

# Objection Letter

Relating to Planning Application PT17/5810/RM, Erection of 763 dwellings, community building, nursery and retail units with parking, landscaping and associated works. (Approval of reserved matters to be read in conjunction with outline planning permission PT06/1001/O). | Land At Harry Stoke Harry Stoke Road Stoke Gifford Bristol South Gloucestershire BS34 8QQ

Robert Forsey, The Willows, Harry Stoke Road  
4<sup>th</sup> March 2019

## Executive Summary

### Background

The proposed development at Harry Stoke was granted outline planning consent by the Secretary of State in 2006 with a large number of conditions attached to it. Condition 5 required a site wide Design Codes document to be produced prior to any reserved matter applications.

The planning application PT17/5810/RM has been submitted by Crest Nicholson in December 2018 and an updated plan in February 2019. This document aims to show where the current plan does not meet the guidelines in the Design Codes document or the current South Gloucestershire local plan.

### Non-alignment to Design Codes document

There are a number of areas where the new plan is completely opposite to the agreed design codes document.

- It does not adhere to the location of the Character Areas, specifically the Rural Edge location adjacent to Harry Stoke Road as it does not follow the density, building type or material guidelines.
- It does not follow the guidelines for the Urban Village specifically 4 storey apartment blocks at the top of the hill and not in the designated Urban Core character area at the bottom of the hill.
- It does not adhere to the building types in the agreed Urban Village and Rural Edge character areas, especially 4 story apartment blocks in the Urban Village areas and a lack of variety and detached houses along the Rural Edge.
- The Design Code guidelines clearly show that building heights in the area opposite the Southern end of Harry Stoke Road should be Predominantly 2 storey and that 3 to 4 storey apartments are only in the Urban Core character areas thus minimising visual impact. It also states that the site wide strategy is to locate taller and larger buildings at the lowest points of the site.

### Contravention of Policies CS1, PSP1 and PSP2 of the Local Plan

Core Strategy Policy CS1(1) requires that; 'siting, form, scale, height, massing, detailing, colour and materials, are informed by, respect and enhance the character, distinctiveness and amenity of both the site and its context'

The new plan fails totally to meet these requirements with the inappropriate placing of modern apartment blocks directly opposite and in the site line of all properties in the Southern end of Harry Stoke Road, which has a very traditional and rural feel.

It also fails to respect the character of the current dwellings with no detached or semi-detached dwellings, comprising entirely of terraced blocks and the aforementioned apartments.

### Conclusion

The council officers have indicated that the Design Codes document is old and that planning rules and policies have changed, however the overriding principles of respecting the current dwellings along Harry Stoke Road with a rural edge and placing the tallest buildings at the lowest points of the site fit exactly with the policies in the current local plan. The current plan goes against these principles with terraced housing and 3/4 storey apartment blocks along Harry Stoke Road and therefore should be rejected as being inappropriate and contrary to Policy CS1, PSP1 and PSP2 of the South Gloucestershire Local Plan.

## Detailed Objections

### Contravention of Policies in the South Gloucestershire Local Plan – Policies, Sites and Places Plan, Adopted November 2017

The new design does not follow the policies in the South Gloucestershire Local Plan, specifically CS1, PSP1 and PSP2.

#### Core Strategy Policies – CS1 High Quality Design, Objectives

- Promoting high quality design that **responds to its context**, the **distinctive assets of the district** and creates ‘sense of place’ and civic pride.
- Create attractive, cohesive, safe and inclusive communities.
- Protecting the landscape for its own sake
- **Managing the impacts of urban intensification**

The proposal to build modern 3 and 4 bedroom apartment blocks does not respond to the context of the properties along the Southern end of Harry Stoke Road, which are predominantly detached houses and a small number of terraced houses in a traditional style giving a very rural feel.



Properties along Harry Stoke Road South, showing mainly detached houses and rural character



Side view of proposed development in the field directly opposite Harry Stoke Road

The current plan does not manage the impact of urban intensification by having a large block of continuous apartments, it is also arguable that massing the apartments and small terraced houses together will not lead to safe and inclusive communities. Creating a more diverse mix of properties as originally proposed would be more aligned with these policies.

The Local Plan sets out very clearly that it is a requirement for plans to reflect the identity of local surroundings.

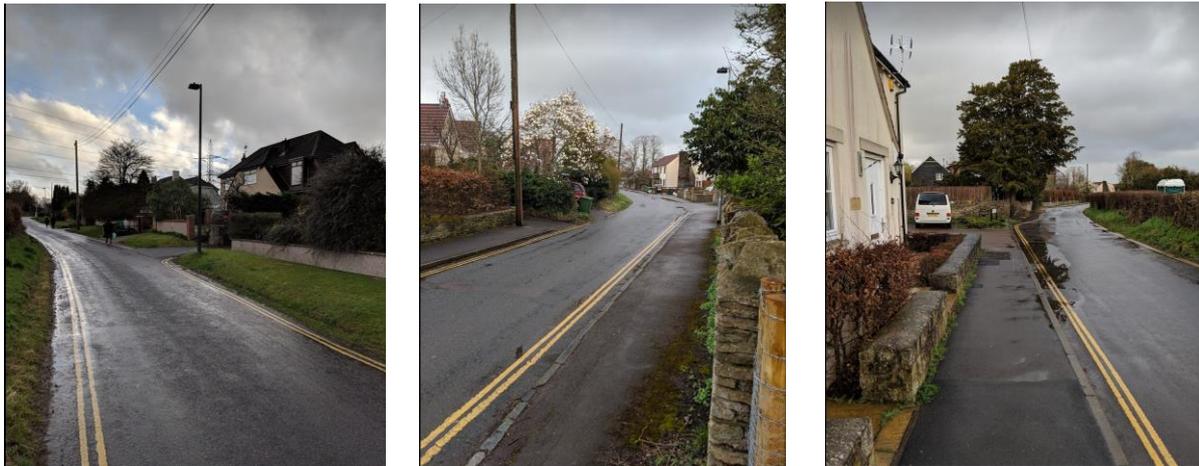
## POLICY PSP1 – LOCAL DISTINCTIVENESS

Development proposal(s) will be acceptable where the proposals demonstrate an **understanding of, and respond constructively to the buildings and characteristics that make a particularly positive contribution to the distinctiveness of the area / locality.**

NPPF para 58 **requires** that development should, **'respond to local character and history, and reflect the identity of local surroundings and materials,** while not preventing or discouraging appropriate innovation'.

Core Strategy Policy CS1(1) **requires that; 'siting, form, scale, height, massing, detailing, colour and materials, are informed by, respect and enhance the character, distinctiveness and amenity of both the site and its context'**. It however remains common for developers, in undertaking a context appraisal, to attempt to justify further indistinct development by referring to usually 20th century post-war development of indistinct quality nearby and/or claiming that the locality lacks distinction by way of the variety of ages and styles of development that exist in a locality. In justifying new development in accordance with the NPPF requirements, **this approach will not be acceptable.**

Again, the new plan totally fails to reflect the current character and diversity of dwellings in the Southern end of Harry Stoke Road as indicated previously.



Photos of Harry Stoke Road, showing the diversity of dwellings and rural feel



Comparisons of current street scene showing current dwellings and the proposed development directly opposite. Some changes have been made to the small terraces so that they are more traditional, but they are still very small with no detached properties. The apartments are completely at odds with the current environment which is a complete contravention of Core Strategy 1 that **requires that 'siting, form, scale, height, massing, detailing, colour and materials, are informed by, respect and enhance the character, distinctiveness and amenity of both the site and its context'**

**It should be noted that this is not a guideline, it is a REQUIREMENT and therefore the council must enforce their own policies.**

The site is quite unique with a fairly large difference between the highest and lowest points and prominent hedgerows and the remains of a moat in the Northern end of Harry Stoke Road. The local plan promotes conservation where appropriate to enhance the special character of the landscape.

### Policy PSP2 - Landscape Protection and Enhancement

Development proposals will be acceptable where they conserve and where appropriate enhance the quality, amenity, distinctiveness and special character of the landscape (defined by the Landscape Character Assessment). This includes, but is not limited to:

landscape attributes which define the inherent character of an area, such as: landscape patterns arising from roads, paths, hedges, waterways and buildings; designed and natural landscapes, which include elements of natural beauty, historical or cultural importance and ecological features;

the tranquillity of a landscape, sense of place and setting; landscape features, such as trees, hedgerows, woodlands, views, banks, walls, ponds and waterways; distinctive or characteristic topography and landforms.

The current plan does not acknowledge the existence of the moat at all and it is completely lost. The internal hedgerows are not kept and have already been cut down prior to planning permission being granted. There is also a complete lack of use of the landscape to minimise the impact of urbanisation on Harry Stoke Road by placing tall buildings at the top of the site.

#### **Objection :**

**The proposal represents a cramped form of development, and the proposed erection of 3 and 4 storey apartment blocks is not appropriate in the highest part of the site as it would be out of character with the prevailing form of development in Harry Stoke Road. The proposed development would appear as an incongruous, overly prominent and cramped addition to Harry Stoke Road, and the proposal would therefore harm the visual amenity of the streetscene and the character of the immediate area. The proposal fails to meet high standards of design and site planning, and the proposed development is therefore contrary to Policy CS1, PSP1 and PSP2 of the South Gloucestershire Local Plan: Core Strategy (Adopted) December 2013; Policy PSP1 of the South Gloucestershire Local Plan: Policies, Sites and Places Plan (Adopted) November 2017 and the National Planning Policy Framework.**

## Non-alignment to Design Codes document

**In accordance with Condition 5 of the 2007 Outline planning consent (ref: PT06/1001/O) a site-wide design code is required to be submitted and approved prior to determination of Reserved Matter applications.** The Condition requires detailed coding to be provided for:

- Architectural and sustainable construction principles;
- Character areas;
- Street types and street materials;
- Block types block principles;
- Car parking principles;
- Boundary treatments;
- Building types and uses;
- Building heights;
- SUDS and public open spaces;
- Building materials;
- Environmental performance;
- Implementation;
- Mechanisms for period review and if necessary revision of the design code.

The document is therefore set out based upon the above requirements. The coding is site-wide, has been developed in close cooperation with South Gloucestershire Council and is consistent with the criteria set out within the extant planning consent.

**The new plan does NOT adhere to ANY of the guidelines set out in the Design Codes Document relating to Block types, Character areas, Building heights and Building Materials, therefore it should be rejected and the old plan re-instated or another new plan produced that does follow the agreed design codes.**

Condition 6 of the outline planning consent states;

Applications for the approval of the reserved matters shall be in accordance with the detailed codings set out in the approved Design Code, **unless otherwise agreed in writing by the Local Planning Authority.**

Have the changes in the new plan been agreed in writing between the developer and the local planning authority? If so, will the Design Codes document be updated to reflect this? Nowhere does it state there is a time limit on the validity of the document and the principles it lays down are very sensible and sympathetic to the existing communities around the proposed site.

Below are the primary areas where the new plan is not aligned with the Design Codes document either in detail or spirit. It is as though the architects were not even aware of this document.

## Details of Non-Alignment

### Section 2.2 Character Areas



Figure 2.2 Character Areas Plan

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This diagram shows the agreed Character Areas for the Outline Planning and sets the Design Codes for the development.

The areas adjacent to the Southern end of Harry Stoke Road comprise of a band of Rural Edge, then Urban Village and finally Urban Core which is at the bottom of the hill.

#### Rural Edge Definition

Traditional village architecture **responding to the existing dwellings along Harry Stoke Lane and villages in South Gloucestershire**. Streetscenes exhibit greater variety in housing types and materials, and building proportions are predominantly wide and square-fronted with traditional rural detailing.

Density : Average 30 dw. p/hectare

Building Type : Largely 2 and 2.5 storey detached and semidetached units; some short terraces.

Parking courtyards and mews streets contain coach houses, mews houses and cottages.



Continuity of form : Variety of styles and building form emphasis organic development pattern.  
Consistency created by materials and boundary treatments.

Ancillary Elements : Bay, oriel and dormer windows; porches. Limited chimneys to Harry Stoke Road and other rural edge.

### Urban Village Definition

Traditional cottage vernacular architecture. Limited contemporary elements. Simple plan and form, regular proportions to openings. Street identity achieved through consistency of elements or detailing by street.

Density : Average 50 dw. p/hectare

Building Type : Primary streets and key public spaces comprise short terraces and semi-detached units, interspersed with occasional breaks for larger detached houses. **Apartments and special housing to key dual-aspect corners.** Minor streets and mews lanes mixture of 2-3 storey detached, semidetached and terraced units.



### OBJECTION :

**The new plan does not adhere to the location of the Character Areas, specifically the Rural Edge location adjacent to Harry Stoke Road as it does not follow the density, building type or material guidelines.**

**It also does not follow the guidelines for the Urban Village specifically 4 storey apartment blocks at the top of the hill and not in the designated Urban Core character area at the bottom of the hill.**

**Therefore it should be rejected and the old plan re-instated or another new plan produced that does follow the agreed design codes.**

### Section 8 -Building Types and Uses

Building type and form will vary in reflection to the following:

- Location;
- Function;
- Density;
- Character area.

The density strategy set at the outline stage dictates a more 'urban' character (up to 80dph) around the Main Square and southern gateway, and more 'village' character towards the east and central

open space edges (approximately 30 dph). The average site density is 50dph. These densities therefore require a greater proportion of townhouses, terraces and apartments within the Urban Core, **a mixture of housing types (minimal apartments) in the Urban Village, and larger detached and semi-detached units at the periphery of the development and in particular Harry Stoke Road south.** Wide fronted units may be used sporadically in higher density areas where fitting with character, in lower density areas, or where plot depth dictates.

**OBJECTION :** The new plan does not adhere to the building types in the agreed Urban Village and Rural Edge character areas, especially 4 story apartment blocks in the Urban Village areas and a lack of variety and detached houses along the Rural Edge.

Therefore it should be rejected and the old plan re-instated or another new plan produced that does follow the agreed design codes.

### Section 9 – Building Heights

Streetscapes shall be designed to create an interesting roofline with variation in roof form and building height. **The site-wide strategy is to locate taller and larger buildings at the lowest points of the site to minimise visual impact in the wider landscape.**

**Dwellings along Harry Stoke Road shall be between 1.5-2 storeys, and a mixture of detached and semidetached units with limited short terraces.**



Figure 9.1 Building Heights Plan

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**OBJECTION :** The Design Code guidelines clearly show that building heights in the area opposite the Southern end of Harry Stoke Road should be Predominantly 2 storey and that 3 to 4 storey apartments are only in the Urban Core character areas thus minimising visual impact. It also states that the site wide strategy is to locate taller and larger buildings at the lowest points of the site.

The New design has 3 and 4 storey apartments in the Urban Village character area opposite Harry Stoke Road which is completely against the strategy in the design code. This puts the tallest buildings at the top of the hill and overlooking Harry Stoke Road.

**Therefore it should be rejected and the old plan re-instated or another new plan produced that does follow the agreed design codes.**