

# **PLANNING STATEMENT**

**On behalf of**

**Woodstock Homes (Charlton Mead) Limited**

**Permission in Principle  
for the construction of 6 dwellings**

**on**

**Land at Cedar Lodge, Charlton Common,  
Brentry, BS10 6LB**

D2 Planning Ref: 014/24

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**D2**

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## **1. INTRODUCTION**

- 1.1. D2 Planning Limited is instructed by Woodstock Homes (Charlton Road) Limited (the applicant) to submit a permission in principle for the proposed construction of six dwellings (the proposed development) on land at Cedar Lodge, Charlton Common, Brentry, South Glos, BS10 6LB (the site).
- 1.2. This statement, alongside a review of the site history and relevant policies at both a local and national level, provides a description of the proposed development together with an appraisal of the planning merits of the scheme as a whole and should be read in conjunction with the submitted drawing.
- 1.3. It is concluded that the proposals are entirely consistent with relevant policies contained within the South Glos Local Plan 2010-2030, the National Planning Policy Framework 2023 (NPPF) and the emerging South Glos Local Plan.
- 1.4. Moreover, it is demonstrated within this statement that the development should be supported by the Local Planning Authority and permission ought to be granted.

## **2. PROPOSED DEVELOPMENT**

- 2.1. The proposal is for six dwellings at Cedar Lodge, Charlton Common, Brentry, BS10 6LB. No details in relation to design are provided at this stage as it is purely the principle of development that is being sought for approval. The proposed layout is shown on the plan below with access via Charlton Road through the residential development currently under construction.
- 2.2. Any final scheme would seek to ensure the proposed development would be of a scale and design that would be in keeping with the character and appearance of the surrounding area, incorporating good size garden areas and parking provision. In addition, any final scheme would adhere to the relevant planning policies contained within the NPPF and Local Plan.
- 2.3. The site comprises an area of vacant land within a well defined site comprising: -
- A consented residential scheme to the west;
  - A balancing pond to the north; and
  - Charlton Road to the east.

**3. RELEVANT PLANNING HISTORY**

- 3.1. There is no relevant history on the application site. Adjacent to the site, planning permission has been granted for the erection of 29 dwellings under application nos P19/15643./0, P22/0512/FUL and P22/00588/RM.
- 3.2. In addition, to the north of the site planning permission has been granted for the erection of an attenuation basin under application No. P22/00593/F (12 December 2022).

#### 4. PERMISSION IN PRINCIPLE

- 4.1. Permission in Principle (PIP) is a type of planning permission targeted at housing led developments which separates the consideration of matters of principle from the technical detail of the development.
- 4.2. On the basis that this type of consent is still relatively new, this section sets out the relevant legislative provisions and associated guidance and provides an outline of the various stages involved.

##### **Legislative Context**

- 4.3. The relevant legislation is set out within the Town and Country Planning (Permission in Principle) (Amendment) Order 2017 whilst the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) provides further information and guidance.
- 4.4. The NPPF helpfully defined Permission in Principle at Annex 2 as follows: -

**“A form of planning consent which establishes that a site is suitable for a specified amount of housing-led development in principle. Following a grant of permission in principle, the site must receive a grant of technical details consent before development can proceed.”**

##### **Stages**

- 4.5. The permission in principle consent route has two stages.
- 4.6. Firstly, there is Stage 1, through which an applicant can establish with the Local Planning Authority whether or not a site is suitable in principle in land use terms.
- 4.7. Secondly, providing the Stage 1 application is successful, a Stage 2 application can be progressed which is also known as the ‘Technical Details Consent’ stage at which point the detailed development proposals are assessed in full, in a similar manner to a reserved matters application.
- 4.8. The process for Stage 1 varies depending on the scale of the proposed development and whether it relates to greenfield or previously developed land. For minor developments i.e. developments of less than ten units, an

application must be submitted to the Local Planning Authority and this applies whether the site is greenfield or previously developed.

### **Requirements for a Valid Stage 1 Permission**

- 4.9. Article 5D of the Town and Country Planning (Permission in Principle) (Amendment) Order 2017 sets out the requirements for a valid Stage 1 application.
- 4.10. The requirements include the following: -
- Completed application form;
  - A plan which identifies the land to which the application relates; and
  - The correct application fee.
- 4.11. On the basis the scope of the Stage 1 application is limited to location, land use and amount of development, being those issues relevant to the principle of the development, there is no requirement (either nationally or locally) for any other form of technical supporting information, this would be provided at the Technical Details Consent stage.
- 4.12. Once a valid application for PIP has been received, the Local Planning Authority should make a decision on the proposal as quickly as possible, and in any event within the statutory time limit of 5 weeks unless a longer period has been agreed in writing with the applicant.

### **Stage 1 Planning Considerations**

- 4.13. Proposals are determined in accordance with the adopted development plan for the site together with any relevant material considerations and to reiterate, the Local Planning Authority's assessment within the Stage 1 application is limited to the location, land use and amount of development only.
- 4.14. To be clear, matters such as ecology, flood risk, contamination, trees, highways and so on are only to be assessed at Stage 2, once the principle has been accepted.

### **Stage 1 Implementation Period**

- 4.15. Where Stage 1 permission is granted, an applicant has three years to apply for Stage 2 Technical Details Consent.

- 4.16. Paragraph 020 of the NPPG (Reference ID: 58-020-20180615) states that Local Planning Authorities cannot add conditions or secure planning obligations to the grant of permission under Stage 1 but can inform applicants on the level of information and any likely obligations that may be required at the Technical Details Consent Stage. In a similar vein, the Community Infrastructure Levy only applies following the grant of the Technical Details Consent.



## 5. PLANNING POLICY CONTEXT

### Development Plan

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan, unless other material considerations indicate otherwise.
- 5.2. In this case the relevant development plan which applies to the application proposals is the South Gloucestershire Core Strategy (2006 – 2027) and the Policies, Sites and Places DPD.
- 5.3. The ‘other material considerations’ referred to in Section 38(6) of the Act would include the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG), Planning Policy Statements (PPS), Planning Circulars, and relevant Supplementary Planning Guidance (SPG) or Supplementary Planning Documents (SPD) (emerging and adopted).

### South Gloucestershire Core Strategy (2006 – 2027)

- 5.4. South Gloucestershire Council adopted their Core Strategy in 2013 and this seeks to cover the plan period 2006 – 2027. This sets out the Council’s vision for development including strategic housing, employment, community, and retail facilities.
- 5.5. Relevant policies to the application’s assessment are the following: -

**Policy CS1:** High Quality Design – Development will be required to be of high quality, respecting and enhancing the character of the area and promoting distinctiveness. Density and layout should be well integrated with existing adjacent development and connect into the wider network of foot, cycle and public transport links.

**Policy CS4a:** Presumption in favour of Sustainable Development – This policy repeats the presumption found in the NPPF.

**Policy CS5:** Location of Development (including Green Belt) – This policy sets out a spatial strategy for the SGC area and states that amongst other things, most new development will take place within the confines of the north and east frontage of Bristol sub areas. The focus will be for

development within existing communities and the existing South Gloucestershire Local Plan allocations.

**Policy CS6:** Infrastructure and Developer Contributions – All new development of a sufficient scale that would add to the overall demand and impact on infrastructure will be required to provide site specific measures to directly mitigate the impact of the development.

**Policy CS7:** Strategic Transport Infrastructure – Priority will be given to the implementation of strategic infrastructure proposals that reduce congestion and improve accessibility by means other than the private car.

**Policy CS8:** Improving Accessibility – New development proposals which generate significant demand for travel will be more favourably considered the nearer they are located to existing and proposed public transport infrastructure and existing facilities and services. Proposals must promote sustainable travel options including providing integration with existing walking, cycling and public transport infrastructure; contributions to bus services, etc.

**Policy CS9:** Management of the Environment and Heritage: New development will be expected to conserve and enhance the natural environment, avoiding or minimising impacts on biodiversity and geodiversity; conserve and enhance the character, quality, distinctiveness and amenity of the landscape; reduce and manage the impact of flood risk through the implementation of Sustainable Drainage Systems; and avoiding areas of flood risk.

**Policy CS15:** Distribution of Housing – A minimum of 28,355 new homes will be delivered over the plan period 2006 – 2027.

**Policy CS16:** Housing Density – Housing development is required to make efficient use of land, to conserve resources and maximise the amount of housing supplied, particularly in and around town centres and other locations where there is good pedestrian access to frequent public transport services.

**Policy CS17:** Housing Diversity – All new housing development comprising both market and affordable housing, must provide a wide

variety of housing type and size to accommodate a range of different households.

**Policy CS18:** Affordable Housing – Development of over 10 dwellings will be required to provide 35% affordable housing on site.

**Policy CS24:** Green Infrastructure, Sport and Recreation Standards – New developments must comply with all the appropriate local standards of provision in terms of quantity, quality and accessibility; provision must be delivered on-site, unless it is demonstrated that partial or full off-site provision or enhancement creates a more acceptable proposals; and the functionality and usability of spaces and facilities must be suitable for their intended purposes.

### **Policies, Sites and Places DPD**

5.6. The Policies, Sites and Places (PSP) DPD was adopted by the Council in November 2017. This part of the development plan sets out the development management policies and some site allocations for development.

5.7. Relevant policies to the application's assessment are the following: -

**Policy PSP1:** Local Distinctiveness – Development proposals must make a positive contribution to the distinctiveness of the area / locality.

**Policy PSP2:** Landscape – Development proposals will be acceptable where they conserve and enhance the quality, amenity, distinctiveness and special character of the landscape. Amenity space, hard and soft landscape works and open space provision will be required to be of a high standard of design, appropriate to the use and character of the development and its location.

**Policy PSP3:** Trees and Woodland – Development proposals should minimise the loss of existing vegetation on a site that is of importance in terms of ecological, recreational, historical or landscape value. Development proposals should include the protection of trees; replacement trees where tree loss is essential; additional tree planting; and new planting schemes that retain and integrate native trees and hedgerows.

**Policy PSP5:** Undesignated Open Spaces within Urban Areas and Settlements - Development in these areas is not prohibited provided that it does not affect the quality, character, biodiversity, sustainable water management, recreation opportunities, heritage value, amenity, or distinctiveness of the locality.

**Policy PSP6:** Onsite Renewable and Low Carbon Energy – All development proposals will be encouraged to minimise end-user energy requirements over and above those required by the current building regulations through energy reduction. All major greenfield residential development will be required to reduce CO2 emissions further by at least 20% via the use of renewable and / or low carbon energy generation.

**Policy PSP8:** Residential Amenity – Development proposals will be acceptable provided that they do not create unacceptable living conditions.

**Policy PSP11:** Transport Impact Management – Development proposals which generate a demand for travel, will be acceptable where they provide appropriate, safe, accessible, convenient and attractive access; it would not generate traffic that would create or contribute to severe congestion or have an unacceptable effect on highway and road safety.

**Policy PSP16:** Parking Standards – New development proposals will be acceptable where they provide the appropriate parking standards for residential development including cycle parking and garages.

**Policy PSP19:** Wider Biodiversity – Development proposals resulting in a loss or deterioration of irreplaceable habitats including unimproved grassland, ancient woodland and ancient trees will be refused unless the need for, and benefits of, the development in that location clearly outweigh the loss.

**Policy PSP20:** Flood Risk, Surface Water and Watercourse Management – Development proposals will be expected to reduce surface water runoff; incorporate Sustainable Drainage Systems; ensuring that surface water drainage proposals are design to not increase off-site flood risk; and wherever practicable achieve the top tier of the surface water drainage hierarchy.

**Policy PSP37:** Internal Space and Accessibility Standards for Affordable Dwellings – Affordable Housing shall be consistent with the nationally described (minimal internal) space standards; meet accessibility standards; and provide 8% of units to meet wheelchair standards.

**Policy PSP43:** Private Amenity Space Standards – All new residential units will be expected to have access to private amenity space. Provision should, as a guide, meet or exceed the standards set out in this policy

### **Emerging Local Plan**

- 5.8. South Gloucestershire initiated consultation in respect to their Local Plan between November 2020 – March 2021. A Consultation on the Regulation 18 Local Plan closed in February 2024. Given the stage the emerging Local Plan has reached, it can be attributed very little weight.

### **National Planning Policy Framework (NPPF)**

- 5.9. The National Planning Policy Framework sets out the government’s planning policies for England. Central to this guidance is the presumption in favour of sustainable development. The NPPF was revised in December 2023 and a number of significant changes were made, including the implementation of the standard method for calculating housing need (‘the standard method’), the Housing Delivery Test, and differences in calculating five-year housing land supply.
- 5.10. Relevant paragraphs to the application’s assessment from NPPF include the following:-

**Paragraph 11:** Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

**Footnote 7:** The policies referred to are those in the Framework relating to: habitats sites and / or designated as SSSIs; Green Belt; Local Green Space; AONB; National Park; Heritage Coast; irreplaceable habitats; designated heritage assets; and areas at risk of flooding or coastal change.

**Footnote 8:** For applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites; or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

**Paragraph 48:** Local planning authorities may give weight to relevant policies in emerging plans according to: the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies with the Framework.

Paragraph 49: Arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

**Paragraph 50:** Where planning permission is refused on grounds of prematurity, the LPA will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.

**Paragraph 59:** 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.

**Paragraph 77:** LPA’s should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement including the addition of an appropriate buffer.

**Footnote 42:** Unless these strategic policies have been reviewed and found not to require updating.

**Paragraph 109:** The planning system should actively manage patterns of growth and significant development should be focused on locations which are or can be made sustainable, through limited the need to travel and offering a genuine choice of transport modes.

**Paragraph 123:** Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.

**Paragraph 131:** Planning policies and decisions should ensure that developments are ... sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

**Paragraph 157:** LPAs should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood risk assessment.

**Paragraph 180:** Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks.

## **6. PRINCIPLE OF DEVELOPMENT**

- 6.1. In the preparation of this planning, full regard has been given to relevant planning policies within the statutory development plan as required by Section 38(6) of the Act.
- 6.2. The site lies within the defined settlement limits where the principle of residential development is acceptable under Policy CS5 subject to various other criteria. The site is an underused, unmanaged area of land which has no inherent use. The site is not identified as an area of open space, green gap or wedge that should be protected in the Development Plan.
- 6.3. Furthermore, the site is within proximity to the public highway network, providing opportunities for future users to walk to nearby services and facilities, providing opportunities for positive impacts upon future occupiers' mental and physical health, as well as providing opportunities to travel without reliance on the private car.
- 6.4. Whilst no details in relation to the design of the proposed development are available at this stage, as we are seeking comment for the principle of the development only, a high quality design would be achieved at the site. It is considered that a future design would comply with the recently approved adjacent development of 29 dwellings. Furthermore, the development would offer a range of energy efficient measures similar to those being provided on the adjacent site. The proposed use of land is thought to represent a compatible and appropriate land use to the immediate surrounding area and would not result in any conflicting land uses or problems.
- 6.5. Due to the location and size of the plot, future development would ensure adequate parking designed and located in a sensitive manner, the provision of good sized and usable private amenity space and enables the dwelling to be located in a position which allows high levels of privacy for existing and future residents.
- 6.6. The NPPF provides specific support for small to medium sized sites with Paragraph 69 detailing that 10% of a Council's housing requirement should be delivered on sites no larger than 1 hectare. The application would aid the



Council in meeting this ongoing requirement through an efficient use of an unallocated site, in line therefore with Paragraph 68.

- 6.7. Given the nature of the scheme, it is considered more than likely that before and during construction, the development would contribute to the local economy directly through the employment of local companies to facilitate the build. This would include planners and architects/designers as part of the Stage 2 application process, local contractors involved in the physical build and the local supply chain through the provision of materials. Once occupied, new residents would use and sustain the growth of nearby services through local spending power. It is considered that the proposed development would therefore assist in achieving the economic aims of sustainable development.
- 6.8. In summary, it is considered that the proposal would constitute a useful windfall opportunity within the built up area. The site would also be located adjacent to existing residential development and contained within a site with clearly defined boundaries.
- 6.9. The application is not accompanied at this stage by the technical assessments which would allow for adherence to the environmental aims of sustainable development to be demonstrated; such matters are not relevant to the application at hand. However, we are confident that this is achievable.

**7. OTHER CONSIDERATIONS**

- 7.1. It is important to reiterate that all design and technical related matters are not relevant considerations to this application. The nature of Permission in Principle applications infers that development could be permissible at Stage 1 but subsequently fail to gain Stage 2 consent.
- 7.2. Concerns regarding technical matters such as design, visual impact, drainage, ecology and so on should not form part of the determination of this application. It is only when the Council have the technical information provided as part of a Stage 2 application that an informed position on such matters can be reached.

## **8. CONCLUSION**

- 8.1. In summary, it has been demonstrated that the principle of residential development on the site is consistent with both adopted local planning policies and would be consistent with the thrust of NPPF policy.
- 8.2. In terms of economic benefits, the proposals would make a positive contribution to the local economy during the construction phase and would comprise two additional dwellings. From a social dimension, the proposals would result in a high quality contribution towards the area's housing stock and in terms of the environmental aspect, the proposals would be developed carefully to mitigate, conserve and, where appropriate enhance the environment.
- 8.3. There is clear and strong support in both the South Glos Local Plan and the NPPF for new developments that may not be within, but are well related to, existing settlements and Policy CS5 recognises the importance of delivering new housing to such areas, so as to meet the local housing needs and sustainability of communities within South Glos's settlements. The ability to develop areas on the fringes of these settlements through rounding off allows this housing requirement to be met in a manner that is proportionate to the size of the settlement.
- 8.4. The development should therefore be approved, having regard to the statutory determination obligations prescribed by Section 28(6) of the Planning and Compulsory Purchase Act 2004.