



Appeal Decisions

Hearing Held on 15 December 2020

Site visit made on 16 December 2020

by Jonathon Parsons MSc BSc(Hons) DipTP Cert(Urb) MRTPI

an Inspector appointed by the Secretary of State

Decisions date: 1st April 2021

Appeal A Ref: APP/Z0116/W/19/3242232

Former Pring and St Hill Site, Malago Road, Bristol BS3 4JH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by A2Dominion against the decision of Bristol City Council.
- The application Ref 19/00267/F, dated 16 January 2019, was refused by notice dated 6 September 2019.
- The development proposed is the redevelopment of the site to provide 74 no student cluster units and 40 no Affordable housing units (social rented), flexible ground floor community/commercial use (use class A1-A5/D1/B1), landscaping, access and public realm works and associated works to the Malago Road.

Appeal B Ref: APP/Z0116/W/20/3249159

Former Pring and St Hill Site, Malago Road, Bristol BS3 4JH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
 - The appeal is made by A2Dominion against the decision of Bristol City Council.
 - The application Ref 19/05740/F, dated 27 November 2019.
 - The development proposed is redevelopment to provide student accommodation across four development blocks, landscaping, access, public realm works and associated works to Malago Road.
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Decisions

1. Appeal A is dismissed. Appeal B is dismissed and planning permission for the redevelopment to provide student accommodation across four development blocks, landscaping, access, public realm works and associated works to Malago Road is refused.

Procedural Matters

2. As set out above there are two linked appeals on this site. Both appeal proposals comprise tall building blocks fronting onto Malago Road and Hereford Street. In Appeal A, the blocks would comprise student accommodation, 550 spaces, 40 affordable housing units and flexible community/commercial space. In Appeal B, the blocks would comprise solely student accommodation, 542 spaces.
3. In Appeal A, the Malago Road blocks A/B, C/D and E/F would be 8 and 10 storeys compared to 7 and 9 storeys for the equivalent blocks in Appeal B. For Appeal A, the Hereford Street block G would be 10 and 12 storeys compared to

8 and 9 storeys for the equivalent block in Appeal B. Appeal A's blocks E/F would have a cantilevered overhanging storey which is lacking in Appeal B's equivalent block. Appeal A's block G would have a larger and lozenge-shaped footprint compared to that in Appeal B which is smaller, indented and rectangular shaped.

4. For landscaping and public realm provision, the Appeal A proposal would have less next to the river and between blocks E/F and G. Between these blocks in Appeal A, there would be parking areas whereas in Appeal B, there would be a 'pocket' park. I have considered each proposal on its individual merits. However, to avoid duplication I have dealt with the two schemes together, except where otherwise indicated.
5. In Appeal A, the Council's second reason for refusal related to flood risk, having regard to climate change and surface water drainage, and the lack of safe emergency and maintenance access to the river for the Environment Agency (EA). Following a Hydrock Technical Design Note (HTDN) 30 November 2020, the EA has withdrawn its objection based on flood risk but still maintain its objections based on river access. The Local Lead Flood Authority (LLFA) also objects that no provision has been made for future river restoration.
6. Appeal B is against the non-determination of a planning application by the Council. Had it been in a position to do so, the Council would have refused the planning application for the following reason:

"The proposed development by reason of its height, scale, massing and overall design quality would be unacceptable in design terms contrary to Section 12 of the National Planning Policy Framework (February 2019); Policy BCS21 of the Bristol Core Strategy (June 2011); Policies DM26, DM27, DM28 and DM29 of the Site Allocations and Development Management Policies (July 2014); Urban Living SPD (November 2018) and Bedminster Green Framework (March 2019)."
7. For each proposal, Unilateral Undertakings (UU) dated 21 December 2020 were submitted concerning affordable housing provision (Appeal A only), affordable housing viability review (Appeal A only), transfer of land for strategic highways improvements, contributions for local transport improvements (Electric Vehicle Club, schemes for Windmill Hill Residential Parking and Traffic Management, Traffic Regulation Orders and Bedminster Green Travel Plan Club), and future connection to Bristol Heat Network (reduced carbon energy source).
8. Other documentation was submitted prior and after the hearing as detailed in the attached schedule of documents. The site description and appellant's details in the Statement of Common Grounds has been used in the decisions here. Main parties' views on the local authority Housing Delivery Test results (HDT) have been considered in the decisions' reasoning.

Main Issues

9. In each appeal, the main issues are the effect of the proposal on (a) the character and appearance of the area and (b) whether there would be safe river access, having regard to maintenance and emergency requirements of the EA.
10. In appeal A, additional main issues are whether (c) people and property would be at unacceptable risk from flooding, having regard to surface water discharge

and climate change, and (d) adequate provision has been made for river restoration.

Reasons

Context and Policy Background

11. The appeal site was formerly an engineering works. It is situated south of Bedminster centre, including East Street, and Bristol city centre. Both the Malago Road (A38) and East Street are key routes connecting the city to its southern suburbs and beyond.
12. Policy BCS5 of the Bristol City Council Core Strategy (CS) 2011 aims to deliver new homes within the city's built up areas to contribute towards accommodating a growing number of people and households. CS Policy BCS18 supports a neighbourhood with a mix of housing tenures, types and sizes to meet the changing needs and aspirations of its residents. Although not a policy requirement here, CS Policy BCS17 and the Council's Affordable Housing Practice Note (AHPN) 2018 set out city needs and requirements for affordable housing.
13. Progressing Bristol's Development 2020 statement promotes city and wider region development. Bedminster is identified as a Growth and Regeneration Area suitable for student accommodation. The Bedminster Green Framework (BGF) 2019, details parameters and principles, including higher density, to shape and integrate individual site-based development proposals. The appeal site is identified specifically for development with a 'mid-high' 6-9 floor height parameter, along with public realm and landscape, green infrastructure, hydrology and access requirements. The BGF's Strategic Transport Assessment proposes enhancement of Malago Road corridor, including parts of the appeal site, for public transport, cycling and pedestrian improvements.
14. Bristol City Council Urban Living Supplementary Planning Document (SPD) 2018 requires all major developments to respond positively to its context. Through generic planning principles and considerations, it requires consideration of prevailing height, scale and mass of surrounding buildings, streets and spaces. Under the SPD, the site would be within an 'Inner Urban Area' with 'significant potential for intensification' and that schemes should respond to emerging contexts in areas of significant change.
15. The emerging Bristol Local Plan Review (LPR) is at an early stage of preparation. Draft Policies DS8 and H7 propose the redevelopment of Central Bedminster for a mixture of residential, workspace and community uses, including student accommodation. To the west of the site, the industrial and commercial units on Malago Road are part of an emerging growth area under the LPR.
16. Development plan policies provide a strong emphasis in redeveloping brownfield sites at higher densities to accommodate growth. Both non-statutory documents and emerging policies identify a direction of policy travel that promotes this.
17. Nevertheless, Policy BCS21 of the CS and Policies DM26, DM27, DM28 and DM29 of the Bristol Site Allocations and Development Management Policies Local Plan (SADMP) 2014, collectively and amongst other matters, require new development to deliver high quality urban design, development height, scale

and massing to be appropriate to immediate context, site constraints, character of adjoining streets and spaces, and for development to contribute or contribute to a safe, attractive, high quality, inclusive and legible public realm.

Character and appearance

18. The site is longitudinally shaped, mainly fronting onto Malago Road. Its frontage width is considerably greater than its depth. At each end of the site, the plot tapers to a point where it faces onto Hereford Street and a bend in Malago Road respectively. A perimeter footway separates the site from these roads. To the rear, there is the river, associated culvert under a railway embankment, and further along, a narrow piece of land used for commercial storage between the embankment and the site.
19. Behind the railway embankment, there is a landscaped open space and the Windmill Hill residential area comprising older traditional terraced streets stepped up, one from another, on a rising slope. Polden House and Holroyd House are noticeable tall buildings within Windmill Hill which disrupt the area's low-rise residential character and appearance. Opposite the appeal site, the Malago Road apartments are a more recent addition sited on a rising slope with St John's Churchyard and the Bedminster Conservation Area (BCA) behind. Either side of the apartments, there is more traditional style housing on St John's Road and Church Lane, that lead off Malago Road. At the furthest end of St John's Road, there are the Robinson buildings, comprising a tall building with lower level buildings around it.
20. At the Hereford Street end of the site, there is a public car park and landscaped area, which is also designated for redevelopment under the BGF. At the other end of the site, there are industrial and commercial units on the opposite side of Malago Road, designated for growth under the emerging LPR.
21. Therefore, parts of the site's context are fragmented and in mixed-use, with variation in scale provided by tall buildings, differing building designs, irregular patterns of development and valley-type topography. However, the residential areas, notably the Malago Road apartments, the terraces along St John's Road and Church Lane, and at Windmill Hill dominate due to their built coverage in the immediate area. They have an attractive low-level scale and domestic character and the Malago Road industrial and commercial units, although in a different use, do not detract from this due to their small scale and smaller extent. Despite the embankment and green open space, the Windmill Hill residential area is part of this by reason of its significant extent and visibility from Malago Road and its immediate vicinity.
22. Further high density development will take place within Bedminster. There are proposals for the redevelopment of BGF Plots 2, 3, 4 and 4B where planning permissions have been granted or have resolutions to permit. Upon completion of legal agreements, the Little Paradise Street Plot 4 planning permission would have a tall building with a stepped storey level from 8 to 16 storeys. Under the BGF, the adjacent Plot 5 has the same floor parameters as the appeal plot with the exception of a taller building in its far northern part.
23. Nevertheless, these plots are in closer proximity to Bedminster Town Centre and the residential areas, contributing to the low-rise context of the appeal site, would be unlikely to be developed at a significantly higher density. Unlike

- the BGF sites, firm proposals and detailed guidance to redevelop the Malago Road industrial and commercial units at high density have not been advanced.
24. Within this context, the appellant's Public Realm Diagram¹ shows separation between the Malago Road blocks and the apartments opposite to narrow from 43m to 33m. Within the narrowing section of gap, the Appeal A blocks A/B and C/D would be 10 storeys (primary façade) and 8 storeys (linking façade). Despite setbacks and varied facing materials, this would result in combined façades of extensive width, height and massing. The setback for the linking façade for blocks C/D would be limited for a building of this scale and height, and blocks A/B higher storey primary façade would be uncomfortably close at approximately 26m in relation to the apartments. Although designed as a landmark building, these blocks would appear particularly overbearing within the street because of their cramped relationship with the new footway due to limited areas of intervening landscaping/amenity areas. Such intensity of development would adversely affect the important low-rise qualities of the surrounding area.
25. Block G's siting would lie directly adjacent to another plot within the BGF. Nevertheless, this block would markedly stand out above the lower scale of neighbouring development because of its 10 and 12 block storey scale and height, massing due to its combined elements and width, and its siting so close to a footway along an extensive stretch of road. For all these reasons, the Appeal A proposal would give rise to an abrupt and overly dominating built development unsympathetic to the low-rise domestic appearance and character of the area.
26. In Appeal B, blocks A/B and C/D would be 9 storeys (primary façade) and 7 storeys (linking façade) within the narrowing gap but despite setbacks, the combined façades would still be of extensive width, height and massing. Given the building's scale and height, the linking façade setback for blocks C/D would also be limited and blocks A/B higher storey primary façade would be uncomfortably close to the apartments opposite. Furthermore, these blocks would appear particularly overbearing within the street due to their cramped footway relationship, despite a smaller footprint compared to Appeal A.
27. The 8 and 9 storey block G would markedly stand out above the lower scale of neighbouring development because of its storey scale and height, massing due to its combined elements and width, and its siting close to a footway over an extensive road stretch. For all these reasons, the Appeal B proposal would give rise to an abrupt and overly dominating built development unsympathetic to the low-rise domestic appearance and character of the area.
28. For each proposal, the Townscape and Visual Assessments (TVA)² indicated the schemes would have moderate beneficial effects on townscape character, including the adjacent BCA and Windmill Hill neighbourhood, and appearance (visual) including from viewpoints on Windmill Hill, Malago Road, St John's Churchyard and Bedminster Station. However, my findings indicate that it downplays the value and sensitivity of the character and view receptors, and importantly, the magnitude of change.

¹ Appendix XIX of Statement of Case, Avison Young, November 2019.

² Appeal A: Townscape and Visual Impact Assessment, Neil Tully Associates, December 2018; Appeal B: Townscape and Visual Impact Assessment, Neil Tully Associates, November 2019 rev A.

29. In both appeal proposals, the shaded photograph montages show the blocks' height, scale and massing would be substantial relative to their surroundings, even after having regard to development floor parameters on the adjacent BGF plot. There would be gaps between the blocks and the gap between blocks E/F and G would ensure a view to Windmill Hill and with future development, it would be inevitable the existing views of Windmill Hill would change. Nevertheless, the gaps between the Malago Road blocks would appear relatively small given they form only a minor proportion of the built coverage on this part of the site. In TVA views from Malago Road, St John's Churchyard and Windmill Hill (adjacent to the open space), the blocks appear as one substantial building due to the relatively small nature of the gaps and would highlight the incongruous nature of the blocks' massing in both appeals.
30. The BGF 'mid-rise' floor parameters would be exceeded in Appeal A but not in Appeal B. However, these parameters are indicative only and have not been subject to testing through a proposal-led design process. Moreover, assessing high quality design involves the assessment of considerations other than floor levels only. Therefore, the parameter guidance is of limited relevance to the assessment of the appeal proposals.
31. For public realm, each proposal would have a new footway along Malago Road (as part of the strategic highways works) and within the site, there will be series of linked tree-lined public spaces with changes in pavement materials in front of blocks, between blocks E/F and F, and alongside the river. The Appellant's Daylight Sunlight³ report and the orientation of the blocks demonstrates that these areas would receive adequate light, including sunlight.
32. However, Appeal A's design of the public realm between blocks E/F and G, and adjacent to the river would be poor due to the dominance of vehicular parking. The river is a major feature of the site, with access to it and the ability to enjoy it a significant consideration. Consequently, this proposal would not take an opportunity available to improve the area's character and quality, and the way that it functions, and overall, public realm provision would be inadequate. In Appeal B, such objection does not apply as there would be an attractive and high quality public realm provision, including a 'Pocket' park.
33. For all these reasons, each proposal would not be high quality urban design due to the abrupt and dominating adverse impact of the blocks which would harm the character and appearance of the area. In Appeal A, the public realm provision would not be attractive or high quality whilst in Appeal B, the benefit of the public realm provision would not overcome the considerable adverse impact of the blocks. Accordingly, the proposals would conflict with Policy BCS21 of the CS and Policies DM26, DM27 and DM29 of the SADMP. In Appeal A, there would be additional conflict with DM28 of the SADMP.

Flooding, Access and River Restoration

34. The site is located within Flood Zone 2 and partially within Flood Zone 3. The HTDN revised FRA assumes no river restoration works, a worst-case flooding scenario and comprehensively considers the site's surface discharge rates, latest climatic change guidance and allowances. Finished floor levels of buildings would be above a worst-case flooding level scenario. The EA has now

³ Appeal A: Internal Day and Overshadowing Report, Point 2, June 2019; Appeal B: Internal Day and Overshadowing Report, Point 2, November 2019.

withdrawn its original objections and as a statutory consultee, considerable weight is attached to this. Consequently, the risk to life and property from flooding has been minimised and Appeal A proposal is acceptable in this respect.

35. The river has heavily modified banks and there is an EA requirement to have maintenance and emergency access. Appeal A would have a 5m access strip alongside the river. The cantilevered block E/F would have accommodation partly overhanging this strip. However, it would be at approximately 5m above bank level and although this could still restrict the safe use of larger machinery, the height constraints are limited to a small stretch of the river. In any case, not all of the river will be accessible to machinery, notably that flowing under the culvert. Therefore, hazardous river maintenance and emergency access operations have not been demonstrated. In Appeal B, there is no building height constraint within a 5m access strip alongside the river. Within the 'Pocket' park and public realm, fixtures such as benches and fencing, could be made dismantlable if access was required to the river. For all these reasons, river access would be acceptable in both appeals.
36. In Appeal A, the LLFA has raised objections because it is not clear whether river restoration measures are to be incorporated into any scheme. Finalised river restoration plans for the area are unclear because they are still being developed by the Council. It is possible that the river restoration measures will reduce the width of the access strip. However, the EA has advised that a reduced strip may be acceptable in Appeal B and therefore, a planning condition requiring the implementation of suitable sustainable drainage measures, incorporating river restoration, would overcome this objection.
37. Accordingly, both appeal proposals would comply with Policy BCS16 of the CS which amongst other matters, expects all development to incorporate water management measures to reduce surface water run-off and ensure that it does not increase flood risks elsewhere.

Unliteral Undertakings

38. For Appeal A, the UU would secure 8 affordable housing units (social rented tenure without public subsidy) and there would be a review mechanism to upgrade provision through contributions, if viability improved. Whilst there is no policy requirement for affordable housing, such provision would meet identified needs within the city and also meets many of the requirements set out in CS Policy BCS17 and AHPN.
39. The UUs also secure strategic highway and local transport improvements. In both appeals, parking would be limited to disabled and active management measures would discourage vehicular use. Nevertheless, both appeal proposals would generate demands on the local highway infrastructure, through deliveries, visitors and student pickups/drop offs which would result in greater parking pressures in the area. There would be increased use of footpaths, cycleways and public transport with greater people residing on the site.
40. The strategic highway improvements would provide public transport and footway improvements. A contribution would provide improvements to the Dean Lane cycleway. The electric vehicle car club contribution is to offer a viable alternative to owning a car and so reduce the dominance of private

vehicles. The Windmill Hill Residential Parking and Traffic Management contributions would be for restrictive parking and traffic calming measures.

41. The Traffic Regulation Order contribution covers the Council costs in undertaking the relevant legal and consultative work for the introduction and amendment of waiting restrictions on the highway around the development. The Bedminster Green Travel Plan contribution would cover the costs of implementing and monitoring a travel plan to be submitted by way of a planning condition. A sound and detailed methodology has been produced to justify the contribution levels. These strategic highway and transport improvements would comply with CS Policy BCS11 and SADMP Policy DM23.
42. As to the Bristol District Heat Network, CS Policy BCS14 sets out proposals for the development and encouragement of renewable and low carbon sources of energy. The proposal seeks a future connection to the Bristol District Heat Network and the obligation provides for this, with measures for alternative provision if it does not proceed. Such provision would comply with CS Policies BCS11 and BCS14, and SADMP Policy DM23. For all these reasons, the obligations would meet the statutory tests of the Community Infrastructure Levy (CIL).

Other matters

43. There is no 5 year housing land supply (5YHLS) and the HDT indicates that delivery was at 72% of the requirement over the last 3 years. The tilted test under paragraph 11 d) ii. of the National Planning Policy Framework (the Framework) would apply in each proposal. For both, occupiers would have excellent accessibility to the city and employment areas through sustainable transport. The student accommodation has the support of the university. New occupiers would add activity, footfall and vibrancy providing business and community benefits. The strategic highway and local transport improvements, secured by the UUs, would have wider community benefits. The CIL payments will be put towards infrastructure, such as the Malago Road improvements and river restoration, which would also have such benefits. There would be the reuse of previously developed land. There would be flooding, cleaner water and biodiversity gains through river restoration.
44. In Appeal A, student accommodation and affordable housing would significantly boost the supply of homes and provide specialist housing for specific groups. Although the UU only secures 8 affordable units, a total of 40 affordable units are proposed (those outside of the UU would be provided with public subsidy). This affordable housing provision would contribute positively to the stock of affordable housing. There would be a flexible community space available to the local community. Support would be provided to the affordable housing residents in their education, employment, health and wellbeing and access to financial resources and help. In Appeal B, there would be solely student accommodation and no affordable housing or community space provision but there would be attractive and high quality public realm provision.
45. Therefore, the economic, social and environmental benefits would weigh significantly in favour of each proposal. However, the developments would not function well, add to the overall quality of the area or be sympathetic to local character, including the surrounding built environment. The adverse impact would be less in Appeal B because of the smaller scale nature of the development and public realm provision. Nevertheless, even with this

proposal, the adverse impact would be considerable and permanent for the reasons indicated. Consequently, the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, in each proposal.

46. The Council and appellant have raised no specific heritage asset harm to the BCA. The appellant's Heritage Assessments⁴ have concluded no harm on significance. Nevertheless, there would be harm to the character and appearance of the area in general, which the Conservation Area would be part of. The low-lying, largely undeveloped nature of the site would contribute to its significance under the Framework. There are historic and architectural qualities to the Conservation area, notably its low-lying residential character and appearance, that contribute positively to it. There would be less than substantial harm, at the lower end of the impact spectrum, in terms of the Framework, because each development would not be immediately adjacent to BCA.
47. Considerable weight is attached to such harm but there would be notable public benefits arising from each proposal, including the provision of students' accommodation and affordable housing (in appeal A), and strategic highway and local transport improvements which would be sufficient to outweigh the heritage harm identified above. Nevertheless, the broader harm to the character and appearance of the area remains for each proposal.

Planning Balance

48. In Appeal A, the proposal would provide student accommodation and affordable housing to meet Development Plan housing requirements. The UU would secure strategic highway and local transport improvements in accordance with CS and SADMP policies. However, there would be harm to the character and appearance of the area in conflict with the CS and SADMP policies. Due to the overriding nature of this harm, the proposal would conflict with the development plan taken as a whole.
49. In Appeal B, the proposal would provide student accommodation to meet Development Plan housing requirements. There would be public realm provision in accordance with SADMP Policy DM28. The UU would secure strategic highway infrastructure and local transport improvements in accordance with CS and SADMP policies. However, there would be harm to the character and appearance of the area in conflict with the CS and SADMP policies. Due to the overriding nature of this harm, the proposal would conflict with the development plan taken as a whole.
50. For each appeal, there are no considerations of sufficient weight or importance that determine that the decision should be taken other than in accordance with the development plan and therefore, planning permission should be refused.

⁴ Appeal A : Heritage Assessment , Cotswold Archaeology, CA Project 6735, CA Report 18698, January 2019 and Appeal B : Heritage Assessment, Cotswold Archaeology, CA Project 6735, CA Report 18698, November 2019.

Conclusion

51. For the reasons given above and having regard to all other matters raised, including support, I conclude that the appeals should be dismissed, with planning permission refused in Appeal B.

Jonathon Parsons

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

R Warren	Landmark Chambers
J Davis	Avison Young
C Taylor-Drake	Avison Young
I Fern	JTP Architects
S Mirams	Hydrock
J Hanks	A2Dominion
J Smith	A2Dominion

FOR THE LOCAL PLANNING AUTHORITY:

D Grattan	Bristol City Council
S Riches	Bristol City Council
P Gomez	Bristol City Council
J R Stevens	Bristol City Council
P Goodey	Bristol City Council

OTHER INTERESTED PARTIES

M Willits	Environment Agency
N Townsend	Third Party
R Oliver	Third Party
C Beaumont	Third Party
D James	Third Party
F Firmston	Third Party

DOCUMENTS SUBMITTED AT HEARING

1. Separate Planning Statement of Common Ground for Appeals A and B, December 2010.

2. Combined Flooding Statement of Common Ground (for Appeals A and B).
3. Annotated Plan showing viewpoints for the Unaccompanied Site Visit.
4. CIL compliance Statement (submitted by Bristol City Council), 10.12.2020.
5. Draft S106 Agreements.
6. Development Control Committee report 30 Sept 2020 for a planning application at land at Little Paradise and Stafford Street (Site 4).
7. Progressing Bristol's Development Statement – a statement about Planning 6 10 2020.
8. Hydrock Technical Design Note (HTDN) 30.11.2020.
7. Avison Young Marked up Masterplans for each appeal showing EA emergency access and maintenance.

DOCUMENTS SUBMITTED AFTER HEARING

1. BCC Table setting out the status of BGF sites, Plot 2 (St Catherine' Place), Plot 3 (Former NCP Car Park and land at Clarke Street/Whitehouse Lane, Plot 4 (Little Paradise), Plot 4a ((Little Paradise Car Park) and Plot 5 (Centred around Bedminster Green), email dated 18.12.2020.
2. Scheme plans for Plot 2 (pending consideration, refused and consented).
3. Scheme plans for Plot 3 (pending consideration).
4. Scheme plans for Plot 4 (resolution to grant).
5. Scheme plans for Plot 4b (resolution to grant).
6. Avison Young Post Hearing Note (in relation to bats and lighting to the development), 18 December 2018.
7. BCC Updated CIL compliance Statement post hearing, 18 December 2020.
8. BCC CS Policies BCS811, BCS14, BCS17, DM2, DM23.
9. BCC Affordable Housing Note 2018.
10. BCC Letter and tables detailing calculation of obligation transport contributions 18 12 2020
11. UU dated 21.12.2020 for Appeal A.
12. UU dated 21.12. 2020 for Appeal B.
13. Avison Young letter accompanying UUs detailing and explaining obligation requirements, together with title evidence and true copy certification of UUs, 21.12.2020.
14. BCC email detailing terms of disagreement over obligations, 22.12.2020.
15. Avison Young, Housing Delivery Results 2020 Report, 3.2.2020.
16. BCC, Housing Delivery Results 2020 letter, 5.2.2020.