



Appeal Decision

Hearing held on 31 August 2022 and 20 September 2022

Site visit made on 31 August 2022

by Mr A Spencer-Peet BSc(Hons) PGDip.LP Solicitor (Non Practising)

an Inspector appointed by the Secretary of State

Decision date: 08 November 2022

Appeal Ref: APP/Z0116/W/21/3283037

493-499 Bath Road, Brislington, Bristol, BS4 3JU

- 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 Sovereign Housing Association against the decision of Bristol City Council.
 - The application Ref 18/05023/F, dated 17 September 2018, was refused by notice dated 17 March 2021.
 - The development proposed is the demolition of existing building and redevelopment of the site for 146 residential units, including apartments and houses (Use Class C3), with associated car parking, landscaping and works.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The development plan comprises policies of the Bristol Core Strategy (June 2011) (the Core Strategy) and the policies of the Bristol Site Allocations and Development Management Policies (July 2014) (the SADMP).

Main Issues

3. The main issues in this appeal are:
 - The effect of the proposed development on the character and appearance of the surrounding area,
 - The effect of the proposed development on the living conditions of future residents; and,
 - Whether the proposed development would accord with national and local planning policy for sustainable energy use.

Reasons

Character and Appearance

4. Policy BCS21 of the Core Strategy and Policies DM26, DM27 and DM29 of the SADMP, collectively and amongst other matters, require new development to deliver high quality urban design, with development height, scale and massing to be appropriate to its immediate context, character of adjoining streets and spaces. The appeal site has been allocated for housing within the SADMP, with the allocation being for an estimated 85 units.

5. Both the main parties have also referred me to the Bristol City Urban Living Supplementary Planning Document (November 2018) (the SPD). In that regard, the Appellant has put it to me that the SPD should be afforded only limited weight in the determination of this appeal, by reason of its adoption prior to the current version of the National Planning Policy Framework (July 2021) (the Framework) and maintaining that the SPD sets more prescriptive and onerous standards than the policies of the development plan, effectively amounting to policy via the backdoor.
6. Whilst I acknowledge the Appellant's submissions, as set out in the preface the SPD only provides guidance with regards to the policies of the development plan. Although the SPD may be somewhat aged in relation to the latest version of the Framework, it builds more detail onto the policies of the development plan and appears tailored to the circumstances across Bristol, providing a degree of variety and built in flexibility. As such I give the SPD substantial weight in the determination of the current appeal.
7. The appeal site comprises land and vacant buildings associated with a former tailoring factory, located on the eastern side of Bath Road. The frontage of the main building is substantial in terms of its spread across the width of the plot and, at the date of my visit, appeared to be in a dilapidated state. The evidence before me indicates that the building has been vacant since 2017. To the rear of the vacant building is a substantial area of hardstanding. Whilst the area of hardstanding appeared to be relatively level, in general terms the site slopes uphill from north to south.
8. The appeal site is situated in a predominately residential area, albeit with some commercial buildings being located close to the site. There is some variety in terms of design and scale of residential dwellings within the wider surrounding area. Immediately to the north of the site there are long terraces of modestly sized dwellings. To the south of the site and fronting onto Bath Road, dwellings are predominantly semi-detached. To the rear of those semi-detached dwellings, there are three storey, modestly scaled blocks of flats of modern design, arranged in an estate.
9. To the east of the site there are commercial buildings and a nursing home. West of the appeal site is the junction between Bath Road and King's Road, with King's Road separating residential dwellings located on the western side of Bath Road from the open space at Arnos Court Park. The appeal site is located outside of, but adjacent to the Arnos Court Park Conservation Area.
10. It is noted that the design of the appeal scheme has been amended since the planning application was made and following discussion between the main parties. The appeal scheme seeks to demolish the existing dilapidated building at the site and construct the proposed number of units, split between apartments and dwellings, arranged over five blocks. Block A of the proposed development, comprising a number of apartments arranged over 3 to 4 storeys and set on a plinth containing car parking, would front onto Bath Road. Blocks B and C would be positioned to the rear of Block A and would respectively comprise six and seven storeys of development. Blocks D and E would comprise a mixture of apartments and a short terrace of dwellings which would be located to the north of Blocks B and C.
11. The façade of Block A would only be highly visible and prominent from Bath Road close to the site. In terms of design, the roof form of Block A would

somewhat reflect those exhibited by the semi-detached dwellings to the south of the site, with the front elevation of Block A being relatively consistent with those dwellings located north and south of the site within Bath Road in respect of its set back from the highway.

12. The existing dilapidated building at the site does not reflect the prevailing character or appearance of the surrounding area and is incongruous within this setting. However, whilst the existing building is substantial in terms of its spread when viewed from within Bath Road, its height is not excessive, being comparable to the building heights of dwellings located to the north on Bath Road. When viewed from the front within Bath Road, the existing building has a consistent height across its frontage and given the comparison in height of those buildings to the north as described above and given that the dwellings to the south have a greater overall height, the existing building does not dominate the views from within Bath Road.
13. The front elevation of Block A would step up in height to reflect the sloping nature of the land, with the overall height of the southern section of Block A reflecting the heights of semidetached dwellings to the south, with the northern section responding to the overall heights of dwellings to the north. In that regard, I do not find that the overall height of Block A would be excessive or would necessarily dominate its surroundings on its own.
14. Nevertheless, as noted above, Blocks B and C are located to the rear of Block A and there would be a relatively limited amount of separation distance between those substantial buildings. In views from within Bath Road and particularly in views from the adjacent Arnos Court Park, the gaps between the proposed buildings would not be apparent so that the separate blocks of apartments would appear to coalesce into a single, continuous built form.
15. In that regard, the additional height of Blocks B and C above that of Block A would result in a development that, overall, would dominate its surroundings. Whilst the overall height of Block A on its own would not dominate, in views from within the surrounding area the combined mass, height and bulk of the Blocks A, B and C would be seen as a single form and, in my view, would significantly dominate the surrounding buildings and dwellings, appearing as an intrusive and incongruous development that would draw the eye.
16. For the above reasons, the proposed development would not contribute positively to the surrounding area's character or identity and would not respond appropriately to the height, scale or massing of existing buildings. As such, the appeal scheme would conflict with Policy BCS21 of the Core Strategy and would be contrary to the provisions of Policies DM26, DM27 and DM29 of the SADMP. Furthermore, the proposed scheme would fail to accord with the design guidance contained within the SPD.

Living Conditions

17. The Council has raised a number of separate concerns in respect of whether the proposed development would provide adequate living conditions for future occupiers. Amongst other matters described above, Policy BCS21 of the Core Strategy expects development to safeguard the amenity of existing development and create a high quality environment for future occupiers. Policies DM27 and DM29 of the SADMP expect developments to achieve appropriate levels of privacy, outlook and daylight. Policy DM28 of the SADMP,

amongst other things, requires new development to contribute to a safe, attractive, high quality, inclusive and legible public realm.

18. Concerns have been raised that by reason of the short separation distance between windows of apartments within Block B and windows within the communal corridor at the rear of Block A, occupants at Block B would have unacceptable living conditions with regards to overlooking and loss of privacy. However, it is apparent that, whilst the separation distance between the two blocks is limited, particularly at the apex close to where the two blocks are joined, windows within the Block A communal corridor would be frosted and obscured. As such, I do not share the Council's concerns regarding loss of privacy in that respect.
19. Nevertheless, by reason of the tight separation distance between the two blocks, outlook from those Block B apartments, which would be single aspect and that face the rear of Block A, would be extremely constrained and confined. Whilst I acknowledge that those single aspect apartments include a 'sawtooth' design that would, in addition to the openings facing west towards Block A, provide openings facing north in the direction of the courtyard, the outlook from habitable rooms would be primarily towards the rear of Block A given the geometry of those rooms with the large openings facing north being confined to the corner of such rooms. As noted above, separation distance is very limited, and even in views from the openings that face north, outlook would be dominated by the height and mass of Blocks A and B.
20. In terms of the numbers of single aspect apartments included across the development, whilst I have noted and carefully considered the Council's submissions, by reason of the separation distance between the rear of Block B and the northwest elevation of Block C, and given that additional mitigation features to include Juliet balconies are proposed, I do not find that the inclusion of single aspect apartments in those blocks would result in unacceptable living conditions of residents with regards outlook. However, whilst I do not share the Council's concerns in that respect, as above, the single aspect nature of apartments within Block B that face the rear of Block A would result in unacceptable living conditions for future occupants.
21. Further to the above, the Council raises concerns regarding the double stacked arrangement of apartments which, it is maintained, results in long internal corridors with no access to natural light or ventilation. The SPD guides development to avoid long corridors with a recommendation that each corridor generally provide access to no more than six dwellings on each floor.
22. As noted by the Appellant, there is no specific policy of the development plan that stipulates the maximum number of units that should be served by a single corridor. I also acknowledge that, in the majority, corridors would serve six or fewer units. However, in those instances where corridors would serve a greater number of units, and noting the inclusion of windows at each end of such corridors, I find that conditions would likely appear rather dark and gloomy for occupants in accessing those apartments which are served by such long corridors. In terms of car parking and entrances to the residential units within Block C, I find no conflict with Policy DM28 of the SADMP or with the guidance contained within the SPD.
23. The Council have further put it to me that the amenity value of the courtyard space between Blocks A and B would be compromised as a result of the height

and mass of those blocks which, it is maintained, would limit levels of sunlight and daylight, with those blocks creating an unpleasant sense of enclosure.

24. The Appellant has provided a sunlight analysis for the courtyard. At the hearing, it was acknowledged that whilst only stills from the sunlight analysis animation had been provided in the appeal submissions, a full video animation had been provided by the Appellant to the Council during discussion of the planning application. The Appellant maintains that the video showed that the courtyard would receive sufficient light in accordance with policy and guidance.
25. In that respect, I acknowledge the Appellant's submissions during the determination of the planning application. However, even in the event that it was shown that the courtyard would receive above the minimum amount of light in accordance with Building Research Establishment guidance, given the acute angle relationship between Blocks A and B and limited separation distance, I find that outlook from that courtyard would be dominated by the respective blocks and would not, in my view, create a high quality environment for occupants in terms of adequate usable communal amenity space.
26. Notwithstanding the above, the Appellant maintains that the proposal provides sufficient amounts of external amenity space and that is supported by access to the neighbouring green space at Arnos Court Park, where there is provision of an equipped play space, a BMX track and open areas. Whilst I acknowledge that access to that park would require occupants to cross the busy Bath Road, there are sufficient traffic light controlled crossings immediately outside the site that would provide safe access to the park. In that respect, access to the park would, in my view provide sufficient mitigation for the amount of usable external amenity space at the site, in accordance with the guidance contained within the SPD.
27. In summary of the above, whilst the courtyard space would not provide adequate usable amenity space for residents, there is convenient access to sufficient amounts of public space at the nearby park. I therefore find no harm, or conflict with policy, in that regard. Nonetheless, in terms of long corridors and internal circulation, and in respect of the harm to future residents with regards to outlook, I conclude that the appeal scheme would not provide acceptable living conditions for occupants. As such, the appeal scheme would conflict with Policy BSC21 of the Core Strategy and would be contrary to Policies DM27 and DM29 of the SADMP. The proposal would also fail to accord with the guidance contained within the SPD as well as conflict with those paragraphs of the Framework which seek to ensure that developments provide a high standard of amenity for future users.
28. I have been referred to several other developments within Bristol that have been previously approved by the Council. It has been put to me by the Appellant that those approved schemes are comparable to the appeal proposal in terms of amenity space of courtyards, private amenity space and separation distance between apartments. However, I do not have full details of the circumstances that led to those other developments being accepted and approved. I have therefore determined this appeal on its own merits.

Sustainable Energy

29. Policy BCS14 of the Core Strategy seeks to reduce carbon dioxide emissions from energy use. It expects development to provide sufficient renewable

energy generation to reduce such emissions from residual energy use in the buildings by at least 20%. This accords with the provisions of the Framework which states that plans should take a proactive approach to mitigating and adapting to climate change and that development should be planned for in ways that can help to reduce greenhouse gas emissions.

30. Policy BCS14 of the Core Strategy also requires that development demonstrates that heating and cooling systems have been selected according to a 'heat hierarchy', with the policy's supporting text emphasising that the lowest carbon solution feasible for the development should be achieved.
31. The appeal scheme's energy strategy proposes that 75% of the proposed units would be served by direct electric heating - being a system which includes electric panel heaters and radiators, electric convection heaters, electric boilers and electric immersion heaters - with the remaining 25% of the units being served by individual air source heat pumps.
32. The main parties agree that as part of the proposed energy strategy, with the proposed air source heat pumps supported by photovoltaic panels, the appeal scheme would achieve reduction in carbon dioxide emissions from residual energy use by 23%. Notwithstanding that position, the Council has put it to me that direct electric heating and hot water systems do not appear on the heat hierarchy element of Policy BCS14 of the Core Strategy and therefore would not comply with the requirements of the policy as a whole.
33. The Appellant considers that the aims of Policy BCS14 of the Core Strategy in terms of minimising energy requirements and contributing to the requirement to reduce carbon emissions is consistent with the environmental objectives of the Framework. However, the Appellant contends that the heat hierarchy contained within the policy is not consistent with section 14 of the Framework, maintaining that the evidence that underpins the heat hierarchy is over ten years old which no longer accurately represents current carbon intensity and includes gas based technologies which are not environmentally sustainable, and therefore should be afforded very limited weight.
34. In that regard, whilst I note that the policy was adopted over ten years ago and does include gas based technologies, I do not agree that the heat hierarchy no longer helps to achieve the overall aims or objectives of Policy BCS14 of the Core Strategy. It is clear from the wording of the policy, that new development will be expected to demonstrate that heating and cooling systems have been selected according to the hierarchy. Amongst other matters, the supporting text to the policy also provides that where the full requirements of the policy as a whole cannot feasibly be delivered, alternative solutions would be considered. Furthermore, the supporting text provides that, if onsite measures or alternative allowable solutions would render the development unviable, then careful consideration will be given to whether the development is appropriate in other respects and sufficiently necessary to warrant departure from the policy requirements and thereby permit development.
35. As such, there is flexibility in the policy and the heat hierarchy element within Policy BCS14 of the Core Strategy would be consistent with the provisions of paragraph 157a) of the Framework. I therefore afford full weight to Policy BCS14 of the Core Strategy in the determination of this appeal.

36. A direct electric heating system relies on energy from the National Grid. I have carefully considered the Appellant's contention that, as a result of previous years efforts to decarbonise the national grid, direct electric heating is a sustainable solution. However, from the evidence before me, it appears that even when considering the measures taken to decarbonise the national grid, carbon dioxide emissions in terms of space and water heating from direct electric would remain significantly higher than from heat pumps, even when accounting for seasonal variations in the efficiency of heat pumps when compared to direct electric heating.
37. Nonetheless, whilst direct electric arrangements do not appear within the systems contained within the heat hierarchy, as noted above it is apparent from the wording of Policy BCS14 and its associated supporting text that systems that do not fall within the heat hierarchy could be permitted on grounds of feasibility or viability.
38. In terms of feasibility, whilst it is agreed between the main parties that connection to the Bristol Heat Network would not be possible at this time and that installation of individual air source heat pumps in the remaining units of accommodation would not be technically feasible, the Council maintains that there are other solutions contained within the heat hierarchy, that should be considered. At the hearing, the Council put it to me that once installed, electric heating systems would be technically difficult and costly to remove and therefore such systems had been omitted from the heat hierarchy.
39. The Appellant contends that communal air source heat pumps with ambient loop are not technically desirable, maintaining that without residents being individually billed for their own use, energy saving behaviour would not be incentivised. Nonetheless, the Appellant accepts that it would be technically feasible to install a communal air source heat pump system within the appeal proposal.
40. Furthermore, the Appellant also confirmed that whilst a communal ground source heat pump system could be feasible, that would be dependent on whether the required drilling depth would be achievable at the site. At the hearing, it was confirmed that those drilling depths had not been substantially tested across the site and, as such there is no substantive evidence before me which confirms that this type of system, which would fall within the heat hierarchy, would not be technically feasible. Accordingly, putting cost aside, I have no reason to conclude that more appropriate heating systems would not be technically feasible in this scheme.
41. Nonetheless, the thrust of the Appellant's argument is that, irrespective of feasibility considerations, by increasing the number of units at the appeal scheme that would be served by systems included on the heat hierarchy, above those already proposed as described above, and in combination with the provision of affordable housing within the scheme, the proposed development would be financially unviable. In that regard, the Appellant maintains that the additional capital costs, as well as ongoing administrative and management costs would be significant and extreme.
42. Given the wording of Policy BCS14 of the Core Strategy and its supporting text, it is apparent that if it is shown that the inclusion of systems listed on the heat hierarchy would result in the development being unviable, then alternative solutions such as direct electric systems could be acceptable subject to whether

the development would be appropriate in other respects and would be sufficiently necessary to warrant a departure from the heat hierarchy requirements.

43. In respect of viability, consideration of the provision of affordable housing within the scheme is necessary. The Appellant maintains that the proposed development would be for 100% affordable housing as the Appellant is a Social Housing Provider. However, the Council noted that the planning application simply stated that development of the site was for 146 residential units and that within the original planning application the Appellant's position was that no affordable housing, that would be secured via planning obligation, was to be provided.
44. The submissions in this appeal confirm that the Council considered and tested the viability of the scheme on the basis of the description of development as included on the planning application, being for 100% open market units. Following that viability assessment, it was agreed between the main parties that the appeal scheme, without heat hierarchy compliant systems, could provide 22% affordable housing to be secured by planning obligation. However, the Appellant maintains that the development would be a 100% affordable housing scheme, comprising 22% secured by planning obligation with the remaining 78% of the units within the scheme resulting from grant funding.
45. At the hearing, it was confirmed that the Appellant, as a social housing association, had obtained grant funding from Homes England in order to deliver affordable homes. It was put to me that the grant funding is limited to provision of unsecured affordable housing units only. Whilst there would be no security provided by legal agreement under planning legislation, or via a registered Local Land Charge, the Appellant advised at the hearing that in the event that housing units were subsequently disposed of on the open market, the grant funding agreement and the overall grant funded programme would be subject to financial penalties.
46. However, in the event that the appeal was allowed, planning permission would run with the land, and would not be subject to a planning condition that provided that only the Appellant could develop the site. As such, and given the security provided by the completed planning obligation which provides separate definitions for the affordable housing and open market housing units, if the site was disposed of by the Appellant, then a subsequent developer would only be obliged to provide 22% affordable housing with no heat hierarchy compliant system being incorporated, despite potential revenues from the sale of the open market units affecting the scheme's viability.
47. The Appellant provided additional information regarding the increased capital costs and ongoing management and maintenance costs of providing air source heat pumps with ambient loop and communal ground source heat pumps within the proposed scheme, with the conclusion that by incorporating either system within the proposed development the scheme would be rendered financially unviable.
48. The Council confirmed that, as part of the assessment of viability, sensitivity testing had been conducted which included the additional costs of providing communal air source heat pumps or communal ground source heat pumps based on the figures provided by the Appellant in their viability report. The Council's conclusion from that sensitivity testing was that, by incorporating a

system that would be compliant with the heat hierarchy element of Policy BCS14 of the Core Strategy, there would be an impact on the amount of affordable housing that could be secured by planning obligation. The Council accepts that if the number of units that were to be served by systems compliant with the heat hierarchy was increased, then the level of affordable housing could be reduced. In that regard, the Council maintains that if a policy compliant system was incorporated, the proposed scheme would remain viable if the secured affordable housing provision dropped from 22% to 6%.

49. I acknowledge the additional capital and ongoing management and maintenance costs, and the information provided by the Appellant at the hearing regarding internal hurdle rates. However, if, despite the terms of the legal agreement, the Appellant opts to implement the scheme as stated with 100% affordable housing, there does not appear to be any viability information or testing that, as result of the decrease in secured affordable housing which would account for additional grant funding to be incorporated, would confirm that the proposed development would be financially unviable with the inclusion of systems that would be compliant with the heat hierarchy. Consequently, I cannot be satisfied that it has been shown that a greater or improved level of heat hierarchy compliant systems could not be viably secured.
50. It therefore has not been demonstrated that the scheme would clearly be incapable of being an economically viable development with the inclusion of the types of systems that would be compliant with the heat hierarchy element of Policy BCS14 of the Core Strategy.
51. In summary of the above, the proposed use of direct electric systems would not accord with the heat hierarchy element of Policy BCS14 of the Core Strategy, and it has not been adequately demonstrated that the incorporation of heat hierarchy compliant systems would not be feasible or would necessarily render the scheme financially unviable. In light of the above, the proposed development would conflict with the provisions and aims of Policy BCS14 of the Core Strategy and would fail to accord with the Framework in respect of planning for climate change.

Planning Balance

52. The main parties agree that the Council cannot currently demonstrate a five year housing land supply and it appears that the shortfall of housing land supply is significant, currently being approximately 3.7 years of supply.
53. Paragraph 11(d) of the Framework provides that where there are no relevant development plan policies, or the policies most important for determining the application are out-of-date (including housing, where the Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites), permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.
54. For the reasons given, I have found that the appeal scheme would significantly harm the character and appearance of the area and would result in unacceptable living conditions for future residents. The proposed development therefore would conflict with the design and amenity aims of the relevant development plan policies set out above, matters to which I attach significant weight in the determination of this appeal.

55. Furthermore, it has not been adequately demonstrated that inclusion of compliant heat hierarchy systems within the scheme would not be feasible or that the provision of such systems would necessarily render the proposed development financially unviable. The appeal proposal would conflict with Policy BCS14 of the Core Strategy which, as above, I have found to be consistent with the provisions of the Framework. The scheme therefore would fail to accord with the environmental objective of the Framework in respect of supporting the transition to a low carbon future and with regards to mitigating and adapting to climate change. Given the emphasis and importance placed on planning for climate change included within the Framework, I attach very significant weight to the identified conflict in the determination of this appeal.
56. Against the identified harm and resulting conflict with the policies of the development plan, the proposal would provide a range of benefits. In terms of environmental benefits, the scheme would make use of previously developed land on a site which has been allocated for housing, would provide some biodiversity enhancement through the delivery of landscaping and planting, and would be located close to services and facilities thereby reducing the need for future residents to travel by car in order to meet day to day needs. I attach moderate weight to these benefits in the determination of this appeal.
57. The proposed scheme would provide economic benefits in terms of employment opportunities during construction and through the future spend of residents within nearby businesses, thereby supporting the local economy. By reason of the scale of the appeal proposal, cumulatively I attribute moderate weight to these economic benefits.
58. In the context of social benefits, the proposal would provide 146 additional units of residential accommodation contributing towards local housing supply within an area which, as described above, currently has a significant shortfall of housing land supply. The proposal would provide for a mixture of housing types, including accessible accommodation, and would provide a pedestrian and cycle link between Bath Road and Belmont Road.
59. The appeal scheme would, subject to the submitted and signed planning obligation under section 106 of the Town and Country Planning Act, provide 32 units of affordable housing. The proposed development would also provide 114 unsecured affordable units from grant funding. Given the housing land supply position and the identified need for affordable housing, cumulatively I attach substantial weight to the provision of housing and affordable housing in the determination of this appeal.
60. In summary of the above considerations, I find that the cumulative benefits associated with the proposal would be substantial. However, the harm arising from the proposal's conflict with the identified policies of the development plan would, in my view, significantly and demonstratively outweigh the benefits of the appeal scheme when assessed against the provisions of the Framework when taken as a whole.

Other Matters

61. Interested parties raise additional objections to the proposal on the grounds of, amongst other things, adequacy of parking arrangements and impact on the living conditions of existing nearby residents. These are important matters and I have considered all the evidence before me. However, given my findings in

relation to the main issues above, these are not matters that have been critical to my overall decision.

Conclusion

62. For the reasons given above I conclude that the appeal should be dismissed.

Mr A Spencer-Peet

INSPECTOR

APPEARANCES

FOR THE APPELLANT

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