



Development Management  
City Hall  
Bristol City Council  
PO Box 3176  
Bristol  
BS3 9FS

18<sup>th</sup> February 2021

EMAIL ONLY

Dear Sir/Madam

**Town and Country Planning Act 1990 - Application for planning permission for the erection of residential dwellings, access road, refuse/ recycling stores, cycle parking and ancillary development (Use Class C3)**

**LAND TO THE REAR OF 2 WOODWELL COTTAGES, WOODWELL ROAD, SHIREHAMPTON, BRISTOL, BS11 9XU**

Rackham Planning is instructed by Hallen Developments South West Ltd, (the 'applicant') to submit an application for planning permission for the erection of 3 no. dwellings, access and ancillary development including refuse/ recycling and cycle stores on land to the rear of 2 Woodwell Cottages, Woodwell Road, Shirehampton, Bristol, BS11 9XU.

The description of development is:

*"erection of residential dwellings, access road, refuse/ recycling stores, cycle parking and ancillary development (Use Class C3)"*

Planning permission was granted in July 2020 for the demolition of garages to the south of Woodwell Road for the erection of two residential dwellings (BCC ref: 20/00663/F). The relevant conditions have been discharged, the garages demolished and works to construct the dwellings has commenced. The proposal that is the subject of this application is on land to the rear of these dwellings. Given the location of this backland site, careful consideration has been given to the siting, design and layout of the proposed dwellings to ensure that issues relating to overlooking and amenity for both existing and future occupiers are maintained.

This supporting letter sets out the background and context to the application and demonstrates that the proposal is in accordance with both local and national policy and is an entirely acceptable development for the site.

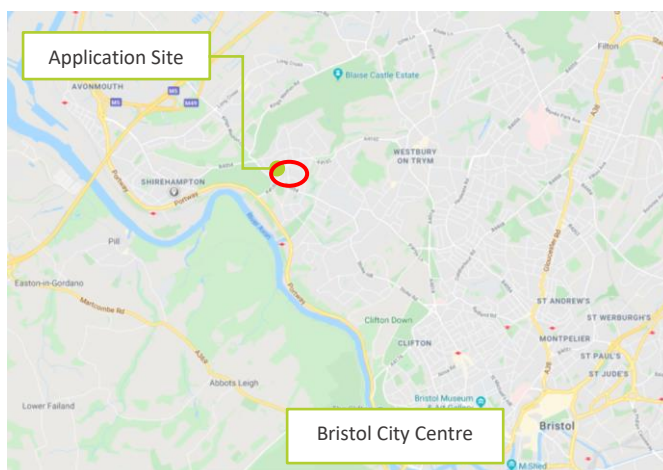
In addition to this letter, submitted in support of this application are the following (all of which are submitted online via the Planning Portal (under ref: PP-09558994):

1. Copy of the planning application form including completed Ownership Certificate;
2. Supporting Justification contained within this letter;

3. The following drawings prepared by MLG Architects:
  - a. Site Location Plan (Ref: 19/1724/2001 Rev A);
  - b. Existing Block Plan (Ref:19/1724/2010 Rev A);
  - c. Proposed Block Plan (19/1724/2110 Rev C);
  - d. House C Floor Plans (19/1724/2200 Rev A);
  - e. House C Elevations (West and North) (19/1724/2210 Rev B);
  - f. House C Elevations (East and South) (19/1724/2215 Rev B);
  - g. House D&E Ground Floor Plans (19/1724/2250 Rev A);
  - h. House D&E First Floor Plans (19/1724/2255 Rev B);
  - i. House D&E elevations (North and East) (19/1724/2265 Rev B);
  - j. House D&E elevations (South and West) (19/1724/2270 Rev B);
  - k. Courtyard View (19/1724/2400 Rev A);
  - l. Bike Store (19/1724/2175 Rev A);
  - m. Refuse/ recycling store (19/1724/2170);
4. Transport Technical Note prepared by Cotswold Transport (To follow);
5. Energy and Sustainability Statement prepared by JMDC Services (To follow);
6. Community Infrastructure Levy (CIL) form;
7. The planning application fee of £1386 (no VAT) and £25 (including VAT) Planning Portal administration fee will be paid directly to the Planning Portal.

### Site and surrounding area

The application site is located on land to the rear of no. 2 Woodwell Cottages, Woodwell Road in Shirehampton, Bristol. The site is located approximately 9 km to the north west of Bristol City Centre within the Avonmouth and Lawrence Weston Ward (see **Images 1 & 2**).



**Image 1:** Indicative Site Location Plan (Source: Google Maps)



**Image 2:** Application Site (Source: Google Maps)

The site comprises land at the rear of 2 Woodwell Cottages and a former residential garage that was demolished as part of the recent planning permission granted to erect two dwellings (ref: 20/00663/F). The land is unused and originally formed part of the extended rear garden of 2 Woodwell Cottages. However it is now separated from this dwelling and forms a vacant site that is suitable for development.

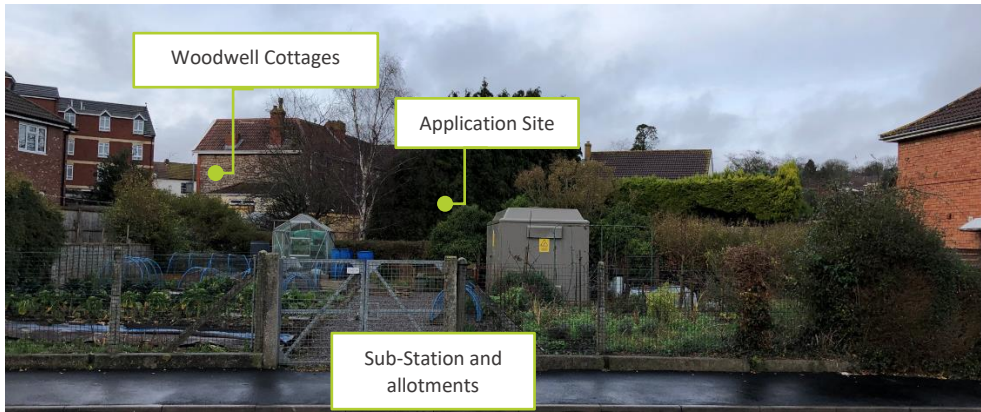
As **image 3** confirms that the land is generally flat. To the south the rear of the houses fronting St Bernard’s Road are visible, including a gap in the streetscene where an electricity sub-station and allotments are located (**images 3 & 4**).



**Image 3:** Application Site from rear of 2 Woodwell Cottages

Pedestrian and vehicular access to the site off Woodwell Road, where the triple garages visible in **image 5** have been demolished to make way for the two new dwellings. This part of Woodwell Road has a mixed residential style and character. To the north of the application site are residential properties (nos. 1 and 2 Woodwell Cottages). The cottages are traditional semi-detached, two storey, stone built cottages with open gable and valley roofs. The cottages have red brick quoins and redbrick detailing around the windows (**image 5**).





**Image 4:** Towards the application site from St. Bernard's Road



**Image 5:** Woodwell Road, 2 Woodwell Cottages, the now demolished garages and proposed entrance

To the south of the site are residential properties (flats at 21 and 23 Woodwell Road and 25 Woodwell Road) with St Bernard's Road beyond. Nos 21 and 23 Woodwell Road are modern two storey, red brick flats with hipped roofs (constructed circa 2013 - see **image 5**). No. 21 Woodwell Road has a front door but no windows on the northern elevation overlooking the application site.

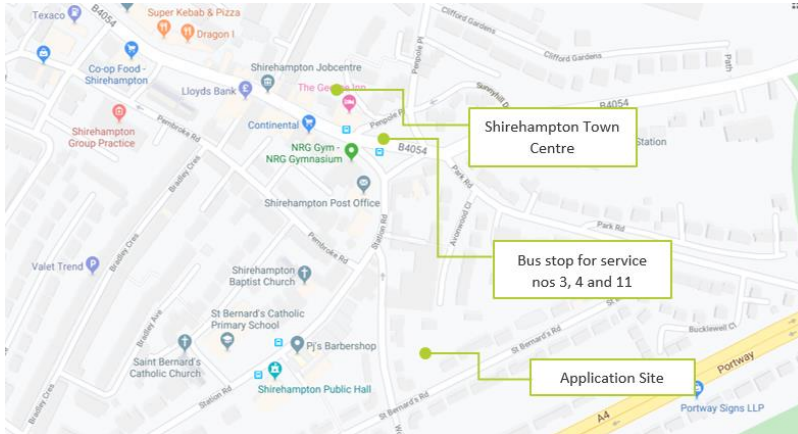


**Image 5:** Application site and neighbouring development

Opposite the site (to the west) on slightly higher ground are pairs of red brick, semi-detached, two storey properties with hipped roofs. North west of the site is a car park which serves the four storey residential apartment block (accessed from Station Road) which is visible from Woodwell Road (**image**

6). The boundary of the car park is marked by a brick wall and close boarded boundary fence (also shown in **image 6**) .

Properties on Woodwell Road are generally set back from the street with a small front garden or parking area. There is no prevailing boundary treatment. Instead, boundary treatments comprise a mix of low boundary walls, hedges and fencing. There is unrestricted parking on the majority of Woodwell Road, but double yellow lines where the road narrows to the north.



**Image 7:** Application site and Shirehampton Town centre

**Image 7** confirms the sustainable location of the application site, which is less than 200 metres from Shirehampton High Street which is an established town centre with a large range of shops and services, including pubs, restaurants and cafes, hot food take ways, supermarket, post office, job centre, banks, library, public hall, gym, estate agents, charity shops, pet shop, hairdressers, barbers, betting shops and interior design shop.

Shirehampton is served by regular bus services to Cribbs Causeway, the City Centre and Avonmouth (Service nos. 3, 4 and 11), with the main bus stop located approximately 170 metres from the application site. Shirehampton Train station is 0.2 miles away from the site and the closest primary school (St Bernard's Catholic school) is located approximately 0.1 miles away. The proximity and range of shops, services and public transport facilities confirm the highly sustainable location of the site.

## The Proposal

The proposal involves the erection of 3 small chalet style two bedroom dwellings on land to the rear of 2 Woodwell Cottages. Access is proposed between 2 Woodwell Cottages and the new dwellings granted planning permission on the former garages off Woodwell Road. An amendment to the garden boundary of the northern dwelling is submitted at the same time as this application as a variation of condition application of app ref: 20/00663/F to ensure the access road has a width of 3.1m. This leads to a courtyard with parking for three cars (one per dwelling) and a turning area.

The proposed houses, known as C, D, and E are sited around the courtyard and each has a ground floor kitchen/ dining and living area with downstairs toilet. The first floor accommodation is set within the roof to reduce the height of the houses to ensure they remain subservient to the existing dwellings. On each first floor are two bedrooms – one double and one single and a bathroom. Each

house has access to a private south facing garden. Each bedroom is served by a rooflight and/ or small dormer that faces towards the courtyard and not the neighbouring dwellings.

Within the courtyard is a refuse and recycling store for the three dwellings and two bike stores for houses D & E. House C has the cycle store within its private rear garden.

The new dwellings each measure 71sqm which exceeds the minimum floorspace requirement of 70sqm for a two storey, 2 bedroom/ 3 person house as required by the Nationally Described Space Standards (DCLG, March 2015).

The City Council's waste requirements<sup>1</sup> are that *"new development must provide accommodation for the external or ventilated internal storage of waste, organic and dry recyclables. A minimum footprint size of 0.6m x 1.5m, or a volume of 1.5m<sup>3</sup> must be provided where each dwelling or flat has individual storage enabling the following to be stored*

- *25 litre capacity storage for organic waste (additional capacity can be provided if required)*
- *2 kerbside boxes (minimum 40 litre capacity each) storage for dry recyclables (additional capacity can be provided if required) "*

In accordance with this guidance, the bin store provides three individual refuse/ recycling bays that measure 0.8m x 1.5m enabling the required bins, boxes and bags for each dwelling to be stored in accordance with these standards. As the refuse/ recycling store is located approximately 20m from the highway and the courtyard not large enough to turn a refuse vehicle, a collection point is proposed adjacent to the highway outside 2 Woodwell Cottages.

As shown on the proposed elevations and courtyard view confirm, the scale of the new dwellings is single storey with further accommodation in the pitched roof, thus ensuring the scale is subservient to the established height and scale of properties on Woodwell Road and St. Bernard's Road.

The dwellings will be finished in off white render with concrete tiles on the roof. Windows, facias, soffits, guttering are to be white upvc. The hardstanding will be finished in block pavements with tarmac turning area.

The siting and size of the window openings has sought to retain a uniformity across the three dwellings and provide light and outlook onto the private garden areas of each dwelling. Hard and soft landscaping is proposed within the garden areas of each dwelling as well as in the communal courtyard, including in the space to the rear of the bin store. These details can be agreed by a planning condition attached to a planning permission.

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<sup>1</sup> Waste and Recycling: 'Collection and Storage Facilities'. Guidance for developers, owners and occupiers (February 2017). Bristol Waste Company

## Planning History

There is no relevant planning history on the application site itself. However, there are a number of applications of relevance in close proximity to the application site, including the planning permission granted for the redevelopment of the garage site. These are summarised in the table below.

Reference	Address	Proposal	Decision	Decision Date
09/02546/F and 11/02329/R	Land adjacent to 25 Woodwell Road	Erection of 2 new build flats in a 2-storey building on land adjacent to 25 Woodwell Road. Provision of bin and cycle storage facilities	Granted	28/08/2009 and 03/08/2011
01/04360/F	Land at The Savoy Cinema, 20 Station Road	Demolition of former bingo hall and construction of 3 storey block also including accommodation at roof level, comprising 38 no. apartments & 38 no. car parking spaces and associated landscaping	Granted	10/02/2003
17/06965/F	Former Social Club, Station Road	New build residential development comprising 5no. 3 storey terraced townhouses and 4no. flats	Granted	Nov 2018
17/05016/F	8-10 Station Road	Demolition of glasshouses and redevelopment to form 33 No. apartments for the elderly, guest apartment & ancillary development	Refused and Appeal dismissed	Dec 2017
18/03865/F	Land At 8 - 10 Station Road	Redevelopment to form 34 No. apartments for the elderly (sixty years of age and/or partner over fifty five years of age), guest apartment & ancillary development	Refused	May 2019
20/00663/F	Adjacent to 2 Woodwell Cottages	Erection of two new dwellings	Granted	July 2020

**Table 1:** Planning History

The delegated report supporting the most recent decision for the planning permission for the two dwellings on the former garage (20/0063/F) confirmed a number of issues that are relevant to the consideration of the current proposal:

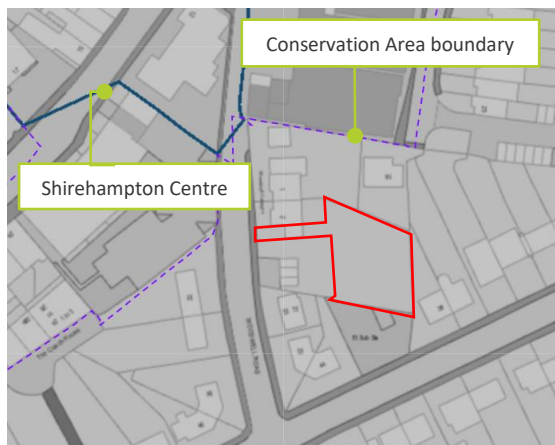
- The erection of dwellings in this predominantly residential area was acceptable.
- Whilst the addition of two houses would not contribute to the overall mix of dwelling types in the area (there being an approximate 81%/19% mix between houses and flats), this wouldn't represent substantial harm when compared to the overall need for housing in the City.
- The design was considered acceptable following changes made as a result of discussions with the planning and urban design officers. The design and appearance of the approved dwellings is considered differently to the application site given the different site location i.e. one fronting Woodwell Road and the other 'backland development'.
- Issues relating to bin, bikes, highways and amenity were considered acceptable given the site specific circumstances of this proposal.

The recent planning history on sites in close proximity to the application site confirm the residential nature of recent development proposals. The planning history also indicates a dynamic neighbourhood where the redevelopment of sites can be successfully achieved.

### Planning Policy Assessment

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications must be made in accordance with the Development Plan unless material considerations indicate otherwise. The relevant Development Plan for this site is formed by the Bristol Core Strategy (CS) (June 2011) and the Site Allocations and Development Management Policies (SADMP) (July 2014). The National Planning Policy Framework (NPPF) (February 2019) is a material consideration to which significant weight is attached.

The site is not covered by any site specific designations on the Local Plan Policies Map. The site is near, but not adjacent to, the Shirehampton Conservation Area (CA), the boundary of which lies, as **image 8** confirms, to the north (beyond Woodwell Cottages) and west (boundary of Savoy car park) of the site. Given the backland location of the site, it has very limited visibility from the CA. However the impact of the proposed development on the setting of the Conservation Area is taken into consideration, in accordance with the NPPF and Core Strategy **Policy BCS22**.



**Image 8:** Extract from Development Plan Proposals Map (source: BCC) with site location indicatively shown in red

The site not close to any listed buildings and is located in Flood Zone 1, which is land at the lowest risk of flooding.

**Paragraph 38** of the NPPF relates to decision making and confirms that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. **Decision-makers at every level should seek to approve applications for sustainable development where possible**”* [Author’s emphasis].

In order to pursue sustainable development, the NPPF sets out the presumption in favour of sustainable development (**Paragraph 11**) which states that *“Plans and decision should apply a presumption in favour of sustainable development...for decision taking, this means (c) approaching*



*development proposals that accord with an up-to-date development plan without delay...* . This is reiterated in **Policy DM1** of the SADMP, which states that *“...Planning applications that accord with the policies in the Bristol Local Plan and, where relevant, with policies in Neighbourhood Development Plans will be approved without delay, unless material considerations indicate otherwise...”*

An assessment of the proposed development against relevant policies in the Local Plan and other material considerations is set out below.

### **1. Principle of development**

The NPPF supports the delivery of additional homes to meet the acute housing need across both the city and country and states that *'the purpose of the planning system is to contribute to the achievement of sustainable development'*. This includes economic, social and environmental objectives. The proposed development at the rear of 2 Woodwell Cottages to provide three windfall residential dwellings will help meet this overarching objective in this highly sustainable location.

Section 5 (Delivering a sufficient supply of homes) of the NPPF outlines 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 specific groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay'*.

Paragraph 118 (d) promotes and supports the *“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)”*.

The drive to deliver more housing is further supported by the recent Government announcements in the White Paper and the changes to the General Permitted Development Order. This continued objective is aimed at meeting the long identified housing need and also to support the economy in the post-COVID world. The erection of the three windfall dwellings in this sustainable location on the edge of Shirehampton is also supportive of these wider objectives.

**Core Strategy Policy BCS5** confirms the need to provide 26,400 homes in the City between 2006 and 2026 on a number of identified sites as well as other smaller 'windfall' sites. **Policy BCS20** seeks to maximise the efficient use of previously developed land. The **2020 Housing Delivery Test** measurement confirms that the City Council are only delivering 72% of the homes required over the last three years meaning greater weight is given to the NPPF and the presumption in favour of sustainable development.

**Section 11** of the NPPF sets out how planning policies and decisions should promote effective use of land. **Policy BCS20** seeks to maximise the efficient use of previously developed land. This policy also seeks to achieve a minimum net density of 50 dwellings per hectare (dph). The application site measures approximately 0.68 ha and the provision of three additional dwellings represents a density of 44 dph across the site which is an appropriate density in this location on the edge of Shirehampton centre. This density level meets the requirements set out by **Policy BCS20**, it whilst also achieving a density which is appropriate for the site and the character of the locality, the thrust of which is supported by the NPPF and **Policy BCS20**.

The proposed dwellings exceeds the minimum space standards as set out in the nationally adopted space standards. For a 2 bedroom/ 3 person dwelling two storey dwelling, these are 70sqm. Each dwelling measures 71sqm and includes floorspace with a ceiling height about 1.5m.

In order to support the Government's objective of significantly boosting the supply of homes, **Paragraph 55** of the NPPF requires that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.

The application site is located in an established residential area within Shirehampton, approximately 200 metres from Shirehampton town centre, in a highly sustainable location with excellent access to a range of services, facilities and public transport services in the town centre. The principle of development on this windfall site is therefore in accordance with the requirements of the NPPF, **policies BCS5** and **BCS10** and will help contribute towards meeting housing needs within the city in a sustainable location.

**Paragraphs 60** and **61** of the **NPPF** require planning authorities to plan for the variety of size, type and tenure of housing needed by different groups in the community. **Policy BCS18** supports the development of a mix of housing tenures, types and sizes to help support mixed, balanced and inclusive communities.

Data from the 2011 Census on Avonmouth and Lawrence Weston Ward (contained in the Statistical Ward profile 2019) confirms that 26.3% of the accommodation in the ward is terraced housing, with the majority being semi-detached housing (40.4%). The construction of a detached and pair of semi-detached new dwellings on the site will therefore help to increase the proportion/availability of different housing types and in doing so address the requirements of **Policy BCS18**.

**Policy DM21** of the SADMP relates to Development of Private Gardens. It seeks to restrict the loss of gardens unless certain criteria are met, including:

- (i) *"The proposal would represent a more efficient use of land at a location where higher densities are appropriate; or*
- (ii) *The development would result in a significant improvement to the urban design of an area..."*

The policy requires that in all cases *"any development of garden land should not result in harm to the character and appearance of an area"* and that *"Development involving front gardens should ensure that the character of the street is not harmed, and that appropriate boundary treatments and planting are retained"*.

The proposed development will utilise this rear land that does not form the garden of any existing dwellings. The original dwelling at 2 Woodwell Road and the two new dwellings on the former garage site have their own private gardens. The site has no frontage or direct relationship with a highway and does little to contribute to the street scene. The development of this site will not detract from the open character of the area given that the land to the south, occupied by the sub-station and allotments will remain open in views from St Bernard's Road.

In accordance with criteria (i) of **Policy DM21**, the proposal will represent a more efficient use of land in a sustainable location, close to Shirehampton town centre, where higher density development is encouraged. Further, the high quality and sensitive design of the dwellings, which are single storey chalet style dwellings with accommodation in the roof will maintain a subservience compared to the houses fronting the surrounding roads, which ensures that the development makes a positive contribution to the character of the area in accordance with criteria (ii) of **Policy DM21**.

Overall, the site is located within an established residential area where the principle of residential development is acceptable. The development will increase the housing stock and variety of housing types locally and will achieve an efficient use of land in a sustainable location. The fact that Bristol are failing to meet the 2020 Housing Delivery Test and only delivering 72% of the homes required over the last three years, means that there is greater weight given to the NPPF and the presumption in favour of sustainable development. This policy support and material considerations weigh heavily in support of the proposal.

## **2. Design**

The NPPF places good design at the heart of sustainable development. **Paragraph 124** states that:

*“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development more acceptable to communities...”*

**Policy BCS21** seeks to achieve high quality design and states that ‘...development should contribute positively to an area’s character and identity, creating or reinforcing local distinctiveness...’. This is reinforced by **Policy DM26** which sets out the criteria against which a development’s response to local character will be assessed. With regard to ‘infill development’, **Policy DM26** states that:

*“Infill development will be expected to have regard to the prevailing character and quality of the surrounding townscape. The higher the quality of the building group and the more unified the character of the townscape, the greater the need to reproduce the existing pattern, form and design of existing development...”*

**Policy DM29** requires new buildings to be “...designed to a high standard of quality, responding to their importance and reflecting their function and role in relation to the public realm. **Policy DM27** requires that layout and form, including height, scale and massing of development is appropriate for its immediate context, site constraints, character and setting. The policy sets out a number of criteria including ensuring that blocks and plots “achieve continuity of development edge”; “ensure active frontages and natural surveillance”; “ensure appropriate levels of privacy, outlook and daylight are provided”; and that “appropriate private amenity space and parking is provided”. **Policy DM27** also seeks to ensure that proposals do not prejudice existing and future development potential of adjoining sites.

Existing development on Woodwell Road and St. Bernard Road is generally two storey, residential, semi-detached properties, set back from the street frontage with a small front garden or parking area

and private rear gardens. The age and design of the dwellings is mixed, with traditional stone built cottages to the north of the site and more modern red brick dwellings to the south and west. Although not accessed from Woodwell Road, the four storey modern red brick apartment block visible from Woodwell Road also contributes to the prevailing character. Dwellings have mixed roofscapes including hipped or gable and valley roofs, with brown concrete roof tiles and white upvc windows.

The proposed new dwellings have been carefully designed to respond positively to the existing character of the area. Reference has been made to existing building plots, scale, massing, building lines, external appearance and building materials.

The rationale and justification for the siting of the proposed dwellings has been driven by the need to maintain acceptable distances to the surrounding houses and the need to ensure no overlooking from habitable rooms. The principle of 'chalet style' dwellings on the site is to maintain a subservience in height and scale compared to the surrounding two storey dwellings. This is considered to be the correct approach for the site that enables the development to achieve the required levels of privacy and amenity.

For example, the proposed Block Plan confirms that the distance of house D to the rear of no. 23 Woodwell Road to the south west is 12m. However as house D is a single storey building, there can be no harmful impact from overlooking. The ground floor habitable room will not be able to look towards the rear of no. 23 given the 1.8m boundary between the two properties.

The distance from the gable of house D to the rear of the approved houses on the former garage site is 11m. However, as there are no windows on this elevation and it is a single storey building with a pitched roof, there is no overlooking possible.

In accordance with Policy **DM27** and **DM29**, the three new dwellings have a coherent and accessible layout, with the site accessed off Woodwell Road and the dwellings all facing onto a central courtyard. The front door to each dwelling as well as car parking, bins and bikes are all accessed off this private courtyard. Internally, habitable rooms and the kitchen/ dining rooms, all have access to either the courtyard, providing natural surveillance, and private amenity space, in accordance with **Policy DM27**.

The new dwellings have been set back from the rear of the recently approved houses on the former garage site. This was a consideration in respect of the siting and layout of this proposal to ensure that the future development potential of the application site was not prejudiced, as required by **Policy DM27**.

The height, scale and massing of the terrace has been carefully considered to respond to the prevailing scale of development and address the requirements of Policies **BCS21**, **DM26** and **DM27**. As described above, the proposed three chalet style houses are all single storey with accommodation in the roof space to maintain a subservience in respect of their height, scale and massing compared to the neighbouring dwellings on Woodwell Road and St. Bernard's Road.



The design and appearance of the dwellings includes render and tiled roof to reflect elements of neighbouring developments including the dwellings to the north east that are visible from the application site (**image 9**), within Webb Court - the former Shirehampton Baths site.



**Image 9:** Rendered elevations of dwellings off Park Road to the north east of the application site

Consideration was given to alternative materials including red brick which is the dominant building form. However on this backland site, a material with a lighter coloured finish that differentiated itself from the principle material of brick was considered the appropriate solution. The proposal is considered to achieve a high quality design which responds positively to existing character and enhances the visual amenity of the site, whilst achieving a high quality sustainable and energy efficient building which addresses the requirements of **Policy BCS21 and DM29**.

Given the site's location outside the Conservation Area, coupled with the low height of the proposed dwellings, their design which is in keeping with the local character, and the fact that the site cannot be seen to relate to the CA, ensures that there is no adverse impact on the setting of the nearby Shirehampton Conservation Area in accordance with the requirements of **Policies BCS22 and DM31**.

In accordance with **Policies DM29 and BCS13-16** consideration has been given to energy efficiency and solar orientation in the design of the dwelling. Active rooms (lounge and kitchen/diner) are either east or west facing so will achieve natural sunlight during either the morning or afternoon/evening period. Natural ventilation is achieved through opening doors and windows. The building has been designed with energy efficient materials and will achieve the required reduction in carbon dioxide emissions, including incorporating renewable energy sources (as set out below).

Overall, the proposed development is considered to achieve high quality dwellings that will make a positive contribution to the character and appearance of the area. Alterations to the existing dwelling enhance the traditional character of the dwelling whilst the removal of the garages provide the opportunity to enhance the street scene. The overall design accords with policy expectations in both the Core Strategy and the SADMP and in this regard, in line with **Paragraph 130** of the NPPF the development should be supported.

### **3. Residential Amenity**

With regard to residential amenity, **Section 12, Paragraph 127** of the **NPPF** states that:

*“Planning policies and decisions should ensure that developments:*

*...(f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience'*

Core Strategy **Policy BCS21** and **Policies DM27, DM29 and DM30** of the SADMP seek to safeguard the amenity of existing development and create a high-quality environment for future occupiers. Specifically, **Policies DM27 and DM29** require proposals for new buildings to ensure that existing and proposed development achieves appropriate levels of privacy, outlook and daylight.

The proposed new dwellings have been sited with outlook specifically designed to avoid overlooking either from or to the rear of the surrounding neighbouring dwellings in order to minimise overlooking or loss of privacy. The main outlook for each dwelling is on the ground floor towards the private rear gardens. On the first floor, given that the bedrooms are in the roof and all dormers face the courtyard, there will be no overlooking from habitable rooms.

The distance to the rear of 23 Woodwell Road is shown as 12m but at this point, from the single storey eaves of House D. there will be no overlooking from the first floor. This same relationship has been achieved with regards to the distance and relationship between House C and the rear of the dwelling on St. Bernard's Road. There is also no overlooking between the side gable wall of House D to the rear of the new dwellings. This careful siting ensures that privacy of existing and proposed development is protected in accordance with **Policies DM27 and DM29**.

In terms of daylight and sunlight, given the careful siting and the fact that the existing dwellings are all located to the south of the proposed site. Ensures that there is no loss of daylight and sunlight for the neighbouring dwellings. In this regard the proposals are considered to be compliant with the requirements of **Policy BCS21, DM27, DM29 and DM30**.

SADMP **Policy DM30** requires alterations to existing buildings to “...Leave sufficient usable external private space for the occupiers of the building...”. The proposed development requires a minor change to the size of the garden of recently approved house A to provide an access road measuring 3.1m in width. A large garden remains for this dwelling. Each proposed house has a private rear garden that provides adequate usable outdoor amenity space for occupiers ensuring compliance with SADMP **Policy DM30**.

In accordance with CS **Policies BCS18, BCS21** and SADMP **Policy DM29**, the proposed dwellings have been laid out and will be constructed to provide sufficient space and allow future adaptability. The room sizes and overall gross internal floor area which is 71sqm measured with all ceiling heights over 1.5m and therefore meet the appropriate spaces standards within the Government's Technical Housing Standard - Nationally Described Space Standards (March 2015) for a 3 person 2 bedroom two storey dwelling (70sqm).

In accordance with SADMP **Policy DM32** (Recycling and Refuse in New Development), Core Strategy **Policies BCS15 and BCS21**, and Bristol City Council's **Waste and Recycling Supplementary Guidance** (updated February 2017), the proposed dwellings provide sufficient space for the storage of recycling and refuse containers. Externally, a bin store is proposed in the courtyard of the required size

(confirmed above) to meet the requirements of Bristol Waste. A waste collection point is shown at the front of 2 Woodwell Cottages to store waste off the highway on collection days, thereby ensuring safe, convenient and secure access from the side of the dwelling for kerbside collection. As discussed in detail below, secure cycle parking and on site car parking is also provided in accordance with Local Plan requirements.

Overall, the proposed development has been designed to minimise its impact on the amenity of neighbouring properties and the character of the area. Sufficient space is provided within the site to accommodate the dwellings without having a detrimental impact on privacy, loss of daylight or sunlight to neighbouring properties and whilst achieving a high quality internal and external environment for future occupiers ensuring compliance with policies in the Core Strategy and the SADMP.

#### **4. Transport and Highways**

**Policy BCS10** confirms that proposals will be determined to prioritise pedestrians and cyclists over the private car. The policy also states that development proposals should be located where sustainable travel patterns can be achieved. **Policy DM23** states that development will be expected to provide adequate access to public transport and that development proposals should provide an appropriate level of safe, secure, accessible and usable parking provision having regard to the level of accessibility by walking and cycling.

**Appendix 2** of Bristol City Council's Local Plan sets out the Parking Standards. The maximum car parking standard for a two bedroom house is an average of 1.25 spaces. However, the Local Plan identifies that: *"In respect of individual or small-scale developments these standards will be applied flexibly to allow for the best layout of the site. On occasion this may result in the provision of driveway space which exceeds that specified in the guidelines"*. The minimum cycle space requirement for two bedroom dwellings is two spaces per dwelling.

The proposed courtyard has sufficient space to accommodate one car parking space per dwelling. In addition there is on street parking on Woodwell Road should this be required. Given the flexibility identified above, and the fact that the car parking standards are set as a maximum, the proposed arrangements are considered to accord with relevant policy.

All weather secure storage for at least two cycles is provided in a secure cycle store in either a secure store in the courtyard (for Houses D and E) and in the rear garden of the House C. The car and cycle parking provision meet with the Local Plan requirements and it is considered that the development can be suitably accommodated on site without detriment to highway or pedestrian safety or the quality of the local neighbourhood.

In respect of the access off Woodwell Road, visibility is good in both directions, as **images 9 and 10** confirm. The proposed width of the access road is 3.1m which is of sufficient width to allow cars to drive down. The access road is straight and only 23m in length and given the low movements that will be associated with the three dwellings, will minimise the chance of a conflict with two cars using the road in opposite directions. Further, the private road is designed as a shared space which will prioritise pedestrians over cars.

The principle of a private access road to serve residential development has been approved elsewhere in the City. A recent example is off Avalon Road (app ref: 17/04220/F) where planning permission was granted for the demolition of 48 garages and erection of 8no. town houses, served off an unadopted access road. A copy of the approved site layout plan is attached at **image 11**. The use of a shared surface for pedestrians and cars to access the site was supported and private refuse collection was agreed. However in the case of this application, a refuse collection area is proposed to enable Council waste operatives to collect waste.



**Images 9 & 10:** Visibility south and north on Woodwell Road



**Image 11:** Approved layout of 17/04420/F – garages to west of Avalon Lane

A Transport Technical Note prepared by Cotswold Transport has been prepared in support of this application to support and further justify the proposed highways, access and parking arrangements. For these reasons, the proposal is considered to comply with policies **BCS10** and **DM23** of the Local Plan.

## 5. Heritage

The application site is located outside the Shirehampton Conservation Area, but the boundary of the Conservation area lies to the north (beyond Woodwell Cottages) and the north west (boundary of Savoy car park) of the site. The Conservation Area Statement for Shirehampton confirms that *“the conservation area comprises the core of the historic settlement of Shirehampton whose focus is a small*



village green. It also includes a smaller area to the south across the Portway, known as the Lamplighters". The part of the Conservation Area to the south of the high street (which is closest to the application site) is described as follows:

*"(6) The area to the south of the High Street is mostly residential comprising small cottage style houses in short terraces. Elevations were originally rendered or in roughcast, many have subsequently been pebble-dashed. Post war development in this area is generally of a poor quality and utilitarian character. The Parade, a '60s style complex of shops and offices exemplifies this".*

It is considered that the existing backland site does not relate to the character of this part of the CA to the north. In determining planning applications affecting heritage assets, **Paragraph 192** of the NPPF confirms that local planning authorities should take account of "...*(c) the desirability of new development making a positive contribution to local character and distinctiveness*". **Policy BCS22** requires that *"Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance..."*

The sensitive development with single storey chalet style dwellings which pick up on some modern design elements locally will not have an impact on the CA. The only relationship that could be made between the site and CA is from the existing gap on St. Bernard's Road. However given the building's low height, siting and design, most of which will be screened by the boundary fences and hedges (notably the hedge on the southern boundary), ensures that no relationship will be formed and the sloping tiled roof will be the only part of the new dwellings visible which is considered to have a neutral impact the streetscene. In this regard the proposed development will not harm the significance of the Shirehampton Conservation Area, in accordance with the requirements of the NPPF and **Policies BCS22** of the Local Plan.

## **6. Other Issues**

Core Strategy **Policies BCS13-15** relate to climate change, sustainable energy and sustainable design and construction. The proposed development will achieve the reduction in carbon dioxide emissions at the Building Regulations stage to meet the objectives of **Policy BCS13-16**, including the incorporation of renewable energy and reduce on site emissions by more than 20% required by these policies. Further detail on this is provided in the Energy and Sustainability Statement prepared by JMDC Services submitted in support of this application.

## **Summary**

This supporting letter confirms that the proposed construction of new residential dwellings on this underused site comprising 3 no. two bedroom dwellings and associated works on land adjacent to 2 Woodwell Cottages is supported in principle by the NPPF and the Local Plan.

The site is located within an established residential area where the principle of residential development is acceptable. The development will increase the housing stock in Bristol, helping to increase the variety of types of housing in this locality and will achieve an efficient use of land in a sustainable location. Bristol are failing to meet the 2020 Housing Delivery Test and only delivering 72% of the homes required over the last three years, which means that there is greater weight given to the

NPPF and the presumption in favour of sustainable development. This weighs heavily in support of the application.

The development represents a high quality design, with height, scale, massing and building details reflecting the existing character of the area. The careful siting of the windows ensures that there is no overlooking and a good standard of amenity is maintained and ensured for existing and future occupiers.

Off street parking for cars and cycles as well as dedicated refuse and recycling storage is also proposed. The proposed development would not lead to any detrimental impact on the local area and is in accordance with policies contained in the NPPF and the Development Plan.

Therefore, for the reasons justified above, we respectfully request that the proposal should be granted planning permission. In the event of any queries or correspondence, please do not hesitate to contact me either by email (address below) or telephone (07841 674794).

Yours faithfully



**Stuart Rackham**

**Rackham Planning Limited**

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Enc. As Above

Cc: Hallen Developments South West Ltd, MLG Architects, Cotswold Transport, JMDC Services