



Document Control

Project Name:	Bristol Local Plan – DS6 Lawrence Hill
Project Reference:	CP0058
Report Title:	Matter 4 EiP Statement
Doc Reference:	250207_CP0058_EiP_Matter 4

	Name	Position	Signature	Date
Prepared by:	A Tildesley	Director	<i>AT</i>	05.02.25
Approved by:	C Danks	Director	<i>CD</i>	06.02.25

For and on behalf of Copperfield L&P Ltd

Revision	Date	Notes	Prepared	Approved
-	-	-	-	-

This report and the content herein have been prepared by Copperfield L&P Ltd for the client and project described in the particulars of the instruction.

This report has been prepared in accordance with the professional services appointment related to the project.

Unless by written consent of Copperfield L&P Ltd it should not be relied upon by any third party beyond the instructing client. Copperfield L&P Ltd accepts no duty or responsibility (including negligence) to any party other than the client and disclaims all liability to any such party in respect of this report



MATTER 4: Issue 4.3: Are the policies relating to East Bristol justified, effective and consistent with national policy? DS6 Lawrence Hill

Introduction

1. This Hearing Statement has been prepared by Copperfield Land and Planning Limited on behalf of landowner Frank Bruce and Company Limited. Frank Bruce and Company own land across the city but have specific development related interests in a major brownfield regeneration site at Lawrence Hill Industrial Estate on Easton Road and Croydon Road.
2. This hearing statement builds on the representations previously made to the Bristol City Council Reg 19 Local Plan consultation and is focused on the Inspectors' MIQs that are relevant or need additional explanation beyond those earlier submissions.
3. Frank Bruce and Company Limited are one of four major landowners working alongside Wolseley UK Plumbing Business, Bristol City Council and the Department for Transport to bring forward the Lawrence Hill Industrial Estate site. The 8.2Ha site is the single largest brownfield redevelopment opportunity in the Policy DS6 Lawrence Hill Regeneration Area.
4. The site is capable of making a significant contribution to housing and employment as well as delivering transformational place making, all of which are in line with the broader delivery objectives of the local plan. To inform previous representation we have engaged Stride Treglown to prepare an initial Capacity Study with initial site analysis, indicative masterplan, heights and quantum assessment and Ground Floor uses. This work is appended to the Hearing Statement below for ease of reference. Its purpose is to show in a proportionate way that the site is deliverable and developable.
5. Set out below are the responses to the relevant MIQs. **MIQ are in bold underline** with responses in normal text.

Q4.19:

Is Policy DS6 justified, consistent with national policy and effective? In particular:

6. Frank Bruce and Company Limited are broadly supportive of the overall aims of Policy DS6. The work undertaken to date looking at the development potential of the Lawrence Hill Industrial Estate has demonstrated the site would make a substantial contribution to meeting the overall aims of the policy. Frank Bruce and Company Limited fully intend to work with other landowners to ensure that a comprehensive development proposal can come forward for the 8.2Ha site. We agree the policy is justified and consistent with national policy but make some observations about its effectiveness (and how it could be made effective). Our observations respond to subsequent questions.



a) Is the policy sufficiently clear in defining what uses would be acceptable within the area?

7. The delivery of Policy DS6 is predicated on the completion of a Regeneration Framework. Such Frameworks have been part of the Bristol Local Plan for other areas and offer the ability to plan comprehensively. Frank Bruce and Company Limited acknowledge that such Frameworks are effective and appropriate for use in the Policy DS6 circumstances and have engaged with the City Council already with regard to producing one with the support of Policy DS6. A framework would facilitate consistent and comprehensive development to occurring across different land ownerships.
8. There are, however, ways in which the drafting of Policy DS6 is less effective and this is capable of being addressed through modifications.
9. After Policy Text paragraph 1 it should be made Clear that any Development in Lawrence Hill will be planned comprehensively within a Regeneration Framework. These words are currently located under the first paragraph in Place Principles.
10. Having explained the intention to prepare an area wide Development Framework, the bullet point list of would be effective if it were headed “the Development Framework will include”. The 8 bullet points that then follow would relate to the contents of the Framework rather than being seen as a list to measure individual developments against. This improves the effectiveness of the policy where smaller sites can comply with the relevant framework but don’t have to meet every bullet point.
11. Under bullet point 1 we believe the addition of specific minimum numerical targets should be included. This is covered in our Hearing Statement response to Q4.19c below.
12. The policy should also consider viability. Frank Bruce and Company acknowledge that a viability mechanism does form part of Policy AH1 but to maximise the effectiveness of the policy DS6 the wording should be explicit that any major development proposals for the Lawrence Hill Industrial Estate within the Framework will be viability tested to ensure that development is deliverable. Such a viability and deliverability assessment would inform policy makers before the adoption of any Regeneration Framework to ensure its effectiveness.
13. In all other regards the bullet point list provides clarity on the component parts expected to contribute to a successful Regeneration Framework document. The list is also broadly consistent with the policies of the NPPF.
14. In the context of wording surrounding the Bus Depot and Ambulance Station, Frank Bruce and Company would suggest the inclusion of specific references to retaining these uses is not necessary to make the policy effective. Any reference to retention of these uses “until they are no longer required” are unnecessary and should be removed.
15. In the wording of Place Principles, the reference to individual development sites meeting the ‘policy and regeneration framework’ should be replaced with ‘regeneration framework’ only. Smaller parcels of development should not automatically need to ‘contribute appropriately to



the delivery of the mix of uses and supporting infrastructure, services and facilities. Again, this should be down to the Regeneration Framework to consider avoiding placing multiple layers of policy requirements on smaller individual development projects.

16. Likewise, the wording of Place Principles, relating to ‘progress more comprehensive or co-ordinated forms of development with other sites in the locality’ pre-judges the outputs of any Regeneration Framework. For the policy to be effective it should allow the Regeneration Framework to direct the way in which possible development sites work towards the policy outputs of DS6.
17. There also appears to be some duplication in the Place Principles bullet point list of the more general ambitions of the Policy Text. For brevity these could be included where necessary in the Policy Text bullet points to be expanded upon in the Regeneration Framework.
18. Both Transport and Housing Mix text could also be incorporated in the main Policy Text to avoid unnecessary duplication. The paragraph relating to parking provision could be retained for clarity and incorporated into the main Policy Text bullet points.
19. Frank Bruce and Company Limited would support the retention of wording relating to Workspace as currently drafted as a necessary policy direction to grow employment opportunities in the area.
20. The above changes would achieve the following:
 - i. They would direct the production of the Regeneration Framework to align with a clearly defined bullet point list of DS6 policy requirements;
 - ii. They would set a minimum housing requirements target to inform the Councils land supply position;
 - iii. They would avoid a significant amount of duplication of text relating the principles of development whilst retaining necessary site specific direction;
 - iv. It would embed delivery and viability as a key part of Lawrence Hill Industrial Estate development given the sites significance in the success of Policy DS6;
 - v. Remove unnecessary direction on the retention of the Bus Depot and Ambulance Station.
21. With the above changes made the policy would be effective and better meet the tests of soundness.

b) Is the boundary shown on the diagram at page 35 of the Plan appropriately defined?
22. Frank Bruce and Company Limited agree with the Lawrence Hill Regeneration Area as defined on page 35 of the Bristol Local Plan.



27. The following land use parameters for employment have been established applying an indicative blended mix of job uses resulting in a doubling of new FTE job roles within the 8.2Ha development area:

Land Use	Amount	FTE Job numbers
Employment	8000 to 10,000 sq m of mixed use employment	In excess of 500+ FTE roles created

28. The following residential capacity has also been established through the application of density multipliers:

Land Use	Amount
Residential – Core Site (Frank Bruce and Co Land)	c. 566 dwellings
Residential – Bus Depot	c. 542 dwellings
Residential – Wolesley	c. 289 dwellings
Residential – DVLA	c. 105 dwellings
Total Housing	c. 1502 dwellings

29. Given that the Lawrence Hill Industrial Estate is one brownfield opportunity within a wider regeneration area we would consider a **minimum** of 1,500 dwellings be applied to the policy wording itself makes the policy specific and measurable. Current drafting of ‘around 1,500’ in para 3.2.8 of the supporting text should be removed in favour of the quantum being in the main body of the policy text. Having justifiable, specific and measurable policy targets in this regard should improve the effectiveness of the Local Plan.

d) Is it clear how a decision maker should react to any proposals which suggest that the bus depot at Easton Road is no longer required?

30. Frank Bruce and Company Limited’s assessment includes the assumption that the Bus Depot would be relocated during the plan period due to the specific requirement of the Bus Company and its likely need to electrify the network with new infrastructure requirements not potentially deliverable on the current site. Should the bus depot remain during the plan period there maybe opportunities to plan and integrate this within a comprehensive redevelopment.

31. In any event the inclusion of any wording in the policy relating to protection of the Bus Depot or policy wording encouraging redevelopment is unnecessary. The land is owned by Bristol

City Council and as landowners they have the ultimate control over the release and redevelopment of the Bus Depot site. Including any wording relating to the Bus Depot site is not justified and won't improve the effectiveness of the policy.

Q4.20:

Are the requirements set out in Policy DS6 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

32. Frank Bruce and Company Limited believes that the policy DS6 wording will be broadly effective in securing sustainable development. Improvements to the wording could be made to avoid duplication of development requirements and to add clarity for any decision maker in the assessment of future applications.

33. Our response to the MIQ are set out below.

a) Is the approach to tall buildings consistent with Policy DC2 and is it justified within this area?

34. The inclusion of tall buildings as part of Policy DS6 and the Lawrence Hill Industrial Estate redevelopment is entirely justified. The Stride Treglown assessment looked at the existing tall buildings located immediately adjacent to the site on Croydon Road and concluded that there is no impediment to the delivery of tall buildings.

35. Early proposals suggest scaling of up to 15 storeys would be justified within the Frank Bruce and Company Limited site based on precedent set locally with other tall buildings. There are no identified heritage or landscape matters on the Lawrence Hill Industrial Estate site to suggest development in accordance with Policy DC2 cannot be delivered.

36. We propose the following amendment to the Policy wording to add clarity and provide consistency for any decision maker. The DS6 paragraph on tall buildings in the Place Principles section should be removed and the following inclusion in the Policy Text bullet points added:

- City Centre Density and the use of Tall Buildings consistent with Policy DC2 may be appropriate in the right setting.

b) Are the requirements set out in bullets 1, relating to Croydon Street and Lawrence Hill Station and bullet 2 relating to improved pedestrian cycle links justified?

37. The inclusion of policy text wording promoting the delivery of pedestrian cycle links is entirely consistent with national and local policy and fully supported by Frank Bruce and Company Limited.

38. The inclusion of bullet 1 wording relating to "connected and well-designed community" is unnecessary duplication given that the delivery of new walking and cycling routes is covered within the main Policy Text bullet point wording. Frank Bruce and Company Limited would support the naming of "links between Lawrence Hill, the Bristol and Bath Railway Path and



Easton Road” alongside retention of the specific named locations in bullet 2 as it assists decision makers in identifying specific measurable improvements.

c) Are the requirements set out under the remaining place principles (design, density, active ground floor uses, reconfiguration of Lawrence Hill roundabout) and transport, workspace and flood risk, clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

39. It is our view that the Place Principles section could be rationalised to avoid duplication. As set out above. The following observations are made:

- a. Reference to Development Frameworks should be in the Policy Text section before the bullet points. The bullet point list should be applied to any Framework and individual applications in the future to enable the policy to be consistent and effective.
- b. Reference to tall buildings should be a bullet point in the Policy Text list.
- c. There is no need to reference ‘comprehensive and co-ordinated forms of development’ as this is the function of any Development Framework. This paragraph does not assist decision makers so isn’t effective.
- d. Reference to Lawrence Hill Roundabout should be assessed in the production of any Framework. It is unclear why the policy would be worded to include the roundabout only when the whole of the Lawrence Hill Regeneration Area needs to connect to the City Centre.
- e. The two paragraphs on Transport could be adequately addressed by amending or adding Policy Text bullet points. As presently drafted, there is a significant amount of duplication.
- f. Workspace wording should be retained as it places a specific policy requirement on the development of exiting employment spaces and is an appropriate and effective policy approach to enhancing employment in the area.
- g. The section on Housing Mix is unnecessary duplication of wording in the Policy Text bullet list.

40. In conclusion, Frank Bruce and Company broadly support the intentions of Policy DS6 and would further support the re-introduction of housing targets within the policy text.

41. The elevation of the Development Framework as an effective place making tool to the Policy Text wording alongside the rationalisation of duplicate wording elsewhere in the wording of DS6 would make the policy more effective.

End.

APPENDIX 1 – STRIDE TREGLOWN CAPACITY ASSESSMENT

**LAWRENCE HILL INDUSTRIAL PARK
CAPACITY STUDY**

Site Analysis

KEY			
	Site boundary		Local centre
	Existing access into the site		Lawrence Hill train station
	Contextual tall buildings		School
	Green open space		Locally listed building
	Bath & Bristol Railway Cycle Path		Existing trees
	Principal Industrial and Warehousing Areas (PIWA)		Key view

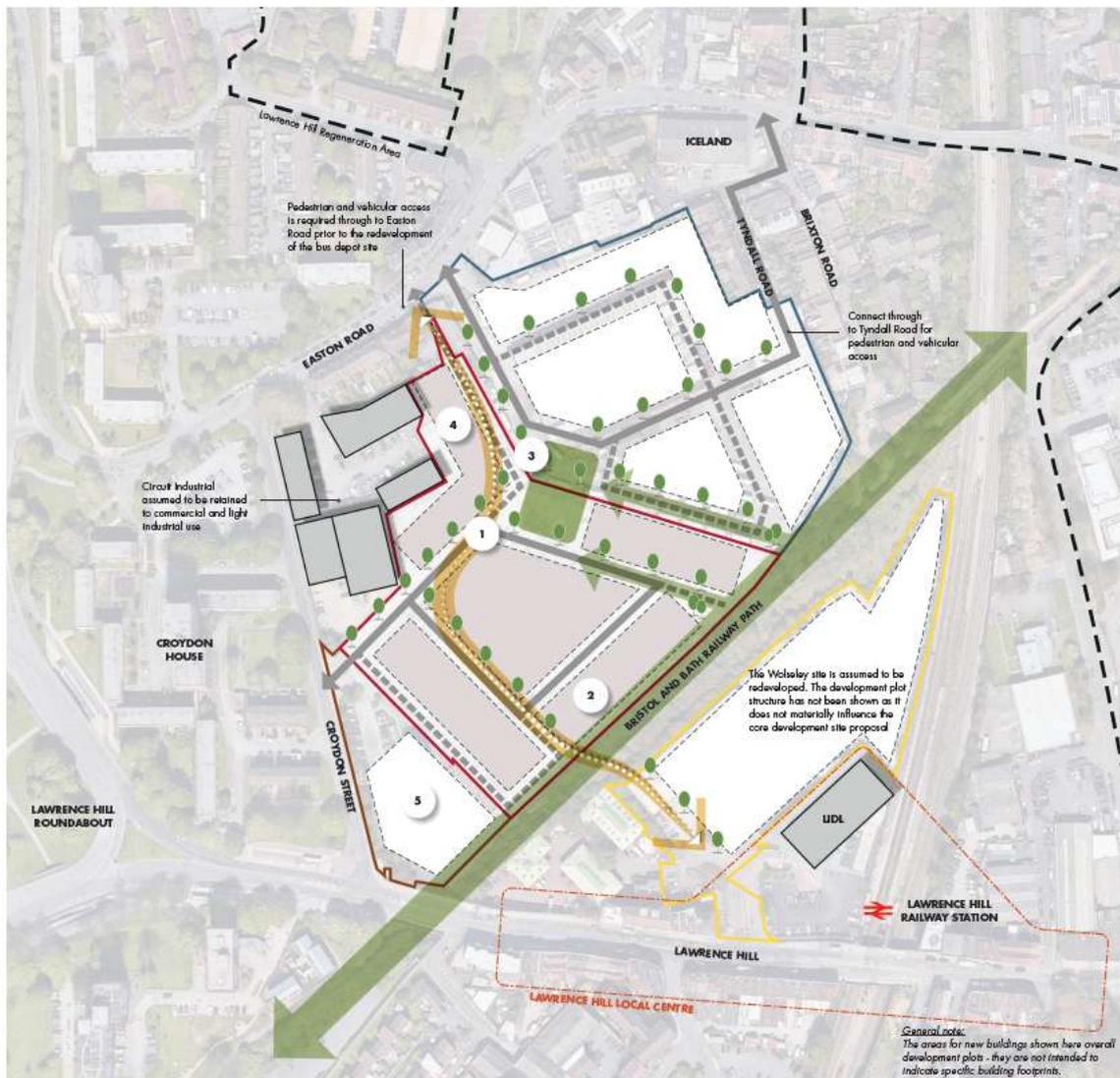


LAWRENCE HILL INDUSTRIAL PARK CAPACITY STUDY

Indicative Masterplan

1	Creation of a pedestrian-friendly connection through the heart of the site, connecting Easton Road to the north with the local centre and train station on Lawrence Hill to the south, crossing the Bath & Bristol Railway Path.
2	Residential development throughout the site will provide high levels of natural surveillance, including over the Bristol and Bath Railway Path.

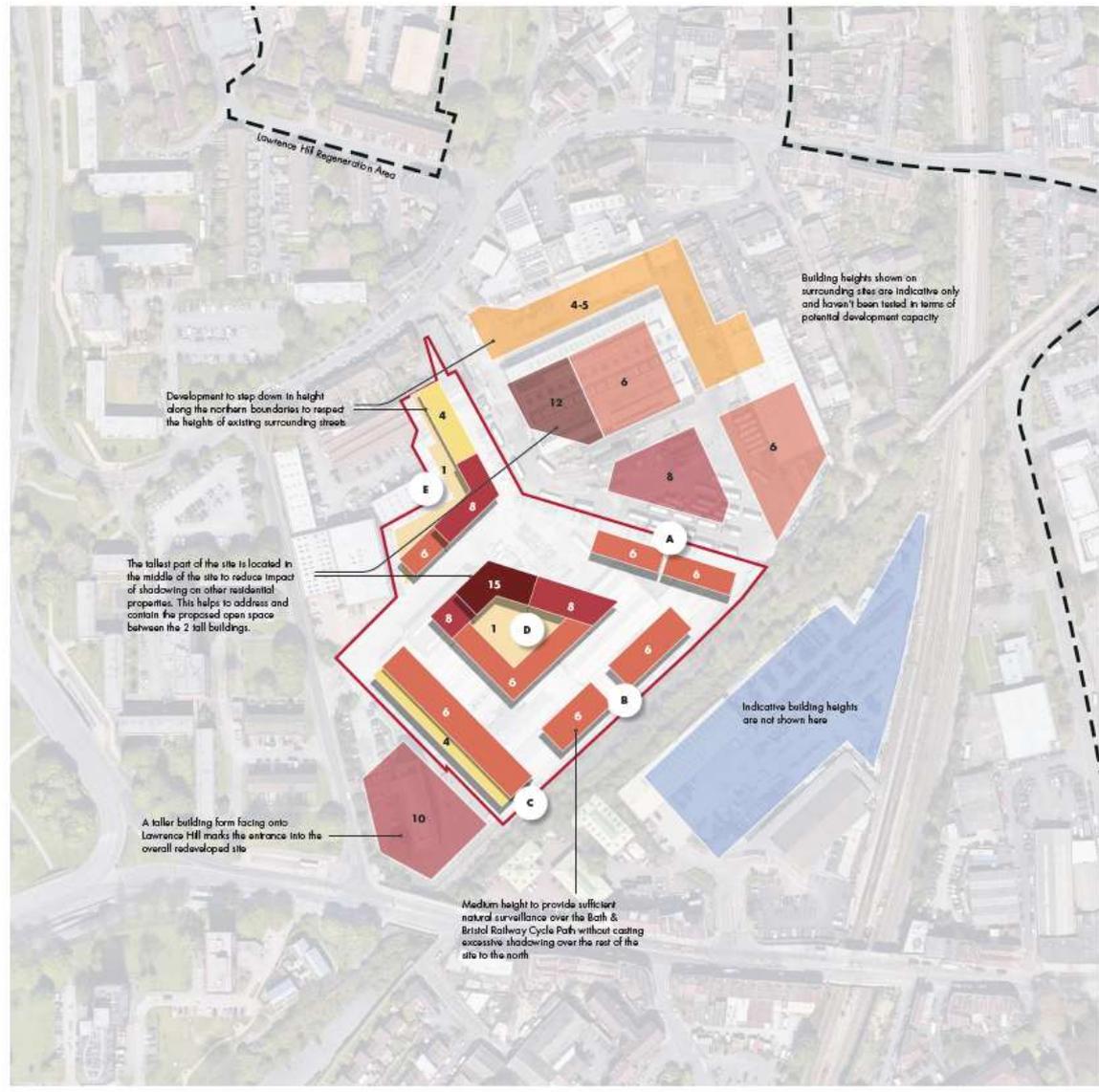
3	A phased approach to the delivery of the road network allows for access into/from the bus depot site in the interim. Priorities can be subsequently rearranged when the bus depot site is redeveloped. Access will be also be needed out onto Easton Road to the north.
4	Ground floor collocation of light industrial/commercial buildings to the north close to existing warehousing units at Circuit, with residential units above. Additional commercial space is provided in the plot immediately to the south.
5	Opportunity for ground floor office-based employment with residential apartments on upper floors. Car parking is likely to be needed to support the employment provision.





LAWRENCE HILL INDUSTRIAL PARK CAPACITY STUDY

Heights & Quantum		CORE AREA			TOTAL DEVELOPMENT AREA			
BLOCK A	8 x Duplex 50 x Apartments	DUPLEX (FAMILY HOUSING)	90 units	16%	Area	Area x 251dph		
BLOCK B	90 x Apartments	APARTMENTS	476 units	84%	BUS DEPOT	c.542 dwellings		
BLOCK C	57 x Duplex 2 x Apartments	TOTAL:	c.566 dwellings		DVLA	0.42Ha		
BLOCK D (PODIUM DESIGN)	c.1,425 sqm 15,339sqft Commercial 15 x Duplex 242 x Apartments	DENSITY:	c.251 dph		WOLSELEY UK LIMITED	1.15Ha		
BLOCK E	c.2,159 sqm 23,239 sqft Commercial 92 x Apartments	This schedule provides an indication of the development capacity of the site and surrounding land. A detailed feasibility study is required to test these sites and to confirm residential and commercial development capacity.					CORE AREA	2.25Ha
					TOTAL	5.98Ha	c.1,502 dwellings	



LAWRENCE HILL INDUSTRIAL PARK CAPACITY STUDY

Ground Floor Uses Distribution

KEY	
	Commercial area with residential above
	Residential area

