
  - Project 1000 Affordable Housing Delivery Plan 2022 -2025 – This established a new approach to accelerating housing delivery in the city to meet Mayoral aspirations for the delivery of 1,000 affordable homes a year from 2024.
  - Funding – Continued support and investment in housing delivery including investment in the establishment of a new housing delivery vehicle, with 2,000 council homes built over the next seven years. Funding used to ensure affordable housing is delivered.
  - Structure and governance – the Housing Delivery Team and Housing Delivery Board as well as the Construction and Development Team all support housing delivery.
- 3.28. All of the above provides an important context for the assessment of housing need and delivery which is currently far from adequately recognised or addressed in the 2022 DPDA Consultation Document. In fact, the proposed approach in the Consultation Document seeks to reduce the amount of new housing to be provided and remove existing sustainable allocated housing

<sup>11</sup> [Building a better Bristol: 2,563 new homes - The Bristol Mayor](#) (accessed 13 January 2023)

sites, despite the significant housing land supply shortage and enormous housing need.

## **Continued under delivery of housing**

- 3.29. Since the adoption of the Core Strategy there has been a chronic under delivery of market and affordable housing in Bristol for a number of years. In addition, the development plan has failed to deliver the types of homes needed across the City. Housing delivery has focused on central areas, delivering largely student accommodation and small 1 and 2 bed flatted development. Whilst there is a need for this type of development, there is also a need to deliver homes for other types of households.
- 3.30. The NPPF at paragraph 62 states that:  
  
*Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).*
- 3.31. This makes clear that the needs for different groups of people should inform the Council's spatial strategy, which in turn should identify those locations which can deliver residential development to meet a wider group of households than the extant development plan does. However, BCC's own Housing Need Paper gives no insight to the housing needs of Bristol. It is not an evidence base we agree with.
- 3.32. Therefore it is necessary to look back at past delivery in Bristol. The Bristol City Council Development Monitoring Report 2021 covers the period 1st April 2020 – 31st March 2021 and contains information on housing delivery.
- 3.33. Tables H9 and H10 of the report include cumulative information on the delivery of different sizes of dwellings from 2006-07 to 2020-21.
- 3.34. Table H9 of the report includes cumulative net information on dwelling completions by type and area from 2006-07 to 2020-21. The table below is an extract from the report.

### Net housing completions by dwelling type and area 2006-07 to 2020-21

Area	Private				Affordable				Total			
	Flats	Houses	Other	Total	Flats	Houses	Other	Total	Flats	Houses	Other	Total
City Centre	4,927	74	3,373	8,374	688	17	0	705	5,615	91	3,373	9,079
Inner East	1,237	184	29	1,450	266	169	0	435	1,503	353	29	1,885
Northern Arc	1,102	915	-6	2,011	398	308	-42	664	1,500	1,223	-48	2,675
Rest of Bristol	3,702	1,403	236	5,341	307	242	-1	548	4,009	1,645	235	5,889
South Bristol	3,959	1,293	15	5,267	839	649	-25	1,463	4,798	1,942	-10	6,730
<b>Total</b>	<b>14,927</b>	<b>3,869</b>	<b>3,647</b>	<b>22,443</b>	<b>2,498</b>	<b>1,385</b>	<b>-68</b>	<b>3,815</b>	<b>17,425</b>	<b>5,254</b>	<b>3,579</b>	<b>26,258</b>
<b>%</b>	<b>66.5</b>	<b>17.2</b>	<b>16.3</b>	<b>100</b>	<b>65.5</b>	<b>36.3</b>	<b>-1.8</b>	<b>100</b>	<b>66.4</b>	<b>20.0</b>	<b>13.6</b>	<b>100</b>

Source: Bristol City Council Development Monitoring Plan 2021 (Table H9)

- 3.35. As land at Brislington Meadows is located in the Bristol South, analysis of demand and delivery will focus on this area.
- 3.36. Bristol South has a comparatively high level of completions according to table H9 in the latest Development Monitoring Report. Furthermore, it has the highest level of affordable completions amongst both flats and houses, thus indicating a demand and popularity amongst developers in this area. Affordable housing completions in Bristol South represent 38% of total affordable housing completions in Bristol and 6% of total completions.
- 3.37. However, Bristol South does not have a comparably high level of completions amongst the private market dwellings and is over 3,000 completions below that of the city centre. Private market completions in Bristol South represent 24% of total private market completions in Bristol and 20% of total completions in Bristol.
- 3.38. This indicates that the Bristol South has a high popularity for affordable housing development.



3.39. The table above also indicates that there is further potential for development in the private market in the Bristol South zone, given the high delivery rates of smaller properties in the city centre.

3.40. Table H10 of the report includes cumulative gross information on dwelling completions by type and size from 2006-07 to 2020-21.

**Gross housing completions in Bristol by tenure and bedrooms 2006-07 to 2020-21.**

Citywide		Flats/Maisonettes		Houses/Bungalows		Total	
		Number	%	Number	%	Number	%
Private	1 Bed	7,734	40.7	188	3.1	7,922	31.6
	2 Bed	7,359	38.7	1,139	18.9	8,498	33.9
	3 Bed	632	3.3	1,895	31.4	2,527	10.1
	4 Bed +	92	0.5	837	13.9	929	3.7
	Missing	415	2.2	11	0.2	426	1.7
	<b>Total</b>	<b>16,232</b>	<b>85.4</b>	<b>4,070</b>	<b>67.5</b>	<b>20,302</b>	<b>81.1</b>
Affordable	1 Bed	1,174	6.2	34	0.6	1,208	4.8
	2 Bed	1,536	8.1	937	15.5	2,473	9.9
	3 Bed	64	0.3	800	13.3	864	3.5
	4 Bed +	3	0	177	2.9	180	0.7
	Missing	5	0	9	0.1	14	0.1
	<b>Total</b>	<b>2,782</b>	<b>14.6</b>	<b>1,957</b>	<b>32.5</b>	<b>4,739</b>	<b>18.9</b>
Total	1 Bed	8,908	46.8	222	3.7	9,130	36.5
	2 Bed	8,895	46.8	2,076	34.4	10,971	43.8
	3 Bed	696	3.7	2,695	44.7	3,391	13.5
	4 Bed +	95	0.5	1,014	16.8	1,109	4.4
	Missing	420	2.2	20	0.3	440	1.8
	<b>Total</b>	<b>19,014</b>	<b>100</b>	<b>6,027</b>	<b>100</b>	<b>25,041</b>	<b>100</b>

Source: Bristol City Council Development Monitoring Plan 2021 (Table H10)

3.41. It should be noted that the figures above relate to gross rather than net completions and therefore do not account for potential losses. The figures

also relate to the city as a whole rather than respective zones, however the information on the sizes of dwellings completed provides for useful analysis.

- 3.42. The table above indicates that of the dwellings completed within Bristol, 1 and 2 bed properties account for the largest proportions in both the private and affordable markets, which is reflected in the total completions. Of the remaining completions, 3 bed properties are next highest, followed by 4+ bed properties.
- 3.43. Due to the urban nature of Bristol, it is likely that the large number of completions in 1 and 2 bed properties in the city centre is largely accounted for by flats.
- 3.44. When considering the past delivery of housing in Bristol against what is set out within Volume 2 of the SHMA, which is the most recently published assessment of housing needs in Bristol, there are some clear discrepancies between delivery and BCC's identified housing mix.
- 3.45. The SHMA at figure 6 suggests that the highest need amongst private market housing is for 3 bed houses, however, 3 bed homes delivered across Bristol from 2006-07 to 2020-21 only represent 10.1% of total completions and 12.4% of private market completions.
- 3.46. Table 22 indicates that Bristol delivers a high volume of 1 and 2 bed properties.
- 3.47. The majority of the development proposed by Homes England for Brislington Meadows (subject to appeal ref. 3308537) is for 2 bed houses (42%) which will help address the high demand for these properties as demonstrated by past completions and the identified need in the SHMA.
- 3.48. Together, 1 and 2 bed flats and houses account for 32% of the indicative housing mix and will therefore contribute to the demand and need for these properties.
- 3.49. In addition, 22% of the proposed properties are proposed as 3 bed houses which will undoubtedly contribute to the high demand for 3 bed homes in the private market as identified by the SHMA as well as contribute to

increasing the delivery of 3 bed houses, which is currently relatively low in the private market.

- 3.50. The scheme proposes that the remainder of the indicative housing mix, 9%, is 4 bed houses which are identified as needed in the SHMA, but have seen low levels of delivery in Bristol.
- 3.51. The extant development plan's evidence base has not been updated in respect of a calculation for affordable housing needs, which would be accommodated within the next Local Plan. Therefore, to understand the delivery of affordable housing, looking back at how the Core Strategy's objectives have or have not been met, should again be an important consideration for BCC in the preparation of the next version of the Local Plan.
- 3.52. Policy BCS17 of the Core Strategy requires that affordable housing will be required for developments of 15 or more dwellings. The supporting text for this policy considers that the need for affordable housing in Bristol is high. It notes that lowest level house prices were more than eight times that of lower earnings. To address this, the then up to date SHMA identified that there was an annual need of approximately 1,500 new affordable homes over the next 12 years (2011 to 2023).
- 3.53. Paragraph 4.17.5 of the Core Strategy states that the level of affordable housing is very high, but that the target (1,500 per year, for 12 years) is adjusted to take into consideration a range of constraints to delivery. Therefore, this figure should be seen as an under-estimation of affordable need.
- 3.54. Whilst there is no data for 2006-07, the data in the Development Monitoring Report suggests that a total of just over 4,500 affordable dwellings have been delivered since the Core Strategy's inception.
- 3.55. The annual average is just under 325 affordable dwellings per annum and cumulatively, affordable housing accounts for approximately 17% of total housing delivery from 2006-07 to 2020-21.
- 3.56. The delivery of affordable housing in Bristol has fallen drastically short of the 1,500 affordable dwellings per annum identified in the Core Strategy. The Council's own evidence identifies that the need since then has become more

acute and that Bristol is the least affordable area within the housing market area.

- 3.57. The need for affordable housing in Bristol is chronic and the delivery of new affordable housing has fallen drastically short year after year for at least the last 16 years. Therefore, allocations which can make a contribution to the delivery of affordable housing in Bristol, such as land at Brislington Meadows, should be favourably considered and the proposed approach to de-allocate these sites is certainly premature and unsound.

## **Calculating Housing Need for Bristol**

- 3.58. Paragraph 4.1 of the 2022 DPDA Consultation Document recognises the importance of addressing the housing crisis: “Contributing to the delivery of new and affordable homes is a core objective for the local plan review as we seek to meet the needs of a growing population whilst tackling climate change and supporting biodiversity.”
- 3.59. Paragraph 4.4 of the 2022 DPDA Consultation Document confirms that under the ‘standard method’ the number of homes required to meet housing need is 3,376 dwellings per year. The paragraph briefly explains that the standard method formula for housing need is based on the 2014-based household projections, an affordability adjustment, a capping mechanism and then a 35% uplift directed to 20 identified urban authorities of which Bristol is one.
- 3.60. However, Paragraph 4.5 of the 2022 DPDA Consultation Document then states that the standard method ‘over estimates’ the need for homes in Bristol up to the year 2040, and refers to Appendix 1 of the Consultation Document where an alternative method for calculating objectively assessed housing need is set out.
- 3.61. Appendix 1 of the 2022 DPDA Consultation Document confirms that “an alternative approach to establishing the number of new homes needed is being explored as part of this consultation. A paper has been prepared: ‘Reviewing the demographic evidence for the City of Bristol to establish local housing need’.”
- 3.62. The ‘Reviewing the demographic evidence for the City of Bristol to establish local housing need’ paper (the “Housing Need Paper”) is dated November 2022. In short, the purpose of the housing need paper is to calculate a lower

housing need figure for the City Council's Local Plan, than calculated when using the standard methodology.

- 3.63. Paragraph 61 of the NPPF sets out how the number of homes needed should be calculated:

*"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."*

- 3.64. The two key elements of this paragraph are that firstly Local Housing Need must be calculated using the standard method and that secondly, only if justified by exceptional circumstances can an alternative approach be used.
- 3.65. The Planning Practice Guidance (PPG) follows the NPPF and clarifies that, whilst the standard method is not mandatory, the expectation is that it will be used and other methods would only be used in exceptional circumstances.
- 3.66. This paragraph is referenced in BCC's Housing Need Paper, apparently as justification for an alternative approach to calculating need. However, crucially, no exceptional circumstances to justify the use an alternative method are set out.
- 3.67. In the PPG at paragraph: 001 Reference ID: 2a-001-20190220, housing need is defined:

*"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations. For further details on how constraints should be considered once a housing need figure has been identified, please see...."*

- 3.68. This paragraph makes clear that the calculation of housing need is unconstrained and that constraints to the delivery of homes should only be considered once a housing figure is calculated. This sets the context in which exceptional circumstances, as referred to in paragraph 61 of the NPPF, need to be considered in. Exceptional circumstances, to use an alternative housing

need calculation, should not be taken from the supply side i.e. housing delivery.

- 3.69. However, as detailed below, no demand side exceptional circumstances are offered by the Council as to why an alternative to the standard method would be appropriate.
- 3.70. As confirmed in paragraph 3 of the Housing Need Paper, the standard method calculation set out in the PPG establishes a minimum Local Housing Need of 33,755 dwellings for the City of Bristol over the 10-year period 2022-2033 (an average of 3,376 dwellings per year).
- 3.71. The method set out in the paper, uses the 2018 SNPP as it's demographic basis. However, the PPG is absolutely clear, this should not be used as more recent household projections do not reflect under delivery and declining affordability. PPG paragraph: 005 Reference ID: 2a-005-20190220 states that:  
  
*The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.*
- 3.72. The premise on which BCC's alternative methodology is based is that, because the 2018-based household projections and sub-national population projections are more recent than their 2014 equivalents and that they are recognised by the OSR as National Statistics, then these should be used instead of the 2014-based information. The PPG guidance quoted above makes it clear that this should not be done. Further to this, there is an assumption that the 2018-based projections are correct and that the 2014-based projections are wrong. There is no evidence to suggest that the 2014-based projections are wrong and should not be used for plan making. BCC has not produced the necessary analysis that is required to justify this assertion or an alternative approach based on this assertion. The PPG is clear, that it is only the 2014 projections that should be used for plan making purposes.
- 3.73. Notwithstanding this lack of justification, the paper sets out an alternative approach to calculating housing need by making adjustments to the 2018 projection; manipulating the household formation rate; including an allowance for higher migration; and then applying an amount for historic under supply. This equates to a need for 2,600 dwellings per annum, equivalent to 52,000 dwellings over the plan period to 2040. Compared to the

3,376 dwellings per annum calculated using the standard methodology (equivalent to 67,520 dwellings over a 20-year plan period) this is 776 dwellings per annum lower, amounting to 15,520 fewer homes over the plan period.

- 3.74. The method set out in the paper also fails to reconcile the absence of step 4 of the standard methodology, which is the urban centres uplift. As set out in previous sections of this report, the urban centres uplift is a key element of the Government's approach to reaching the delivery of 300,000 new homes each year. The importance of this is emphasised by Government by specifically including it at the proposed paragraph 62 of the NPPF changes:

*The Standard Method incorporates an uplift for those urban local authorities in the top 20 most populated cities and urban centres. This uplift should be accommodated within those cities and urban centres themselves unless it would conflict with the policies in this Framework and legal obligations*

- 3.75. BCC proposed to omit any uplift. This is a clear departure from national policy. Such a departure requires good reasons. None are provided in the paper. BCC's approach is not evidence-based and is not justified.
- 3.76. Further, as set out above, should an area not be able to accommodate the urban centres uplift, a supply side solution should be sought, and not to adjust the need. That incorrect approach is how BCC has calculated housing need, as set out in their November 2022 paper.
- 3.77. Application of the urban uplift of 35% to the amended methodology would add 910 dwellings to the annual requirement, to bring the total number of homes required per annum to 3,510 (134 dwellings more per annum than under the standard method). The uplift increases the total dwellings over the plan period to 70,200, which is 18,200 dwellings higher than the unjustified figure calculated by BCC.
- 3.78. As such, the proposed approach fails to meet the requirements of the NPPF and therefore at the Regulation 19 stage of plan making, it would not be sound. It fails to achieve the central objective of Government housing policy,



to significantly boost the supply of homes. Further, it fails to deliver the housing that the people of Bristol need.

### **Establishing housing capacity in Bristol**

- 3.79. In terms of housing capacity within Bristol City, Appendix 1 of the 2022 DPDA Consultation Document utilises past delivery rates as “a useful guide as to whether capacity estimates will be realistic in the future”. The analysis provided in Appendix 1 states that the annual average delivery of new homes in Bristol has been around 1,800 per annum over the last 20 years.
- 3.80. Appendix 1 also states that “A further indicator of delivery rates for the future is the extent to which previous targets have been met. The Bristol Core Strategy 2011 aspired to a total of 32,800 homes between 2006 and 2026. By April 2022 a total of 28,832 homes had been completed within that period.”
- 3.81. Appendix 1 goes on to state that the future capacity for new homes in Bristol is based on the availability of appropriate development sites and whether those sites are deliverable. The sources of deliverable capacity are set out in Table 2: ‘Sources of deliverable housing supply to 2040’. This includes delivery from those sites with planning permission, existing development site allocations and proposed site allocations. Of the 2,300 homes anticipated from existing development site allocations, it is not clear which sites this includes / excludes. Combining the total in the ‘estimated delivery of homes column’ equals 34,700 units.
- 3.82. The total figure of 34,700 is then used to define the annual housing targets in Draft Policy H1: Delivery of new homes – Bristol’s housing requirement:  
**Draft Policy H1 text:**  
**An annual average minimum of 1,925 new homes will be delivered by 2040. The aspiration is that this figure will be exceeded where this is supported by service and infrastructure capacity. The delivery of the annual average minimum will be phased as follows:**  
**2023 – 2027: approximately 2,000 homes per year**  
**2028 – 2040: approximately 1,900 homes per year**
- 3.83. There is no certainty in the proposed delivery strategy for housing and the supply of “appropriate sites” considered in both the 2019 / 2022 draft Local Plan consultation documents include Green Belt sites and other challenging



locations, with a lack of evidence as to their suitability, developability and deliverability for housing.

- 3.84. The approximate delivery targets in the draft policy text are 600-700 units per annum short of BCC's own housing need as estimated in the Housing Need Paper (and considerably short of the standard method requirement) and would leave a deficit of 17,300 undelivered units over the plan period against the Council's own housing need requirement. So, BCC is following an approach that does not seek to significantly boost the supply of housing, or even meet identified need.
- 3.85. No explanation is offered as to how the deficit of homes will be addressed other than a brief statement at paragraph 4.8 "Although most of the assessed need for new homes can be met within Bristol, the evidence indicates additional homes will need to be delivered elsewhere to ensure that the city's need for new homes does not go unmet. Bristol City Council is working with the neighbouring councils of North Somerset, South Gloucestershire and Bath & North East Somerset to consider whether and to what extent those needs could be met in those areas. A statement will be issued which sets out any agreement on these matters".
- 3.86. Given the withdrawal of the Joint Spatial Plan, and subsequent abandonment of the West of England Combined Authority Spatial Development Strategy, it is not demonstrated how accommodation of a significant deficit of housing need would be addressed through the cooperation and agreement amongst neighbouring authorities. The 2022 DPDA Consultation Document suggests that work is ongoing with neighbouring authorities to consider what extent of the unmet housing need could be met in those areas. Until this is resolved or clarified further, BCC needs all available housing land to help meet needs, including the previous development site allocations yet to be delivered. The current approach is therefore obviously unsound.
- 3.87. BCC has not demonstrated any exceptional circumstances for not using the standard method to calculate housing need. Given the lack of clarity and certainty around the proposed approach to housing, it is clear that BCC is not in a position to de-allocate sustainable sites, such as the Land at Broom Hill Brislington which was considered to be acceptable for allocation as tested and examined through the previous local examination.

## 4.0 Strategic Context

### **Changes to the Strategic Context since the previous Regulation 18 Consultation**

- 4.1. Since the Regulation 18 consultation in 2019 there have been a number of significant changes to the strategic context influencing the Local Plan. Of particular note are the following:
- 1) Continued under-delivery of new housing;
  - 2) A strategic scale spatial plan for the West of England area is no longer being progressed, with the withdrawal of the West of England (WoE) Joint Spatial Plan and subsequently the halting of West of England Combined Authority (WECA) Spatial Development Strategy;
  - 3) Introduction of Step 4 in the standard method for the urban centres uplift; and
  - 4) Escalating (worsening) affordability ratio.
- 4.2. In addition, there has been a changing political context.

### **Continued under delivery of housing, use of standard method and escalating affordability**

- 4.3. There has been a chronic under delivery of market and affordable housing in Bristol for a number of years. The effect of this has been to worsen affordability ratios in the city, and also to make it the least affordable area within the wider housing market area, pushing the need for affordable housing to an even greater level than when BCC's extant plan was adopted. See detailed commentary under the 'Housing Need' in section 3 of these representations.

### **Withdrawal of the strategic scale spatial plan**

- 4.4. At the time of the 2019 Regulation 18 consultation BCC, along with South Gloucestershire Council, Bath and North East Somerset Council and North Somerset Council were progressing the WoE Joint Spatial Plan. This was withdrawn in April 2020 following the Inspectors' conclusion that there were very substantial soundness problems with the plan. Subsequently, work on a WECA Spatial Development Strategy progressed, but this too has been

halted indefinitely following the decision of the WECA Mayor to stop all work on the Spatial Development Strategy in 2022.

- 4.5. The 2019 DPDA Consultation Document stated the following:

*'The Joint Spatial Plan sets out the overall strategy for how the housing needs of the wider Bristol and Bath housing market areas will be met over the period to 2036. This includes a requirement of 33,500 new and affordable homes to be delivered in Bristol by 2036.'*

*The local plan will be updated to set out how the proposed 33,500 homes will be delivered in Bristol by 2036 – and show how the council aims to exceed that amount. This will require a new development strategy identifying broad locations for new development around the city, supported by individual site allocations for development and policies which promote the delivery of new and affordable homes' (paragraphs 1.4 -1.5)*

- 4.6. The approach to the Local Plan review as presented in the 2019 Regulation 18 consultation document was therefore intending to set the housing target and develop the related development strategy for its distribution, in the context of the emerging strategy and housing requirement of the Joint Spatial Plan.

- 4.7. Clearly, this is no longer the case as paragraph 4.8 of the 2022 DPDA Consultation Document makes clear.

- 4.8. Notwithstanding this, the 2022 DPDA Consultation Document fails to identify a level of unmet housing need to be met in neighbouring authorities, and no timeline or process for agreeing cross-border issues with neighbouring authorities is set out in the document. In the absence of an emerging or adopted Joint Spatial Plan there is a void in dealing with the strategic housing supply, and it is unclear, uncertain and unjustified how a range of cross-border issues, such as agreeing the level of and solution for unmet housing needs, will be addressed.

## **Changing political context**

- 4.9. In addition to the housing crisis in Bristol, discussed in Section 3 of these representations, BCC has declared a climate emergency (2018) and an ecological emergency (2020); and strategies have been prepared in response to both.
- 4.10. BCC cites the declaration of the ecological emergency in the 2022 DPDA Consultation Document, as a reason for the proposed de-allocation of the

Brislington Meadows site. This follows public statements made by the Mayor of Bristol declaring opposition to housing development on the allocated Site. For example, in April 2021, in an interview reported by Bristol Live. The Mayor is reported to have said that he had now determined that the impact developing the land would have on the natural environment and wildlife is ‘too great, as the ecological importance of the area became clear’.

- 4.11. The declaration was made without any apparent attempt to identify material planning considerations that justified a wholesale and in-principle departure from the allocation and development strategy at that time. Importantly there has been no material change in the ecological importance of the Site since its allocation for development in 2014. The only material change is the worsening housing delivery and affordability in the city.
- 4.12. It is also considered that in response to the climate emergency declared, development at Brislington Meadows provides a direct and positive response by delivering new homes in a location that is accessible and sustainable, supported by public transport and local shops and services.

## **Implications of the Revised Strategic Context for developing the Local Plan**

- 4.13. The change in context is acknowledged in the 2022 DPDA Consultation Document; Paragraph 2.5 states that, ‘When the review started it was expected that many existing policies (retained policies) would be carried forward from the current Local Plan where they remained up to date and relevant. With the passage of time and changing strategic context it is now necessary to rewrite the whole of the Local Plan’.
- 4.14. However the consultation material fails to clearly set out how this impacts the preparation of the next Local Plan. BCC fails to clearly demonstrate how the revised strategic context informs the proposed development strategy and policies, and fails to show how the policies have balanced social, economic and environmental issues. The Mayor for Bristol has himself acknowledged in an article on the Mayor of Bristol’s blog<sup>2</sup> the need to balance a range of crises, stating,

*‘Unfortunately some single-issue campaigns often fall short of engaging with our city in the fullness of the reality of life here. We face a housing crisis, at the same time as ecological and climate emergencies, the national cost of living crisis, recovering from the pandemic, and other major pressures. There is no magic button*

<sup>2</sup> Building a better Bristol: 2,563 new homes’, available from: <https://thebristolmayor.com/2023/01/11/bristol-new-homes> (accessed: 13th January 2023)

*to turn off any of these to focus on a favourite – they must all be considered and tackled at once.'*

- 4.15. BCC needs to set out more clearly which plans and strategies have been considered in the preparation of the Local Plan consultation, and how this is translated into a spatial strategy which balances a range of objectives in order to achieve a suitable and sustainable development strategy. For instance, notwithstanding BCC's housing crisis, the 2022 DPDA Consultation Document indicates that greater priority is being given to the ecological and climate emergencies than was given at the Regulation 18 stage in 2019.
- 4.16. However, it is not clearly set out in a transparent way how this is factored into the Local Plan consultation and how this priority is informing the overall development strategy and the approach to allocations. This has implications in terms of BCC's compliance with the sustainability appraisal framework, for example the assessment of reasonable alternatives in a lawful way.
- 4.17. It is noted that neither the One City Ecological Emergency Strategy nor the Ecological Emergency Action Plan include actions that relate to directing development. Furthermore the 2022 DPDA Consultation Document does not suggest that the ecological and climate emergencies are to be given greater weight than the housing crisis and yet the 2022 DPDA Consultation Document makes direct policy and site allocation decisions, such as the proposed removal of certain site allocations previously recognised by the Council to be sustainable locations for development, with reference to these documents. No analysis is presented justifying how the removal of these sites from the consultation document , and the subsequent inclusion of new site allocations (including Green Belt sites and those currently designated as Important Open Space or within conservation areas), achieve BCC's objectives in respect of sustainable development, housing delivery, climate change and ecological priorities.
- 4.18. It is not clear if work has been completed to assess the degree to which the proposed development strategy performs against the aims and objectives which are set out in Section 3 of the 2022 DPDA Consultation Document and include: setting out an approach to inclusive and sustainable growth and development, addressing the needs of everyone in all parts of the city; enabling delivery of at least 1,925 new homes a year in Bristol up to 2040 including affordable housing and homes to meet a range of needs; Aiming to exceed the housing target where new infrastructure can unlock additional

potential; and tackling the climate and ecological emergencies as we meet our needs for sustainable development.

- 4.19. As a result, there appears to be a lack of consistency between the stated objectives and aims of the next Local Plan and decisions that have been made on the proposed development strategy, in particular the approach to site allocations.
- 4.20. The consultation material does not include evidence to demonstrate how the sites that have been proposed as development site allocations have been assessed to appraise how they each perform against achieving the stated aims and objectives. The 2022 DPDA refers to 70 draft development allocations that were put forward in the March 2019 consultation for inclusion under Draft Policy DA1. However, a number of these sites appear to be subject to important constraints such as having ecological potential or arboricultural interest, designation in the adopted Local Plan as Important Open Space or being located within an existing Conservation Area or the presence of existing uses on the Site. BCC proposes that the majority of these draft allocation are retained, despite there being no evidence provided with the consultation material that shows an appraisal of these sites to confirm their suitability for development, their availability and deliverability or the degree to which they represent sustainable locations for new development, as a number of sites do not appear to be within close proximity of public transport services or access to local shops or community facilities.
- 4.21. In addition, the 2022 DPDA Consultation Document proposes the allocation of three sites requiring Green Belt release. The 2022 DPDA Consultation Document states that, 'The council considers that the best place to meet the housing needs of Bristol is within the city; and that as much of the housing need as possible should be met within our local authority boundary' (paragraph 4.6). This appears in conflict with the proposed approach to remove certain adopted allocations that are located within the city and include new allocations requiring Green Belt release on the edge of the city's boundary and in the open countryside.
- 4.22. It is also notable that, even on the basis of the unjustifiably reduced housing requirement figures proposed for the next Local Plan, a consequence of the proposed de-allocation of the Brislington Meadows site is that BCC is considering Green Belt release. The existing allocation and ongoing suitability of the Brislington Meadow site, which is not Green Belt, for development mean that exceptional circumstances cannot exist to justify the

contemplated release of Green Belt, having regard to the considerations set out in NPPF paragraph 141.

- 4.23. In order to justify the proposed development strategy, there needs to be greater transparency and clarity around how the objectives of the next Local Plan have been weighted and what implications this has for the spatial strategy and approach to allocations.
- 4.24. Furthermore, while the consultation material for the 2019 Regulation 18 Consultation included a Sustainability Appraisal (SA) Scoping Report (dated February 2018), no update to the SA Scoping Report has been provided as part of this consultation. A range of important regional level policies, plans, programmes, strategies and initiatives (PPPSIs) listed in the February 2018 SA Scoping Report at Appendix A are now out of date or have been superseded. We would expect that in setting the new baseline context, BCC would need to refresh the SA Scoping Report, to take account of, and clearly describe, the up to date related PPPSIs that have influenced the production of the Local Plan, per the Strategic Environmental Assessment (SEA) requirements. The PPG “Strategic environmental assessment and sustainability appraisal” at paragraph 13 suggests that in consulting on a Regulation 18 version of a local plan, the Council should consider the Local Plan objectives against the SA framework and evaluate likely effects if the Plan and ways to mitigate effects etc. As there was no update to the SA Scoping report, this exercise has not been done and is likely to be unlawful.
- 4.25. In the absence of this evidence, it appears that BCC have come to conclusions on the development strategy in advance of undertaking an up to date assessment of spatial options to determine their suitability and effectiveness in meeting the objectives of the Local Plan. There seems, from the consultation material available, to be a missing step in the process by which BCC has arrived at its preferred development strategy. Given this, it is not possible to conclude that the spatial strategy proposed is the most suitable in achieving the objectives of the Plan. We contend that it is premature to remove site allocations in the absence of this justification.



## 5.0 Brislington Meadows - Land at Broom Hill, BSA1201

- 5.1. The 2022 DPDA Consultation Document sets out in section 11 the approach to retained policy from the adopted Development Plan. Regarding policy BSA1201 Land at Broom Hill it states:

### *Brislington Meadows*

*11.20 This site has city wide importance for nature conservation. In 2014 a part of the meadows area was allocated for housing development subject to providing compensation and mitigation for the loss of habitat which would arise from development. Since that allocation was made in the adopted local plan, an ecological emergency has been declared by Bristol City Council and it is considered that it would now be more appropriate for the existing site allocation to be discontinued and for the site to be retained as open space with nature conservation interest.*

*11.21 The following existing development site allocations are therefore proposed to be discontinued and not retained in the local plan: BSA1201 Land at Broom Hill, Brislington*

*11.22 At the time of this consultation a planning application had been made for residential development. The application will be determined in accordance with planning legislation. The next stage of the local plan will reflect the outcome of that application.*

- 5.2. The Land at Broom Hill site was allocated for housing under the adopted Site Allocations and Development Management Policies Local Plan (July 2014) under Policy SA1 Site Allocations (site reference: BSA1201 Land at Broom Hill, Brislington). The Site Allocations and Development Management Policies (DMP) provides an explanation of why the Site is allocated. The reasons are stated below:
- The Site is in a sustainable location close to the supermarket and shops of Broom Hill Road / Fermain 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.
- 5.3. The Development Considerations (set out in BSA1201) demonstrate BCC's awareness of the Site's natural assets and how the development on the Site



should respond to these. For example, BSA1201 makes specific reference to provision for habitat loss and compensation measures. BCC estimated that 300 homes may be deliverable on site, an estimate made in the knowledge and understanding of the Site conditions, constraints and considerations.

- 5.4. BCC's Development Management Policies Allocations and Designations Process (Submission version July 2013) also records the process that led to the conclusion that the Site was no longer important for recreation, leisure and community use, townscape and landscape quality and visual amenity and could be released for allocation and housing development. The Council's proposals for protection of open space (2019 consultation document) also indicated that the Site is not a Local Green Space or a Reserved Open Space.
- 5.5. Through the Local Plan making process, including appraisal, the application of development considerations, examination and adoption, BCC demonstrated the acceptability of developing c300 homes on the Site.
- 5.6. Since the allocation was made, the Site conditions remain fundamentally the same and have changed in detail only. The physical context has not materially changed. The Outline Ecological Impact Assessment (EcIA) that accompanied the outline application (22/01878/P) did not identify any material change in the ecological value of the allocated site since a review in 2010. There is no evidence therefore that the ecological value of the Site has changed or that it now warrants a greater level of protection than when it was allocated. Further, the Site continues to be a highly sustainable location for housing development, close to public transport links and existing community facilities and services, helping to combat climate change by reducing reliance on private vehicles or the need to travel. The need for housing is also even stronger than when the Site was allocated given the clear shortfall in delivery over recent years and the limited housing land supply (discussed in Section 3), which is driving BCC to promote the allocation of land in the Green Belt.
- 5.7. The Council has presented no evidence that justifies a change in prioritisation from housing delivery to ecological protection in relation to the Site. No further evidence has been presented to demonstrate that the ecological significance of the Site has changed since it was previously allocated. The key material change is the housing crisis and the Council's under delivery of homes making it apparent that this existing allocation is needed now more than ever to help deliver the affordable and market homes

that the city needs. The declaration of an ecological emergency is not a material consideration that would alter the balance.

- 5.8. Notwithstanding that, the allocation of the Site for housing development does not preclude it from contributing to habitat creation and green infrastructure network enhancement, in line with three of the four goals set out in the Ecological Emergency Action Plan:
  - *30% of land in Bristol to be managed for the benefit of wildlife: within the Site, approximately 45% of the Site area will be multifunctional green infrastructure managed for the benefit of wildlife and additional offsetting is designed and managed solely for the benefit of wildlife.*
  - *Reduce use of pesticides in Bristol by at least 50%: Future management plans adopted for on and offsite habitats delivered by the scheme could be agreed to adopt this measure.*
  - *Waterways to have excellent water quality which supports healthy wildlife: the proposed scheme incorporates an extensive SUDS that will protect water quality and flows of downstream watercourses.*
- 5.9. Homes England’s proposed development commits to delivering a 10% biodiversity net gain, which can be delivered through on and off-site measures, and which exceeds BCC’s current policy requirements. The proposes include a long-term ecological management plan that will enhance the retained habitats, and this can include measures to sustain existing mature trees and enable their future veteranisation.
- 5.10. There are numerous additional benefits to retaining allocation of the Site for housing, not the least of which is the delivery of up to 260 homes including 30% affordable housing which would be a key factor in meeting the housing targets given the housing in Bristol is undersupplied (reference section 3).
- 5.11. The Site is in a highly sustainable location, which is one of the reasons that it was allocated for housing in the DMP. The Site is adjacent to the existing residential area and within the Broomhill neighbourhood. It is within the proximity of the supermarket, shops and services of Broomhill Local Centre, as well as the shops of Brislington Retail Park, employment areas and public transport infrastructure.
- 5.12. The sustainability of the Site’s location is a key factor in helping BCCto become carbon neutral and climate resilient. Th location minimises the need

to travel by car and supports the notion of the 20 minute neighbourhood in which people's daily needs are accessible on foot or cycle.

- 5.13. Surface water management required for the development will provide off-site flood risk benefits, and necessary off-site highway improvements will improve safety for pedestrians, cyclists and other road users, all of which benefit the existing community.
- 5.14. Development of the allocated Site will bring a positive local effect on the patronage of shops, services and community facilities resulting from the increased population. Further, the construction of the proposal would provide direct employment on Site as well as indirect supply chain employment and induced employment as a benefit of the corresponding increase in expenditure.
- 5.15. In conclusion, development of the allocated Site meets the three objectives of sustainable development as set out in paragraph 8 of the NPPF and should not, therefore, be deallocated.

## 6.0 Conclusion

- 6.1. BCC has failed to deliver the housing needs identified in the extant development plan. The Council has also consistently failed to deliver sufficient homes to meet identified Local Housing Need and has failed the Housing Delivery Test, most recently only achieving the delivery of 74% of homes needed in the past three years.
- 6.2. Government is clear in the NPPF that Local Housing Need should be calculated using the standard method and that identified urban centres, including Bristol, have an important role to play in meeting housing needs. In the 2022 DPDA Consultation Document, BCC has opted to use an alternative approach to calculating housing needs, an approach which is clearly contrary to national policy and guidance. However no exceptional circumstances have been identified that justify that departure.
- 6.3. BCC's failure to plan for the correct number of homes, as identified using the standard methodology, will exacerbate the housing market issues seen in Bristol today. By reducing housing need and pursuing a strategy which mirrors the failed delivery of recent years, these problems within the housing market will not be resolved and Bristol will continue to be an unaffordable place for people to live.
- 6.4. In direct contrast, the development of land at Brislington Meadows, as allocated for an estimated 300 homes in the adopted Development Plan, will provide a significant contribution of new affordable and market dwellings in a sustainable location.
- 6.5. The proposed de-allocation of this Site has not been justified by BCC. There has been no material change to the Site or its ecological value since it was allocated. The key material change in context is the worsening housing delivery and affordability in Bristol, which places even more emphasis on the need for sustainable housing sites to come forward for development. It has been demonstrated above (Section 3) how the development of Brislington Meadows meets the three objectives of sustainable development as set out in paragraph 8 of the NPPF.
- 6.6. In the absence of an appropriate estimate of housing need and an identified supply of sites to demonstrate capacity to deliver the homes needed, the Council cannot justify removing existing allocated housing sites from the next Local Plan. Even on the basis of the unjustifiably reduced housing requirement figures proposed for the next Local Plan, a consequence of the

proposed de-allocation of the Site is that BCC is considering Green Belt release. The existing allocation and ongoing suitability of the Brislington Meadow site, which is not Green Belt, for development mean that exceptional circumstances cannot exist to justify the contemplated release of Green Belt, having regard to the considerations set out in NPPF paragraph 141.

- 6.7. In order to justify the proposed development strategy, there needs to be greater transparency and clarity around how the respective objectives of the next Local Plan have been weighted and what implications this has for the spatial strategy and approach to allocations. This must be evidenced and supported by an updated Sustainability Appraisal which has not been published.
- 6.8. We contend that it is premature to remove site allocations in the absence of all of the above justification.

**Appendix B: Rebuttal Proof of Evidence:  
Housing Delivery, prepared by Alex J Roberts,  
Director at Lambert Smith Hampton, January  
2023**

**PLANNING,  
REGENERATION  
+ INFRASTRUCTURE**

**Housing  
Delivery Rebuttal**

APP/Z0116/W/22/3308537  
Land at Broom Hill / Brislington  
Meadows  
Broomhill Road  
Bristol  
BS4 4UD

Homes England  
January 2023

## **1.0 INTRODUCTION**

### **1.1 Overview**

- 1.1.1 This rebuttal has been prepared in response to the Proof of Evidence prepared by Mr Gary Collins on behalf of Bristol City Council ('the Council'), with specific reference to housing delivery matters.
- 1.1.2 Within Section 5 of Mr Collins' evidence, he sets out the extant development plan for the Council, in particular the Core Strategy and Site Allocations and Development Management Policies Development Plan Document (SADM).
- 1.1.3 From paragraph 34 to 42, Mr Collins establishes that the appeal site falls within policy SA1 of the SADM, he then goes through the policy and supporting text. Reference is made, at paragraph 39, to the Sustainability Appraisal (SA) (CD 8.3) for the SADM. At his paragraph 40, specific reference is made to the SA paragraph 4.91.4.1 – 4.2. In paragraph 41 of the proof, Mr Collins references the evolution of the site allocation and finally at paragraph 42 he states that:  
*...the Council clearly had not accepted a specific level of harm and had instead identified the need for an acceptable balance of harm and benefits to be achieved...*
- 1.1.4 Through Mr Collins' exploration of the examination process for the SADM, by his reference to the SA, it is important to understand the full context of that examination; how it relates back to the Core Strategy and other evidence base documents which the examining Inspector relied upon to find the SADM sound.
- 1.1.5 Within Mr Collins' Planning Balance and Conclusions, he sets out a sub-section on housing delivery, from page 29 onwards, paragraphs 99 to 109. Whilst he accepts that the Council are unable to demonstrate a 5YHLS, he presents no evidence on housing delivery in Bristol and instead he returns to other matters.
- 1.1.6 In combination, section 5 and the sub-section of housing delivery in Mr Collins' proof, the Council do not set out the steps in the preparation of the SADM which led to the site being allocated for 300 dwellings and they do not set out how the site was an important element to the delivery of the Core Strategy and SADM objectives.



## **2.0 REBUTTAL TO MR COLLINS' PROOF OF EVIDENCE**

### **2.1 Overview**

- 2.1.1 My rebuttal identifies key evidence base and local plan examination documents which are of relevance to the issues identified in Section 1.
- 2.1.2 The Council's evidence base for the examination of the SADM has been removed from their website and annual monitoring reports, or assessments of 5YHLS pre-dating the 2021 publication, are also not available on their website. A full list of documents not available is set out in section 3 of this rebuttal. In addition to this the SADM was adopted without a housing trajectory, despite this being a requirement of the NPPF (2012) paragraph 47 bullet point 3<sup>1</sup>, at the time the plan was examined and latterly adopted. This section has reviewed evidence which is available.

### **2.2 The Strategic Housing Land Availability Assessment (SHLAA) (2009)**

- 2.2.1 The 2009 SHLAA (CD8.22) is part of the evidence base to support the delivery of the development plan, the Core Strategy and SADM. It should be noted that the SHLAA has not been updated since 2009; it is therefore assumed this is the version used during the SADM examination.
- 2.2.2 At paragraph 1.2 it is suggested that;
 

*"The SHLAA aims to identify as many of the potentially developable housing sites in Bristol as possible. Developable sites are those which are considered to be in a suitable location for housing development and have a reasonable prospect of being developed before 2026."*
- 2.2.3 At paragraph 1.3 it states that the intention is to update the document with new information and monitoring as time elapses, however, there is no evidence that this document, published in 2009, has ever been updated to reflect any changes and monitoring data since this time.
- 2.2.4 The SHLAA refers to the land at Broom Hill (SH0085) as a much larger site, than the adopted allocation, measuring 18.5 hectares and extending further to the south and south west than the site allocated in the SADM.
- 2.2.5 On page 4 of the SHLAA at paragraph 8.1 the methodology relating to the estimation of the housing potential of each site is outlined. The SHLAA uses density multipliers and density assumptions based upon an older document, the 2006 HLAA.

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<sup>1</sup> for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target...

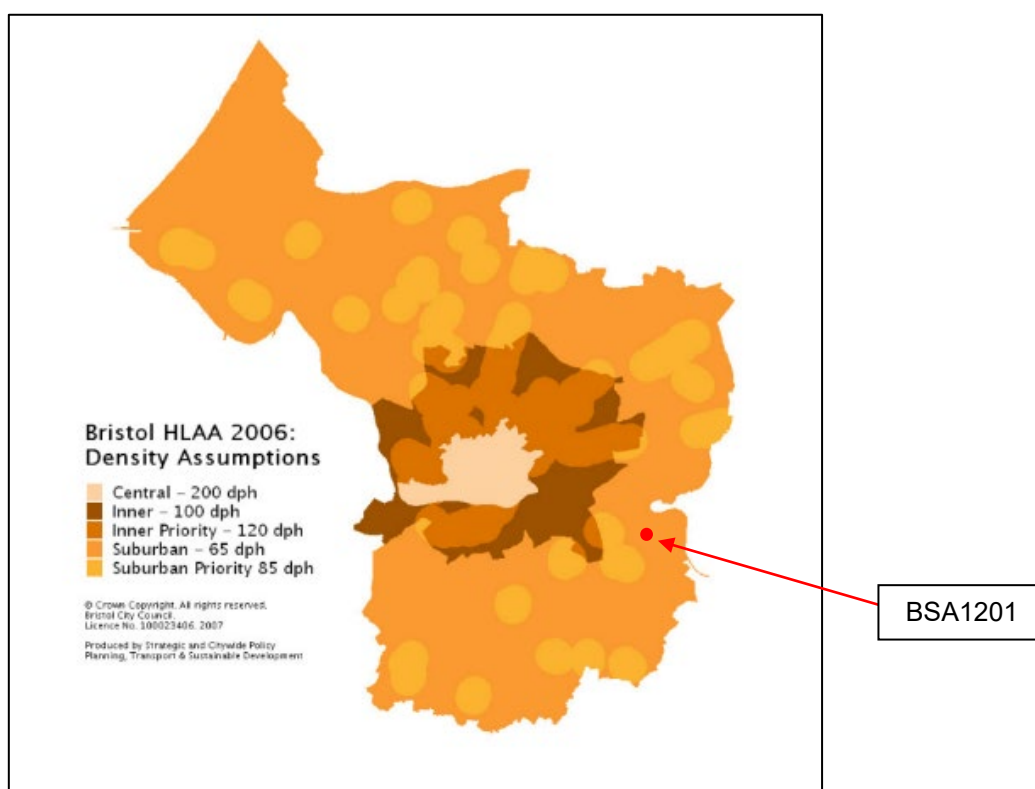
2.2.6 The illustrative dwelling capacities for respective areas within the city are set out in the table below.

**Table 1. Dwelling per hectare (dph) assumptions used in the 2006 HLAA <sup>2</sup>**

Area	Dwellings per Hectare (dph)
Central	200
Inner Priority	120
Inner	100
Suburban Priority	85
Suburban	65

2.2.7 The map below is an extract from the SHLAA and identifies the density assumptions in respective areas of Bristol. The approximate location of the appeal suite is also indicated on the map.

**Map 1. Density Assumptions**



**Source:** BCC SHLAA 2009

2.2.8 The appeal site, indicated on the above map, is located within the 'suburban' density assumption area and therefore, a density assumption of 65dph is applied to the site.

2.2.9 Annex B of the SHLAA contains additional detail on the Land at Broom Hill (SH0085) and suggests that the 18.5ha site has an illustrative capacity for 500 dwellings.

<sup>2</sup> Table extracted from section 8, page 4 of SHLAA

2.2.10 If the dwelling assumption (65dph) is applied to the site size (18.5ha) the result would be a capacity of 1,202.5 dwellings.

2.2.11 Paragraph 8.2 of the SHLAA goes on to say that:

*“Illustrative capacity for sites have taken into account a number of factors including the developable proportion of a site, physical characteristics and policy constraints including, historic environment, slope, site size and shape, access, etc. The likely mix of uses and need to include infrastructure on sites was also considered in producing illustrative capacities.”*

2.2.12 This shows that whilst the site size and dph assumption would suggest a higher yield from the site, that the illustrative capacity of 500, used in the SHLAA, is as a result of the Council applying the methodological step at paragraph 8.2, and therefore the 500 dwellings accounts for potential constraints and additional infrastructure required. The factors listed above are not exhaustive, nevertheless those identified can typically take up large portions of land. It can therefore be seen at this very early stage in the site’s progress to an allocation in the SADM that a reduction to the capacity, as a mitigation measure to on-site constraints, had been factored in.

2.2.13 Furthermore, Annex B of the SHLAA suggests that the illustrative phase for site delivery was 2016-2021, putting the Council’s expectations of site delivery firmly in the earlier stages of the SADM’s plan horizon.

2.2.14 The table on page 7 of the SHLAA outlines the overall level of housing provision from 2006-2026 based upon the SHLAA, Residential Development Survey and five year deliverable housing supply survey and is included below.

**Table 2. Assumed level of net additional housing provision 2006-26 by source and phase**

Source	2006-11	2011-16	2016-21	2021-26	Total
Net dwelling completions 2006/07 to 2008/09	7,000	-	-	-	7,000
Estimate of capacity from sites with planning permission or agreed subject to s.106	4,500	6,900	200	0	11,700
SHLAA illustrative capacity	0	300	5,600	4,500	10,400
Area Green Space Plans (not individually identified)	0	0	0	1,100	1,100
<b>Total</b>	<b>11,600</b>	<b>7,300</b>	<b>5,800</b>	<b>5,600</b>	<b>30,200</b>

Note: figures may not sum due to rounding to nearest hundred

2.2.15 The above is an extract from page 7 the SHLAA and includes source of development as well as phasing and therefore it is assumed that the illustrative capacity of the site (500) was included in the relevant cell of this table.

## **2.3 Bristol City Council Sustainability Appraisal (SA) Main Report: Site Allocations and Development Management Policies (March 2013)**

2.3.1 The SA (CD 8.3) references the allocations in Brislington at paragraph 4.86 where the Appeal Site, Land at Broom Hill (BSA1201) is categorised as a 'Super Major Allocation'.

2.3.2 At paragraph 4.88.3.1 the SA states:

*"Super major site BSA1201, Option A is considered to have potential for significant positive effects, as the site is thought to be able to provide up to 926 new dwellings, over 3% of the Core Strategy housing requirement"*

2.3.3 Initially, in this instance, using the site density assumption and site size, theoretically the site has capacity for over 1,200 dwellings.

2.3.4 It is assumed, as there is no evidence to suggest otherwise, that the reduced capacity of 926 dwellings on the site of 18.5Ha was to account for the documented concern regarding ecological and heritage assets at the site. However, as part of the SA process the allocation size was reduced further.

2.3.5 The SA later goes on to acknowledge that the Preferred Approach is to allocate the site for housing due to the significant positive effects of housing provision, however in paragraph 4.9.2.1 the SA introduces the fact that the number of dwellings for the site had fallen from the 926 provision in the Options Consultation document to 300 at the Preferred Approach.

2.3.6 The SA of the Local Plan Options is set out on page 178, table 4.89; the SA of the Preferred Approach (the adopted plan), is set out on page 185, table 4.92. The sites assessed are different in size and dwellings capacity. There are several assessment criteria which have improved (i.e. moving from negative to positive), through the change in size of the allocation. It can be seen that in the Preferred Approach appraisal, there is no longer a likely significant negative effects 'double negative' rating for *Protect and enhance local ecology* and is instead rated as single positive and single negative. The *Conservation and Wise Use of Land* assessment has changed from neutral / single negative, to neutral. The *Protect and Enhance Green Infrastructure* assessment has changed from neutral to single positive / neutral.

2.3.7 This shows that, despite the size of the allocation and thus the capacity decreasing to 300 dwellings, it remains that the delivery of housing would be a likely significant positive effect, whereas the likely negative effects have decreased, or become positive or neutral effects. This shows that, contrary to Mr Collins' paragraph 41, the Council had accepted the positive and negative aspects of the site and that the positives clearly outweighed the negative.

## **2.4 SADM Inspector Report**

2.4.1 The SADM Inspector's Report (CD8.23) was published on 2<sup>nd</sup> April 2014 and finds the SADM sound, subject to the modifications identified within the report.

2.4.2 The SADM Inspector's Report concludes on the site at paragraph 122:

*“In my judgement, this large site [BSA1201] (9.1 ha) would make an important contribution to the housing needs of Bristol. It is a site of no overriding environmental quality. Matters of significance could be addressed through the normal processes of development management. There is no evidence before me to indicate that the allocation should not be confirmed.”*

- 2.4.3 If the density assumptions, as above, are applied in this instance, 65dph multiplied by a site size of 9.1Ha this results in 591.5, it is therefore assumed as there is no evidence to suggest otherwise, that the final allocation of a site for 300 dwellings takes further account of potential constraints identified through the SA process.

## **2.5 Site Allocation and Development Management Policies (SADMP) Local Plan - Adoption**

- 2.5.1 The SADMP was adopted at a meeting of Full Council on Tuesday 22<sup>nd</sup> July 2014.
- 2.5.2 The SADMP does not have a housing trajectory, identifying when allocations would come forward for residential use, at the point of adoption. This is despite there being a requirement for such in the NPPF (2012).
- 2.5.3 The Council Report at paragraph 8 refers to a version of the SADMP with modified text alterations as track changes as a consequence of the Inspector’s Report. However, the link<sup>3</sup> to this document does not work.
- 2.5.4 The Council Report also refers to appendices including the main Document, Annex and Inspector’s Report; however, the same link is used for these documents and therefore, they are unavailable.

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<sup>3</sup> <http://www.bristol.gov.uk/siteallocations>

## **3.0 CONCLUSIONS AND AVAILABILITY OF EVIDENCE**

### **3.1 Conclusions**

- 3.1.1 The Appeal Site has had several iterations as a proposed allocation, which was subject to several amendments prior to final adoption in the SADM. The evidence available on the Council's website and the Inspector's examination report for the SADM shows the site was, and still is, an important component to the delivery of housing in Bristol in the early years of the SADM. Through the SA process an exercise was carried out by the Council, to reduce the site size and capacity to reduce negative impacts, whilst retaining the significant positive effect of housing delivery.
- 3.1.2 The SADM was examined by the Inspector, with the allocation showing a capacity for 300 dwellings (as per SADM Appendix 2). Therefore, the tests of soundness were carried out based on the 300 dwellings contributing to meeting the objectives and requirement of the Core Strategy. The SADM failed to set out a trajectory for housing delivery/allocations and does not identify when specific allocations are set to come forward. However, the 2009 SHLAA, which the SADM is reliant upon, shows the site to come forward in the earlier years of the SADM. Cumulatively the total allocations would be necessary to meet the total requirement of the Core Strategy.
- 3.1.3 The SA process clearly sets out how the site has been considered by the Council and how changes to the site area and capacity will have less, or no negative impact on certain SA objectives, whilst the likely significant positive effect of delivering housing remains.
- 3.1.4 Upon review of the SHLAA, a table located on page 7 would suggest that the higher figure of 500 has been included in an 'Assumed level of net additional housing provision 2006-2026 by source and phase'. There is no other published information available from the Council, at this point, showing a different delivery assumption for the site.
- 3.1.5 The appeal is for up to 260 homes on a site allocated for 300 with the Inspector's Report for the SADM concluding that the site measuring 9.1ha will be an important contribution to the housing needs of Bristol.
- 3.1.6 The site is not listed in the Council's most recent (2021) 5YHLS assessment, as it is assumed, they did not consider the site to be deliverable when the assessment was carried out. Previous versions of the 5YHLS position of the Council are not available.

### **3.2 Further Evidence Required**

- 3.2.1 Below is a list of evidence base documents that the Appellant requires sight of due to the inaccessibility and unavailability of the documents for public view on the Bristol City Council webpages:
  - 1) Authority Monitoring Reports for each consecutive year between 2011-12 to 2019-20
  - 2) Development Monitoring Reports for each consecutive year between 2011-12 to 2019-20

- 3) Five Year Housing Land Supply Assessments that predates the published version on the Bristol City Council webpage.
- 4) The “BCC response to Inspector’s issues and questions – Strategic Matters” as referred to in paragraph 22 of the Inspectors Report into the Bristol Site Allocations and Development Management Policies Local Plan.
- 5) The document referred to at paragraph 8 of the Full Council Report for the meeting on 22<sup>nd</sup> July 2014, namely, ‘Site Allocations and Development Management Policies showing the modifications as added/delete text’.

**Appendix C: Rebuttal Proof of Evidence  
prepared by Amir Bassir, Principal  
Historic Environment Consultant at The  
Environment Partnership, January 2023**



## Brislington Meadows - Rebuttal Proof of Evidence

<b>Project</b>	Brislington Meadows	<b>Author</b>	Amir Bassir BSc PGCert MCIfA
<b>Date</b>	24/01/23	<b>Checked</b>	Francis Hesketh BSc(Hons) MCIEEM CEnv CMLI MICFor
<b>Doc Ref</b>	7507.43.037	<b>Approved</b>	Jason Clarke BSC (Hons) MA MCIfA
<b>Version</b>	1.1	<b>Purpose</b>	Rebuttal evidence in respect of 'Statement of Ken Taylor'

- 1.1 I provide the following rebuttal evidence in response to the 'Statement of Ken Taylor'. I do not respond to every point in that evidence, only those which I consider will most assist the inquiry at this stage. The fact that I have not responded to a particular point does not indicate a concession or acceptance of that evidence.
- 1.2 **Paragraph 1** – Archaeological surveys of the site have not provided evidence of continuous occupation of the site. No archaeological features post-dating the Roman period were identified during the trial trench evaluation and as such there is no known archaeological evidence for occupation or activity at the site between the end of the Roman period and the post-medieval period.
- 1.3 **Paragraph 3:** The glass finds were recovered from the fill of a single feature. The assemblage included fragments of glass and glass waste and 72 beads that may represent a single necklace. These were found along with four iron nails and a small amount of charcoal fragments and may represent a dump of industrial waste material. A small quantity of fragments of industrial waste including a crucible fragment and pieces of fired clay were recovered from two other features.
- 1.4 The evaluation report concluded that the archaeological features identified during the works formed a planned and coherent system of enclosures of 2<sup>nd</sup> to 4<sup>th</sup> century date but was not able to confirm the purpose of these features. The presence of industrial debris including possible glass working residues may indicate small-scale industrial processes however there was no conclusive evidence that these processes were taking place within the investigation area. The deposition of these archaeological finds within a small number of features may indicate that they represent a single deposit of waste material rather than evidence for wide-scale industrial activity on the site. A similar assemblage of glass beads is also recorded to have been found at the Brislington Roman Villa site, indicating that glass-making activity was taking place in the vicinity of Brislington during the Roman period.
- 1.5 The trial trench evaluation was guided by the results of a geophysical survey and targeted features of possible archaeological origin, as well as to test 'negative' areas. No features suggesting the remains of industrial working such as glass kilns were identified during the trial trenching.
- 1.6 The Brislington Meadows site has the has the potential to include archaeological remains associated with glassmaking, however this is not definitive. The site of such activity may be located outside of the development site bounds, with material

evidence such as glass waste which was found on the Brislington Meadows site representing disposal of waste away from the centre of industrial activity. A significant amount of modern development has been carried out in the wider area of the site without any archaeological investigation, and the sites of industrial activity may already have been removed by that development.

- 1.7 If present, such remains could be of regional significance as highlighted by the Council's Principal Historic Environment Officer, who has not objected to the development and has stated that the impact of development could be mitigated via a programme of archaeological works. The extent of archaeological mitigation would be set out in a Written Scheme of Investigation to be agreed with the Principal Historic Environment Officer who would monitor the works. This is the most appropriate approach and is consistent with paragraph 205 of NPPF, Policy DM31 of Bristol Local Plan, and SPD7.
- 1.8 A recently submitted application to Historic England requesting that the Brislington Meadows site be designated as a scheduled monument has been rejected. As part of their decision-making process Historic England reviewed the results of the Appellant's desk-based assessment, geophysical survey, and trial trench evaluation report. The Historic England assessment report (appended) considered the survival, diversity, potential and rarity of the archaeological remains and noted that, whilst finds indicative of industrial activity and glass-working were recovered, there is a lack of evidence for industrial or domestic structures within the investigation area. The assessment concluded that whilst the development site has a high potential to include archaeological remains of the Roman period, the identified remains cannot be said to have clear national significance.
- 1.9 **Paragraph 6** – *"The meadows have been preserved as agricultural fields since the end of the Roman period"* The current layout of the fields is not reflective of the Roman landscape and no conclusive evidence has been found or brought forward that the current landscape predates the 18th century. There is at present no clear evidence of land use at Brislington Meadows between the Roman and post-medieval period.
- 1.10 **Paragraph 8** – it is not clear or confirmed that the east-west aligned hedgerows are lynchets or pre-date the late 18th century. The 1791 Estate Map provides field colour coding which confirms that the site was in mixed use, with the parcels labelled as Four Acres, Five Acres and Little Blackwood used for pasture, and Pool Close and Two Acres were arable. The remainder of the land was freehold. Aerial views of the site dated to 1938 do now show any significant soil build-up alongside the hedgerows which were kept closely cropped. Any build-up of soil against these boundaries is likely to be modern and the result of natural soil erosion and deposition in an unmanaged landscape. Modern mechanised ploughing may also have contributed to this process.
- 1.11 Comparison of historic mapping and Lidar has demonstrated that the linear striations interpreted as ridge and furrow do not respect the position of a former hedgerow visible on 1791 mapping. These marks are considered likely to result from modern activity such as mechanised ploughing.

- 1.12 **Paragraph 9** – The desk-based assessment did not include bomb craters as part of the baseline assessment. The features within the site are not clearly defined on Lidar information and may be backfilled and naturally silted. As a heritage asset, these would be of negligible or low heritage significance. The location of the features is visible on aerial photographs. No archaeological mitigation is considered necessary to mitigate the impact of development if these are to be removed.
- 1.13 **Paragraph 10** – The desk-based assessment did not include the stock pond as a heritage feature, likely due to vegetation overgrowth at the time of survey which obscures the remains. The feature is visible on first edition Ordnance Survey mapping. No evidence has been put forward that this is a wagon pond. As a heritage asset the pond is of low heritage significance. Preservation in situ within the masterplan would be recommended. If impacts cannot be avoided, preservation through record can be achieved via a programme of archaeological works secured as a condition.
- 1.14 **Paragraph 11** – Pedestrian access through the site is maintained in the development with minor variation of the current route to accommodate new landscaping and features. As a heritage asset the footpath would be of low heritage significance. The development would affect a small part of a route considered to be several miles in length.
- 1.15 **Paragraph 12** – The current field pattern represents the partial remains of the extent of former fields. Map evidence confirms that 19th century and modern development has reduced the historic extent of several of the fields, including through the merger and loss of fields at the north of the site. The site is not considered to represent a complete and cohesive historic landscape.
- 1.16 **Appendix 1** - It is not certain or confirmed that the development site was historically part of an open field system. Supposed ridge and furrow remains are considered by the Appellant to have derived from modern activity. The Lynchets are considered to be modern and have formed as a result of natural soil erosion and deposition.
- 1.17 The earliest detailed map of the site, 1791, confirms that the majority of the site was in pasture, arable and free-hold use at that time. The site is confirmed to border the former Brislington Common and a small part of the northern limits of the site were part of an area which was enclosed by Act of parliament in c1778. The nomenclature of the fields (two-acre, three-acre, four-acre etc) is indicative of an organised land management and it is likely that the area of the site was enclosed through private agreement. This may have been undertaken as a piece-meal process over a period of time, or as a single event the date of which is not recorded. The western extent of the field, formerly allotments, appears to have remained as waste ground until the mid-19th century.
- 1.18 Several hedgerows within the site and forming its bounds have been assessed as Important in accordance with heritage and archaeology criteria of the Hedgerow Regulations 1997 as they can be demonstrated to pre-date 1845. A consensus on the

exact date of the establishment of the hedgerows is not necessary to establish Importance which will remain unchanged.

**Application Name:** **Brislington Meadows are a series of grassland fields that stretch from School Road access point across to Bonville Road in Brislington**

**Number:** 1484609  
**Type:** New  
**Heritage Category:** Scheduling

**Address:**

Brislington Meadows, Brislington, Bristol

County	District	District Type	Parish
	City of Bristol	Unitary Authority	Non Civil Parish

**Recommendation:** **Reject**

**Assessment**

**Context and Background:** Historic England has received an application requesting that we assess Brislington Meadows for designation as a scheduled monument. The application has been prompted by an outline planning application (22/01878/P) for a housing development of up to 260 residential units with associated infrastructure on a 9.6 hectare site to the north-east of Brislington. The application was received by Bristol City Council on the 12 April 2022. It is yet to be determined and is currently the subject of an appeal. The planning inquiry is due to begin on 31 January 2023.

The site is not within a conservation area but is bounded to the south by Brislington Conservation Area and to the north by Avon Valley Conservation Area. There are no listed buildings within the development site.

**History and Details:** a desk-based historic environment assessment (2020) followed by a geophysical survey by Wessex Archaeology (2021) and a trial trench evaluation by Cotswold Archaeology (2021) revealed evidence for a system of linear and rectilinear enclosures of indeterminate function concentrated in the south-west of the site. Associated finds that included 45 pottery sherds, four iron nails from a posthole, a fragment of worked sandstone, as well as a crucible fragment, an assemblage of 72 glass beads that may have formed a necklace, glass fragments, and other industrial waste are indicative of a site of domestic and industrial activity dating to the Roman period between the C2 to C4. The evidence for glass working on the site, whether that be manufacture or recycling of glass, is particularly noteworthy. However, there is so far a lack of evidence for associated industrial or domestic structures and many of the trenches did not contain any finds or evidence for Roman activity.

**Criteria/Assessment:** the Ancient Monuments and Archaeological Areas Act (1979) states that monuments are scheduled by reason of their archaeological, historic, architectural, artistic or traditional national importance. The Department for Culture, Media and Sport's 'Scheduled Monuments: Identifying, protecting, conserving and investigating nationally important archaeological sites under the Ancient Monuments and Archaeological Areas Act 1979, Annex 1' (2010), sets out the non-statutory criteria which provides further guidance on assessing national importance. Key considerations are period, rarity,

documentation, group value, survival/condition, fragility/vulnerability, diversity and potential. Monuments are assessed under those criteria relevant to their type. The criteria should not be regarded as being definite, but as indicators which contribute to a wider judgement based on the individual circumstances of the case.

With reference to the criteria Brislington Meadows is not recommended for scheduling for the following principal reasons:

\* Survival: the archaeological remains may be part of a larger settlement site, with domestic and industrial activity, but the location, extent, and degree of survival remains unknown;

\* Diversity: the site lacks evidence of a diverse range of features which would strengthen our understanding of how the site was used;

\* Potential: the likelihood of further, probably Roman, remains in the vicinity is high, and although there is the potential for further evidence relating to glass working in particular, the character and nature of the archaeology and understanding of the site is not yet clearly determined;

\* Rarity: although evidence for glass working or making in the Romano-British context is so rare that regional representation is not a consideration, there is not the necessary degree of evidence and preservation that would be needed to recommend the site for scheduling.

**Conclusion:** the archaeological investigations have provided some evidence of features and finds associated with a Romano-British settlement, but its extent and character cannot be determined, and on the basis of current information, these remains cannot be said to have clear national importance. The Romano-British site at Brislington Meadows is not, therefore, recommended for scheduling.