

STATEMENT OF COMMON GROUND BETWEEN:

HOMES AND COMMUNITIES AGENCY (trading as HOMES ENGLAND)

AND

THE CITY COUNCIL OF BRISTOL

In relation to an appeal by Homes England against the failure of Bristol City Council to determine an application for planning permission (reference. 22/01878/P) for the 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 on land at Broomhill / Brislington Meadows, Broomhill Road, Bristol

Planning Inspectorate Reference: APP/Z0116/W/22/3308537

Bristol City Council Reference: 22/01878/P

Signature LDA DESIGN Date: 06.03.2023

Name: LDA Design Position Agent

On behalf of HOMES AND COMMUNITIES AGENCY (trading as HOMES ENGLAND), One Friargate, Coventry, CV1 2GN

Signature Gary Collins Date: 08.03.2023

Name: Gary Collins Position Head of Development Management

On behalf of THE CITY COUNCIL OF BRISTOL, City Hall, College Green, Bristol, BS1 5TR

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1. The Planning Application and Agreed Description of Development

1.1 The parties agree that:

1.1.1 the appeal reference is APP/Z0116/W/22/3308537

1.1.2 the site address is as follows:

Land At Broom Hill/Brislington Meadows Broomhill Road Bristol BS4 4UD

1.1.3 the description of development is as follows:

Application for Outline Planning Permission with some matters reserved - Development of up to 260 new residential dwellings (Class C3 use) together with pedestrian, cycle and vehicular access, cycle and car parking, public open space and associated infrastructure. Approval sought for access with all other matters reserved.

The Planning Application

1.2 The Appellant applied for outline planning permission (all matters reserved apart from access) to Bristol City Council ('the Council') in April 2022, via the Planning Portal (online submission only).

1.3 The planning application was registered as valid by the Council on 27 April 2022 and given the reference 22/01878/P.

1.4 Following consultation on the application documents and some submission of further information, the statutory determination period for the application ended on 27 July 2022 (13 weeks). The application was not determined in this timeframe and no extension of time was agreed.

1.5 The appeal submission against non-determination of the application was made on 7 October 2022. In accordance with Recommendation 3 of the Rosewell Review into inquiry appeals, the Appellant gave notice to the Local Planning Authority and Planning Inspectorate not less than 10 working days prior to the intended date for the submission of the appeal.

Bristol Development Control Committee

1.6 In appeals against non-determination, the Council is required to put forward to the Planning Inspectorate the basis upon which the planning application would have been determined if a decision had been taken by the Local Planning Authority. The Council therefore presented Officers recommendation for the determination of the application to the Bristol Development Control Committee on 7 December 2022. This was set out in a report (CD10.2) to the Committee, with the putative reasons considered by the Committee being set out in the Amendment Sheet (CD10.3) as these had been revised since the main report was published. It is agreed that the standard of reasoning for putative reasons for refusal in case where the LPA has not determined an application within the statutory timescale is no less than it is under Article 35 of the DMPO in a case

where the LPA has complied with the statutory duty (were it otherwise then the LPA would be benefiting from its breach of statutory duty).

1.7 The Officer's recommendation was for the refusal of the application which was agreed by Members.

1.8 The reasons for refusal were agreed by Members as follows:

- 1) *The proposed development is considered to result in significant harm to biodiversity, for which it provides neither adequate mitigation nor compensation (whether on or off site). The application is therefore considered contrary to the development considerations of allocation BSA1201 of the Site Allocations and Development Management (2014), policy BCS9 of Bristol Development Framework Core strategy (2011) policies SA1, DM17 and DM19 of the Site Allocations and Development Management (2014), and paragraphs 174, 179 and 180a of the NPPF (2021).*
- 2) *The proposed development fails to retain important hedgerows and trees within the proposal site and is therefore considered contrary to the development considerations of allocation BSA1201 of the Site Allocations and Development Management (2014), policy BCS9 of Bristol Development Framework Core strategy (2011) policies SA1, DM15, DM17 and DM19 of the Site Allocations and Development Management (2014).*
- 3) *The proposal would lead to the loss and deterioration of Irreplaceable Habitat without either a wholly exceptional reason or a suitable compensation strategy. It is therefore contrary to the development considerations of allocation BSA1201 of the Site Allocations and Development Management (2014), policy BCS9 of Bristol Development Framework Core strategy (2011) policies SA1, DM15, DM17 and DM19 of the Site Allocations and Development Management (2014) and paragraph 180c of the NPPF.*
- 4) *The proposed development fails to adhere to the landscape and urban design policy considerations by virtue of excessive damage to the existing features on the site. The proposed plans and supporting documents present unsympathetic responses to the natural assets on the site and surrounding context and would prejudice the future design and delivery of an appropriate scheme. The proposal will fail to meet the requirements of the NPPF; policy BCS21 of the Core Strategy 2011; and policies SA1, DM26, DM27, DM28 and BSA1201 of the Site Allocations and Development Management Policies 2014.*
- 5) *In the absence of an appropriate agreement under s106 of the Town and Country Planning Act 1990, the proposed development fails to make provision for the following:*
 - *Affordable Housing*
 - *Ecological Mitigation (including BNG Biodiversity Off Setting),*

- Financial Contributions towards Fire Hydrants, Public Transport Facilities, amending Traffic Regulation Orders, Tree Planting, Training and Employment Initiatives,
- Management and Maintenance of on-site Public Open Space,
- Travel Plan Audit Fee and contribution,
- Highway works including cycle and pedestrian works though Bonville Trading Estate.

These are required in order to mitigate the impacts of the development. The proposal is therefore contrary to policies BCS10, BCS11 and BCS17 of the Bristol Local Plan: Core Strategy (2011) policies DM15, DM16, DM17, DM19, DM23 of the Bristol Local Plan: Development Management Policies (2014) and the Planning Obligations SPD (Adopted 2012).

1.9 It was also resolved that;

The Head of Development Management in consultation with the Head of Legal Services be authorised :-

- (a) To draft and sign the Council's Statement of Case for the appeal*
- (b) To agree and sign the Statement of Common Ground for the appeal*
- (c) To negotiate and complete any s106 obligation that can be negotiated with the applicant that mitigates the impact of the development*
- (d) To prepare and present the evidence on behalf of the Council based on the recommended reasons for refusal outlined in this report*
- (e) To take all necessary decisions arising during the course of the Inquiry proceedings relating to the presentation of the Council's case.*

2. List of plans and documents submitted to the Council

2.1 The parties agree that the following list of plans and documents are those that have been submitted to and consulted on by the Council prior to this appeal:

Reports:

- **Application Form & Certificates** – April 2022, submitted by LDA Design
- **Planning Statement** - April 2022, prepared by LDA Design
- **Design and Access Statement** - April 2022, prepared by LDA Design
- **Transport Assessment** – April 2022, prepared by Key Transport Consultants
- **Framework Travel Plan** – March 2022, prepared by Key Transport Consultants
- **Outline Construction Environmental Management Plan** – March 2022, prepared by Campbell Reith
- **Historic Environment Summary (including built heritage and archaeology evaluations)** – April 2022, collated and summary provided by The Environment Partnership
- **Arboricultural Impact Assessment** – March 2022, prepared by The Environment Partnership
- **Townscape and Visual Impact Assessment** – April 2022, prepared by LDA Design
- **Ecology Impact Assessment and Technical Appendices** – April 2022, prepared by The Environment Partnership
- **Outline Biodiversity Net Gain Assessment** – April 2022, prepared by The Environment Partnership
- **Noise Impact Assessment** – March 2022, prepared by Accon UK Environmental Consultants
- **Air Quality Assessment** – April 2022, prepared by Accon UK Environmental Consultants
- **Sustainability and Energy Statement** – April 2022, prepared by Kovia Consulting
- **Contamination – Land Quality Statement** – March 2022, prepared by Campbell Reith
- **Flood Risk Assessment and Drainage Strategy** – March 2022, prepared by Campbell Reith
- **Health Impact Assessment** – April 2022, prepared by Kovia Consulting

- **Statement of Community Involvement** – March 2022, prepared by Cadence PR
- **Utilities Assessment** – March 2022, prepared by Campbell Reith
- **DRAFT Planning Obligations Heads of Terms**

For approval

- Design Code - April 2022, prepared by LDA Design
- Location Plan (LDA Design No. 7456_016)
- Parameter Plans
 - Land Use (LDA Design Drawing No. 7456_103 PL1)
 - Heights (LDA Design Drawing No. 7456_104 PL1)
 - Access and Movement (LDA Design Drawing No. 7456_101 PL1)
 - Landscape (LDA Design Drawing No. 7456_102 PL1)
- Access Layout Details
 - Broomhill Road Preliminary Access Layout Plan (Key Transport Consultant No. 1066-007.D)
 - Bonville Road Emergency Vehicle Access (Key Transport Consultant Drawing No. 1066-014)
 - School Road Pedestrian and Cycle Link (Key Transport Consultant Drawing No. 1066-016)
 - Allison Road Pedestrian and Cycle Link (Key Transport Consultant Drawing No. 1066-003.H)

Drawings for illustrative purposes only

- Illustrative Masterplan (LDA Design Drawing No. 7456_105 PL1)

Additional Information submitted to the Council post-submission of the application (prior to submission of this appeal):

- Outline Biodiversity Net Gain Metric 3.0 calculation – *submitted to the Council on 24 May 2022*
- Arboricultural Impact Assessment (V2) – *submitted to the Council on 26 May 2022*
- Applicant's response to initial urban design comments received from the Council's City Design Group (CDG) – *submitted to the Council on 19 July 2022*
 - Site Sections (LDA Design Drawing No. LDX_7456_XX_XX_DR_2001_Rev A)
 - Isopachtyes Plan Formation Against Topsoil Strip Tree Survey Overlay (Campbell Reith Drawing No. DR-C-5007-P1)

- Drawing 3: Tree Conflict Plan (Full Site) (TEP Drawing no. D7507.21.303)
 - Ecology, Trees, Estimated Ground Level Changes, Estimated Habitat Losses and Development Platform Overlay CONFIDENTIAL (TEP Drawing No. G7507.20.064)
- Building with Nature (BwN) assessment and accreditation – *submitted to the Council on 19 July 2022*
 - BwN Summary of Award (July 2022)
 - BwN Certificate of Accreditation of 2.0 Design Award (12 July 2022)
 - BwN Audit (July 2022)
- Employment and Skills Statement – *submitted to the Council on 23 June 2022*
- Applicants' response to initial highways comments received from the Council's Transport Development Management team (TDM) – *submitted to the Council on 8 August 2022*
 - Proposed Improvements to Pedestrian Route to East Sheets 1 of 7 (KTC drawing no. 1066-020-01)
 - Proposed Improvements to Pedestrian Route to East Sheet 2 of 7 (KTC drawing no. 1066-020-02)
 - Proposed Improvements to Pedestrian Route to East Sheets 3 of 7 (KTC drawing no. 1066-020-03)
 - Proposed Improvements to Pedestrian Route to East Sheets 4 of 7 (KTC drawing no. 1066-020-04)
 - Proposed Improvements to Pedestrian Route to East Sheets 5 of 7 (KTC drawing no. 1066-020-05)
 - Proposed Improvements to Pedestrian Route to East Sheets 6 of 7 (KTC drawing no. 1066-020-06)
 - Proposed Improvements to Pedestrian Route to East Sheets 7 of 7 (KTC drawing no. 1066-020-07)
 - Indicative Contour and Retaining Wall Plan (Campbell Reith Drawing No. DR-C-5001-P4)
- Applicant's response to the statutory consultation comments received from the Council's Landscape Officer – *submitted to the Council on 7 October 2022*
- Applicant's response to the statutory consultation comments received from the Council's Nature Conservation Officer and Arboricultural Officer – *submitted to the Council on 7 October 2022*

3. List of new plans and documents not previously seen or consulted on by the Council

3.1 Please refer to submitted Core Documents:

- CD9 – Appellant’s Statement of Case and Appendices
- CD12 – Appellant’s Proof of Evidence
- CD16 – Appellants Rebuttal Proofs of Evidence

4. Relevant planning history

- 4.1 The parties agree that the only relevant planning decision-making (as opposed to plan-making) history of the Appeal Site is as follows:

Reference	Address	Scheme	Decision
19/05220/PREAPP	Land At Broom Hill (Meadows) Broomhill Road Bristol BS4 4UD	Provision of up to 300 residential units with infrastructure	Response – January 2020
20/05675/SCR	Land At Broom Hill (Meadows) Broomhill Road Bristol BS4 4UD	Request for a Screening Opinion as to whether an Environmental Impact Assessment is required for a residential development comprising up to 300 homes.	Response – December 2020
21/00550/P	Land At Broom Hill (Meadows) Broomhill Road Bristol BS4 4UD	Outline application for preliminary works to deliver a 'Green Link' between Brislington Meadows and Broomhill Road, including the laying of a pedestrian footpath, ecological enhancements and provision of a temporary construction access and compound within the site to facilitate the preliminary works.	Pending determination

5. **List of the relevant development plan policies for determining the application**

5.1 The statutory adopted development plan, insofar as it relates to this appeal, comprises the following:

- Site Allocations and Development Management Policies Plan (2014) and Annex: Site Allocations Information (2014) – Site Reference. BSA1201
- Core Strategy (2011)
- Policies Map (2014)

5.2 The parties agree that the following are relevant policies in the development plan for the purposes of the determination of the appeal. Those policies cited in the Reasons for Refusal are marked with an asterisk (*).

Site Allocation Development Management Policies Plan (2014)

- Policy SA1 - Site allocation ref. BSA1201*
- Policy DM1 – Presumption in favour of sustainable development
- Policy DM15 – Green Infrastructure Provision*
- Policy DM16 – Open Space for Recreation
- Policy DM17 – Development Involving Green Infrastructure*
- Policy DM19 – Development and Nature Conservation*
- Policy DM22 – Development adjacent to waterways
- Policy DM23 – Transport Development Management*
- Policy DM26 - Local Character and Distinctiveness*
- Policy DM27 – Layout and Form*
- Policy DM28 – Public Realm*
- Policy DM29 – Design of New Buildings
- Policy DM31 – Heritage Assets
- Policy DM35 – Noise Mitigation

Core Strategy (2011)

- Policy BCS1 – Development in South Bristol
- Policy BCS5 – Housing Provision
- Policy BCS9 – Green Infrastructure*
- Policy BCS10 – Transport and Access Improvements
- Policy BCS11 – Infrastructure and Developer Contributions
- Policy BCS13 – Climate Change
- Policy BCS15 – Community Facilities
- Policy BCS16 – Flood Risk and Water Management
- Policy BCS17 – Affordable Housing Provision
- Policy BCS18 – Housing Type
- Policy BCS20 – Effective and efficient use of land
- Policy BCS21 – Quality Urban Design*

- Policy BCS22 – Conservation and the Historic Environment

5.3 Since the submission of the appeal, the Council has now published a further draft policies and site allocations plan for Regulation 18 consultation as part of the Local Plan Review. The consultation ran from 28 November 2022 – 20 January 2023.

5.4 The emerging Local Plan intends to allocate new sites for development and to retain most of the undelivered sites allocated for housing in the current adopted Development Plan. However, in respect of the Appeal Site the Council propose to remove the allocation for housing. Paragraph 11.15 of the current consultation document states:

The local plan consultation in 2019 proposed that development site allocations from the existing local plan which had not yet been developed should be retained in the new local plan. It is proposed that this should remain the approach, with the exception of two locations where a change is considered necessary to reflect the greater priority for biodiversity required in response to declaration of the ecological emergency.

5.5 The weight to be afforded to the emerging Local Plan is discussed in Section 9 (Matters Not Agreed).

Other relevant planning policy and guidance

5.6 The parties agree that the following items of current and adopted planning policy and planning guidance are relevant to the determination of the appeal:

Item
NPPF
NPPG
National Model Design Code
Bristol Urban Living SPD (November 2018)
Bristol Affordable Housing SPD (April 2019)
Bristol Planning Obligations SPD (September 2013)

Public Rights of Way

5.7 The Appellant has acknowledged that various rights of way over the Appeal Site are likely to have been established through long use or presumed dedication at common law. The Appellant is in discussions with the Council and it is agreed that these rights of way can be adequately dealt with through separate statutory processes, such that they

do not weigh against the Appeal Scheme in the planning balance. This matter is established in the land agreement between the Council and the Appellant.

6. Appeal Site and Surroundings

- 6.1 The parties agree that paragraphs 2.1 to 2.13 of the Appellant's Statement of Case (September 2022) accurately describe the appeal site ('the Appeal Site') and surrounding area.

7. The Appeal Scheme

- 7.1 The parties agree that paragraphs 3.1 to 3.7 of the Appellant's Statement of Case (September 2022) accurately describe the appeal scheme ('the Appeal Scheme') and development proposals.
- 7.2 The Council do not agree paragraphs 3.8 and 3.9 of the Appellant's Statement of Case. These are set out in Section 9 (Matters Not Agreed).

8. Matters Agreed between the Appellant and the Council

8.1 This section sets out the matters which are agreed between the parties.

Scope of the Application

8.2 The application is submitted in outline, with all matters reserved apart from access. This is considered to be appropriate and the information submitted with the application (including the Parameter Plans and Design Code referred to in 8.4) was sufficient for the validation of the application. There has been no request by the Council for further details to be submitted on any reserved matter, as per article 5(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

8.3 The Appellant's position is that in considering the acceptability of this application for outline planning permission, the key question is whether if outline permission is granted an acceptable scheme is capable of coming forward at the reserved matters stage as governed by the extent of development determined by the approved description of development, and the elements of the proposal that are fixed by the grant of permission.

8.4 The Council's position is that in considering the acceptability of this application for outline planning permission, the key question is whether if outline permission is granted an acceptable scheme is capable of coming forward at the reserved matters stage as governed by the extent of development determined by the submitted description of development, the Parameter Plans and other fixed elements of the proposal that have been put forward.

8.5 The following documents are agreed as submitted for approval by the Appellant¹:

- Land Use Parameter Plan (LDA Design Drawing No. 7456_103 PL2)
- Heights Parameter Plan (LDA Design Drawing No. 7456_104 PL2)
- Access and Movement Parameter Plan (LDA Design Drawing No. 7456_101 PL2)
- Landscape Parameter Plan (LDA Design Drawing No. 7456_102 PL2)
- Broomhill Road Preliminary Access Layout Plan (Key Transport Consultant No. 1066-007.D)
- Bonville Road Emergency Vehicle Access (Key Transport Consultant Drawing No. 1066-014)
- School Road Pedestrian and Cycle Link (Key Transport Consultant Drawing No. 1066-016)
- Allison Road Pedestrian and Cycle Link (Key Transport Consultant Drawing No. 1066003.H)
- Design Code (April 2022)

¹ Refer to paragraph 9.624 for matters not agreed.

Principle of Development

- 8.5 The majority of the Appeal Site (93.1% of the total Appeal Site area) is allocated for development in the adopted development plan (Site Allocations and Development Management Plan, 2014).
- 8.6 The allocation for the Appeal Site states that the Appeal Site has an estimated capacity for 300 homes. This conclusion was reached based on the Council's consideration of the site during the adoption of the Site Allocations and Development Management Policies Plan (2014). The annex to this document includes the following text:

"For each site an explanation for the allocation is provided. For those sites with a housing allocation, an estimated number of homes which could be developed on the site is provided. The precise number of homes to be developed will be determined through the planning application process".

- 8.7 Policy SA1 and allocation BSA1201 require that any proposal should accord with specific development considerations and details set out in the Site Allocations and Development Management Annex.
- 8.8 In planning policy terms the application site is not considered to be within an SNCI, as evidenced on the Council's adopted Local Plan Policies Map. Therefore, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, for the purposes of the determination of the Appeal, the Appeal site it is not considered to be within the SNCI as it is not shown as being so in the development plan.
- 8.9 In total, 93.1% of the Site is allocated for housing and the adopted development plan supersedes the previous designation of the site as an SNCI under the 1997 Local Plan (confirmed by Appendix 3 to the Site Allocation Development Management Policies Plan (2014)).
- 8.10 It is noted that the Council's Pinpoint Mapping system and records held by the Bristol Regional Environmental Records Centre indicate that the proposal site lies within the Brislington Meadows SNCI. It is agreed that these documents do not form part of the adopted Development Plan for the reasons set out in paragraph 8.8 above.
- 8.11 It is agreed that Site Allocation BSA1201, under Policy SA1, prevents any SNCI status of the Appeal Site as being an 'in principle' reason for refusal under the relevant part of Policy DM19 which relates to SNCIs.
- 8.12 There are five small areas of land included in the application red line boundary which fall outside of the site allocation area defined under Policy SA1 – Site Allocation ref. BSA1201. Together these constitute 6.9% of the total Appeal Site area. This includes the site of the former Sinnott House police station on Broomhill Road which comprises previously developed land, as well as land to the rear of the former police station which

is designated as Important Open Space on the Council's Policies Map. The agreed recommendations of the Council's Cabinet meeting 1st November 2016 confirmed that primary vehicle access to the allocated land will be via a new access built on this land parcel. The Council agree the use of this land is appropriate to facilitate the appeal scheme.

- 8.13 The Appeal Site also comprises two existing points of connection in the south-western corner of the site, also allocated as Important Open Space on the Council's Policies Map. This comprises the existing pedestrian and cycle access to School Road which will be retained and enhanced, as supported by the site allocation, as well as the existing pedestrian access into Victory Park which has been included to facilitate drainage connections and which will be retained as a pedestrian and cycle connection once the drainage works have been completed.
- 8.14 It is agreed that these are appropriate uses of those areas of unallocated land, in order to deliver the development of the allocated site.
- 8.15 These two points of connection are also still allocated as part of the wider Victory Park SNCI designation according to the adopted Local Plan Policies Map, however it is agreed that the function of this existing land in providing points of pedestrian and cycle access will be retained as a result of the Appeal Scheme.
- 8.16 Two further areas of unallocated land are included in the Appeal Site boundary. This includes the proposed emergency access, pedestrian and cycle connection to Bonville Road, as supported by the site allocation, and the proposed 'School Link' pedestrian and cycle connection to Allison Road. These areas are not subject to any specific designation according to the adopted Policies Map but have been included as a result of a comprehensive Masterplanning exercise and to facilitate sustainable travel connections to the local area, as envisioned in the site allocation. It is agreed that this is consistent with the explanation and aspiration underpinning the allocation.
- 8.17 It is agreed that the Appeal Site comprises a sustainable location close to the Broomhill Road / Fermaine Avenue Local Centre and local shops, community facilities, employment areas and public transport infrastructure, as explained under Site Allocation BSA1201.
- 8.18 It is agreed that the principle of residential development in this location has already been established and is considered acceptable.
- 8.19 It is also agreed that if the appeal scheme is properly to be judged as in accordance with the development plan (either on the basis of complete compliance with every policy or pursuant to the principle of accordance with the plan as a whole), there are not material considerations of sufficiently compelling weight to outweigh that accordance and compel refusal of planning permission. The direction in this situation under NPPF para. 11(c) would be that the appeal scheme should be, and should have been, approved

without delay. The parties disagree, however, as to whether the appeal scheme is indeed in accordance with the development plan so as to engage NPPF para. 11(c).²

Bristol Housing Supply

- 8.20 The Appeal Scheme will deliver up to 260 homes. It is agreed that this will make an important contribution to the Council's housing supply (including within the current five year housing land supply period), set out under Core Strategy Policies, BCS1, BCS5 and as explained under Site Allocation BSA1201.
- 8.21 It is agreed that the Council cannot currently demonstrate a five-year housing land supply. The extent of the shortfall is being discussed between the parties and is the subject of a specific statement of common ground and further evidence.
- 8.22 The Council consider they have a housing land supply of 2.45 years.
- 8.23 The Appellant considers the Council has a housing land supply of 2.24 years.
- 8.24 A range of 2.24 – 2.45 years is therefore agreed between the parties.

Affordable Housing

- 8.26 In accordance with Core Strategy Policy BCS17 and the Council's Affordable Housing SPD, the Appeal Scheme provides a policy compliant level of affordable housing. In total, 81 units (30%) will be delivered as affordable dwellings.
- 8.27 During consultation on the application, comments were received from the Council's Strategy and Enabling Planning team in respect of the planning application (Appendix B, CD3.4). Officers had no objection to the proposals in principle and offered comments on the detailed requirements in terms of the mix and location of the affordable dwellings.
- 8.28 The Appeal Scheme would make a substantial contribution to the area's housing stock and mix of housing (including 30% affordable housing) which weighs in favour of the scheme.
- 8.29 The provision of 30% affordable housing on the Appeal Site would be secured in the legal agreement attached to an outline planning permission, and this is agreed through the proposed Heads of Terms for the planning obligations agreement (Appendix A of this Statement).

² Refer to paragraph 9.58 for matters not agreed.

- 8.30 Final details in respect of the mix of affordable units in terms of tenure split, size and location of the dwellings would be agreed pursuant to future applications for reserved matters.

Energy and Sustainability

- 8.31 An initial Sustainability Statement and Energy Statement were submitted to support the outline application. The measures set out in these reports demonstrate how the Appeal Scheme would be designed to comply with the relevant policies contained within the Bristol Local Plan and also Building Regulations and the Future Homes Standards as a minimum.
- 8.32 A full Energy Strategy would be provided at detailed design stage, once full details of the proposed scheme are confirmed.
- 8.33 The Council's Sustainable City Team have provided comments on the application (Appendix B, CD3.5). They have no objection to the proposals and the suggested planning conditions are agreed (see Section 10 of this Statement) between the parties.

Flood Risk and Drainage

- 8.34 The Appeal Site is located entirely within Flood Zone 1 as shown on the Environment Agency mapping. As the Appeal Site is larger than 1ha in size, a Flood Risk Assessment and Drainage Strategy was submitted with the application.
- 8.35 The Council's Flood Risk and Drainage Team had no objection to the outline Flood Risk Assessment and Drainage Strategy submitted with the application (Appendix B, CD3.2), subject to suggested conditions requiring further details to be submitted prior to construction of the Appeal Scheme.
- 8.36 Wessex Water were also consulted on the application and had no objection to the proposals.
- 8.37 The suggested conditions are agreed between the parties and listed in Section 10 of this Statement.

Refuse and Recycling

- 8.38 Bristol Waste had no objection to the application (Appendix B, CD3.3). They offered detailed comments on the detailed waste and recycling requirements based on the proposed housing numbers and unit mix.

- 8.39 It is agreed between the parties that this is a matter for detailed design stage and a refuse strategy would need to be provided with any reserved matters application. This is secured by planning condition listed in Section 10 of this Statement.

Crime

- 8.40 Avon and Somerset Police provided comments on the application (Appendix B, CD3.1) comprising detailed advice in relation to measures for designing out crime and raising no objection to the current proposals.
- 8.41 It is agreed between the Parties that this is a matter for detailed design stage and any reserved matters application will need to demonstrate how the detailed layout and other matters of the development have been designed to provide a safe and secure environment, and in accordance with the initial principles in relation to security set out in the submitted Design Code.

Pollution Control

- 8.42 The application was supported by an Air Quality Impact Assessment and a Noise Impact Assessment.
- 8.43 The reports detail that the Appeal Scheme would not give rise to unacceptable impacts in respect of noise or air quality, that could not be appropriately mitigated or addressed. The scope of these impact assessments considers both impacts within the Appeal Scheme itself, as well as the relationship with the existing Brislington Trading Estate, as required by the site allocation.
- 8.44 An outline Construction Environmental Management Plan (CEMP) was also submitted with the outline application to identify initial construction impacts and outline mitigation measures. It is agreed that between the parties that a full CEMP, to include working hours and noise and dust mitigation measures, will be secured by planning condition (see Section 10 of this Statement).
- 8.45 The Council's Pollution Control officer commented on the outline application and raised no objection to the Appeal Scheme.
- 8.46 Further detail in relation to proposed noise impacts and any required mitigation measures in respect of the detailed design proposals will be secured by planning condition as suggested by the Council (Section 10 of this Statement).
- 8.47 It is therefore agreed between the parties that matters of noise, air quality and construction impacts do not form part of the reasons for refusal.

Heritage and Archaeology

- 8.48 The application was supported by a Historic Environment Desk-Based Assessment, Geophysical Survey and Archaeological Evaluation reports (April 2022, collated report from TEP). The scope of the reports was agreed with the Council prior to submission of the outline application. The reports conclude that the Appeal Scheme will not give rise to unacceptable impacts in heritage or archaeological terms.
- 8.49 No comments have been received from the Council's historic environment officer and no concerns raised in respect of built heritage impacts.
- 8.50 The Council's Archaeological officer has responded to the application and raised no objection to the proposals. It is agreed that any harm caused to archaeological remains can be mitigated through a programme of archaeological works. The suggested planning condition to secure the further archaeological works is agreed between the parties and set out in this Statement (Section 10).
- 8.51 It is agreed between the parties that built heritage and archaeological matters do not form part of the reasons for refusal (either as free-standing reasons for refusal or as contributing in any way to a conclusion that permission should be refused). The heritage and archaeological merits of the hedgerows are material to the appeal, as set out in the table in 8.52.
- 8.52 A breakdown of the existing hedgerow and field boundaries on the site is provided below, along with an agreed assessment of the existing status of the hedgerow: :

Hedge/Field Boundary Ref	Hedgerow Regulation Status A = meets archaeology and history criteria W = meets wildlife and landscape criteria
H1	A, W
H2	A, W
H3	A, W
H4	A, W
H5	A, W
H6	
HH1	A
HH2	A, W
HH7	A, W
HH8	A
HH9	

Transport

- 8.53 Whilst the application was submitted in outline, matters relating to access are applied for in detail. The information submitted in relation to transport and access was considered to be sufficient by the Council's Transport Development Management (TDM) team for determining the application.
- 8.54 The findings of the Transport Assessment submitted with the outline application are not disputed in relation to traffic and highways safety impacts. The methodology used by the Transport Assessment is not disputed and is acceptable.
- 8.55 The application is supported by detailed highways drawings relating to points of pedestrian, vehicle and cycle access to the Appeal Site, which are applied for in detail. The proposed access arrangements are considered to be acceptable and the Council's TDM team had no objection to the details submitted. It is agreed that the submitted access drawings will be approved by condition (see Section 10 of this Statement).
- 8.56 It is agreed between the parties that a Road Safety Audit (as standard procedure) will be prepared. This will take place in term time and include periods before and after school to ensure that the movements of children through the area are fully taken into account.
- 8.57 It is agreed that a strategy for dealing with the existing Public Rights of Way through the site is required. This is being pursued by the Appellant through separate statutory processes which is agreed as being appropriate.
- 8.58 The proposed School Link connection aligns with the aspirations specified in the land agreement between the Council and the Appellant and is therefore acceptable.
- 8.59 The suggested planning obligations and financial contributions are agreed between the parties (as set out in Appendix A of this Statement):
- The requested financial contribution towards public transport facilities (£143,208) is agreed.
 - The requested financial contribution towards amending the required Traffic Regulation Orders (£25,240) is agreed.
 - Travel Plan:
 - audit fee (£5,165)
 - contribution (£37,440)
 - Offsite highways works including cycle and pedestrian works through Bonville Road trading estate.
- 8.60 It is agreed between the parties that further detail will be provided as reserved matters, or prior to construction of the Appeal Scheme as requested. This is secured by suggested planning condition (section 10 of this Statement).

- 8.61 It is agreed between the parties that the outstanding objection to the Appeal Scheme from the TDM team will be addressed and resolved through the resolution of the S106 agreement and planning conditions.

Contamination

- 8.62 The outline application was supported by a Land Quality Statement (April 2022) prepared by Campbell Reith which concluded that any risks from contamination are considered to be very low and that targeted remediation works to mitigate contamination issues are considered necessary.
- 8.63 The Council's contaminated land officer had no objection to the Appeal Scheme. The suggested condition in terms of further remediation works is agreed between the parties and included in his Statement (Section 10).

Urban Design

- 8.64 The application is submitted in outline, with detailed approval sought for access only. It is agreed that matters relating to layout, scale, landscaping and appearance are reserved for future determination. This is secured by planning condition as set out in Section 10 of this Statement.
- 8.65 Pre-application discussions were held between the Appellant and the Council, including discussions with the City Design Group (CDG). The CDG also attended the Design West review panel in January 2022. The Design and Access Statement submitted with the outline planning application details how the Appeal Scheme evolved and responded to the design comments received.
- 8.66 The submitted Design Code (April 2022) prepared by LDA Design provides parameters and principles for the future detailed design proposals. It is agreed that future reserved matters submission(s) must demonstrate compliance with the requirements of the planning condition relating to the Design Code.

Landscape

- 8.67 It is agreed that in allocating the Appeal Site for development for an estimated 300 homes, there will be some landscape/townscape impacts and loss of some existing landscape features. The Development Considerations include:
- Be informed by an ecological survey of the site and make provision for mitigation and compensation measures, including enhancement to the razing land adjacent to Victory Park and compensation for the loss of semi-improved grassland and damp grassland (the site currently has city-wide importance for nature conservation due to the presence and confirion of particular species, habitats and /or features)

- Retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey
- Provide a green infrastructure link with Eastwood Farm Open Space to the north-east

8.68 The context for the Development Considerations is the following text set out in the introduction to the Site Allocation Annex:

“Each section provides details about the site allocations listed under Policy SA1. This includes the development considerations for each site. Policy SA1 states that the sites listed in the policy will be developed for the uses identified and in accordance with the accompanying development considerations set out in this Annex. For each site an explanation for the allocation is provided. For those sites with a housing allocation, an estimated number of homes which could be developed on the site is provided. The precise number of homes to be developed will be determined through the planning application process”.

8.69 The application is supported by a Townscape and Visual Impact Assessment (TVIA), the scope of which and selected viewpoints were agreed with Officers prior to submission. The TVIA was prepared in accordance with nationally recognised best practice guidance, namely *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013), commonly referred to as GLVIA3. The Council considers that visualisations should have been provided from all viewpoints. The Appellant disagrees.

8.70 None of the following designations apply to the site or to those parts of the surrounding area that are relevant to this appeal:

- Nationally designated landscape
- Locally designated landscape
- Registered Historic Park and Garden
- Open access land
- Common land
- Local green space
- Published or designated key views
- Local landscape designations, as per the adopted development plan

Biodiversity and Ecology

8.71 It is agreed that in allocating the Appeal Site for development for an estimated 300 homes, some loss of habitats would inevitably arise from the development, and would need to be mitigated and compensated accordingly.

8.72 It is agreed between the parties that the scope of the Ecological Impact Assessment (EciA) and associated technical appendices, submitted with the outline application, is appropriate. The methodology of the EciA is acceptable and is agreed. The

methodologies used in producing the EcIA and technical surveys in its appendices are also agreed.

8.73 The Outline Biodiversity Net Gain assessment methods and measurements are agreed. For Area Habitats, the calculations including significance and condition multipliers are agreed. For a 10% net gain, the following off-site habitat area units would be needed:

- Total: 23.05 habitat units; comprising habitats of medium or greater distinctiveness in the following broad types:
- Grassland – minimum 14.61 units
- Heathland and shrub – minimum 8.37 units
- Woodland and forest – minimum of 0.07 units

8.74 For Linear Habitats (hedgerows), the measurements are agreed but the parties differ on some hedgerow types and condition in the pre-development baseline. The Council contends that a higher baseline value applies, but agree that even in that case, a net gain of Linear Habitats of over 10% is achievable on site.

8.75 An agreed BNG Metric position statement has been appended to this Statement (Appendix B), as a factual record of both parties position in regards to the BNG metric.

8.76 It is agreed that the Appellant has committed to delivering 10% BNG, through on and off site measures. It is agreed that the Council do not have an adopted development plan policy which requires 10% BNG. It is agreed that the land agreement dated 20 March 2020 between the Council and the Appellant, supports the use of “Additional Mitigation Land” for offsite ecological enhancements. Additional Mitigation Land is defined in the agreement as being any land adjoining the site which, at the date of the agreement was owned by the “Seller” (i.e. the Council), other than land which comprises adopted highway. Consequently, Victory Park, which adjoins the site, and includes existing recreational playing pitches would fall within the definition of Additional Mitigation Land under the land agreement. The terms of the land agreement preclude detailed discussion in relation to offsite ecological mitigation with the Council until outline planning consent has been granted.

8.77 Pre-Application advice from the Council, including consultation with the Council’s Parks Team, also agreed the principle of a financial contribution towards off-site mitigation through the restoration and enhancement of species-rich grassland in the vicinity of the Appeal Site. There was a further discussion between the Appellant and the Council’s Parks Team on 27 January 2022 and it was again agreed that there may be in principle scope for enhancement of Victory Park and that this should be explored further following more detailed assessment of that land. No agreement has currently been reached between the parties on this issue, and no further discussions undertaken since the submission of this application given the terms of the sale agreement.

8.78 However, the Council’s ecology witness has identified limited scope for habitat improvements in the adjoining SNCI that do not require loss of playing fields.

- 8.79 It is acknowledged that in respect of other outline planning applications submitted to and determined by the Council (for example, Hengrove Leisure Park, ref. 22/00531/P), that the submission of an updated BNG assessment at detailed design stage, based on final details relating to landscape and layout, was secured by planning condition. The same planning condition has been accepted by the Appellant in respect of the Appeal Scheme, as included at Section 10 of this Statement.
- 8.80 It is agreed that it would take a period of time for habitat mitigation and compensation to replace the full biomass and ecological function of the existing well-established habitat. The BNG metric includes temporal risk multipliers that account for the time taken for newly-created habitats to achieve the desired condition. The appellant's commitment to 10% BNG thus includes a risk factor relating to habitat establishment. The proposed Planning Conditions, including requiring a Landscape and Ecological Management Plan enables the Council to control the removal and establishment of habitats.
- 8.81 It is agreed that open space across the site has been designed to be largely multi-functional. This would be managed and mitigated through the preparation and submission of, and compliance with, a detailed Landscape and Ecological Management Plan (as agreed in the suggested planning conditions in this statement). This approach is acceptable.

Arboriculture

- 8.82 It is agreed that in allocating the Appeal Site for development for an estimated 300 homes, there will be some loss of existing trees and hedgerow. It is agreed that the Arboricultural Impact Assessment ("AIA") submitted with the outline application was considered sufficient for the validation of the application
- 8.83 It is agreed that the request for additional information relating to impacts on trees as a result of the detailed access work was not formally made until the final comments from the tree officer were shared with the Appellant on 28 November 2022.
- 8.84 It is agreed that the Appeal Site includes an area covered by TPO 1404. In total, 16 trees, 3 groups of trees and 1 woodland are included in TPO 1404. It is agreed that the illustrative masterplan submitted would result in the loss of three TPO trees only (BCC TPO ref. T10, T15 and T16). It is agreed that the loss of TPO tree T15 is likely as a consequence of delivering primary access from Broomhill Road (access arrangements agreed as being acceptable).

9 Matters Not Agreed between the Appellant and the Council

9.26 This section sets out the matters which are not yet considered to be agreed between the Appellant and the Council. These matters will likely form the basis of the Inquiry.

Emerging Local Plan

9.27 The weight to be afforded to the emerging Local Plan that has just been published for Regulation 18 Consultation (ending 20 January 2023) is not agreed between the Parties.

9.28 The Appellant considers that no weight should be afforded to the emerging Plan at this early stage in the local plan process and given the high degree of uncertainty with the Plan at present.

9.29 The Council consider limited weight should be afforded to the emerging Plan.

Biodiversity, Ecology and Arboriculture

9.30 It is not agreed that the submitted details provide confidence that the Appeal Scheme can achieve a net gain in biodiversity.

9.31 It is not agreed that there is sufficient evidence to demonstrate that the mitigation hierarchy has been followed and that offsite compensation has been favored before retention, mitigation and compensation on site.

9.32 It is not agreed that the biodiversity interest of hedges and trees, and therefore the impact associated with their loss, has been appropriately assessed by the applicant.

9.33 It is not agreed by the Council that the additional information submitted in respect of indicative cut and fill proposals and impacts on trees and habitats to be both lost and retained, provides sufficient detail at this outline application stage. However, there has been no formal request for additional detail as part of this outline application.

9.34 The number of veteran and important trees present on the Appeal Site, and impacts on them arising from the Appeal Scheme, are not agreed.

9.35 It is not agreed by the Appellant that the putative reasons for refusal (accepted by the Council's Development Control B Committee) identified that the Council would be pursuing a case related to additional veteran trees. Consequently, the Appellant considers the LPA has failed to 'state clearly and precisely their full reasons for the refusal, specifying all policies and proposals in the development plan which are relevant to the decision' as required by Article 35 of the The Town and Country Planning (Development Management Procedure) (England) Order 2015.

9.36 It is not agreed that tree T6 will be impacted by the Appeal Scheme. The Appellant

considers that the submitted parameter plans and tree protection measures will avoid deterioration. The Appellant considers that tree T5 can also be provided with the same buffer zone and requirement for tree protection measures as if it were a veteran tree, without prejudice to our view it does not satisfy all veteran tree criteria for the purposes of NPPF.

- 9.37 It is not agreed that there is evidence to demonstrate that the hedgerows were in existence prior to period of the Enclosures Acts.
- 9.38 It is not agreed that of the existing hedgerow and former field boundary (1,564m), the Appellant has demonstrated that 430m will be lost, a further 277m could be lost and a minimum 856m would be retained.
- 9.39 It is not agreed that the loss of hedgerows cannot be appropriately replaced by new hedgerow.
- 9.40 It is not agreed that delivering the allocation on the Appeal Site requires the extent of the loss of trees subject to TPO 1404.
- 9.41 It is not agreed that the site comprises ridge and furrow. It is considered that there is no substantive evidence that the site formed part of an open-field agricultural system or that ridge and furrow remains are present on the site.
- 9.42 It is not agreed that the Appeal Scheme follows the mitigation hierarchy in respect of retention of important trees and hedgerow.
- 9.43 It is not agreed that the preparation and submission of, and compliance with, a detailed Construction Environmental Management Plan (as agreed in the suggested planning conditions in this statement) would help to manage and mitigate any impacts to existing wildlife and habitats.
- 9.44 It is not agreed that the additional tree protection measures provided by the Appellant (Arboricultural Method Statement, Appendix E of the Appellants Arboricultural Proof of Evidence) provides sufficient details of tree protection in response to those areas of the site where access is applied for in detail.
- 9.45 The Bristol Tree Replacement Standards calculation provided by the Appellant (Appendix E of the Appellants Arboricultural Proof of Evidence) is not agreed by the Council for this Inquiry as a reasonable estimate of the likely requirement based on the illustrative masterplan. It is not agreed that it is likely replacement trees can be delivered fully on site, without binding the Council or the Appellant in terms of a future agreement to deliver tree replacement elsewhere in the city should the parties so agree. It is not agreed that updated calculations of tree replacement could be sought and provided with each reserved matters application.

Landscape

- 9.46 It is not agreed that this site is a valued landscape, meaning paragraph 174(a) of the NPPF is engaged.
- 9.47 The methodology used for the TVIA is not agreed.
- 9.48 The landscape and visual effects summarised in Table 4 of the TVIA are not agreed.
- 9.49 It is not agreed that it is appropriate to consider details relating to earthworks and cut and fill impacts, for which information is illustrative only, at this outline application stage. It is not agreed that the illustrative earthworks and topography approach would result in unacceptable impacts on the overall Appeal Scheme.
- 9.50 It is not agreed that the application will give rise to unacceptable impacts on existing landscape character.
- 9.51 It is not agreed that given the site's topography, an element of earthworks and reprofiling of the site, with resulting impact on the existing landscape of the site, would be required to facilitate the development of the allocated site which has an estimate of 300 homes.

Urban Design

- 9.52 It is not agreed that the design approach has been based on an established baseline position of the arboriculture and ecological considerations and constraints.
- 9.53 It is not agreed that the Development Consideration set out under Policy SA1 – BSA1201 guide the **extent** of the loss of landscape/townscape impacts and loss of existing landscape features. The Appellant considers that the estimated capacity of 300 homes indicates the permissible extent of the loss of landscape/townscape impacts and loss of existing landscape features.
- 9.54 It is not agreed that the proposed design arrangement sit comfortably in the mature landscape.
- 9.55 The Appellant's capacity testing led to an application for up to 260 homes. It is not agreed this is well below the Council's estimate for 300 homes and takes into account the site opportunities and constraints.
- 9.56 It is not agreed that the submitted Design Code sets out principles and design requirements that will help to ensure future development proposals will comply with the Building for a Healthy Life.
- 9.57 The following paragraphs from the Appellant's Statement of Case are not agreed:

3.8 The Heights Parameter Plan (Appendix A – CD1.3) identifies that the taller elements of the scheme, comprising the apartment blocks of up to 4 storeys, will be located towards the lower eastern boundary of the Appeal Site, responding to

topography and the larger built form of the industrial units on Bonville Road. Along the northern boundary of the Appeal Site with Allison Road and Belroyal Avenue, where there is the most direct relationship with existing residential dwellings, heights of up to 2 storeys are proposed. Across the remainder of the Appeal Site, a maximum height of 2.5 - 3 storeys would be permitted for the dwellings.

3.9 During informal pre-application discussions, it was agreed with planning officers at the Council that detailed matters relating to layout, scale, appearance and landscaping would be dealt with at the reserved matters stage. Notwithstanding this, the submitted Design Code, for approval, sets design principles and requirements that would ensure development coming forward on the Appeal Site would be high quality and designed to respond to local character. At no point following the submission and validation of the outline planning application have the Council requested further details to be submitted on any reserved matter pursuant to article 5(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Planning Balance

- 9.58 It is not agreed that if the appeal scheme is properly to be judged as not being in accordance with the development plan (either on the basis of complete compliance with every policy or pursuant to the principle of accordance with the plan as a whole), there are not material considerations of sufficiently compelling weight to outweigh that conflict and compel the grant of planning permission. The policy and statutory provisions in this situation (specially under NPPF para 12 and the P&CPA 2004) indicate that planning permission should not be granted. The parties disagree as to whether the appeal scheme is indeed in accordance with or in conflict with the development plan.
- 9.59 In the event that NPPF para. 11(d), as opposed to para. 11(c), applies it is not agreed that the tilted balance under NPPF para 11(d)(ii) is engaged. This is because the Council considers that NPPF para. 180(c) provides a clear reason for refusal within the meaning of NPPF para. 11(d)(i), on the basis of the evidence of Mr Forbes-Laird in relation to veteran trees.
- 9.60 The Appellant considers that NPPF para. 180(c) does not provide a clear reason for refusal within the meaning of NPPF para. 11(d)(i) for one or more of the following reasons:
- (i) It does not agree that there are veteran trees prone to deterioration present on the Appeal Site.
 - (ii) alternatively, even if additional veteran trees are proved to be present, a scheme is capable of being delivered at reserved matters stage that would not result in loss or deterioration of irreplaceable habitat contrary to NPPF para. 180 (c).
 - (iii) In the further alternative, wholly exceptional reasons within the meaning of NPPF para 180 (c) exist.

9.61 The Appellant therefore considers that, in the event that its primary case that the appeal scheme is in accordance with the development plan and thus engages NPPF para. 11(c) is rejected by the Inspector, then the tilted balance under para. 11(d)(ii) is engaged, and that the adverse impacts of granting planning permission would not significantly and demonstrably outweigh benefits of doing so.

9.62 The Council consider there are veteran trees (irreplacable habitat) on the site and that this means that, if this is a NPPF para. 11(d) case, NPPF policy (180c) provides a clear reason for refusal within the meaning of NPPF para. 11(d)(i).

Approved Plans

9.63 The documents submitted for approval are agreed at paragraph 8.3, however it is not agreed that this list is subject to what is said in the Appellant's evidence about the scope for flexibility and/or for conditions to require the submission and approval of updated/additional/replacement versions of some of the below either prior to approval or prior to submission of reserved matters applications.

10 Planning Obligations

10.26 Draft heads of terms for the proposed planning obligations are agreed between the parties and are set out at Appendix A of this document.

11 Statement of Compliance

11.26 The parties agree that:

- 11.26.1 the proposed planning conditions (and the reasons for them) comply with paragraphs 55 and 56 of the NPPF and Paragraph: 003 Reference ID: 21a-003-20190723 of the PPG
- 11.26.2 the draft heads of terms for the proposed Section 106 obligations comply with paragraphs 55 and 57 of the NPPF, Paragraph: 002 Reference ID: 23b-002-20190901 of the PPG and Regulation 122 of the Community Infrastructure Levy (Regulations) 2010 (as amended).

Appendix A – Draft Heads of Terms for planning obligations

No.	Matter
1.	Provision and timing of up to 30% affordable housing
2.	Financial contributions towards: <ul style="list-style-type: none">• fire hydrants (10 x £1,500 plus VAT per hydrant)• public transport facilities (£143,208)• making and implementing four Traffic Regulation Orders (£25,240)• Tree Replacement Contribution in accordance with the Council's Planning Obligations SPD (amount to be calculated later)• Local Labour and Training Plan Fee (£2,000)
3.	Travel Plan: <ul style="list-style-type: none">• audit fee (£5,693)• (or, if the Travel Plan is prepared and implemented by the Council) contribution (£220 per unit)