

WARD: Bedminster

SITE ADDRESS: Police Dog & Horse Training Centre Clange Road Bristol BS3 2JY

APPLICATION NO: 20/01930/F Full Planning

DETERMINATION DEADLINE: 14 September 2020

Proposed change of use from training centre (Use Class D1) to touring caravan site (Use Class D2), consisting of 62 pitches and associated buildings and works.

RECOMMENDATION: Refuse

AGENT: Rapleys
33 Jermyn Street
London
SW1Y 6DN

APPLICANT: Caravan And Motorhome Club
C/o Agent

The following plan is for illustrative purposes only, and cannot be guaranteed to be up to date.

LOCATION PLAN:



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The site is currently vacant and was previously occupied by Avon & Somerset Police as a centre for housing and training police dogs and horses. It is located on the east side of Clanage Road, to the north of the Bedminster Cricket Ground and Bright Horizons Day Nursery. The whole of the site lies within the Bristol Green Belt. The southern part of the site lies within the Bower Ashton Conservation Area. Immediately to the south and east of the site runs a public right of way. This crosses the adjacent freight railway line and links through to a network of paths and cycle routes serving the city centre, Pill and beyond.

The site is roughly triangular in shape and is bounded by Clanage Road to the west, a public footpath to the south and by a public footpath and railway line to the east. The road frontage along Clanage Road is bounded in part by a low pennant stone wall which affords views into the southern part of the site. The site is screened from foot and cycle paths to the east of the railway line by established trees and hedges. However, the site can be seen from an elevated position from 2 pedestrian bridges which cross the railway.

The site itself comprises a main block of low level buildings arranged around a courtyard stable area. To the north is staff and visitor parking. To the south of the building block lies a horse exercise yard and 3 open fields divided by post and rail fences, used for grazing horses.

There are a number of land use designations which affect land adjoining the site. The Ashton Court Estate to the west is a grade II* listed building and a registered historic park and garden. The Avon Valley Special Area of Conservation is located to the north. The open areas to the south and east are Important Open Spaces.

The site lies in Flood Zone 3 which means that the site has a high probability of flooding, particularly from tidal inundation. The site also lies in a Coal Authority High Risk Area.

APPLICATION

Planning permission is sought for a change of use of the former Avon & Somerset Police Dog and Horse Training Centre to a touring caravan site comprising a total of 62 pitches. 4 of these pitches would be grass while the remaining 58 would be all weather pitches these pitches would be constructed using loose stone chippings and as their name suggest are designed to be used throughout the year.

The existing buildings and other structures on the site will be demolished and 3 new buildings are being proposed in their place. The three new buildings would be used for amenity uses, a reception and the warden's accommodation. Lighting is also proposed throughout the caravan park in form of 13x eyelids, 41 x 1.1m low level lights and 3 x lighting columns, details of these lights and their locations can be viewed on the submitted lighting plan.

Access to the site will be taken from a new access onto Clanage Road, in a similar position to the existing southern access. The existing middle and northern access points will be closed off. It is proposed to improve the existing main access into the site by lowering a 15 metre section of stone wall to 600mm in height.

This application is a re-submission of 16/03774/F which was refused on Green Belt, Heritage, Flood and Transport grounds, therefore key considerations for Officers is whether these reasons for refusal have been overcome.

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RELEVANT PLANNING HISTORY

Most relevant to this application is 16/03774/F, which was for a very similar application to the proposal. This application was refused by members at Committee B on 9th November 2016 for the following reasons:

1. The proposed development will detract from the openness of the Bristol Green Belt and, in the absence of very special circumstances, constitutes inappropriate development in the Green Belt. The proposal conflicts with Bristol Core Strategy Policy BCS 6 (adopted June 2011) and Paragraphs 87-89 of the National Planning Policy Guidance (March 2012).
2. The proposed development would fail to preserve or enhance heritage assets, namely the Bower Ashton Conservation Area and the Ashton Court Estate, a Registered Historic Park and Garden, and its setting. The proposal would conflict with Bristol Core Strategy Policy BCS 22 (adopted June 2011) and Policy DM 31 of the Site Allocations and Development Management Policies (adopted July 2014).
3. The application fails to demonstrate that the proposed development will be safe from flooding or that it will not adversely increase flood risk elsewhere. It would therefore conflict with Policy BCS 16 of the Bristol Core Strategy adopted in 2011.
4. The proposal is contrary to Policy DM23 of the Bristol Local Plan Site Allocations and Development Management Policies (adopted July 2014) and Paragraph 32 of the National Planning Policy Guidance (March 2012) since the proposed means of access with its restricted visibility is considered unsuitable to serve the increase in traffic that would be associated with the proposed development. It would result in the scheme being prejudicial to highway safety.

15/04665/PREAPP In November 2015, a pre-application enquiry for a “Change of use to a small, touring caravan site” concluded that such a proposal could not be supported on green belt grounds. The applicants were advised that if they wished to pursue an application, then a strong case would need to be made on any ‘very special circumstances’.

In 2008, planning permission was granted for the construction of a sewage pumping station and new rising sewer main (08/03444/F).

COMMUNITY INVOLVEMENT

i. Process

A statement of community involvement was submitted at part of the application. The community involvement was undertaken by the applicant’s planning consultants Rapleys and is explained in detail in the Statement of Community Involvement (SCI) and will not be summarised within this section. According to the SCI, the application relies on the consultation that took place by the developers as part of the previous application (16/03774/F) where 74 letters were sent out to 74 local residents. In addition to this community groups were going to be notified.

ii. Outcomes

No further correspondence has been submitted on the community group responses. The SCI also states letters were sent on 3 February 2020 to Mayor Rees and 7 Members, again no information has been submitted outlining their responses. Although a wide range of stakeholders have been consulted there has been limited information on responses, however the LPA have carried out a thorough consultation exercise as detailed below.

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RESPONSE TO CONSULTATION – MEMBERS OF THE PUBLIC

In accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015, the application was advertised via site and press notice, and neighbours were notified by letter. As of the date at which this report was written, 33 comments have been received with the majority being supportive of the development. Summary of the points made in the comments are listed below, full comments can be viewed on the councils website:

- Concerns raised regarding access into and out of the site.
- Support the use of the site for tourism and the club is a valuable asset.
- The site is in a god location with good links to Bristol.
- Further trees should be planted around the site to screen the development.
- The development would provide economic and community benefits benefit.

RESPONSE TO CONSULTATION – AMENITY / NEIGHBOURHOOD GROUPS

i. Bristol Civic Society

Bristol Civic Society supports the proposal. We suggest that the applicants do all they can to encourage those who stay at the site to use public transport, cycling and walking as much as possible to access the city.

ii. The BS3 Planning Group

We have a concern that in order to ensure safety that the site and its access may require further lighting. Given that this is an area of the city that it accustomed to less light pollution we would not wish to see this changed.

However, we do realise that the Caravan Club site needs to find a new home in Bristol if it cannot be allowed to stay in its current location and would be happy to see it on this site.

It would also be preferable to be able to reuse the current structures rather than build new

iii. Bristol Chambers Of Commerce & Initiative At Business West

Bristol Chambers of Commerce & Initiative at Business West is the main business representation and leadership organisation for the West of England with over 22,000 members from the smallest to the largest businesses. As a business organisation we are not representing any specific business interests or sector, but are writing to strongly support this application based on our independent view of the long term economic interests of the region and the whole spectrum of businesses and employers who operate here. We jointly own and run Destination Bristol, the destination management and tourism organisation for the city and wider region, and so directly understand and recognise the importance of our visitor economy to the city.

We recognise that this is an important application for Bristol that will bring c.£1- £1.5million of spend pa into the local economy. Following Bristol City Council's decision to serve notice on the club's existing site on Bristol's Harbourside there is a need to ensure that the city, as part of its offer to visitors, retains this facility in a quite central, but also discrete, location. We are aware that there is strong support for the application with many letters of support received, most notably from the SS Great Britain, Bristol Civic Society and site neighbours.

The existing caravan site at Baltic Wharf has proven over many years to be an important, high performing asset for Bristol's visitor economy, enabling visitors to stay in walking distance of the city centre and thus providing significant levels of custom for local businesses. It has played a part of the regeneration and enhancement of Bristol's Harbourside, now such a jewel for our city, enabling more

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and more people to live, work, visit and enjoy the city. The importance of locating such a site centrally is evident when looking at the comments on this planning application from those who regularly stay at the Baltic Wharf site and is reflected in the consistently high levels of occupation of the site. As the existing site is being redeveloped by Bristol City Council it is important that an alternative is provided close to the city centre or we risk losing such visitors and the benefits that they bring to our local economy. Further to that, JLL's comprehensive site search for the caravan club showed there are no other suitable options. There is no obvious better use for the Clanage Road site and if refused the site will continue to be a problem in terms of attracting anti-social behaviour, thereby creating an ongoing eye sore for the city as well as a lost opportunity.

We consider the site to be very well positioned and suitable for this use as it is close to both the city centre the countryside, in a discreet position, is easily accessed from the motorway network without needing visitors to access or drive through the city centre, and replaces a vacant eye sore that is currently creating a negative visual impact on the Greenbelt and the setting of Ashton Court. We feel that the use as a caravan site, with the proposed landscaping, will considerably improve the character and appearance of the area compared to its current condition. Indeed, visitors will be very well placed to visit many parts of the city by foot, bicycle and by Metrobus.

We have noted with the applicant that there has been a material change in the context of the application since the previous refused application in 2016 and we are satisfied that they have addressed the reasons for the previous refusal. To be more specific, the access, green belt, heritage and flood risk issues are ones we believe the applicant has suitably addressed in the application. We consider that the very substantial social and economic case for this application will help strengthen the city's economy, offering an important facility for visitors on a brownfield site and thus that this application should be given consent to proceed.

At a time of huge challenge to our local and national economy as a consequence of the impact of Covid-19 it is very important that Bristol and its local economy is able to move forward and enable investment into areas of growth. Our visitor economy is very much part of this and this replacement site for the caravan club will enable the city to offer visitors to the city a very good solution in a very well placed location.

On behalf of the business and employer community of the city and wider region we strongly encourage this application to be brought forward to the planning committee and given consent.

iv. Destination Bristol

In my role of Chief Executive of Destination Bristol, I would like to confirm my support for this application. There are significant financial benefits for Bristol due to the year round supply of visitors to their current caravan site.

We know that the current Bristol site at Baltic Wharf has been one of the most popular and successful central sites in the UK.

The imminent closure of the existing site has become even more important following COVID-19.

The national interest in camping and caravanning has risen out of all proportion.

The closure of the current site is happening at a time when Bristol needs to send a really positive message to potential visitors and we must support the new application. Relocation in the near future is critical.

To recover effectively post COVID-19 is going to be incredibly difficult for our sector, we need to give as much support as we can.

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It is vital that Bristol has a replacement central site for the Caravan and Motorhome Club. Failure to do so will result in visitors looking for alternative sites to visit in other cities and locations.

The proposed new site is relatively close to Ashton Court, Clifton, Harbourside and the city centre and will allow easy access to Bristol's long list of great attractions.

Bristol needs to be sure that all aspects of the tourism sector are adequately provided for and Destination Bristol fully support this application.

v. SS Great Britain Trust

I write on behalf of the SS Great Britain Trust (SSGB) to express strong support for the planning application to convert the old Police Horse training centre into a new home for the Bristol caravan site. SSGB believes that the applicant has now addressed the reasons for the previous refusal of an application in 2016, and we can now support this application wholeheartedly.

The SSGB plays an important part of the cultural life of Bristol as a major tourist destination, and it has long been clear to us that the Baltic Wharf caravan site is a highly significant driver of tourist visits to the city centre in a sustainable way, and for people of many differing backgrounds. A high quality caravan site within easy walking of the city centre is a virtually unique asset to Bristol and its visitors and should be strongly encouraged for its social and economic benefits to the city. We were sorry to hear that the Baltic Wharf site must be redeveloped, and have argued strongly that a suitable alternate site is a very important part of the visitor economy for the city. This derelict site on Clanage Road is that site, and it offers sustainable and readily accessible travel to the SSGB and on to the city centre.

In our view the benefits of the proposals significantly outweigh any negative impacts, and furthermore now result in an overall improvement in the character and appearance of this area of Green Belt. We believe it will enhance the area and will help define clearly the green edge of the built up area of the city as it transitions to the countryside and Ashton Court.

RESPONSE TO PUBLICITY – INTERNAL AND OTHER STATUTORY CONSULTTEES

The majority of these comments are summarised and discussed further within the Key Issue Section of the report, to review full comments, please see the online case file.

i. City Design Conservation:

There is little difference between what has previously been refused and the current proposals. There are few visual impact views included at the end of the landscape impact assessment document that illustrate clearly that the proposals will result in incongruous visual clutter in this location. The proposals require a good deal of lighting which is a particular problem in this context at night where it will stand out as visually prominent in views towards, and from the suspension bridge. Whilst some of the effects during daylight will be mitigated by distance the isolated island of light on this site will be obvious and jarring. The proposed lighting plan identifies a large number of new light sources, and the caravans themselves will add further to levels of illuminance. Views from Brunel Way, Ashton Court, and to and from Clifton and the Suspension Bridge will all be adversely affected by visual clutter of caravans, hardstanding and built features, with particularly bad intrusion after dusk.

Whilst only part of the site is within a Conservation Area it is all within a sensitive heritage setting. The special character of this corner of the Ashton Conservation Area would not be preserved or enhanced, and its setting would be negatively impacted and eroded. Therefore the proposals pose harm to the designated Conservation Area under the definitions of the National Planning Policy Framework. The applicant asserts that there's no harm in the proposals on heritage grounds; this is an incorrect assessment based on the submitted visuals, and negates to assess the impact on the site at night. In

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refusing to acknowledge any harm the applicant has omitted to provide any “clear and convincing justification” for harm where it is identified as required by the NPPF. As such any purported public benefits cannot be demonstrated and the harm is not outweighed in the planning balance. The meagre enhancements associated with the removal of existing buildings and landscape features of low value are unconvincing when the proposed development would have greater negative impact.

We do not feel that the proposals have resolved the issues raised with the previous refusal and would recommend that these form the basis for a further refusal for this site. We would also ask that, unless it's already been done, that Historic England are approached for comments considering the extreme sensitivity of the location adjacent to Ashton Court, the Clifton Suspension Bridge, and the setting of Listed buildings on the Clifton escarpment.

ii. City Design Landscape:

In conclusion, the merits of the revised scheme do not outweigh the reasons for the previous refusal. However, the application can be viewed more favourably in the light of the Network Rail compound the visual harm from which renders the harm from the touring park almost irrelevant.

iii. Arboricultural Officer:

I strongly object to the proposed due to the loss of age trees and important green infrastructure assets in accordance with the National Planning Policy Framework (175) and DM17: Development Involving Existing Green Infrastructure; the lack of a Green Infrastructure - Sustainability Statement to address the loss of ash in the short term that will significant change the character and appearance of the southern section of the site within the Bower Ashton Conservation area in accordance with DM15: Green Infrastructure Provision.

iv. Nature Conservation:

Satisfied with the additional ecological surveys and reports submitted and have no objection subject to conditions. However, planning permission cannot be granted until the Habitats Regulation Assessment has been approved by Natural England.

v. Historic England:

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraph 193 of the NPPF.

vi. The Garden's Trust:

Further to our response dated 23rd June 2020, we have noted the contributions from other statutory consultees and the subsequent response notes from Rapleys LLP. The Gardens Trust and also Avon Gardens Trust, are still of the opinion that the proposed development would affect not only the extensive Green Belt area, but in our opinion, cause unjustified harm to the nationally-significant, Grade II* Registered Ashton Court Park and Garden, the setting of the Grade I registered Ashton Court mansion and stables, the Avon Gorge, the Grade I Clifton Suspension Bridge as well as the setting of two local historic parks and gardens, Greville Smyth Park and Bower Ashton. Our colleagues in the AGT know the site well and their local knowledge informs this joint response.

In an attempt to progress to a solution that does not ignore Flood Risk warnings and the status of Registered Parks and Gardens, we have studied the site selection process which started in 2014.

That study produced 59 possible sites. According to the spreadsheet submitted, three sites are no longer available.

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Of the 56 remaining sites; 34 were classed as DM 58 sites which means that they were within the Greenbelt, so were removed from the list and no further consultation was attempted.

Out of the 22 remaining sites, the reason for not investigating their possibilities is/was “We have not had sight of the official policy guidance relating to caravans and campsites’ but have assumed that this use on undeveloped Greenbelt land would not be permitted by the local authority”.

Incidentally, given that Clanage Road site is in a Zone 3 Flood Risk area, it is still, against expert opinion, being pursued as the preferred site option by your good self, on behalf of the Caravan Club. Fifty of the original list of 59 sites are all in ‘low flood risk’ areas. Furthermore, of the 5 sites identified by the Caravan Club in 2014 for developing, only one was in a low flood risk area.

By 2018, the search for a site was narrowed to 10 sites, 8 were dismissed because it was assumed that: “use on undeveloped Greenbelt land would not be permitted by the Local Authority”. One site in Greville Smyth Park; not in Greenbelt; not part of the Joint Spatial Plan; and was a Low Flood risk area, was dropped from the search with no explanation.

By 2019, three ‘Site Options’ were identified by JLL. The only one with a High Flood risk was taken forward. That is the present Clanage road site.

The Gardens Trust and Avon Gardens Trust consider that three things could be done to progress matters.

1. Respectfully remind the applicants of what the significance of a Grade II* Registered Park and garden means.
2. Ask for proper photomontage images of the two examples submitted:

Visualisation type 1 – showed no montage of proposed buildings and caravans.

Also, photo 26, view from Princes Lane towards the site is a ‘site location’ photo, not a photo montage indicating the height and breadth 3D image of the proposed buildings and caravans, planned for the site.

Incidentally, “For the benefit of this report, the assessment of visual impact is based on the assumption of approx. 50% pitch occupancy”. Local comment suggests the Spike Island site is closer to 100% occupancy.

3. We would also suggest that the applicant researches the Greenbelt Policy changes that have recently occurred and suggest a new site search which would avoid Registered Parks and Gardens and High Flood Risk areas.

Ashton Court is unusual in celebrating its relationship with Bristol in terms of views over the city as the Smyths wanted to embrace the view from their estate over the city that supported their wealth. Most landowners/estates at the time were much more concerned with privacy and containing/controlling their views. In addition the wonderful ‘wedge’ of green (mainly trees, but also open fields/parkland) from the Suspension Bridge down to the river on the west of the gorge, is part of the setting and iconic arrival views of Bristol itself, with the Clifton terraces on the opposite side.

In summary, the GT/AGT strongly OBJECT to the proposed change of use to a touring caravan site of 62 pitches with associated buildings and works. We respectfully encourage the applicants to revisit their search for a suitable site that does not harm the Grade II* Registered Park and Garden.

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vii. Environment Agency:

We maintain our objection to this application on flood risk grounds because it poses an unacceptable risk to life and fails the second part of the flood risk exception test. We recommend that planning permission is refused on this basis.

viii. Flood Risk Manager:

The Lead Local Flood Authority objects to the proposals on flood risk grounds because it fails to satisfy part two of the exception test. Paragraph 39 of the NPPF flood risk guidance states that access routes should allow occupants to safely access and exit their dwellings in design flood conditions. Vehicular access to allow the emergency services to safely reach the development during design flood conditions will also normally be required. We also note the Environment Agency objection, for clarity our consultation response is limited to surface water drainage matters and access / egress only.

ix. Transport Development Management:

No objection following the receipt of additional information.

x. Public Rights of Way:

It is noted that a new fence boundary and native hedgerows are proposed alongside the public footpath to replace the current mesh fencing. This will potentially open up the current enclosed nature of the footpath and improve its visual feel, although the developer will need to ensure that the hedge is regularly maintained so that vegetation does not encroach across the path. The new perimeter will also be an opportunity to improve the line of sight at the blind corner on the path at the southeast of the site.

As the Transport Statement confirms, the public footpath affords pedestrian access to the wider path network alongside the river and into the city centre within easy walking distance. Although the development documents do not indicate any link path directly from the site to the public footpath, the developer may wish to consider this to improve pedestrian access.

Consideration would also need to be given to public access and safety for users of the PROW during construction work (see section 3.5 Bristol City Council Highways – planning conditions, 1028 below). If construction works are likely to require the temporary closure or diversion of the PROW, a Temporary Traffic Regulation Order (TTRO) will be required for the duration of the works on the grounds of safety of the public

xi. The Public Protection Team (Land Contamination):

The proposed development is sensitive to contamination and is situated on or adjacent to land which has been subject to land uses which could be a potential source of contamination. Significant soft landscaping works are proposed.

A minimum of a phase 1 desk study looking into contamination must be submitted to the local planning authority and where deemed necessary (or instead of) a phase 2 intrusive investigation shall take place. If any information is already prepared submission prior to determination is encouraged to reduce the burden of pre-commencement conditions.

If not available, it is recommended the standard conditions B11, B12, B13 and C1 are applied to any future planning consent.

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xii. Economic Development

The Economic Regeneration Service recognises the contribution that the development of this site as proposed would make to the visitor economy. Additional figures underpinning the indirect and induced effects multiplier (3-9) economic impact figure stated would be helpful.

xiii. Sustainability:

The proposals appear to follow the energy hierarchy, prioritising energy efficiency measures to minimise energy demand however the table above will need to be completed to confirm this.

xiv. Network Rail

Network Rail has no objection in principle to the above proposal but due to the proposal being next to Network Rail land and our infrastructure and to ensure that no part of the development adversely impacts the safety, operation and integrity of the operational railway we have included asset protection comments which the applicant is strongly recommended to action should the proposal be granted planning permission.

xv. Designing Out Crime Officer

I have viewed the planning application and have the following comments.

Caravans are high value items and as such security measures should be put in place to address this risk.

- The site does lack natural surveillance, we generally find that areas which are not overlooked can suffer from crime and anti-social behaviour. Whilst it is acknowledged that there will be 2 full time wardens living on site, it could not be expected that they act as capable guardians on a 24 hour basis.
- The site entrance does lend itself to cctv. Any system should be capable of capturing 'identification' quality as defined in the Surveillance Commissioners document The CCTV Buyers Toolkit. The lighting scheme must work in conjunction with any cctv system.
- A level 2 intruder alarm should be fitted to the reception office building.
- Management practices should be in place to advise users of the site on how to secure their caravan and belongings prior to arrival at the site.

EQUALITIES IMPACT ASSESSMENT

During the determination of this application due regard has been given to the impact of this scheme in relation to the Equalities Act 2010 in terms of its impact upon key equalities protected characteristics. These characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Overall, it is considered that the approval of this application would not have any significant adverse impact upon different groups or implications for the Equalities Act 2010. In this case the design and access to the development have been assessed with particular regard to disability, age and pregnancy and maternity issues.

KEY ISSUES**(A) IMPACT ON THE GREEN BELT**

As described above, the whole of the site lies within the Green Belt; there has been little change in terms of Green Belt policy since the last submission in 2016 therefore the assessment of this key issue remains unchanged as discussed below.

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Government policy within the National Planning Policy Framework (NPPF) and Bristol Core Strategy Policy BCS6 seek to protect Green Belts from inappropriate development. "Inappropriate development is, by definition, harmful to the Green Belt" (Section 13 of the NPPF).

The construction of new buildings in the Green Belt is considered to be inappropriate development unless it meets one of six exceptions set out under Paragraph 145 of the NPPF:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development."

It is considered that the last criterion is the only one relevant to this particular case. As there are existing buildings on part of the site, Officers consider that part of the site may be described as previously developed land. However, the majority of the site is open and undeveloped, used for the grazing and exercising of horses. In coming to this conclusion, regard has been paid to the NPPF definition of previously developed land as "land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure."

Officers consider that the new buildings to be sited within the existing built up area of the site may be considered to constitute appropriate development. This is on the basis that the demolition of the existing buildings and replacement of 310 sqm of new buildings will result in a reduction in the building footprint and similar heights of the existing buildings. The new buildings will also be sited in the area of the existing buildings. Whilst the new toilet/amenity block will be higher than the buildings it replaces, it will be set further back from the road frontage behind a new boundary fence. Thereby the new built element on the existing built up area of the site will not have a materially greater impact on the openness of the Green Belt than the existing use.

However, as discussed above little has changed in terms of Green Belt policy since the previous refusal 16/03774/F, and it is still considered that the siting of caravans within the open part of the site constitutes inappropriate development. It is acknowledged that the caravans will not be permanently pitched on the land but regard has been made to established case law and appeal decisions that caravans are inappropriate development in the Green Belt.

It is argued by the applicant that the caravans will not be a permanent feature of the site for most of the year, however 58 of the pitches would be 'all weather' meaning they are intended for use all year round and the caravan park is intended to be open all year (maximum stay of 28 days for every caravan). Therefore, Officers do not accept the argument that the impact would be less due to the mobile nature of the caravans.

It now needs to be considered whether there are any "very special circumstances" that would outweigh any harm to the Green Belt. The applicants have put forward two main arguments, the first being the redevelopment of the existing Baltic Wharf site and lack of alternative suitable sites. One of the main changes in circumstances since the previous refusal (16/03774/F) is that the current site

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where the caravan club operates is due to be redeveloped and the club have been instructed to find an alternative site. Whilst Officers acknowledge the economic and tourism benefits of the club, having to move the club is not considered to be very special circumstances as such circumstances are not unique, the applicants have also identified other sites outside of the Green Belt. The lack of alternative sites shall be discussed further in Key Issue B below.

(B) LACK OF SUITABLE ALTERNATIVE SITES

The applicants have carried out a site search to identify sites within a 5-mile radius of Bristol City Centre within a certain criteria which can be viewed in the submitted report by JLL. The report builds upon the previous searches between 2015 and 2018 which identified 74 sites, the updated search submitted identified an additional 3 sites. The club identified 4 sites which they felt were most suitable, which were Capital One, St Annes, Greville Smyth Park, Cumberland Basin and Clanage Road which is the selected site. The other 3 sites were not selected due to various reasons including being in Flood Zone 3, being adjacent to an industrial estate, economic, community opposition and insufficient infrastructure.

Whilst Officers acknowledge the constraints of the other sites identified, the selected site also has significant constraints with regards to Green Belt, Flood Risk and heritage concerns and the planning history of a recently refused application, it is unclear why this site was not discounted as the others were for the same reasons. Furthermore, committee members considered this issue as part of the assessment of the previous refusal (16/03774/F) and considered it to not outweigh the impacts on the Green Belt, Flood Risk and heritage; Officers take the same view for this application and find no material reason to change the recommendation of refusal.

Therefore, the proposal is not acceptable in terms of impact on the Green Belt.

(C) VISUAL/LANDSCAPE IMPACT ON THE SETTING OF THE ASHTON COURT ESTATE AND THE BOWER ASHTON CONSERVATION AREA

The southern part of the site lies within the Bower Ashton Conservation Area. Although the Conservation Area Appraisal carried out in 1993 is largely out of date, it describes this area as "Clanage Road bounded by dramatic pennant boundary walls encloses flat open ground to the east laid out as sports grounds or allotments". The southern part of the site is visible from local views. Its open and undeveloped appearance contributes to the openness of this part of the Conservation Area and also to the setting of the adjoining Ashton Court Estate, a registered park and garden.

Section 16 of the national guidance within the National Planning Policy Framework (NPPF) states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with any harm or loss requiring clear and convincing justification. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. The NPPF also states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

In addition, Bristol Core Strategy Policy BCS22 seeks to ensure that development proposals safeguard or enhance heritage assets in the city with Policies DM30 and DM31 in the Site Allocations and Development Management Policies expressing that alterations to buildings should preserve or enhance historic settings. Policy BCS21 also requires new development in Bristol to deliver high quality urban design and sets out criteria to measure developments against including the need for development to contribute positively to an area's character and identity, creating or reinforcing local distinctiveness.

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The Council's Conservation Officer along with the Garden's Trust have objected to the application on heritage grounds and Historic England have raised concerns. It is considered there is little difference between what has previously been refused and the current proposals.

The development will harm the designated heritage assets of the Conservation Area and the adjoining registered Park and Garden as set out in the Council's Landscape and Conservation comments. Objections have been raised on the grounds that the proposal will have an adverse effect on the landscape character, Conservation Area and openness of the Green Belt. This is particularly the case on the southern part of the site, from local viewpoints, such as the various public rights of way that surround the site.

The proposal also introduces total of 57 lights and the caravans themselves will add further to levels of illuminance. It is argued by the applicants that the existing training centre operated flood lights; however these lights did not spread across the whole site and the impact therefore was not as severe. The lighting is a particular issue in this context at night where it will stand out as visually prominent from short and long range views.

Furthermore, the Council's Conservation Officer considers that views from Brunel Way, Ashton Court, and the Suspension Bridge will all be adversely affected by visual clutter of caravans, hardstanding and built features with particularly bad intrusion after dusk.

In addition, the development will erode the openness and visual quality of this site which acts as a landscaped buffer to the city to the east. This view is shared by the Conservation Officer, Landscape Officer and the Garden's Trust. The proposal will result in demonstrable harm to the character of the Bower Ashton Conservation Area and the setting of the Ashton Court Estate, both important heritage assets.

However, consideration should be given to the proposal for the Network Rail Portishead Branch compound, located south of the application site. This development will introduce a number of elements impacting both the Green Belt and Conservation Area; a large gravel surface and loading ramp, new stone boundary wall, security fencing, planting to screen views from both north and south. However, these proposals have yet to be developed and the current status of the proposals is that they will be examined by the Planning Inspectorate starting on 6th October. Therefore, Officers do not agree this overrides the harm described above.

Accordingly, the proposal is considered to conflict with NPPF guidance and Policies BCS22 and DM31 which seek to conserve and enhance heritage assets and their settings.

(D) TRANSPORT AND ACCESS

The application has been assessed by Traffic Development Management (TDM) Officers who initially objected to the application highway safety grounds in relation to the access and formed part of the refusal reasons for the previous application. Further information has been submitted to address these concerns by the applicants, in particular a swept path analysis of vehicles towing caravans exiting/entering the site.

Assessment of the submitted Swept path analysis demonstrates the ability of a vehicle towing a caravan manoeuvring from the site in both directions and accessing the site from both directions whilst another vehicle is waiting on site. Widening of the access to 7.3m is also proposed to improve access. It is also proposed to link the site onto the existing Public Right of Way to the east which is supported by TDM and improves links to the caravan park, if the application were to be approved it would be subject to a contribution of £5,913 towards a Traffic Regulation Order.

In view of this, the proposal is considered to be acceptable with regards to transport and movement matters and complies with Policy BCS10 of the Core Strategy, Policy DM23 of the SADMP and

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Chapter 9 of the NPPF.

(E) FLOOD RISK

The site is located in close proximity of the River Avon within Flood Zone 3 which means that the site has a high probability of flooding. It should be noted that caravans for holiday/short-let use are a 'more vulnerable use' under the flood risk use class vulnerability classification. Development classified as "more vulnerable" is only appropriate in these areas if the exception test is passed alongside the sequential test.

Therefore, the principle of the development in Flood Zone 3 is only acceptable provided no sequentially preferable sites are available in areas at a lower risk from flooding (i.e. sites within Flood Zones 1 or 2 – as directed by policy BCS16 and section 14 of the NPPF.

Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. As discussed in Key Issue B, the applicants have carried out a search of alternative sites within a 5-mile radius of Bristol, the document identified 74 sites, a high number of these sites are located within Flood Zones 1 & 2, therefore demonstrating there are sites at a lower risk of flooding. However, the applicants have argued many of these sites are not considered to be reasonably available due to various constraints, with many being dismissed due to being in the Green Belt, although the proposed site is bound by the same constraint. Therefore, as a number of sites have been identified outside of Flood Zone 3, Officers do not consider the sequential test to be satisfied.

As discussed above, the proposal also has to pass the exceptions test. Para 160 of the NPPF states that the application of the exception test should be informed by a strategic or site-specific flood risk assessment, which the applicants have submitted. Also, for the exception test to be passed it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

With regards to part a) the benefits of the scheme have been put forward by the applicant within the submitted planning statement, which are mainly based around the economic and tourism benefits of the scheme and have argued the scheme would improve the landscape and general condition of the land. However, there is nothing specific regarding the 'wider sustainability benefits to the community', Officers do not consider the economic and tourism benefits of the scheme alone to outweigh the risk of flooding to life and property, the landscape benefits are debatable which has already been discussed in Key Issue C. Therefore, Officers do not consider this part of the exceptions test to be passed.

With regards to part b) of the exceptions test, the Council's Flood Risk Officer and the Environment Agency (EA) have objected to the application, they have reviewed the submitted Flood Risk Assessment & Evacuation Plan and consider the development does not satisfy the exceptions test and therefore does not demonstrate the site would be safe from flooding.

The EA have raised concerns that the site will be subject to considerable, hazardous flood depths. This risk increases further when consideration is given to the predicted impacts of climate change over the lifetime of the development. The Flood Risk Officer and the EA have also raised concerns regarding the emergency evacuation plan submitted, particularly over the 6 hour lead time and issues around emergency access and evacuating large vehicles off the site in a timely manner. Therefore, the risk to life and property from tidal inundation would be unacceptable if the development

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were to be allowed. The development is contrary to Section 14 of the NPPF and Policy BCS16 (flood risk) of the adopted Bristol Core Strategy and should be refused on this basis.

(F) NATURE CONSERVATION

The southern part of this proposal forms part of a Wildlife Corridor Site, Bower Ashton Playing Fields and therefore ecological mitigation in accordance with policy DM19 in the Local Plan is required.

The application is supported by an Ecological Impact Assessment; the assessment refers to the requirement for further bat and reptile surveys to be undertaken; these surveys and assessments were not initially submitted as part of the application, however during the application process further reports and surveys have been submitted.

Furthermore, the site is in close proximity to European sites as detailed below:

- Avon Gorge Woodlands Special Area of Conservation (SAC) (c.280 metres north)
- Severn Estuary SAC (c. 3.6 miles north-west)
- Severn Estuary Special Protection Area (SPA) (c. 3.6 miles north-west)
- Severn Estuary Ramsar site (c. 3.6 miles north-west)
- North Somerset and Mendip Bats SAC (c. 7.4 miles south-west)

As such a Habitats Regulations Assessment (HRA) is also required by law.

The Council's Ecologist has assessed the submitted updated reports and surveys and does not raise an objection to the proposed development and has suggested a number of conditions to safeguard protected species. However, if members are minded to approve the application the submitted Habitats Regulation Assessment (HRA) needs to be signed off by Natural England before consent can be granted. The HRA has been sent to Natural England for comment and at the time of writing no response has been received, a further update will be provided at the committee meeting on this issue.

(G) IMPACT ON TREES

Bristol Core Strategy 9 (BCS9) Seeks to conserve existing green infrastructure assets; where the loss of green infrastructure is acceptable mitigation for the loss is addressed with DM17.

The proposed seeks to remove 9 individual trees, 1 group and a line of 34 trees forming a linear feature on the south western corner of the site. Officers accept the loss of the majority of these trees through mitigation as required by Policy DM17. However, the Council's Tree Officer has objected to the removal of 2 trees which shall be discussed in detail below.

Trees T18, T19, T20 & T21 are located within the grass verge between the back of the footway and the current site boundary. Three of the four trees are category B trees and should be considered a material consideration to the proposal; all of the trees have been identified for removal. Whilst Officers accept not all of these high quality trees can be retained the Tree Officer accepts the loss of T18, T20 & T21 to facilitate the proposal.

However, Officers strongly object to the loss of T19 and T9 as they are high quality trees that contribute positively to the green infrastructure of the area and sufficient justification has not been provided for their removal as detailed below:

T19 is an early mature birch tree that provides a significant amenity contribution to the site when viewed from Clanage road. It is native and therefore provides nature conservation value and maturity. It has been identified for removal due to the proposed Warden Compound. Neither the trees canopy spread or Root Protection Area (RPA) are affected by the proposed development of the wardens compound and therefore the Tree Officer objects to the proposed removal; the tree should be

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retained, protected and arboricultural methodologies implemented to secure the trees retention as a key green infrastructure asset.

T9 Sycamore is a large mature specimen that provides a significant visual amenity to the northern portion of the site. As a naturalised species the tree has nature conservation as well and amenity value due to the volume of edible biomass in the form of aphids that helps support wildlife. The tree invertebrate population is not species rich but provides a significant wildlife benefit. As per the Council's Tree Officer Comments, this tree is noteworthy due to its age and is considered an 'aged specimen of note'. It is argued by the applicants that this tree cannot be retained due to the position of the proposed pitches, however it should be noted that the spacing between Pitches 10 & 11 have been modified to accommodate trees T16 & T17 and the Tree Officer considers there to be little apparent reason not to accommodate T9 in the same way.

Para 175 of the NPPF specifically states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. Therefore, the application is not acceptable in this respect and should be refused on this basis.

In terms of the mitigation, the mitigation required to facilitate the proposed development (Excluding Trees T9 & T19) is 74 trees of a pro rata financial contribution of $74 \times 765.21 = \text{£}56,625.54$ (Including T9 & T19 = $86 \times 765.21 = \text{£}65,808.06$).

The proposed Detailed Landscape Plan identifies 54 replacement trees. If conditioned the final financial contribution is £15,304.20 or if committee allow the proposal in its current form losing (T9 & T19) the final contribution is £24,486.72.

However Officers, do not consider this mitigation outweighs the unnecessary loss of T9 & T19. The proposal is therefore contrary to Policies DM15 and DM17 support Bristol Core Strategy in which green infrastructure is an important material consideration to any new development.

(H) SUSTAINABILITY

Themes of sustainability, carbon reduction and climate change underpin national planning policy. Policies BCS13-15 of the Core Strategy relates to the Council's expectations with regard to sustainable construction of new buildings and emissions in respect of climate change. These policies must be addressed and the guidance within the Council's Climate Change and Sustainability Practice Note followed. Core Strategy Policy requires new buildings are also incorporate an element of renewable energy to reduce carbon emissions by a further 20% above energy saving measures.

The application is supported by a sustainability statement which outlines various sustainability measures to be used in the building fabric, solar panels and air source heat pumps are also proposed, this approach is supported by officers. An updated statement has been submitted providing calculations of the 20% energy saving measures. Therefore, the application is acceptable in this respect and complies with Policy BCS13-15.

(I) CONTRIBUTION TO LOCAL ECONOMY/EMPLOYMENT AND TOURISM

Within the submitted supported statement it is stated that the proposed caravan use would create jobs and generate £1 million off site spending into the city each year. Whilst Officers accept the economic and contribution to tourism from the development this does not outweigh the harm to the Green Belt, Heritage Assets, trees and flood risk.

Development Control Committee B – 14 October 2020**Application No. 20/01930/F : Police Dog & Horse Training Centre Clanage Road Bristol BS3 2JY****CONCLUSION**

Although there has been a small change in circumstances since the previous refusal (progression for the plans to redevelop Baltic Wharf) this does not override the previous assessment. The proposed development would detract from the openness of the Green Belt and, in the absence of very special circumstances, would constitute inappropriate development. The proposal would also fail to preserve or enhance the Bower Ashton Conservation Area and the setting of the Ashton Court Estate, a registered historic park and garden. Furthermore, the development would be at high risk from flooding. Finally, the proposed use would have a detrimental impact on trees. Therefore the application is recommended for refusal.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

In this case, as the proposed development does not result in an increase of floor space no CIL is payable.

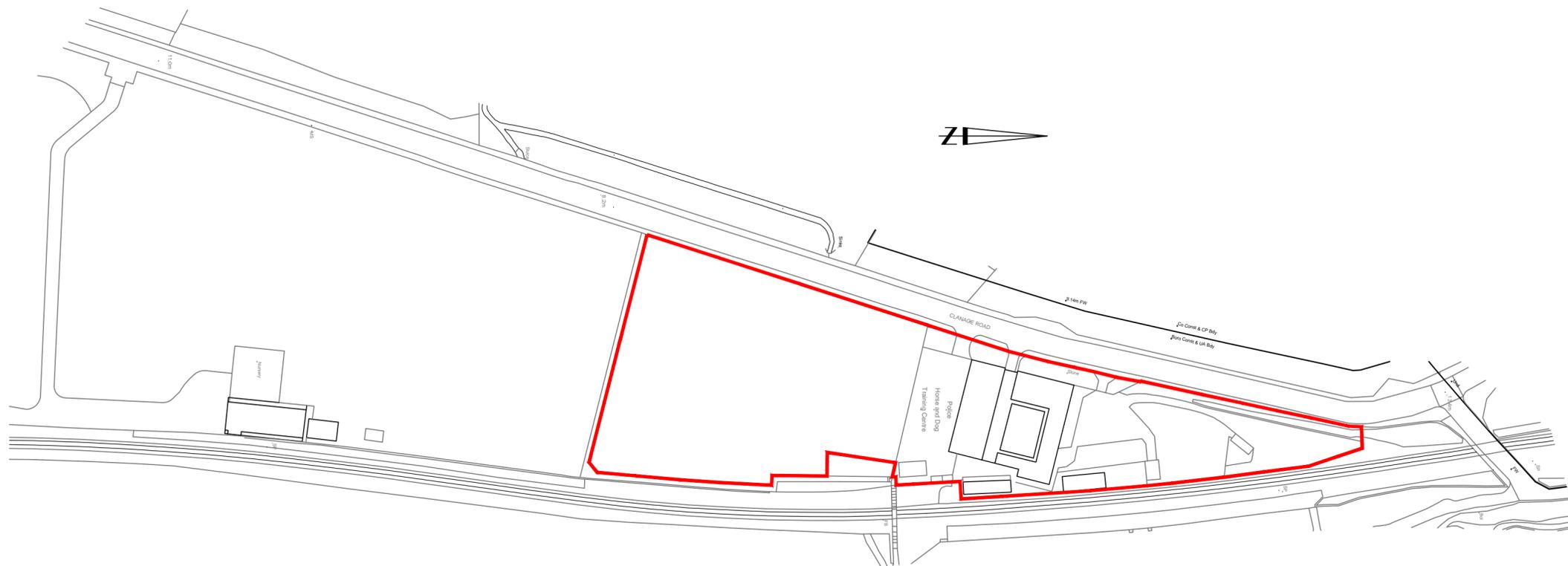
REFUSAL REASONS

1. The proposed development due to the number of caravan pitches will harm the openness of the Bristol Green Belt and in the absence of very special circumstances as required by Para 144 of the NPPF constitutes inappropriate development in the Green Belt. The proposal is therefore contrary to policy BCS6 of the Bristol Local Plan: Core Strategy (2011) and the advice within section 13 of the National Planning Policy Framework.
2. The proposed development would fail to preserve or enhance heritage assets, namely the Bower Ashton Conservation Area and the Ashton Court Estate, a Registered Historic Park and Garden, and its setting. The proposal would conflict with Bristol Core Strategy (2011) Policy BCS22 and Policy DM31 of the Site Allocations and Development Management Policies (2014).
3. The application fails to pass the sequential and exceptions tests as and fails to demonstrate that the proposed development will be safe from flooding or that it will not adversely increase flood risk elsewhere. It would therefore conflict with Policy BCS16 of the Bristol Core Strategy (2011).
4. The unnecessary removal high quality trees (T9 & T19) results in detrimental impacts to the character and biodiversity value of the area and therefore contrary to policies DM15 and DM17 of the Bristol Local Plan: Site Allocations and Development Management Policies 2014.

Supporting Documents

2. Police Dog & Horse Training Centre, Clanage Road

1. Site Location Plan
2. Proposed Site Layout - BRT-2016-S-150 REV G
3. Detailed Landscape Proposals – CSA/2751/107 REV D
4. Proposed Lighting Layout
5. Clanage Road Elevation – BRT-2016-S-500B
6. Proposed Reception Building – BRT-2016-R-201
7. Proposed Amenity Building – BRT-2016-TB-301
8. Landscape and Visual Impact Assessment – Not attached - See Link - <https://planningonline.bristol.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=Q9V5VUDNJDA00> – Dated 5th May 2020 under Supporting Documents (1 of 2 & 2 of 2)
9. Committee Report for previous application (16/03774/F)



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Status	PLANNING		
Revisions			
Project/Site	CLUNAGE ROAD BRISTOL		
Title	SITE LOCATION PLAN		
Drwg no.	OS EXTRACT	Date	MAR 2016
		Checked by	
Drwn. by		CAD Ref.	OS EXTRACT
Scale	1/1 250 @ A2		



Estates Department, East Grinstead House
 East Grinstead, West Sussex, RH19 1UA.
 Tel. (01342) 336772
 Fax. (01342) 327653



Planting Schedule												
Herbaceous - Bulb												
Qty	Name	Age	Height	Form	Girth	CrDm	Bkls	Roz	Cr	Measure Unit	Density (incl/m ²)	Centres
985	Narcissus cyclamineus 'Tete-a-Tete'							BB	m2	25.00	0.200	
Native Hedgerow Mix (NH1)												
Qty	Name	Age	Height	Form	Girth	CrDm	Bkls	Roz	Cr	Measure Unit	Density (incl/m ²)	Centres
230	Cornus sanguinea	1+1 or 1/1	80-80cm	Transplant			4	B	m	5.00	0.200	
231	Cornus avellana	1+5 or 1/1	80-80cm	Transplant				B	m	5.00	0.200	
480	Crataegus monogyna	1+1	80-80cm	Transplant				B	m	5.00	0.200	
103	Eurospium europaeus	1+2	80-80cm	Transplant				B	m	5.00	0.200	
153	Prunus spinosa	1+1	80-80cm	Transplant			2	B	m	5.00	0.200	
153	Rosa arvensis	1+1	80-80cm	Transplant			2	B	m	5.00	0.200	
153	Sambucus nigra	1+1	80-80cm	Transplant			3	B	m	5.00	0.200	
1533												
Shrub												
Qty	Name	Age	Height	Form	Girth	CrDm	Bkls	Roz	Cr	Measure Unit	Density (incl/m ²)	Centres
19	Aucuba japonica 'Crotonifolia'	30-40cm		Bulky			3	C	SL	m2	5.00	0.400
10	Ceanothus 'Blue Mound'	30-40cm		Bulky			5	C	SL	m2	5.00	0.400
43	Ceanothus 'Frydriksfjord'	30-40cm		Bulky			5	C	SL	m2	5.00	0.400
73	Choisyia ternata 'Sundance'	30-40cm		Bulky			4	C	SL	m2	5.00	0.400
41	Coronilla 'Starburst'	40-60cm		Bush			4	C	SL	m2	4.00	0.500
30	Escallonia 'Red Elf'	40-60cm		Bush			4	C	SL	m2	4.00	0.500
23	Hebe 'Green Globe'	1+1 or 1/1	25-30cm	Bulky			5	C	SL	m2	5.00	0.400
73	Hebe 'Mette'	2+	40-60cm	Bulky			4	C	SL	m2	5.00	0.400
62	Hebe 'Santalini'	2+	20-30cm	Bulky			5	C	SL	m2	5.00	0.400
80	Hieracium calycatum	30-50cm		Bulky			5	C	SL	m2	5.00	0.400
13	Hieracium 'Hidcote'	30-50cm		Bulky			5	C	SL	m2	5.00	0.400
10	Hebe 'Santalini'	2+	20-30cm	Bulky			5	C	SL	m2	5.00	0.400
62	Prunus laurocerasus 'Zabelliana'	30-50cm		Bush			3	C	SL	m2	4.00	0.500
1	Spiraea 'Prunifolia'	30-40cm		Bulky			3	C	SL	m2	5.00	0.400
58												

Shrub - Hedgerow												
Hedges to be planted in double staggered row, with post and wire fence (900mm high) through centre to support the hedge												
Qty	Name	Age	Height	Form	Girth	CrDm	Bkls	Roz	Cr	Measure Unit	Density (incl/m ²)	Centres
202	Lonicera 'Hedge Magister'	2+	80-100cm	Fern			3	C	SL	m	0.00	0.200
200	Prunus laurocerasus 'Rotundifolia'	2+	80-100cm				3	C	SL	m	0.00	0.200
Thicket Mix 7												
Qty	Name	Age	Height	Form	Girth	CrDm	Bkls	Roz	Cr	Measure Unit	Density (incl/m ²)	Centres
37	Cornus avellana	1+2	60-80cm				3	B	m2	0.44	1.000	
37	Crataegus monogyna	1+0	60-80cm	Seedling				B	m2	0.44	1.000	
37	Ilex aquifolium		60-80cm					C	SL	m2	0.44	1.000
Tree												
Qty	Name	Age	Height	Form	Girth	CrDm	Bkls	Roz	Cr	Measure Unit	Density (incl/m ²)	Centres
2	Acer campestre	2+	300-350cm	Standard (Standard)	10-12cm	140-200cm	4	RB	m	1.00	0.200	
2	Acer campestre	2+	400-450cm	Standard (Extra-heavy)	10-12cm	140-200cm	5	RB	m	1.00	0.200	
11	Betula pendula	2+	300-350cm	Standard	10-12cm	170-200cm	4	RB	m	1.00	0.200	
11	Betula pendula	2+	425-450cm	Standard (extra-heavy)	10-12cm	170-200cm	5	RB	m	1.00	0.200	
8	Crataegus laevigata 'Paul's Scarlet'	2+	300-350cm	Standard (Standard)	10-12cm	170-200cm	4	B	m	1.00	0.200	
5	Malus sylvestris	2+	300-350cm	Standard (Standard)	10-12cm	170-200cm	4	B	m	1.00	0.200	
3	Populus tremula	2+	300-350cm	Standard	10-12cm	170-200cm	4	RB	m	1.00	0.200	
10	Quercus robur	2+	200-250cm	Standard	10-12cm	170-200cm	4	RB	m	1.00	0.200	
11	Quercus robur	2+	425-450cm	Standard (extra-heavy)	10-12cm	170-200cm	5	RB	m	1.00	0.200	
10	Sorbus aria	2+	300-350cm	Standard	10-12cm	170-200cm	4	RB	m	1.00	0.200	
3	Sorbus aria	2+	425-450cm	Standard (extra-heavy)	10-12cm	170-200cm	5	RB	m	1.00	0.200	
4	Tilia x euchlora	2+	425-450cm	Standard (extra-heavy)	10-12cm	170-200cm	5	RB	m	1.00	0.200	
111												
370												



Planting Specification

General Guidance

All plant handling to be in accordance with the HTA 'Handling and establishing landscape plants' Part 1, Part II and Part III (obtainable from the Horticultural Trades Association) and the CPSE publication: 'Plant Handling and all planting to conform to National Planting Specification Guidelines.

The individual setting-out of the plants on site shall be the responsibility of the contractor and should follow closely the locations shown on the detailed planting proposal drawings supplied by the landscape architect. Contractor to ensure that plants are equidistant within individual planting groups.

Contractor to ensure that smaller plants are located to the front of plant species groups as shown on detailed planting plans.

Contractor shall maintain existing levels around the base of existing trees and shall undertake all planting works occurring within root protection areas (RPA) in accordance with BS5837:2012. Contractor shall not remove or relocate any tree protection fencing without prior consent of the client.

Contractor to check the locations of all underground services, existing and proposed, prior to the excavation of any tree pits or shrub beds and identify any potential conflicts to the client / landscape architect.

All arisings shall be removed from site and the contractor shall at all times, keep the site free from rubbish and debris.

For the duration of the works the contractor shall keep the site free from injurious weeds as listed in the Weeds Act 1959.

All plants to be supplied at the same size and of the same species as specified in the planting schedules on the landscape proposals plan. Any proposed replacement species or deviation from the planting schedules should be highlighted to and agreed with the client prior to installation.

All plants shall be hardened-off at the Contractor's own nursery or at the source prior to planting out.

All field grown and established trees must have been transplanted or underplanted in the nursery no less than 18 months prior to supply.

The Contractor shall carry out the work while soil and weather conditions are suitable. Planting to not take place during periods of frost or strong winds.

The contractor is to ensure that adequate watering and weed control is provided at the time of planting.

Any topsoil retained on site in stockpiles for use in planting works is to be stored in accordance with the DEFRA publication: 'Code of practice for the sustainable use of soils on construction sites'

Do not use peat or peat based products.

Prior to planting, planting areas shall be cleared of grass and weed growth physically and/or chemically with a proprietary translocated herbicide and a period of time shall be allowed to elapse as recommended by the manufacturer before commencement of soil preparation for planting.

All plants are to be watered thoroughly before planting stage to ensure rootball is thoroughly soaked prior to final backfilling.

Tree Planting

Generally plant trees in pits with minimum dimensions of:-

- 1000 x 1000 x 100-200mm deep for trees in soft, planted areas including grass/shrub areas and rear gardens.

Drainage layer

- 200mm layer of compacted inert free draining gravel or pea shingle, wrapped in geo-textile membrane
- 100mm layer of washed medium-course sand to act as leaching layer between geotextile and soil

Topsoil layer

- 400-500mm layer of retained site-sourced topsoil (free from weeds) or imported topsoil (Multi-purpose grade to BS3882:2015; sandy loam); depth dependent on size of rootball.

Depth of topsoil should only be as deep as the rootball of proposed tree to a max. depth of 400-500mm. Should the rootball be larger i.e. 800mm height, then the pit should be increased in depth to suit, but with the difference in depth from the 400-500mm topsoil layer and the drainage layer made up of quality imported free-draining subsoil (Multi-purpose grade to BS3882:2015; sandy loam) to avoid topsoil occurring at depths of greater than 500mm.

Likewise, for smaller trees i.e. feathered trees, with more limited rootball/bare root, the depth of topsoil can be reduced to reflect the surrounding topsoil depths or to a max. topsoil depth of 300mm, with a further layer of subsoil or imported subsoil (to BS3882:2015) below to create a total depth of growth medium of between 400-500mm i.e. 150-200mm layer of subsoil. Drainage layer should remain as above.

As stated above, the pit size for trees planted in newly created planting areas should be 1m x 1m, however where planting is occurring in clean, undisturbed ground, pits should be dug to approx. 200mm greater than the rootball to limit distribution of surrounding soil structure.

Break up bottom of tree pit to a depth of 200mm and ensure ground is free-draining. Loosen edges of tree pit at time of planting by hand, using a fork to ensure good drainage. Pits should be excavated no greater than 48hrs prior to planting and should be kept free from rain.

Incorporate a soil conditioner/amendment in the form of peat-free tree and shrub compost or well rotted spent mushroom compost or 'Rootmaster' by GreenTech Ltd (01423 332100) into backfilled topsoil material at the rate of min. 40L per pit.

Ensure planting appears random / natural and not formal in accordance with the planting proposal layouts as supplied by the Landscape Architect.

All shrub areas to be dressed with a minimum 75mm mulch layer, consisting of medium chipped tree bark, composted for 2-4 weeks, particle size 15-50mm, laid directly onto weed suppressant membrane.

The contractor shall take the necessary precautions to ensure all shrub areas are protected throughout the establishment period by temporary fencing.

Ornamental Hedge Planting (incl. single species native hedges)

Hedge pits into pre-prepared planting trenches, 500-600mm wide for double rows. Planting pits to consist of topsoil to a depth of 350-400mm, mixed with soil conditioner as specified below.

Topsoil to be either: existing retained site-sourced topsoil (free from weeds) or imported topsoil (Multi-purpose grade to BS3882:2015; sandy loam) or a combination of the two as necessary.

Incorporate a soil conditioner/amendment in the form of peat free general-purpose shrub compost or well rotted spent mushroom compost along planting trench in a 50mm layer at the rate of 300kg per m², and incorporate to a depth of 225mm.

Install a proprietary weed suppressant membrane onto the surface of the pre-prepared trench, with minimum 300mm laps. Plant hedge plants into pre-prepared planting strips which are deep enough so as to be 200mm greater than the root depth of the supplied plant stock.

All hedge planting areas to be dressed with a minimum 75mm mulch layer, consisting of medium chipped tree bark, composted for 2-4 weeks, particle size 15-50mm, laid directly on weed suppressant membrane.

Where not planted against a proposed fence-line or wall, hedges to be supported by min. 1000 high timber post and wire fence, consisting of min. 75mm diameter x 2000mm long, rounded timber posts, driven in at 2000mm centres with 3m galvanised wire supports evenly

have a basal trunk diameter greater than 12mm e.g. semi-mature, then two or more guards should be joined together using joining tape and then secured in place.

Root Barrier Membranes

Where trees are proposed in close proximity to laid paved areas or proposed service runs, a root barrier membrane is to be installed as prescribed below.

For all proposed trees centred in a location within 3m of an adjacent hard standing/footpath or carriageway kerb line, a proprietary root barrier membrane will be installed to protect the hard standing and any underground services located beneath from future damage by tree roots.

Ornamental Shrub Planting

Plant shrubs and groundcover into pre-prepared planting beds consisting of topsoil to a depth of no greater than 400mm, overlying clean, free-draining subsoil. Topsoil to be either: existing retained site-sourced topsoil (free from weeds) or imported topsoil (Multi-purpose grade to BS3882:2015; sandy loam) or a combination of the two as necessary.

Subsoil layer to be fully broken-up to ensure adequate decomposition and alleviate free-drainage. For light and non-cohesive subsoils, when ground conditions are reasonably dry, loosen thoroughly to a depth of 300mm (450mm for stiff clay / cohesive soils). Remove all stones and debris greater than 50mm, including roots and tufts of grass. Top 50mm of subsoil to be reduced to a medium till suitable for final shaping using a grading blade.

Where applicable use of a small tractor mounted single line ripper to decompact subsoil layer efficiently.

Incorporate a soil conditioner/amendment in the form of peat free general-purpose shrub compost or well rotted spent mushroom compost across the planting bed in a 50mm layer at a rate of 300kg per m², and incorporate to a depth of 225mm.

Install a proprietary geo-textile weed suppressant membrane onto the surface of the pre-prepared shrub planting beds with minimum 300mm laps. Once planting bed is prepared, dig planting holes for shrubs to a depth of 200mm and a width or 150mm greater than the source pot size, ensuring that pit walls are loosened to ensure good drainage.

All single stem thick transplants to be protected by min. 450mm high x 50mm proprietary plastic spiral guards secured with min. 12-14b x 900mm long bamboo cane.

All woodland and thicket plants to be installed with a min. 500mm square, woven polypropylene mulch mat securely pegged in place.

Where woodland / thicket areas are created from freshly cultivated ground i.e. not in the existing sward, then the planting area should be over-seeded with a proprietary meadow grass mix ('M' mix by Geminal Seeds Ltd) at a rate of 35kg/m² between planting stations.

Amenity Turf Planting

Areas to be turfed are to be 'big over' or rotovated to ensure decomposition of any existing substrate and then finely graded to bring to a uniform and even grade at the correct finished level, removing all minor hollows and ridges. Light rilling may be required to consolidate any loose substrate.

All areas to be dressed with a minimum 75mm mulch layer, consisting of medium chipped tree bark, composted for 2-4 weeks, particle size 15-50mm, laid directly on weed suppressant membrane.

Unless otherwise stated, finished levels of turfed areas to be 30mm above adjoining paving and kerbs.

Final preparation of the turfed areas shall be carried out as to create a fine tilth surface suitable for laying of turves.

Prepared areas to be watered thoroughly to a depth of 75mm and lawn establishment fertilizer should be applied at a rate of 40kg/m², 48hours prior to turfing. Fertiliser to be raked into top 25mm of the surface.

a. The area(s) are to be turfed between April and October with turf, as specified in the planting schedules (Appendix A).

b. Turves should be laid in a series of straight rows, with staggered joints. All joints are to be closely butted together. Timber planks

should be used to spread the load of the installers during laying and areas are to be tampered down to ensure good contact between turves and the soil.

c. All turves should be laid within 24hours of delivery.

d. The contractor shall ensure that all turfed areas are watered fully at the time of installation to the full cultivated depth, and that sufficient subsequent watering is carried out to ensure healthy establishment of the grass sward.

Amenity Grass Seeding

Areas to be seeded are to be finely graded to bring to a uniform and even grade at the correct finished level and to remove all minor hollows and ridges. All stones and debris greater than 50mm in size to be removed and disposed of off-site.

Seeded areas are to consist of min. 150mm topsoil; either existing retained site-sourced topsoil (free from weeds) or imported topsoil (Multi-purpose grade to BS3882:2015; sandy loam) or a combination of the two as necessary, overlying min. 150mm layer of clean, free-draining subsoil. Subsoil should be prepared as per shrub specification, ensuring full decomposition and free-drainage.

Unless otherwise stated, finished levels of seeded areas to be 30mm above adjoining paving and kerbs; 150mm below the dpc of adjoining buildings.

Final preparation of the seeded areas shall be carried out as to create a fine tilth surface suitable for seeding.

For amenity grass areas only, a pre-seeding fertiliser shall be applied at a rate of 250kg/ha approx. 7 days prior to seeding and raked into top surface of a 50kg/ha approx. Establishment fertiliser by Robson Ltd, slow-release granular fertiliser, 7-10-10 NPK, or equal and approved by Landscape Architect.

The area(s) is to be seeded between April and October with approved grass seed mix, as specified in the planting schedules at the specified rate. Following seeding, areas are to be hand raked and lightly rolled.

The contractor shall take the necessary precautions to ensure all grass areas are protected throughout the establishment period, with the use of chestnut pale fencing where appropriate.

The contractor shall ensure that all seeded and turfed areas are watered fully at the time of installation to the full cultivated depth, and that sufficient subsequent watering is carried out to ensure healthy establishment of the grass sward.

Wildflower Meadow Grass Seeding

Kill off any existing vegetation by spraying off with proprietary herbicide and allow a time to elapse as recommended by the manufacturer before commencing any cultivation works.

If time permits, a 'late seed bed' is to be established, by allowing the graded meadow area to colonise with weeds from the existing soil seed bank following initial cultivation / rotovation and an additional application of proprietary herbicide applied to remove any weed growth.

Areas to be seeded are to be finely graded to bring to a uniform and even grade at the correct finished level and to remove all minor hollows and ridges. All stones and debris greater than 50mm in size to be removed and disposed of off-site.

Wildflower seeded areas are to consist of min. 150mm deep existing retained topsoil (free from weeds) subsoil mix (50:50) over existing site subsoil layer. No imported topsoil should be used in the formation of wildflower meadows. Where feasible/practicable, topsoil should be fully stripped and seeding conducted into pre-prepared subsoil layer.

Final preparation of the seeded areas shall be carried out as to create a medium tilth surface suitable for seeding.

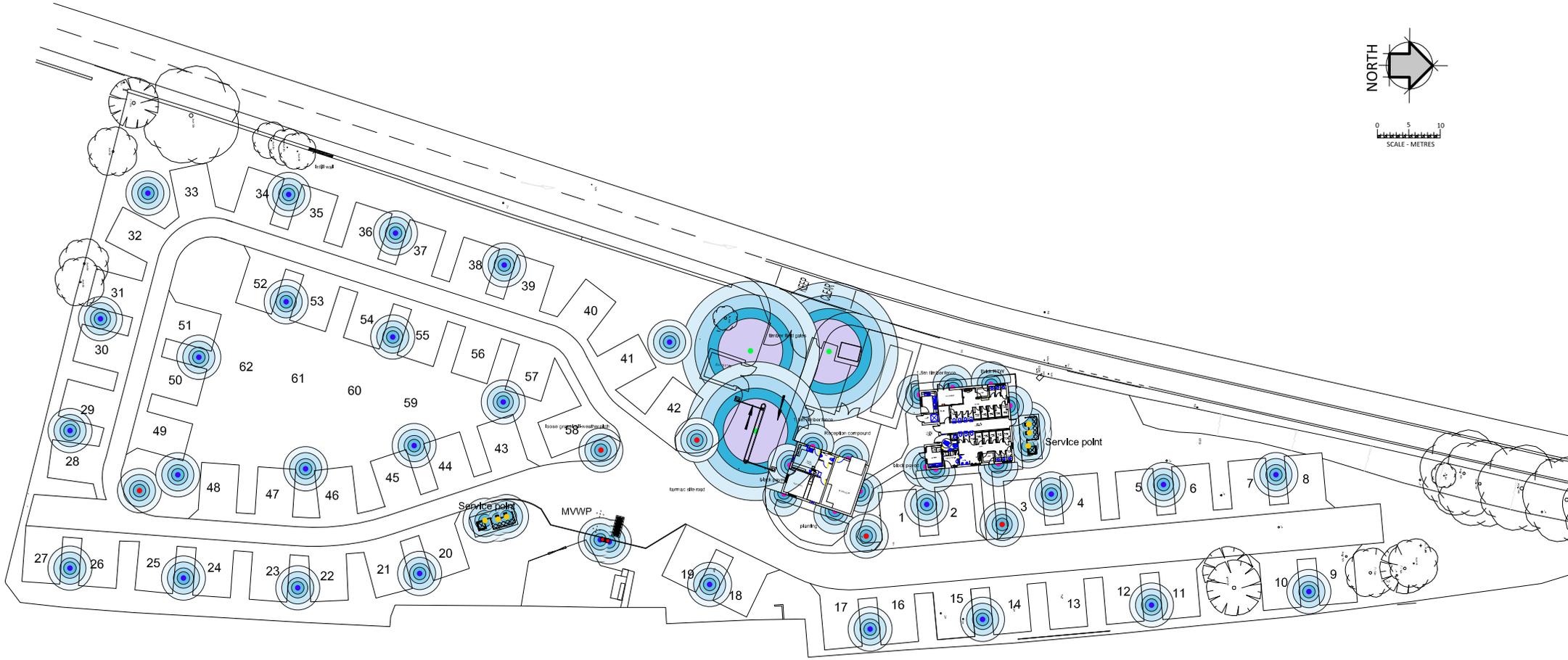
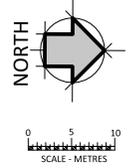
No pre-seeding fertiliser shall be applied.

Wildflower seeded is to be undertaken preferably in Spring (Early March to late June) or if not feasible in Autumn (Mid August to October). Where sowing rates are low and sowing is to be undertaken by hand broadcast seeding, the contractor should mix the seed evenly with a fine, dry sand to bulk up the sowing mixture. Seeding by this method should only be undertaken on calm days with no wind, after seeding, areas are to be hand raked and lightly rolled.

The contractor shall ensure that all seeded areas are watered fully at the time of installation to the full cultivated depth, and that sufficient subsequent watering is carried out to ensure healthy establishment of the grass sward.

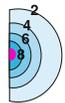
All soft landscape areas to be maintained to BS7370:4-1993.

Sufficient watering should be undertaken by the contractor to establish and maintain healthy plant growth.





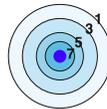
Wall light with eyelid



A. 13 x Dextra Amex 8.4w LED luminaire wall light with eyelid.



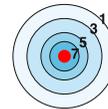
Low level light at electrical hook-up



B. 30 x 1.1m high low level bollard light with 3w LED luminaire.



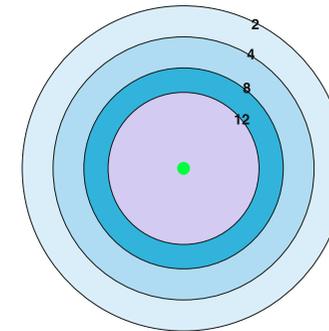
Low level light



C. 5 x 1.1m high low level light with 3w LED luminaire.



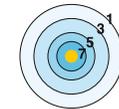
3m light at site entrance



D. 3 x 3m lighting column. G400 42w LED luminaire.



Low level lights at water point



E. 6 x 1.1m high low level light with 3w LED luminaire.

	1 lux		9 lux
	2 lux		10 lux
	3 lux		11 lux
	4 lux		12 lux
	5 lux		13 lux
	6 lux		14 lux
	7 lux		15 lux
	8 lux		16 lux

The lighting information provided on this drawing is for planning purposes only. The specified product manufacturer must be contacted for a comprehensive design and limited warranty information prior to product procurement. Emergency and Escape Lighting (not shown) is to be installed and compliant with BS5266-1 and The Regulatory Reform (Fire Safety) Order 2005 respectively.

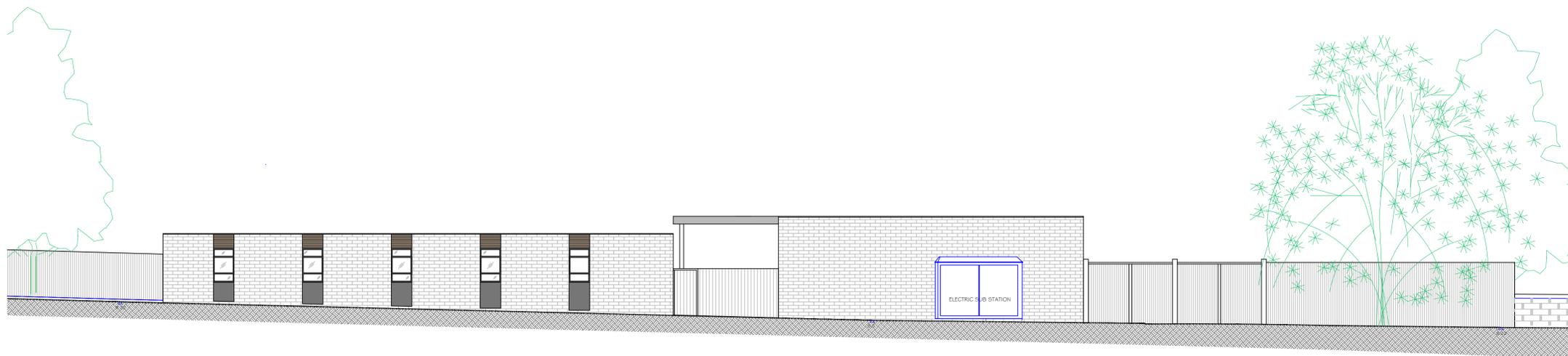
TITLE: Proposed Lighting layout - Clanage Road

FILE REF: DM118

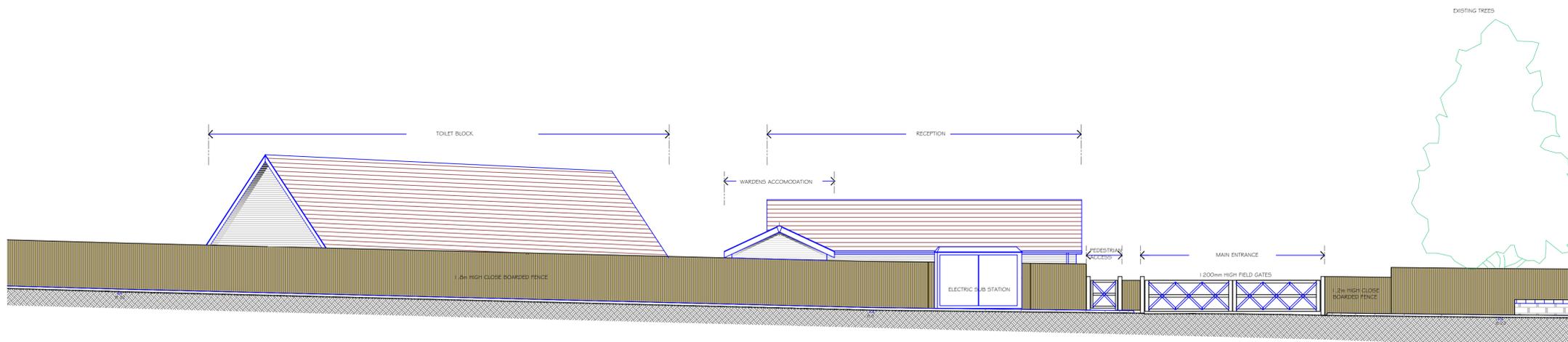
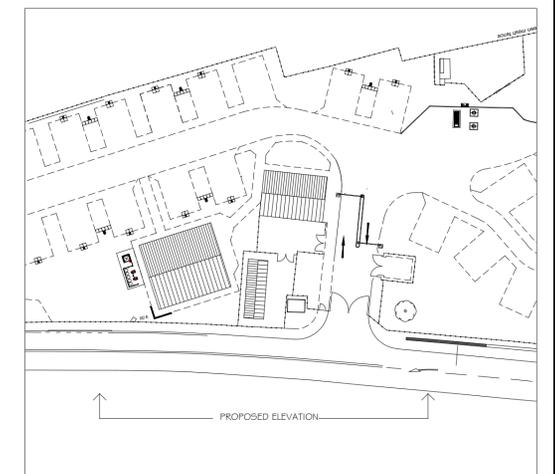
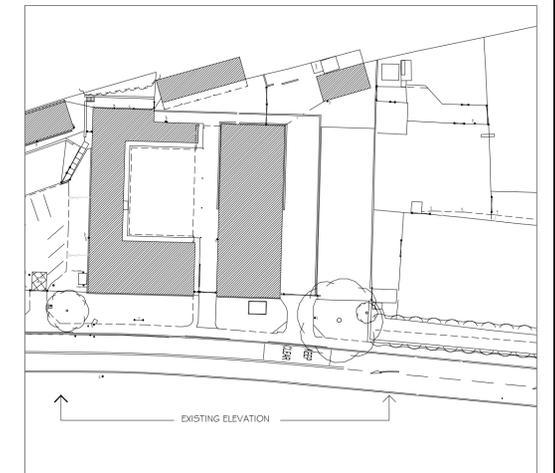
CLIENT: Caravan & Motorhome Club

THE GRAHAM WHITE LIGHTING CONSULTANCY
 Ivy Cottage, 4 Rosemary Lane, Farnham, Surrey. GU10 4DB
 Telephone/Facsimile: 01252 266559 Mobile: 07778 523667
 e-mail: enquiries@gwlc.co.uk www.gwlc.co.uk





CLANAGE ROAD EXISTING PART ELEVATION 1:100



CLANAGE ROAD PROPOSED PART ELEVATION 1:100

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Status	PLANNING		
Revisions			

Project/Site
BRISTOL CC SITE

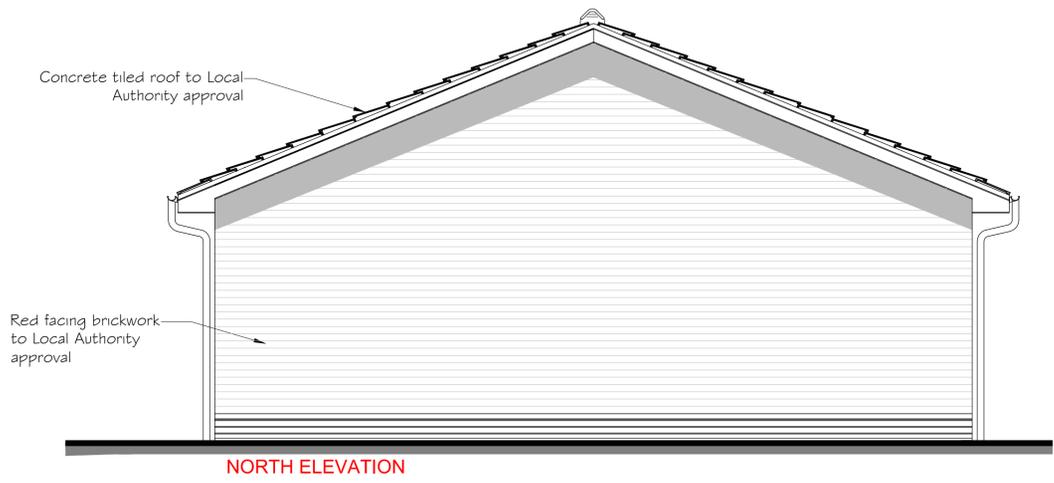
Title
PROPOSED CLANAGE ROAD ELEVATION

Drwg no. BRT-201 G-P-500	Date JAN 16	Drwn. by AN
	Checked by	

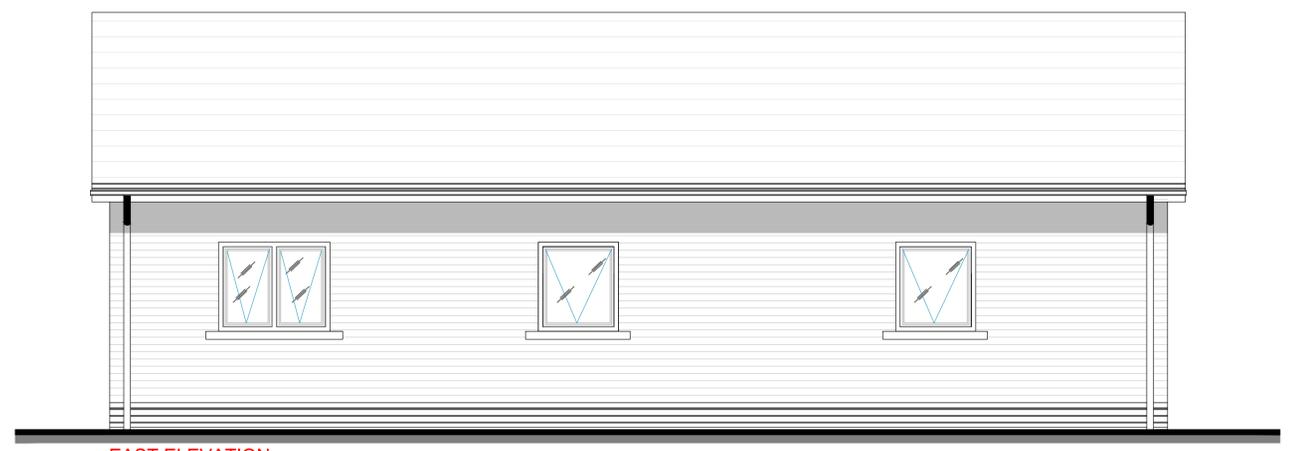
Scale 1:500, 1:100@A1 CAD Ref. BRT-201 G-P-500



Estates Department, East Grinstead House
East Grinstead, West Sussex, RH19 1UA.
Tel. (01342) 336772
Fax. (01342) 327653



NORTH ELEVATION



EAST ELEVATION



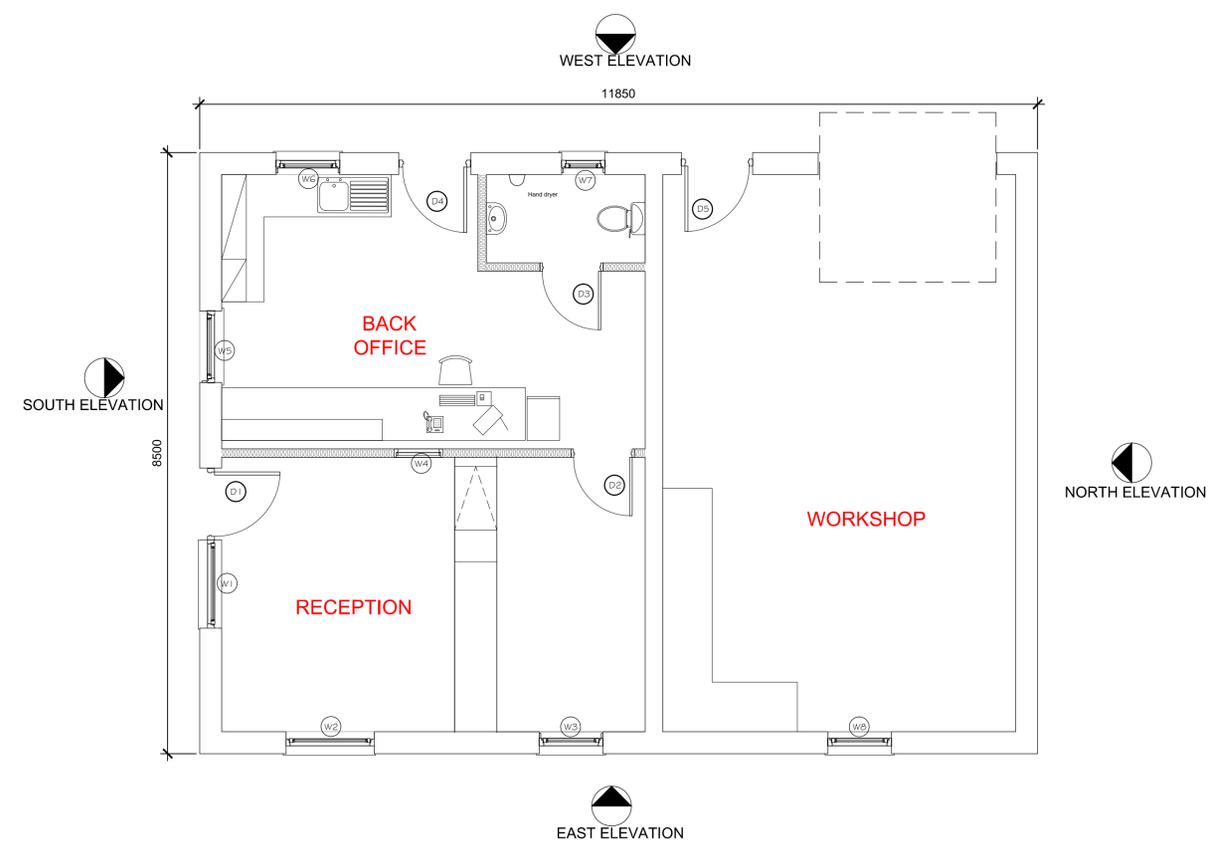
SOUTH ELEVATION

Concrete tiled roof to Local Authority approval



WEST ELEVATION

EXTERNAL ELEVATIONS



RECEPTION PLAN

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Status	PLANNING		
Revisions			

Project/Site **BRISTOL CARAVAN SITE**

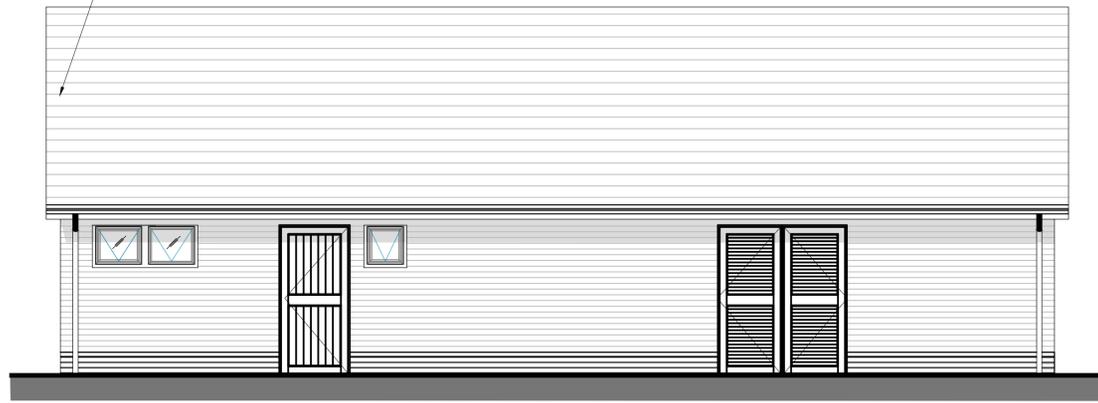
Title **RECEPTION BUILDING PLAN AND ELEVATIONS**

Drwg no. BRT-2016-R-201	Date MAR 16	Drwn. by AM
	Checked by AS	
Scale 1/50	CAD Ref. BRT-2016-R-200	

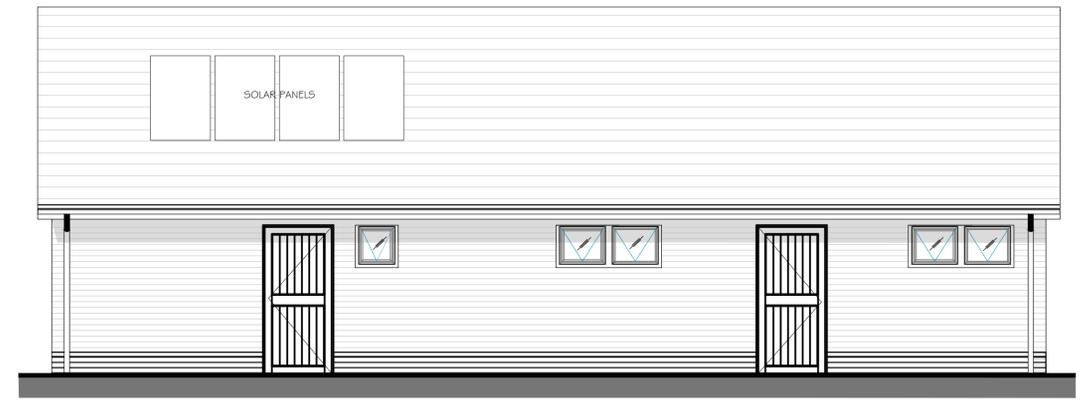


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East Grinstead, West Sussex, RH19 1UA.
Tel. (01342) 336772
Fax. (01342) 327653

Concrete tiled roof to Local Authority approval



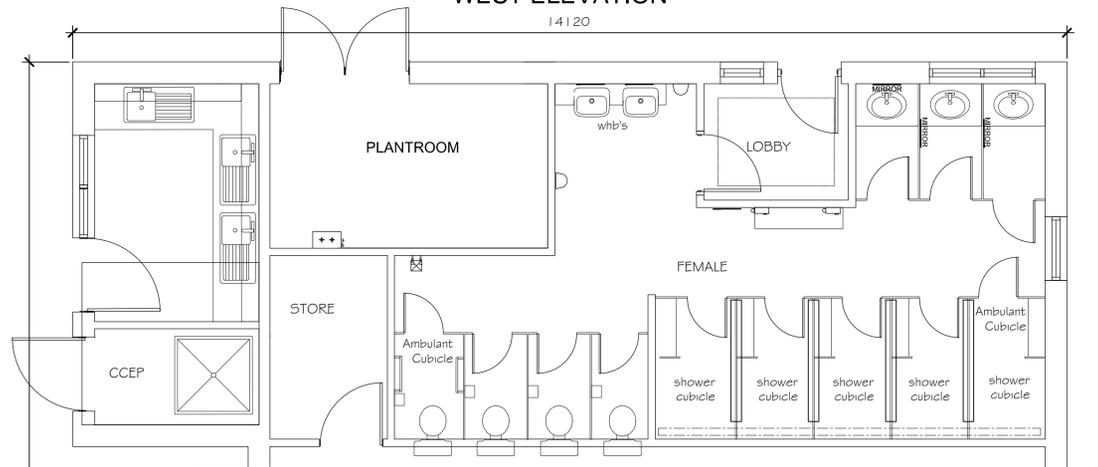
WEST ELEVATION



EAST ELEVATION

WEST ELEVATION

14.120



FFL 8.25m

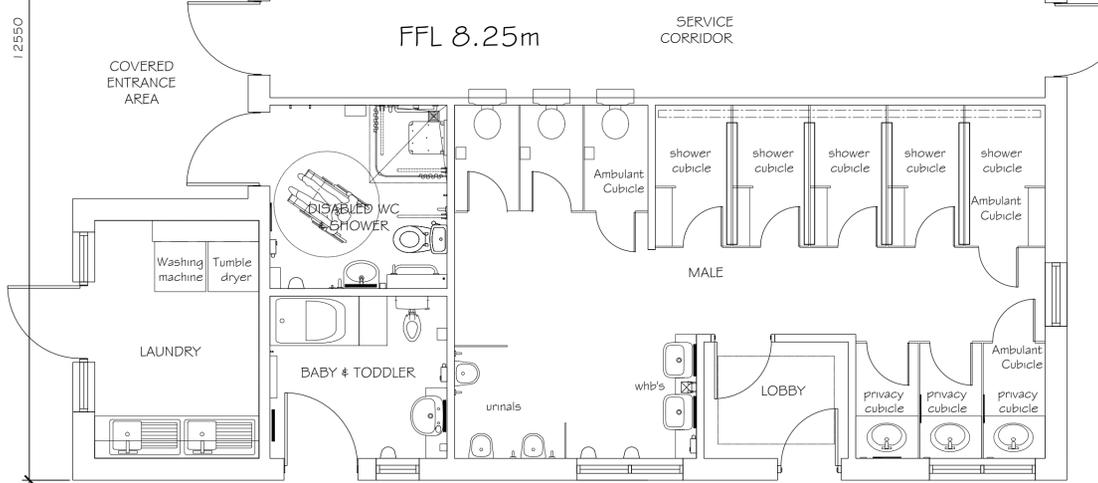
SERVICE CORRIDOR

NORTH ELEVATION



SOUTH ELEVATION

SOUTH ELEVATION



EAST ELEVATION



NORTH ELEVATION

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Status	PLANNING		
Revisions			
Project/Site	BRISTOL CARAVAN SITE		
Title	AMENITY BLOCK		
Drwg no.	Date	Drwn. by	AM
BRT-2016-TB-301	MAR 16		
	Checked by		
Scale	CAD Ref: BRT-2016-TB-300		
1/50			



Estates Department, East Grinstead House
East Grinstead, West Sussex, RH19 1UA.
Tel. (01342) 336772
Fax. (01342) 327653

WARD: Bedminster CONTACT OFFICER: Anna Penn
SITE ADDRESS: Police Dog And Horse Training Centre Clange Road Bristol BS3 2JY

APPLICATION NO: 16/03774/F Full Planning
EXPIRY DATE: 13 October 2016

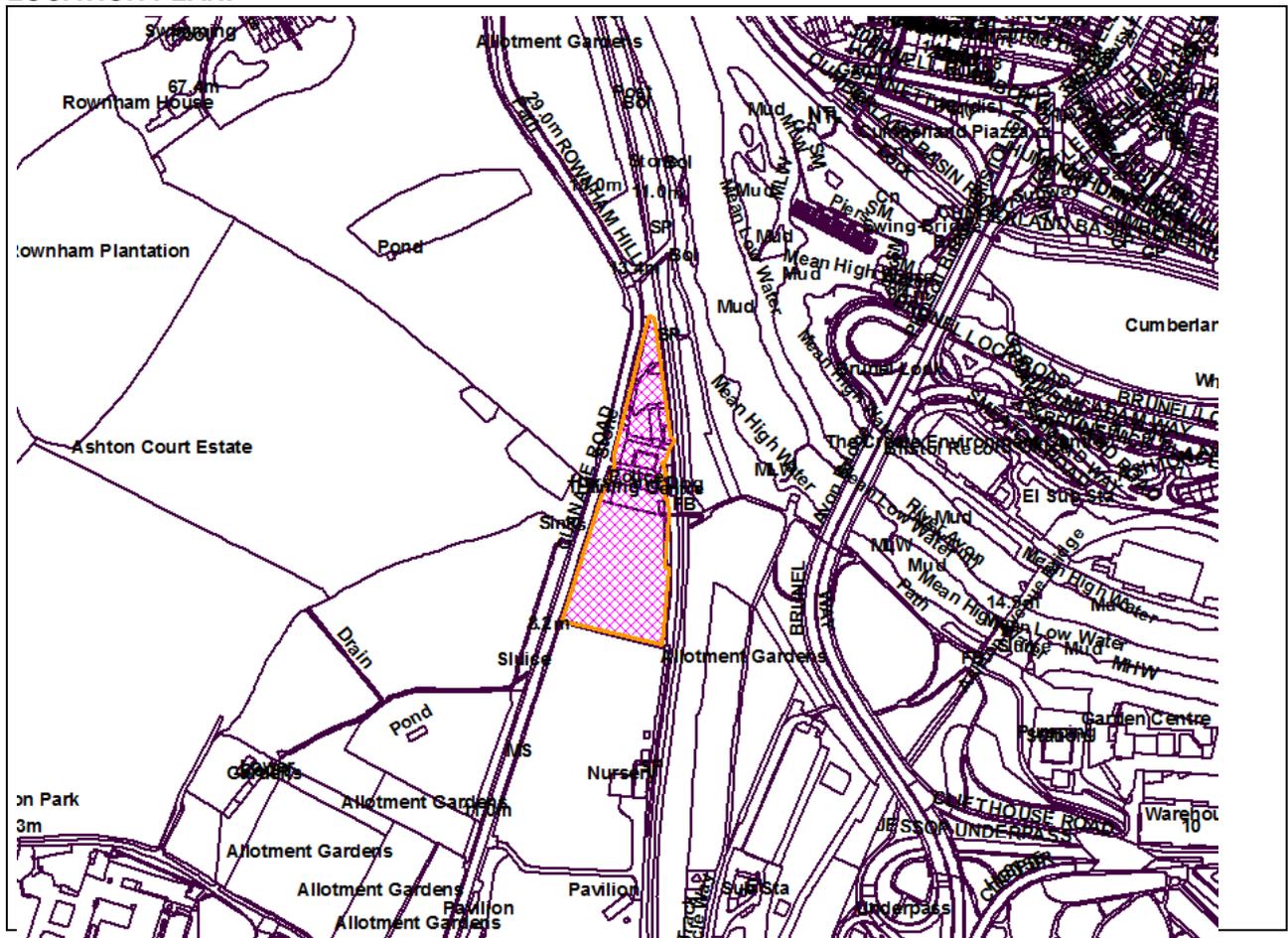
Proposed change of use of the former Avon & Somerset Police Dog and Horse Training Centre to a touring caravan site consisting of 62 pitches and associated work including the demolition of existing buildings and erection of reception and amenity buildings and warden accommodation

RECOMMENDATION: Refuse

AGENT: Savills
74 High Street
Sevenoaks
TN13 1JR
APPLICANT: The Caravan Club
C/O Agent

The following plan is for illustrative purposes only, and cannot be guaranteed to be up to date.

LOCATION PLAN:



Development Control Committee B – 9 November 2016
Application No. 16/03774/F: Police Dog And Horse Training Centre Clanage Road Bristol
BS3 2JY

SUMMARY

Planning permission is sought to re-locate the existing Caravan Club site at Baltic Wharf in the Harbourside to this site within the Bristol Green Belt. Part of this site lies within the Bower Ashton Conservation Area and in close proximity to Ashton Court Estate, a registered Historic Park and Garden. The site also lies in an area which has a high probability of flooding.

The application is being recommended for refusal on four grounds:

- Conflict with Green Belt policy;
- Adverse impact on the setting of established heritage and landscape assets;
- The risk to life and/or property from tidal inundation would be unacceptable;
- Detrimental to highway safety.

The applicant has cited a number of “very special circumstances” to justify an exception to established green belt policy, including the lack of alternative sites. This application is being brought to Committee so that Members can carefully consider the weight to be given to the arguments given in support of the application. These need to be assessed against the clear harm that will be caused to the openness of the Green Belt; the adverse impact on the setting of the Ashton Court Estate and Bower Ashton Conservation Area; adverse landscape impact, impact on highway safety and flood risk.

SITE AND SURROUNDINGS

The site was until recently occupied by the Avon & Somerset Police as a centre for housing and training police dogs and horses. It is located on the east side of Clanage Road, to the north of the Bedminster Cricket Ground and Teddy’s Day Nursery. The whole of the site lies in the Bristol Green Belt. The southern part of the site lies in the Bower Ashton Conservation Area. Immediately to the south and east of the site runs a public right of way. This crosses the adjacent freight railway line and links through to a network of paths and cycle routes serving the city centre, Pill and beyond.

The site is roughly triangular in shape and is bounded by Clanage Road to the west, a public footpath to the south and by a public footpath and railway line to the east. The road frontage along Clanage Road is bounded in part by a low pennant stone wall which affords views into the southern part of the site. Further to the north along the road, dense conifer trees screen a horse exercise yard. At the northern part of the site, the buildings associated with the existing use are clearly visible from the road. The southern and eastern boundary along the footpath is bounded by an open-mesh fence which allows views into the paddocks. Views from further to the south across the playing fields are contained by hedgerows. The site is screened from foot and cycle paths to the east of the railway line by established trees and hedges. However, the site can be seen from an elevated position from 2 pedestrian bridges which cross the railway.

The site itself comprises a main block of low level buildings arranged around a courtyard stable area. To the north is staff and visitor parking. To the south of the building block lies a horse exercise yard and 3 open fields divided by post and rail fences, used for grazing horses. At present there are 4 vehicular accesses serving the site from Clanage Road including a field access.

There are a number of land use designations which affect land adjoining the site. The Ashton Court Estate to the west is a grade II* listed building and a registered historic park and garden. The Avon Valley Special Area of Conservation is located to the north. The open areas to the south and east are Important Open Spaces.

Development Control Committee B – 9 November 2016**Application No. 16/03774/F: Police Dog And Horse Training Centre Clanage Road Bristol BS3 2JY**

The site lies in Flood Zone 3 which means that the site has a high probability of flooding, particularly from tidal inundation. The site also lies in a Coal Authority High Risk Area.

THE APPLICATION

Planning permission is sought for a change of use of the former Avon & Somerset Police Dog and Horse Training Centre to a touring caravan site comprising a total of 62 pitches; of which 58 pitches will be “all weather” and 4 grass pitches. A total of 19 pitches will be located in the northern part of the site which is currently occupied by the former Police buildings. The remaining 39 pitches will be sited in the more open part of the site to the south, in a circular layout. A tarmacked site road will serve the pitches and the “all weather” pitches will be surfaced in loose gravel. All existing buildings on the site will be demolished. Three new buildings will be erected on the site of the old buildings to provide a toilet/amenity block, a reception building and separate warden accommodation. The new buildings will be constructed of red brick with grey tiled roofs. It is proposed to improve the existing main access into the site by lowering a 15 metre section of stone wall to 600mm in height. The three remaining accesses will be closed off.

The proposal also incorporates external lighting around the site, including 36 no. 1.1 metre high 3W LED bollard lights, 5 no. low level lighting points at 1.1 metres high and 13 no. wall mounted lights. The application is submitted by the Caravan Club. The occupation of the site will be limited to members of the Caravan Club only, with a maximum stay of 21 days. It is proposed that all the pitches will be of a “non-awning type” to reduce visual impact.

The application is supported by the following reports:

- Site Search Report
- Statement of Community Involvement
- Planning Statement
- Transport Statement
- Design and Access Statement
- Ecological Impact Assessment
- Flood Risk Assessment and Flood Evacuation Plan
- Coal Mining Risk Assessment
- Landscape and Visual Impact Assessment

RELEVANT PLANNING HISTORY

15/04665/PREAPP In November 2015, a pre-application enquiry for a “Change of use to a small, touring caravan site” concluded that such a proposal could not be supported on green belt grounds. The applicants were advised that if they wished to pursue an application, then a strong case would need to be made on any ‘very special circumstances’.

In 2008, planning permission was granted for the construction of a sewage pumping station and new rising sewer main (08/03444/F).

RESPONSE TO PUBLICITY AND CONSULTATIONS

A Site Notice was displayed and notification letters sent to adjoining residents and amenity groups including the BS3 Planning Group and the Bower Ashton Residents Association.

Development Control Committee B – 9 November 2016**Application No. 16/03774/F: Police Dog And Horse Training Centre Clanage Road Bristol BS3 2JY**

The BS3 Planning Group comments: “We are broadly supportive of this application subject to there being adequate screening to stop any light pollution affecting nearby properties (could be achieved by a mix of low level lighting and screening) and assurances from highways that clear signage will alert drivers (particularly coming down from Leigh Woods) of the possibility that there may be large vehicles crossing the road ahead.”

OTHER COMMENTS

THE ENVIRONMENT AGENCY: “ We object to the application on flood risk grounds and recommend refusal of planning permission on this basis for the following reasons:

The site lies within Flood Zone 3a defined by the Planning Practice Guidance (PPG) to the National Planning Policy Framework as having a high probability of flooding where notwithstanding the mitigating measures proposed, the risk to life and/or property, from tidal inundation would be unacceptable if the development were to be allowed. We note the site is subject to flooding at the 1 in 200 year tidal event. The latest modelling information we have for this area (Central Area Flood Risk Assessment (CAFRA) 2011 model) shows defended and undefended flood depths of up to 1.5 metres AOD for the present day, and higher flood depths with climate change. As outlined above, the risk to life and property from tidal inundation would be unacceptable if the development were to be allowed. (Particularly due to the change of the existing use of the site from “less vulnerable” to “more vulnerable”)

Whilst the occupants of the site could be warned of a tidal overtopping event via our Flood Warning Service, we are unlikely to be able to provide sufficient warning time in the event of a breach. As a result, there may not be enough time to evacuate all occupants from the site. The Local Authority Emergency Planners should be consulted on the Flood Warning and Evacuation Plan for this development.

If you are minded to approve the application contrary to our objection, it is considered essential that you contact the Agency to discuss the implications prior to determination of the application.”

HISTORIC ENGLAND: “Thank you for notifying Historic England of the scheme for planning permission relating to the above site. Our specialist staff has considered the information received and we do not wish to offer any comments on this occasion. The application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.”

THE AVON GARDENS TRUST: “objects to this application due to its modest, unjustified harm to the nationally significant, Grade II* Registered Ashton Court Park and Garden.

The Avon Gardens Trust, formed in 1987, is part of The Gardens Trust which is the statutory consultee for proposals affecting sites in Historic England’s Register of Parks and Gardens of Special Historic Interest in England. One of its roles is to help safeguard the heritage of historic designed landscapes within the former County of Avon by advising local planning authorities on statutory and non-statutory parks, gardens and designed landscapes of importance.

Significance of the Ashton Court Park and Garden as a heritage asset

Ashton Court is “An C18/C19 park on an earlier deer park, laid out after designs by Humphry Repton, and formal gardens (late C19) around a former country house.” It has national significance as a heritage asset, being on the Register of Parks and Gardens of Special Historic Interest at Grade II*, Only 28% of registered sites have this high grading, making it “particularly important, of more than special interest” . It also is the setting of the Grade I listed Ashton Court house, which is “of exceptional interest, only 2.5% of listed buildings are Grade I”. (Historic England)

Development Control Committee B – 9 November 2016**Application No. 16/03774/F: Police Dog And Horse Training Centre Clanage Road Bristol BS3 2JY****Assessment**

The Police Training Centre is on the east side of Clanage Road, on the opposite side of which is the Ashton Court estate. The boundary of the estate and the registered park runs along Clanage Road and Rownham Hill. The applicants' Magic Map and Heritage Information is not correct in this respect and does not show the full extent of the registered park.

The setting of the Ashton Court park is largely characterised by open, green spaces. However, the unbuilt-on land to the east of Clanage Road is especially significant as it lies between the park and the city of Bristol, and provides open green space as the setting of the park and the foreground of public views of it on rising land behind. The Bower Ashton Conservation Area was designated to protect the setting of the park, and the land to the east of Clanage Road (the southern, unbuilt-on part of the Training Centre, and the sports ground and the allotments to the south) is included in the Conservation Area in order to protect its character and appearance as open green space.

It is proposed to use the Police Training Centre as a touring caravan site, involving the unbuilt-on southern part of it (currently a field and a ménage) being laid out with all-weather caravan pitches and a service road. The site would be used throughout the year, and would be likely to have a high occupancy due to its proximity to the city.

This proposal would change the southern unbuilt-on part of the Training Centre from open space to an intensive development of caravans (usually white in colour), their associated vehicles and hard surfaces. It would also be lit at night. Notwithstanding the proposed landscaping (which in any event relies on successful implementation), it is considered that this development would be visible in some short and long views of it, including from the slopes of the deer park on the opposite side of Clanage Road.

Consequently, the Trust asks that the application is refused because the proposal would cause modest harm, not justified by public benefit, to the Grade II* registered Ashton Court Park and Garden, and be contrary to policies in the National Planning Policy Framework, and the Council's policies BCS22 and DM31 for the protection of historic parks and gardens."

NETWORK RAIL: "Whilst there is no objection in principle to this proposal, we do have concerns that the proposals would affect the construction phase of MetroWest Phase 1 as a temporary construction compound is to be created on land to the south, currently occupied by Teddies Nursery. There will also be a temporary diversion of the footpath around the outside of the compound although we cannot as yet confirm a date when these works will commence.

The information available within the planning documents indicates that the development may be at risk from historic shallow mine workings for coal. Should further clarification of risks from mine working stability be required, either by means of ground investigation or mine working treatment, Network Rail's Asset Protection team should be informed prior to any such works and Network Rail's mining team will need to be consulted again on the proposals.

Network Rail has various structures in this location e.g. bridge, retaining wall, culvert etc. which will need to be considered and mitigated through Network Rail's asset protection process. No works are to be conducted until permission for works has been granted. Network Rail would also need to agree the boundary fencing provision and the proposed landscaping along the boundary.

Drainage

Additional or increased flows of surface water should not be discharged onto Network Rail land or into Network Rail's culvert or drains but into the public sewer. In the interest of the long-term stability of the railway, it is recommended that soakaways/ attenuation tanks run-off from the site must drain away from the railway boundary and must NOT drain in the direction of the railway as this could import a risk of flooding and / or pollution onto Network Rail land.

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Access to Railway

All roads, paths or ways providing access to any part of the railway undertaker's land shall be kept open at all times during and after the development.

Site Layout

It is recommended that all buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance work to be carried out without involving entry onto Network Rail's infrastructure. Where trees exist on Network Rail land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines.

Excavations/Earthworks

All excavations / earthworks carried out in the vicinity of Network Rail's property / structures must be designed and executed such that no interference with the integrity of that property / structure can occur. If temporary compounds are to be located adjacent to the operational railway, these should be included in a method statement for approval by Network Rail. Prior to commencement of works, full details of excavations and earthworks to be carried out near the railway undertaker's boundary fence should be submitted for approval of the Local Planning Authority acting in consultation with the railway undertaker and the works shall only be carried out in accordance with the approved details. Where development may affect the railway, consultation with the Asset Protection Engineer should be undertaken.

Signalling

The proposal must not interfere with or obscure any signals that may be in the area.

Landscaping

It is recommended no trees are planted closer than 1.5 times their mature height to the boundary fence. The developer should adhere to Network Rail's advice guide on acceptable tree/plant species. Any tree felling works where there is a risk of the trees or branches falling across the boundary fence will require railway supervision.

Safety Barrier

Where new roads, turning spaces or parking areas are to be situated adjacent to the railway; which is at or below the level of the development, suitable crash barriers or high kerbs should be provided to prevent vehicles accidentally driving or rolling onto the railway or damaging the lineside fencing."

BCC TRANSPORT DEVELOPMENT MANAGEMENT: "The proposed development site is currently vacant but was previously used by Avon and Somerset Police as its dog and horse training centre. The previous use generated a limited number of sporadic vehicle trips to and from the site.

TDM provided observations on a pre-application enquiry for a caravan touring club on the site (reference 15/04665/PREAPP) which recommended that any future planning application be refused on highway safety grounds.

None of the information submitted in support of the planning application appears to adequately address the previous highway safety concerns identified by TDM.

Local Conditions

The proposed development site is located on the east side of the A369 Clanage Road which is a busy, classified highway linking south Bristol and the M5 motorway and is subject to a 30mph speed limit. The road experiences congestion and a series of collisions have been recorded over time resulting in the implementation of a number of 'SLOW' carriageway markings and chevron highway signage on the bend to the north of the development site however, these are regularly damaged. The gradient of the southbound approach (1:14), the camber of the road and its general

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rural nature results in vehicles regularly exceeding the posted 30mph speed limit and this is confirmed by paragraph 3.6 of the submitted Transport Statement, prepared by Stilwell Partnership dated June 2016. An Automatic Traffic Counter was placed on Clanage Road in the vicinity of the site between 20th and 27th November 2015 and the recorded 85th percentile speeds were:

- Southbound – 35.91mph; and
- Northbound – 42.10mph

Paragraph 5.4 of the submitted Transport Statement advises that the following visibility can be achieved from the proposed access:

- 2.4m x 155m looking right out (leading direction); and
- 2.4m x 120m looking left (trailing direction)

However, due to the horizontal and vertical alignment of the A369 to the north of the proposed site access, it is unlikely that the 'y' distance visibility of 155m could actually be achieved; similarly existing vegetation and a low level wall to the south of the proposed access mean that it is unlikely that the 'y' distance visibility of 120m could actually be achieved.

Trip Generation

The submitted Transport Statement attempts to compare traffic generated by the previous use of the site and the proposed use however, it relies on historic traffic counts undertaken by the police force and traffic counts at a number of other Caravan Club sites undertaken in August 2004. TDM considers that neither datasets can be relied upon to produce a robust, reliable comparison.

TDM considers that the use of the site as a touring caravan site will increase the number of vehicular movements, contrary to the claim made in paragraph 6.11 of the submitted Transport Statement which states: *"The proposal site will significantly reduce traffic to and from the site."*

TDM considers that the proposed development will increase the number of large, slow-moving vehicles travelling to and from the site. The inability of these vehicles to exit the site from a standing start in adequate time in a gap in the traffic, together with the lack of visibility is likely to lead to an increase in the number of collisions which is considered to be detrimental to highway safety.

Despite the information contained within the submitted Transport Statement, TDM does not consider that the site is greatly accessible.

In view of this, the proposal is considered to be detrimental to highway safety and contrary to Policy BCS10 of the Core Strategy and Policy DM23 of the SADMP and TDM recommends that the proposal is refused."

BCC Transport Development Management (Further Comment) "To confirm that TDM has nothing to add to its original observations."

FLOOD RISK MANAGER: "We object to the proposed development due to lack of mitigation to reduce surface water flooding. The site is located within a high risk area from surface water flooding. Therefore, even with evacuation measures, the risk to life is too great. The site is also at extremely high risk from tidal and fluvial flooding, and feedback should be sought from the Environment Agency."

BCC LANDSCAPE OFFICER: "The site is located within the Green Belt flanking the railway line and Ashton Court Estate and its southern portion lies within the Bower Ashton Conservation Area. The boundary of the conservation area is not clearly evident though it is clearly some metres to the north of the southern red line boundary marked by the low scrub covered mounding separating the site from the adjacent sports field."

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With regard to its Green Belt status the designation is protected under NPPF Section 9 requiring land within Green Belts to be kept permanently open. Under Local Plan policy BCS6 open spaces within Green Belts are to be protected from inappropriate development as defined by NPPF. Advice provided by the case officer for a formal pre-application held that, with regard to the Green Belt, the development of the southern portion of the site for touring caravan was inappropriate development. Concern was also expressed regarding the impact of touring caravans on the character of the Conservation Area safeguarded by BCS22. The current submission includes a Landscape and Visual Impact Assessment accompanied by a detailed landscape layout proposal in support of a special circumstances application seeking to overturn the above landscape objections.

The landscape proposals set out in drawing CSA/2751/107 Rev B show a number of features that will improve the current perception of the site in near views, particularly along the Clanage Road frontage: - reduced building footprints set back from the road frontage, better organised layout generally, use of native trees and shrubs as a screen to the development, reduced lighting levels and noise pollution. Other near views, however, such as those afforded by the elevated pedestrian footbridge over the railway line and the public right of way beyond will be more adversely affected due to the lack of screening on the east boundary and the proximity of the caravan pitches to the route. Significantly at risk with regard these views is visual openness, as depicted in photographs 05 and 06, which is the chief quality of the greenbelt; the argument in support of the proposal suggests that touring caravans are unlikely to be present on all the plots all year round, but its proximity to the centre of Bristol brings this into question and anyway, isn't this assertion counter to the economic argument put forward as one of the special circumstances? This gives rise to a concern regarding the viewpoints included in the LVIA which takes a baseline plot occupancy of 50% for the purposes of the study in the summer months this is likely to be far higher resulting in higher visual effects.

Relating this discussion to the LVIA there is agreement on the conclusions of visual effect for a number of photographs provided; in general, distant views and those from Clanage Road looking both north and south, where in both cases the combined effects of distance and screening by existing or proposed vegetation reduce the magnitude of effect of the proposals. The views where there is disagreement are generally those on or close to the east boundary of the site, or elevated above it. Included in these are Photographs 8,12/13, 15, 16, discussed in turn below: -

- Photograph 8. Suggested increased rating for visual effect from moderate to high adverse. The impact of the presence of touring caravans will negate the open character of the southern section of the site and is harmful to the character of that part of the conservation area. Mitigation of these harmful effects by screening vegetation will enclose the footpath and restrict views, therefore itself having a negative effect on the user.

- Photographs 12/13. Suggested increased rating from slight/moderate to high adverse. In this instance the sensitivity of the site landscape is higher because it forms continuity with the green open space of the conservation area. The presence of touring caravans will eliminate this continuity and is again counter to the character of the conservation area, which is appreciable from this location despite detracting elements within the view. Removal of the tall conifer hedge and reduction of the overall built form in the northern part of the view will, it is acknowledged, confer landscape benefits.

- Photograph 15. Included here as no assessment was found in the applicants text. Slight to moderate adverse visual effect arising from likely middle distance views of the touring caravans. Loss of conifer hedge helpful.

- Photograph 16. Suggested increased rating of visual effect from slight adverse to slight to moderate adverse. Receptor sensitivity is higher from this viewpoint due to foreground greenspace context and the magnitude of effect arising from the presence of the touring caravans higher will low to moderate, particularly during those months where tree canopy is absent.

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In relation to the photomontages, while acknowledging that existing and proposed vegetation together with effects of distance and intervening landform will diminish the overall visual effect of the development from those locations and that the description in the text are broadly acceptable, there is a concern that the visual effect of the touring caravans will be increased by their brilliant white colour, which can catch the eye even at a distance, particularly in bright weather. This effect can be overlooked in the production of image, giving a reduced impression of likely impacts. In summary, the overall visual effects on the majority of the photographic images are found to be varying degrees of adverse, with two rating as highly adverse due to the effects on both the character of the conservation area and the Green Belt. For these reasons the proposals fail the requirements of appropriate development in the Green Belt under BCS6 and result in demonstrable harm to the character of the Bower Ashton Conservation Area, safeguarded by BCS22. The pre-application advice that the proposals represent inappropriate development is therefore confirmed and the proposals should be rejected on the grounds of visual impact.”

BCC LANDSCAPE OFFICER (Further Comments): “The applicant’s response to my comments doesn’t alter the conclusions reached in my assessment. Whilst I’m happy to acknowledge that the proposals have merit in relation to some aspects of the existing landscape – it would be disingenuous not to – none the less the impact on near views from publicly accessible routes and areas will harm the character of the conservation area and this consideration in my view outweighs any benefits, such as appearance within the site itself.”

BCC CONSERVATION OFFICER: “The southern part of the proposed caravan park will fall within the Bower Ashton Conservation Area and affect the settings of the Registered Historic Landscape around Ashton Court, the City Docks Conservation Area, Grade I Listed Clifton Suspension Bridge, and other Grade II and II* Listed assets overlooking the site from Clifton.

The north part of the Bower Ashton Conservation Area is characterised by the green and natural buffer between the city of Bristol and the rolling parkland of Ashton Court to the west. The proposed loss of open green space is not consistent with the preservation or enhancement of the special character Conservation area and cannot be supported.

The proposed caravan site will be highly visible from Clanage Road, from the public footpath skirting the site, and also visible from more distant perspectives including from the Cumberland Basin flyover. We consider that the visual intrusion into the landscape and Conservation Area would be significant and the development would fail to conform to planning policies aimed at preserving the Special Character or setting of the two adjacent Conservation Areas, or the setting of the Registered Historic Landscape surrounding Grade I Listed asset at Ashton Court.

Notwithstanding the existing development on the north side of the site there are significant views enjoyed from the public footpath around the site towards the Clifton Suspension Bridge and assets within the Clifton & Hotwells Conservation Area. The enjoyment of these views, and therefore the wider setting of those Listed assets, would be negatively impacted by the development of the site. The extensive hard surfacing, roads, ancillary structures, and caravans themselves will introduce a degree of development and visual clutter incongruous to the setting of the assets. The proposed landscaping around the site would not mitigate the impact of the development. We consider there to be an unjustified degree of harm posed by the proposals.

We do not consider that the degree of harm posed to multiple heritage assets and their setting is offset by any public benefit justification. We recommend the application for refusal.”

BCC CONSERVATION OFFICER (Further Comments): “There remains no assessment of the impact of proposals on the heritage assets and their setting, including the Suspension Bridge, Conservation Areas, and the Registered historic landscape. Notwithstanding this it continues to represent harm to those assets under NPPF and fails to conform to BCC policies designed to

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protect the city's heritage.”

BCC NATURE CONSERVATION OFFICER: “The southern part of this proposal forms part of a Wildlife Corridor Site, Bower Ashton Playing Fields and so ecological mitigation in accordance with policy DM 19 in the Local Plan is required. Policy DM 19 states in relation to Wildlife Corridors that: “Development which would have a harmful impact on the connectivity and function of sites in Wildlife Corridors will only be permitted where the loss in connectivity, or function, of an existing Wildlife Corridor is mitigated in line with the following hierarchy:

- a. Creation of a new wildlife corridor within the development site;
- b. Enhancement of an existing corridor or creation of a new corridor off-site to maintain the connectivity of the Bristol Wildlife Network.”

Furthermore in the explanatory text it states: “Development should integrate existing wildlife corridors. Where this is not practicable it should provide suitable mitigation in the form of on-site, functional Wildlife Corridor(s). Development should also provide mitigation for any habitats, species or features of value associated with the Wildlife Corridors, where they are harmed or lost. This should take place on the development site wherever possible.”

Trees and vegetation will be removed as part of this proposal. All species of wild birds, their eggs, nests and chicks are legally protected until the young have fledged. In accordance with the Ecological Impact Assessment dated May 2016, the following planning condition is recommended.

Condition: No clearance of vegetation or structures suitable for nesting birds, shall take place between 1st March and 30th September inclusive in any year without the prior written approval of the local planning authority. The authority will require evidence provided by a suitably qualified ecologist that no breeding birds would be adversely affected before giving any approval under this condition.

Reason: To ensure that wild birds, building or using their nests are protected.

This proposal includes lighting columns. The proposal is located in a key position between the River Avon, which is considered to be a key dark corridor for commuting bats and the Ashton Court Estate, which supports a significant maternity roost of lesser horseshoe bats. Lesser horseshoe bats are known to be sensitive to lux levels above 0.5 lux.

To be useful for ecological purposes, a lighting contour plan should be conditioned which extended outwards until incremental levels of zero lux result. This is also necessary take account of any possible impacts of lighting on the adjacent Ashton Court Estate Site of Special Scientific Interest which is located immediately to the west of the proposal. A lux level lighting contour plan and measures to minimise light spill are required as a planning condition.

Condition: Prior to commencement of development, details for any proposed external lighting shall be submitted and agreed in writing by the Local Planning Authority. This shall include a lux level contour plan, and should seek to ensure no light spill outside of the site boundaries. The lux contour plan should extend outwards to incremental levels of zero lux.

Guidance: According to paragraph 125 (page 29) of the National Planning Policy Framework (2012), By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

To conserve legally protected bats and other nocturnal wildlife.
 The proposed hours of operation of the lighting should also be clarified and secured by condition.

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In accordance with the Ecological Impact Assessment dated May 2016, the following planning condition is recommended.

Condition: Prior to commencement of development details shall be submitted providing the specification, orientation, height and location for built-in bird nesting and bat roosting opportunities. This shall include twelve built-in bird and eight built-in bat boxes.

If built-in bird and bat boxes cannot be provided within built structures, they should be provided on trees (with no more than one bird box per tree). Bird boxes should be installed to face between north and east to avoid direct sunlight and heavy rain. Bat boxes should face south, between south-east and south-west. Bird boxes should be erected out of the reach of predators and at least 3.5 metres high on publicly accessible sites. For small hole-nesting species bird boxes should be erected between two and four metres high. Bat boxes should be erected at a height of at least four metres, close to hedges, shrubs or tree-lines and avoid well-lit locations. Bat boxes which are being placed on buildings should be placed as close to the eaves as possible.

Reason: To help conserve legally protected bats and birds which include priority species. In accordance with Policy DM29 in the Local Plan, the provision of living (green/brown) roofs is recommended on the proposed reception and amenity buildings to provide habitat for wildlife. Policy DM29 states that proposals for new buildings will be expected to incorporate opportunities for green infrastructure such as green roofs, green walls and green decks.

Living roofs can be integrated with photovoltaic panels and also contribute towards SuDS. The following guidance applies. The roofs should be covered with local low-nutrient status aggregates (not topsoil) and no nutrients added. Ideally aggregates should be dominated by gravels with 10 - 20% of sands. On top of this there should be varying depths of sterilised sandy loam between 0 - 3 cm deep. An overall substrate depth of at least 10 cm of crushed demolition aggregate or pure crushed brick is desirable. The roofs should include areas of bare ground and not be entirely seeded (to allow wild plants to colonise) and not employ *Sedum* (stonecrop) because this has limited benefits for wildlife. To benefit certain invertebrates the roofs should include local substrates, stones, shingle and gravel with troughs and mounds, piles of pure sand 20-30 cm deep for solitary bees and wasps to nest in, small logs, coils of rope and log piles of dry dead wood to provide invertebrate niches (the use of egg-sized pebbles should be avoided because gulls and crows may pick the pebbles up and drop them). Deeper areas of substrate which are at least 20 cm deep are valuable to provide refuges for animals during dry spells. An area of wildflower meadow can also be seeded on the roof for pollinating insects (and in the case of this site the meadow could include native grass species to help provide potential foraging habitats for bats)."

BCC TREE OFFICER: "The report provided is a preliminary assessment of the trees on site (Section 1.6) and does not contain sufficient information.

For this application to progress we require further documentation:

- A tree protection plan to identify trees to be retained or removed.
- BTRS calculations for tree replacement on site.
- Calculation of financial contribution for trees that cannot be replaced on site.
- Arboricultural implications assessment and method statement for the protection of trees to be retained.
- A robust landscape plan containing tree locations, species, planting stock size (Minimum 12- 14cm Girth) & a maintenance schedule for watering and aftercare to ensure establishment of newly planted trees.

This information needs to be provided prior to consent due to the planning obligations for a financial contribution via unilateral undertaking for any trees not replaced on site."

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RELEVANT POLICIES

National Planning Policy Framework – March 2012

Bristol Core Strategy (Adopted June 2011)

BCS1	South Bristol
BCS6	Green Belt
BCS9	Green Infrastructure
BCS10	Transport and Access Improvements
BCS11	Infrastructure and Developer Contributions
BCS13	Climate Change
BCS14	Sustainable Energy
BCS15	Sustainable Design and Construction
BCS16	Flood Risk and Water Management
BCS20	Effective and Efficient Use of Land
BCS21	Quality Urban Design
BCS22	Conservation and the Historic Environment
BCS23	Pollution

Bristol Site Allocations and Development Management Policies

DM1	Presumption in favour of sustainable development
DM14	Health impacts of development
DM15	Green infrastructure provision
DM17	Development involving existing green infrastructure
DM19	Development and nature conservation
DM23	Transport development management
DM26	Local character and distinctiveness
DM27	Layout and form
DM28	Public realm
DM29	Design of new buildings
DM31	Heritage assets
DM32	Recycling and refuse provision in new development
DM33	Pollution control, air quality and water quality
DM35	Noise mitigation
DM37	Unstable land

Supplementary Planning Documents and Policy Advice Notes

Planning Obligations - Supplementary Planning Document - Adopted 27 Sept 2012
 PAN 2 Conservation Area Enhancement Statements (November 1993)

KEY ISSUES

(A) IMPACT ON THE GREEN BELT

As described above, the whole of the site lies within the Green Belt. Government policy within the National Planning Policy Framework (NPPF) and Bristol Core Strategy Policy BCS6 seek to protect Green Belts from inappropriate development. "Inappropriate development is, by definition, harmful to the Green Belt" (Para 87 NPPF). The construction of new buildings in the Green Belt is considered to be inappropriate development unless it meets one of six exceptions set out under Paragraph 89 of the NPPF:

- buildings for agriculture and forestry;

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- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*”

It is considered that the last criterion is the only one relevant to this particular case. As there are existing buildings on part of the site, officers consider that *that* part of the site may be described as previously developed land. However, the majority of the site is open and undeveloped, used for the grazing and exercising of horses. In coming to this conclusion, regard has been paid to the NPPF definition of previously developed land as “land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.”

Officers consider that the new buildings to be sited within the existing built up area of the site may be considered to constitute appropriate development. This is on the basis that the demolition of the existing buildings and replacement with 310 sq.m of new buildings will result in a reduction in the building footprint. The proposal will result in a net reduction of 478 sq.m of built floorspace in the existing built up area of the site. The new buildings will also be sited in the area of the existing buildings. Whilst the new toilet/amenity block will be approximately 2.4 metres higher than the buildings it replaces, it will be set further back from the road frontage behind a new boundary fence. Thereby the new built element on the existing built up area of the site will not have a materially greater impact on the openness of the Green Belt than the existing use.

However, the siting of caravans within the open part of the site is considered to constitute inappropriate development. It is acknowledged that the caravans will not be permanently pitched on the land but regard has been made to established case law that caravans are inappropriate development in the Green Belt. It is argued in the supporting Planning Statement that the caravans will not be a permanent feature of the site and that for most of the year, outside of the summer months, the southern part of the site will remain open. This disregards the fact that the site will be in use all year round, with members able to stay for a maximum of up to 21 days. Moreover, a majority of the pitches will be “all weather” and by their very nature, capable of being occupied throughout the year. Officers do not accept that the openness and visual appearance of the southern part of the site will be improved, as it is claimed.

It now needs to be considered whether there are any “very special circumstances” that would outweigh any harm to the Green Belt. The “very special circumstances” cited by the applicant are as follows and will be assessed within the Key Issues below:

- Overall reduction in built form on the site (see Key Issue A above)
- Improvements to local amenity (see Key Issue B)
- Improvement in visual impact of the site (see Key Issues A, B and C)
- Road Safety (see Key Issue C)
- Improvements to biodiversity and ecology (see Key Issue E)
- Regeneration of Brownfield Site at Baltic Wharf (see Key Issue F)
- Lack of suitable alternative sites (see Key Issue G)

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- Support for local tourism industry (see Key Issue H)
- Contribution to local economy (see Key Issue H)
- Creation of local employment (see Key Issue H)

(B) VISUAL/LANDSCAPE IMPACT ON THE SETTING OF THE ASHTON COURT ESTATE AND THE BOWER ASHTON CONSERVATION AREA

The southern part of the site lies within the Bower Ashton Conservation Area. Although the Conservation Area Appraisal carried out in 1993 is largely out of date, it describes this area as “Clanage Road bounded by dramatic pennant boundary walls encloses flat open ground to the east laid out as sports grounds or allotments”. The southern part of the site is visible from local views. Its open and undeveloped appearance contributes to the openness of this part of the Conservation Area and also to the setting of the adjoining Ashton Court Estate, a registered park and garden.

The Authority is required (under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990) to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. The case of *R (Forge Field Society) v Sevenoaks DC* [2014] EWHC 1895 (Admin) (Forge Field) has made it clear where there is harm to a listed building or a conservation area the decision maker "must give that harm considerable importance and weight. [48]. This is applicable here because there is harm to the Conservation Area as set out below.

Section 12 of the national guidance within the National Planning Policy Framework (NPPF) 2012 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with any harm or loss requiring clear and convincing justification. Paragraph 132 of the NPPF states that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Further, Paragraph 133 states that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

It is stated in the supporting Planning Statement that the proposal will result in a visual improvement to the appearance of the site, including the removal of the existing buildings and the manege area. It is also claimed that the previous occupier was not a good neighbour due to the use of a tannoy system and extensive floodlighting. Whilst this is noted, this does not overcome the principal objections to the development as summarised below.

The development will harm the designated heritage assets of the Conservation Area and the adjoining registered Park and Garden as set out in the Council's Landscape and Conservation comments. Objections have been raised on the grounds that the proposal will have an adverse effect on the landscape character, Conservation Area and openness of the Green Belt. This is particularly the case on the southern part of the site, from local viewpoints. In addition, the development will erode the openness and visual quality of this site which acts as a landscaped buffer to the city to the east. This view is backed up by the Avon Garden's Trust. The proposal will result in demonstrable harm to the character of the Bower Ashton Conservation Area and the setting of the Ashton Court Estate, both important heritage assets.

Accordingly, the proposal is considered to conflict with NPPF guidance and Policies BCS 22 and DM31 which seek to conserve and enhance heritage assets and their settings.

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(C) TRANSPORT AND ACCESS

The site is located on the busy A369 which links South Bristol with the M5 motorway. The route is heavily trafficked at peak times and data provided in the Transport Assessment confirms that the 30mph speed limit is regularly exceeded. In addition, the visibility of the existing main access is poor. The site is not particularly accessible to the city centre. There is a bus stop located about 400 m to the south which serves the city centre and Portishead four times an hour at peak times. A footpath to the east of the site goes over the railway line and beneath the Cumberland Way gyratory system, which may be perceived to be physical barriers to the city centre. Hotwells and Southville are located approximately 2 kilometres away with the city centre and Clifton further to the east and north.

TDM have objected on the grounds of highway safety as they do not accept that the proposal will result in a significant reduction in the traffic in and out of the site, as is claimed. The applicant has submitted a further transport statement and additional information in the form of TRICS data and an access/swept path analysis. However, TDM remain of the view that the use of the site for touring caravans will increase the number of large and slow moving traffic from the site. This will be to the detriment of highway safety and contrary to Policy DM23 and Paragraph 32 of the National Planning Policy Guidance.

(D) FLOOD RISK

The site is located within Flood Zone 3 which means that the site has a high probability of flooding. It is worth noting that caravans for holiday/short-let use are a 'more vulnerable use' under the flood risk use class vulnerability classification. Paragraphs 102 and 103 of the NPPF states that in order to pass the exceptions test, the following must be demonstrated:

- "it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."

When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and
- development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems."

Although a Flood Risk Assessment has been submitted, it does not adequately demonstrate that the site will be safe from flooding. The Environment Agency has objected on flood risk grounds as the risk to life in the event of tidal inundation would be unacceptable if the development were to be allowed.

The applicant has recently presented further information seeking to address the objections of both the Environment Agency and the Flood Risk Manager. A further update will be made at the committee meeting.

Development Control Committee B – 9 November 2016**Application No. 16/03774/F: Police Dog And Horse Training Centre Clanage Road Bristol BS3 2JY****(E) NATURE CONSERVATION AND TREES**

The southern part of the site lies within a Wildlife Corridor which is protected under Policy DM19. The Council's nature conservation officer does not raise an objection to the proposed development and has suggested a number of conditions to safeguard protected species such as birds and bats.

There are a number of trees and groups of trees on site. None are protected by a Tree Preservation Order but some are protected by virtue of being in a Conservation Area. An arboricultural survey identifies that these trees are of moderate or low quality. A total of 6 trees are to be lost as part of the development including a sycamore, horse chestnut, weeping willow and silver birch all described as being of poor quality. The application is supported by a landscape masterplan which indicates new tree and hedgerow planting. The tall leylandii hedge along part of the road frontage will be removed and replaced by a native hedgerow. A total of 26 new trees will be planted however; this is not considered sufficient to outweigh the visual harm that would be caused by the development to the openness of the Green Belt and the setting of the Conservation Area and Ashton Court Estate.

(F) REGENERATION OF THE BALTIC WHARF SITE

As part of the Council's wider objective to make budgetary savings, it is reviewing its corporate property portfolio. It is understood that the existing Caravan Club site at Baltic Wharf is under review. However, there are no firm planning proposals currently being considered for this site. At this stage, limited weight can be given to the regeneration of this site as a very special circumstance to justify the proposed development.

(G) LACK OF SUITABLE ALTERNATIVE SITES

The Caravan Club have carried out an extensive site search to identify an alternative site. They have a number of criteria (referenced from the Planning Statement):

In close proximity to the city centre (up to 5 miles from the city centre)

- Site area of between 5-7.5 acres allowing for 75-100 pitches respectively
- Site would need to be available immediately
- Reasonable chance for gaining planning permission for an all year site
- Reasonable level topography
- Existing mature boundary screen planting
- No sensitive ecology
- No flood risk or drainage issues
- Availability of mains services
- Easily accessible from motorway network
- Availability of local services and facilities, public open space and footpaths
- Proximity to public transport, cycle and footpaths
- Low ambient light and noise pollution
- Rectangular or square site shape

A detailed site search was carried out Jones Lang Lasalle on behalf of the Caravan Club and Property Services at Bristol City Council. A total of 59 sites within a 5 mile radius of Bristol were reviewed. In February 2015, a shortlist of 7 sites was drawn up, all within the Green Belt. The five sites in North Somerset were dismissed primarily because of negative pre-application responses from the Local Planning Authority on green belt grounds. The one site in Bath and North East Somerset could not be pursued as no agreement was reached on a lease. The current application site was chosen, notwithstanding similar green belt issues, due to its more favourable location closer to Bristol.

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Members will need to carefully consider the weight to be given to this argument against the clear harm caused to the openness of the Green Belt; the adverse impact on the setting of the Ashton Court Estate and Bower Ashton Conservation Area; adverse landscape impact, detrimental impact on highway safety and flood risk.

(H) CONTRIBUTION TO LOCAL ECONOMY/EMPLOYMENT AND TOURISM

In support of this application, it is stated that the proposal will contribute to the local economy by employing a warden couple; support existing jobs within the tourism/leisure industry and generate £1 million off site spending into the city each year. It is claimed that this local spending would be lost if the Caravan Club is forced to locate outside of Bristol. However, this is a matter of debate. Notwithstanding the lack of apparent alternative sites, if the applicant were to relocate to alternative sites within North Somerset/South Gloucestershire on the fringes of Bristol, the city would still be a major draw for tourists.

CONCLUSION

The proposed development would detract from the openness of the Green Belt and, in the absence of very special circumstances, would constitute inappropriate development. The proposal would also fail to preserve or enhance the Bower Ashton Conservation Area and the setting of the Ashton Court Estate, a registered historic park and garden. Furthermore, the development would be at risk from both tidal and surface water flooding. Finally, the proposed use would be detrimental to highway safety.

RECOMMENDED: REFUSE

The following reason(s) for refusal are associated with this decision:

1. The proposed development will detract from the openness of the Bristol Green Belt and, in the absence of very special circumstances, constitutes inappropriate development in the Green Belt. The proposal conflicts with Bristol Core Strategy Policy BCS 6 (adopted June 2011) and Paragraphs 87-89 of the National Planning Policy Guidance (March 2012).
2. The proposed development would fail to preserve or enhance heritage assets, namely the Bower Ashton Conservation Area and the Ashton Court Estate, a Registered Historic Park and Garden, and its setting. The proposal would conflict with Bristol Core Strategy Policy BCS 22 (adopted June 2011) and Policy DM 31 of the Site Allocations and Development Management Policies (adopted July 2014).
3. The application fails to demonstrate that the proposed development will be safe from flooding or that it will not adversely increase flood risk elsewhere. It would therefore conflict with Policy BCS 16 of the Bristol Core Strategy adopted in 2011.
4. The proposal is contrary to Policy DM23 of the Bristol Local Plan Site Allocations and Development Management Policies (adopted July 2014) and Paragraph 32 of the National Planning Policy Guidance (March 2012) since the proposed means of access with its restricted visibility is considered unsuitable to serve the increase in traffic that would be associated with the proposed development. It would result in the scheme being prejudicial to highway safety.

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BACKGROUND PAPERS

Conservation Section	28 September 2016
Flood Risk Manager	4 October 2016
Bristol Neighbourhood Planning Network	6 September 2016
Environment Agency (Sustainable Places)	19 September 2016
Historic England	26 September 2016
Network Rail	13 October 2016
Landscape	21 September 2016