

Development Control Committee B Wednesday, 9th November 2016

Supporting Documents

- 1. 11-13 Queen Road
- 2. Police Dog & Horse Training Centre Clanage Road
- 3. 112 Coombe Lane

Supporting Documents

1. 11-13 Queens Road

- Supporting Planning Statement Site Location plan Existing plan 1.
- 2.
- 3.
- Proposed general layout plan 4.

June 2016

Supporting Planning Statement

Planning application for the change of use to allow a coffee shop (mixed A1/A3 use)

11-13 Queens Road, Bristol BS8 1QE

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1. Introduction

1.1. Introduction

- 1.1.1. This statement sets out the justification for the planning application for the change of use of a retail unit under temporary lease to an A1 user for a mixed A1/A3 coffee shop, to allow occupation by Costa Coffee.
- 1.1.2. This statement deals solely with the change of use of the floor space shown on the accompanying plans, including the use of the pavement for outdoor seating. Separate applications will be made for signage alterations and there is no requirement to make any changes to the shopfront.
- 1.1.3. The statement sets out the background to Costa Coffee, its profile and its operation. It also examines the key issues with regard to locating the premises within this frontage and considers in detail the use class of the operation in the context of the National Planning Practice Guidance (NPPG) and the, now replaced, Circular 03/2005: 'Changes of Use of Buildings and Land' (March 2005).
- 1.1.4. The statement examines the relevant planning policies and the material considerations in support of the proposed change of use.
- 1.1.5. The main conclusion from the analysis is that the proposals are considered compliant with the various development plan documents and in line with the positive approach set out within the NPPF.

Important Background

- 1.1.6. The application is submitted in parallel to an appeal against the refusal of planning permission in September 2015 for the change of the use of the unit from A1 to A3.
- 1.1.7. The appeal (reference APP/Z0116/W/15/3141401) has recently been given a new start date as the method of appeal has changed from written representations to a hearing.
- 1.1.8. This application has been submitted following an agreement to lease the premises between the landlords and Costa Ltd, subject to obtaining planning approval.
- 1.1.9. Whilst the refusal of A3 use and the ongoing appeal provide important context to this application, it is important to take into account that since the refusal, there have been two significant and material changes which can allow the Authority to support this planning application. These are explored in full throughout the remainder of this statement but in summary, the significant changes are:
 - That the application is for a mixed A1 / A3 coffee shop and not a purely A3 restaurant use. This is a significant material consideration within the context of how the use will compliment the surrounding uses and have a positive impact upon the primary shopping frontage and footfall patterns.





- An appeal has been allowed at 87 / 89 Park Street for a change of use from Class A1 to Class A3. The Inspector's decision provides some very pertinent interpretation of key policy BCAP13, whereby if the same logic is applied to this proposal, it can be considered fully compliant.
- 1.1.10. It is also highly material that the purpose of this application is to allow a relocation of the existing Costa use which trades from Unit 4, 70-78 Queens Road. A successful application will create a vacant unit at 70-78 Queens Road, which would then be put to the market.
- 1.1.11. Furthermore, two highly significant appeals were allowed in favour of Costa Coffee uses within Bristol City Council in 2012. The Inspector found specific merit in the coffee shops, which is material in this case given the occupier and the specific use applied for.
- 1.1.12. It is hoped that the application can be dealt with in advance of a hearing taking place in relation to the parallel appeal. However, the evidence submitted by the landlord's consultants in support of their A3 proposals will be referred to throughout this statement given that it is highly relevant and supportive of the case for an approval.

Summary of Material Considerations

- 1.1.13. This statement identifies that there are a number of key material considerations in favour of the proposed change of use, including:
 - The use is a quasi retail use given the mixed A1/A3 description and the contribution that off site sales of sandwiches and drinks make in terms of Class A1 sales;
 - The premises are currently occupied by charity on a temporary lease. Occupation by Costa will represent a significant investment in the building and provide stability of tenure to improve vitality and viability of the frontage;
 - The proposals are materially different to the application for a change of use refused previously on the site;
 - Evidence provided indicates that the Costa Coffee outlet will generate high levels of footfall, commensurate and purely Class A1 uses; and
 - A large number of appeal decisions have recognised the benefits of locating A1/A3 coffee shops within prime retail frontages and in particular, several decisions since the publication of the National Planning policy Framework (NPPF) (March 2012) have supported coffee shop uses in prime retail frontages where policies seeking to prevent loss of A1 use have been considered out of date.
 - The most recent appeal within the same Primary Shopping Frontage (87 Park Street) provides a clear steer that this application should also be approved.
- 1.1.14. There is a presumption in favour of sustainable forms of development set out within the NPPF (March 2012) and supporting NPPG (March 2014).

This statement sets out the reasoning behind why the application can be supported and approved.





2. Site Description

2.1. Site Description

- 2.1.1. This application relates to the ground floor of 11-13 Queen's Road, Bristol and a small area proposed for external seating adjacent to the shop frontage.
- 2.1.2. Whilst currently occupied by a charity shop, this lease is temporary and no permanent occupier has been found since Kathmandu vacated the premises in April 2016.
- 2.1.3. The lawful use of the application premises is Class A1.
- 2.1.4. Queens Road is made up of a mix of Class A1-A5 commercial uses, whilst the northern side of Queens Road, directly opposite the site, is dominated University and civic buildings.
- 2.1.5. The building is not listed but lies within the Park Street and Brandon Hill Conservation Area.



3. Planning History

3.1. Planning History

3.1.1. Planning history relating to the site itself and other changes of use within the primary shopping frontage is considered relevant.

Site Specific History

- 3.1.2. A planning history search shows that, as well as a number of applications relating to signage and shopfront alterations, the site is currently subject to a planning appeal (Ref APP/Z0116/W/15/3141401) against the refusal of planning permission in September 2015 (Ref 15/02738/F) for the change of the use of the Unit from A1 to A3.
- 3.1.3. The committee report highlighted two reasons for refusal centring upon a lack of information about the proposed extraction flues and the impact this would have on amenity, and the harmful impact an A3 use would have on the Queens Road Primary Shopping Frontage. Initially set to be determined through the written representations process, the appeal procedure has been changed and the appeal is to be dealt with through the informal hearing process. The appeal is still ongoing. The significance of this decision/evidence submitted on the appeal is discussed in the following sections.

History within the PSF

- 3.1.4. Whilst not relating specifically to coffee shops, a number of applications resulting in the loss of A1 uses have been approved within the Primary Shopping Frontage. A site by site analysis is set out below:
 - 67-69 Queens Road- Bill's obtained permission for the change of use from A1 to A1/A3 (12/03122/F). Whilst permission was sought for the A1/A3 use, the report highlights how the proposed use was judged as A3. Significantly, the officer's report recognised that in that case the frontage fragmentation would be minimal and not harmful to the centre's attractiveness.
 - 72-74 Queens Road- CAU obtained permission for the change of use from A1 to A3 (12/04702/F). In this case, the officer suggested that a restaurant would likely generate greater footfall than the specialist clothing shop that occupied the unit at the time.
 - 78 Queens Road- Wahaca gained planning permission for the change of use from A1 to A3 (14/05069/F). Significantly, the committee report concluded that, despite the change of use lowering the percentage of A1 uses in the immediate frontage to 57%, the predominant use of the frontage was A1 and this would be acceptable.
 - 83 Park Street- Permission granted for the change of use from A1 to A3 (15/02216/F). The officer considered that, despite the application site being between and A1 and A3 use, the site's size and location within a frontage where the A1 Use Class would still be predominant, meant the change of use would not cause a significant break to the frontage and was therefore acceptable.





3.1.5. Significantly, officers have continually expressed the opinion that a frontage can be considered healthy if the percentage of A1 units in the particular frontage is greater than 50% and that a loss of an A1 unit is not necessarily harmful for viability and vitality.

Appeals

- 3.1.6. As well as a number of applications that have been granted for the change of use from A1 to A3 within the designated frontage, a number of appeals are of note. Details of these are set out below.
- 3.1.7. At 62 Queens Road an appeal was allowed for the change of use from A1 to A3. The Inspector gave significant weight to the fact that the Unit was adjacent to two A1 units and the frontage was bolstered by two large A1 retailers. The Inspector also considered the frontage and the centre as a whole to be healthy as A1 remained the predominant use.
- 3.1.8. Perhaps most significant in this case is the decision at 87-89 Park Street where an appeal was recently allowed for the change of use from A1 to A3. The Inspector's decision letter (Appendix 1) makes the point that a significant break is not prescribed or quantified in Policy BCAP 13 but left to the decision makers perception. At paragraph 8 the Inspector stated that a mathematical assessment of the frontage is not, in itself, of significance because of other factors contribute to the potential perception of change to the retail function of the PSA.
- 3.1.9. The fact that the outward appearance of the unit would not change was deemed significant in maintaining the character of the frontage. The adjacent uses, whilst being in A3 use, were considered to have a retail function alongside their Class A3 uses as customers for each use can walk in off the street to make purchases. The Inspector found that there was otherwise a strong retail function in the remainder of the terrace and in the wider area, and took into account the terrace on the opposite side the road. In this context, the Inspector concluded that if the appeals were to be allowed and implemented, the walk past the four properties (in non-A1 use), which would take no more than a few seconds, the perception would not be of any cumulative harm to the retail function of the PSF.
- 3.1.10. Additionally, two appeals relating to Costa franchises have been allowed in recent years. Details of these are set out below (see Appendix 2 for decisions):
 - 123-125 Whiteladies Road- Appeal allowed against enforcement relating to the unlawful use of a unit for A1/A3 purposes. The Inspector concluded that the coffee shop use contributed to footfall in the area and that a loss of a newsagent would not be harmful for viability. Significantly, the Inspector also identified there to be a number of nearby vacant units within the Primary Shopping Frontage that an occupier could not be found for.
 - 14 Gloucester Road- Appeal allowed for the change of use from A2 to A1/A3. The Inspector concluded that a mixed A1/A3 scheme to be occupied by Costa introduced a significant enough element of A1 retail activity to strengthen the retail frontage of the Primary Shopping Area and the town centre as a whole. Weight was given to the Allegra Strategies report which highlighted the benefits that coffee shops can bring to high streets.





- 3.1.11. Both of these appeals for Costa were judged in the context of Saved Policy S5 of the Bristol Local Plan, a document that has now been superseded by Policy DM8 of the Site Allocations and Development Management Policies Plan and Policy BCAP 16 of the Bristol Central Action Plan.
- 3.1.12. Whilst the policy framework has changed, the aims of the policies are largely the same in seeking to ensure that changes of use in Primary Retail Frontages resulting in the loss of an A1 unit do not undermine a centre's retail function. Further to these appeal decisions, a number of other appeal decisions from other Authorities are summarised at appendix 3 which re-enforce the benefits of locating coffee shop within primary frontages (full copies of the decisions are available on request).

Summary

- 3.1.13. From the review above it is evident that the authority and inspectors have taken a flexible approach towards proposals to introduce non-A1 uses into the Queens Road/Park Street PSF.
- 3.1.14. The key issues in the consideration of the cases above has been the need to retain a predominantly A1 use within the PSF (i.e. more than 50%), the impact that the proposed use might have upon footfall and a focus upon the break in frontage that might be created, although taking into account the reasoning of the Inspector in the 87 Park Street case it is evident that a break in A1 use is not necessarily harmful.
- 3.1.15. The recent refusal relating to the application site was for a materially different proposal, and this latest proposal can be considered on its merits and in the light of the reasoning of the most recent appeal decision.





4. The Proposals

4.1. The Proposals

- 4.1.1. This planning application is for the change of use of 11-13 Queens Road. The change of use is to allow a mixed A1/A3 coffee shop, with a small area of outdoor seating on the pavement. Costa already trade out of Unit 4, 70-78 Queens Road and would relocate from this unit if planning permission were granted.
- 4.1.2. The intended occupier, Costa Coffee, would sell hot and cold drinks for consumption on and off the premises, along with sandwiches, other cold food and confectionary.
- 4.1.3. The operation does not include any hot food production for either eat in or takeaway. A small element of sales consists of Panini or toasted sandwiches. This does not require any kitchen facilities or specialist extraction facilities.
- 4.1.4. A layout plan is enclosed with the application, indicating the proposed layout of the unit. The servery will be located along the left hand wall stretching away from the shop entrance, with the sales area and displays clearly visible from the outside. In addition 27 no. tables and 81 chairs will be provided across the ground floor. An external seating area either side of the entrance will prove 5 no. tables and 10 no. chairs. Customer toilets including a unisex Disability Discrimination Act 1995 (DDA) compliant toilet are provided towards the rear of the unit and within the basement. Furthermore, the 'back of house area', which provides for storage, washing up and staff facilities are to be provided within the basement. The concept of the mixed A1/A3 use is explained in detail in the following sections of this statement.

4.2. Costa Coffee Profile

- 4.2.1. Costa Coffee was founded in 1971 by Italian brothers Sergio and Bruno Costa as a wholesale operation supplying roasted coffee to caterers and specialist Italian coffee shops. The company was acquired by, and is now a subsidiary of, the Whitbread Company. This happened in 1995. Costa Coffee outlets provide a high quality product served by specially trained staff in a welcoming environment.
- 4.2.2. Typically, Costa Coffee shops trade as Class A1 retail uses on the basis that the stores primarily serve hot and cold drinks and cold food for takeaway. Where levels of seating and levels of eating sale take up a significant proportion of the use then it has been established that a mixed A1/A3 use takes place.
- 4.2.3. Costa Coffee shops do not sell any hot food for either eat in or takeaway purposes. The only warm food which is sold on the premises is Panini, but this typically will comprise only a small percentage of all sales.
- 4.2.4. The preparation of the Panini does not require a separate kitchen for preparation or any extractor equipment to discharge odour and fumes. It is simply warmed on a griddle behind the main servery.





4.2.5. A further contribution to the Class A1 element of the use is the sale of merchandise within the premises which assists in providing an A1 presence, therefore contributing to the vitality and viability of shopping frontages.

4.3. Opening Hours

4.3.1. The proposed opening hours of the premises are between 06:30am and 08:00pm.





5. Use Class Issues

5.1. Introduction

5.1.1. The use class of sandwich shops and coffee shops has been considered in a number of appeal decisions. The principal consideration is the Use Classes Order 1987 (as amended in April 2005). This defines the uses which fall within Class A1 and A3. The order defines Class A1 uses as follows:

"Class A1 Shop

Use for all or any of the following purposes:

- a. For the retail sale of goods other than hot foods
- b. The sale of sandwiches or other cold food for consumption off the premises
- c. For the display of goods for sale"

NB. Only relevant parts of the Class A1 use to the coffee shop type use are highlighted.

5.1.2. Class A3 is defined as:

"Use for the sale of food and drink for consumption on the premises"

5.1.3. Circular 03/2005: 'Changes of Use of Buildings and Land' (March 2005) was replaced in March 2014 following the publication of the National Planning Practice Guidance (NPPG), an online resource which has replaced a considerable amount of guidance documents. Although replaced, Circular 03/2005 provided some useful commentary on the changes of use of buildings which has not been carried forward into the NPPG. The earlier commentary and reference made within Circular 03/2005 with regard to sandwich bars and coffee shops remains useful, and is given below:

Sandwich bars

34. As indicated above in paragraph 12, in considering where individual uses fall, it is the primary purpose that should be considered. A sandwich bar does not necessarily cease to be in the shops class merely because, for example, it also sells a limited amount of hot drinks, hot soup or food that is heated up. Similarly, it is possible for a few sandwich bar customers to eat on the premises, including at tables within or outside their establishments (e.g. on the forecourt) without involving a material change of use. Provided that this is only an ancillary part of their business, the classification of the business as a sandwich bar would rightly remain in the A1: Shops use class where the retail sales element is the primary purpose.





Coffee Shops

- 36. Coffee shops will need to be considered on a case by case basis. Whether their primary purpose is as a shop, i.e. premises for the sale of beverages to be taken away, or as a café, where the primary purpose is consumption of beverages on the premises, or indeed whether it is a mix of both uses.
- 5.1.4. As Costa Coffee retail outlets do not sell any hot food (other than Panini) and a significant proportion of the sales of sandwiches, confectionary and drinks are typically for takeaway purposes, there is a significant element of the use which would ordinarily fall within Class A1 (i.e. under the A1 definition of Sandwich Shops provided in Circular 03/2005).
- 5.1.5. Costa Coffee stores also have an element of seating whereby customers can consume food and drink on the premises. This adds an element of Class A3 use.
- 5.1.6. The now replaced Circular 03/2005 offered the following guidance on determining which use classes any particular use falls within. At paragraph 12 the Circular stated that each case will be a matter for individual determination by fact and degree. It states that the first thing to consider in determining whether a material change of use has occurred is the existing primary use of the land. It states that:
 - 12. The Courts have held that the first thing to consider in determining whether a material change of use has occurred (or will occur) is the existing primary use of the land. Each case will always be a matter for individual determination by fact and degree. In particular, local planning authorities will need to take into consideration more than just the amount of floor space occupied by the different uses. For example, in the case of premises which incorporates restaurant use as well as pub or bar use, the local planning authority will need to determine whether the existing primary use of the premises is as a restaurant (A3), or as a drinking establishment (A4), or a mixed use. This will depend on such matters as whether customers come primarily to eat, or drink, or both. It is the main purpose of that use that is to be considered.
- 5.1.7. Consequently, in determining whether the Costa Coffee use falls within either Class A1 or A3, or is in fact a mixed use, will be determined by a proportion of different uses which make up the whole.
- 5.1.8. A number of appeal decisions have considered the primary uses of the coffee shop.
- 5.1.9. The appeals have established that primary uses of coffee shops are influenced by a number of factors, principally:
 - The proportion of takeaway food/drink sales from the premises compared with eat in/drink in sales; and
 - The proportion of floor space taken up by customer seating areas.
- 5.1.10. A number of other appeal decisions in relation to coffee shop uses concluded that even though significant elements of food and drink were sold for consumption on the premises, they would remain in Class A1 use.
- 5.1.11. More recent decisions relating to Starbucks Coffee and Coffee Republic in Bath and in relation to Caffé Nero at Winchester determine that where the proportion of eat in/takeaway





- sale is more balanced or even where eat in sales could constitute up to 80% of total sales, a mixed A1/A3 use occurs.
- 5.1.12. The A1/A3 description of the coffee shop use has since been established in a number of other appeal decisions relating to Caffé Nero, Starbucks and indeed Costa Coffee (discussed in Appendix 3).
- 5.1.13. It is significant to note that the A1 element of the use has been retained within the description of the major branded outlets and has been supported through a number of appeal decisions. This is a strong material consideration when assessing the impact that Costa Coffee shops (i.e. mixed A1/A3 uses) has on retail vitality and viability.
- 5.1.14. The conclusion is reached that the most appropriate categorisation of the use is as a mixed A1/A3 coffee shop. This has been accepted by Bristol City Council on numerous units across the city and endorsed through the appeals relating to the Costa franchises on Whiteladies Road and Gloucester Road.





Planning Policy Assessment and Material Considerations

6.1. Introduction

6.1.1. This section assesses the key planning policy tests and material considerations in favour of the proposals.

6.2. National Planning Policy

- 6.2.1. The National Planning Policy Framework (NPPF) (March 2012) which is supported by National Planning Practice Guidance (NPPG) (March 2014) replaced Planning Policy Statement 4: Planning for Sustainable Economic Growth (December 2009). The guidance to ensure the vitality of town centres is found between paragraphs 23 and 27. The relevant guidance to this proposal to Local Planning Authorities (LPAs) is as follows:
 - They should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
 - Define a network and hierarchy of centres that is resilient to anticipated future economic changes;
 - Define the extent to town centres and primary shopping areas and set policies that make clear which uses will be permitted in such locations;
 - Promote competitive town centres and provide customer choice and a diverse retail offer which will reflect the individuality of town centres; and
 - Where town centres are in decline, LPAs should plan positively for their future to encourage economic activity.
- 6.2.2. More general policy guidance within the document states that there is a presumption in favour of sustainable development, which should be seen as a golden thread running through both planning making and decision taking. For decision taking, this means approving development proposals that accord with the development plan without delay.
- 6.2.3. Furthermore, the core planning principle is that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.
- 6.2.4. The introduction of a vibrant cafe use would only assist in improving the diversity and vitality of the frontage in which the application site is located. The proposed use will also promote the competitive town centre, providing additional customer choice and a diversified retail offer. Further discussions below in relation to the Allegra Research indicate that the introduction of coffee shops can improve the community role of town and district centre and support viability and vitality.





6.3. Development Plan Policies

- 6.3.1. Bristol City Council's planning policy context is formed by the Core Strategy (June 2011), the Site Allocations and Development Management Policies (July 2014) and the Bristol Central Area Plan (BCAP) (March 2015). Given the sites location within the area covered by the BCAP, the Development Management Policies are secondary to those set out in the BCAP. Key policies relevant to this application are discussed below.
- 6.3.2. Highly relevant to the Development Plan Policy assessment is the application for A3 use across ground flood and basement which was refused on the 17th September 2015. The decision notice contains 2 reasons for refusal. The second refers to insufficient details in relation to extract flues. The proposed coffee shop use does not require any kitchen extracts, only a requirement for standard air conditioning units on a similar scale with the existing A1 use.
- 6.3.3. The external cassettes may need replacement but this is a matter that can be dealt with my condition if necessary. The lack of requirement for extract flues means that the proposal would not have any potential to cause harm to the amenity of occupiers of the flats above.
- 6.3.4. In this case the most relevant reason for refusal stated that:

The proposal would harmfully fragment this part of the primary shopping frontage resulting in a significant break, detrimental to its perception, function and retail presence. Therefore, the proposal would be contrary to Policy BCS7 of the Bristol Local Plan – Core Strategy (June 2011), and Policies BCAP13, BCAP16 and BCAP42 of the Bristol Local Plan – Bristol Central Area Plan (March 2015).

- 6.3.5. The key concern therefore appears to be the break in frontage that a change of use might bring about and the harm that this might cause to perception and function of the retail frontage.
- 6.3.6. Policy BCS 7 states that:

Uses which contribute to maintaining the vitality, viability and diversity of centres will be encouraged. Active ground floor uses will be maintained and enhanced throughout the centres...... Retail shop uses will predominate in the designated primary shopping areas of the City and Town Centres, supported by a wider range of appropriate uses in the other parts of these centres.

6.3.7. The proposed use is evidently an active ground floor use and the complimentary nature of the Coffee Shop use to vitality and viability is considered in further detail below. In terms of the impact of the change of use on the predominance of retail uses within the Primary Shopping Area as a whole, this does not appear to be of concern to the LPA. This is evidenced by the Statement of Case (SOC) issued by the LPA in relation to the ongoing appeal. Para 6.1 of the SOC states:

...Nevertheless, we agree that the proposal would not have an unacceptable impact on the level of retail within the PSA and city centre overall, as outlined within our delegated report





- 6.3.8. Our own assessment concurs with this stance, as does the stance of the Inspector in the 87 Queens Road case. A review of all uses within the Queens Road/Park Street PSF indicates that there are a total of 131 units, of which 84.5 are in A1 use or have a lawful A1 use. Following the change of use proposed (and taking into account the change of use of 87 Park St to A3) this would leave 64% across the PSF. A1 uses would clearly dominate across the PSF as required by BCS7.
- 6.3.9. BCAP13 sets out requirement to maintain a retail focus in the primary shopping area at Park Street / Queens Road. Supporting text to the Policy states that Park Street and Queens Road contain a high proportion of retail shops supported by significant numbers of uses such as cafes, and that this is particularly so at Park Street and Queens Road where there is acknowledged leisure and evening economy role.
- 6.3.10. BCAP 13 sets out a similar requirement to BCS 7 to maintain a predominantly retail role, or focus in that case. Compliance with BCS 7 also indicates compliance with BCAP 13.
- 6.3.11. Policy BCAP16 is considered in greater detail below as it is considered to be the most relevant of the policies. The key tests set out for a change of use are:
 - i. The proposed use would make a positive contribution to the vitality and viability of the Primary Shopping Frontage and the city centre as a whole; and
 - ii. The proposed use would not dominate or fragment the Primary Shopping Frontage as a result of its scale, by creating a significant break in the retail frontage or by resulting in a harmful loss of retail floorspace; and
 - iii. The proposed use would be compatible with a retail area in that it includes a shop front with a display function and would be immediately accessible to the public from the street.
- 6.3.12. Each of the criteria can be considered in turn.
 - 'i. The proposed use would make a positive contribution to the vitality and viability of the Primary Shopping Frontage and the city centre as a whole;'
- 6.3.13. Appendix 3 summarises a wide range of appeal decisions relating to coffee shops where inspectors have consistently concluded that they are fully compatible with primary frontages.
- 6.3.14. The appeal case history relating to branded coffee shops has identified that there are recognised material considerations in favour of allowing such uses within retail frontages. These include:
 - Branded coffee shops generate high levels of patronage, commensurate with other A1 uses that are typically located within primary frontages (more on this below);
 - They have become an established user, which typically locate within prime frontages;
 - They are attractors in their own right; and
 - The A1 element of the use is beneficial to retail vitality and viability.





- 6.3.15. Enclosed at Appendix 4 are extracts from a research document published by Allegra Strategies. This research reinforces the views expressed by the numerous Inspectors discussed above and within Appendix 3.
- 6.3.16. This research highlights a number of benefits in Coffee Shop uses in terms of their positive social impact and sets out a number of case studies whereby customer experiences are positive in primary locations.
- 6.3.17. The initial Allegra Strategies Report has now been updated (July 2014) it shows that British high streets are enjoying significant economic and social benefits brought by the rise of branded and independent coffee shops. The report draws on research with over 2,000 consumers and local businesses. The Role of Coffee Shops on the High Street 2014 report demonstrates that the presence of coffee shops typically boost local high street economies by 2 to 4% through a combination of increased footfall and dwell time. Footfall studies show that branded coffee shops can increase high street footfall by up to 28%. 52% of consumers interviewed for the study are more likely to shop for longer when there are coffee shops nearby.

6.3.18. Key findings of the 2014 report:

- Coffee shops have a highly positive impact on local businesses: 58% of local businesses interviewed indicated that coffee shops attract more people to their business, an increase on 38% in 2010. 43% of local businesses were positive about the contribution of coffee shops to their individual trading;
- Coffee shops create a valuable regenerative effect: 85% of local businesses interviewed agreed that coffee shops improve the viability of the local area, an increase on 76% in 2010;
- Coffee shops play a significant role in driving high street visits: 58% of consumers surveyed had planned to visit coffee shops as part of their trip to the high street.
 Furthermore, 18% of consumers visited the high street primarily to go to the coffee shop;
- Coffee shops are fundamental to the wellbeing of British high streets: 95% of consumers interviewed feel that coffee shops improve the vitality of the local area; and
- Coffee shops produce neighbourhood hubs and foster a strong sense of local community: 85% of consumers state that coffee shops have a valuable role in the local community, an increase from 77% in 2010.
- 6.3.19. The report concludes that over the new few years, coffee shops will take an expanded role in local communities and the evening economy. Branded coffee shops and artisan independents will make further efforts to strengthen links with communities with more authentic and locally relevant store designs. The report predicts more widespread partnerships between coffee shops and retail and leisure operators, which will make valuable use of both existing and vacant high street space.
- 6.3.20. Jeffrey Young, managing director, Allegra Strategies, said:

"The report illustrates that coffee shops are helping high streets to evolve away from





over-reliance on outdated retail models to embrace the demands of a more experience-led British consumer. Coffee shops offer much more than just refreshment, providing a space for community events and mobile working, while boosting local employment opportunities."

6.3.21. Jason Cotta, managing director, Costa Retail UK and committee member of the Future High Streets Forum, added:

"Coffee shops have effectively become more than just a place to enjoy a hot drink. They play an integral role in terms of the socio and economic development of the high street; from employment opportunities to providing friendly community meeting hubs. As a panel member of the Future High Streets Forum, we have been working closely with local councils to revive and develop their high streets. I welcome the findings of this report which reinforces the role of coffee shops in driving footfall to the high street, as well as helping to improve the viability of the area."

- 6.3.22. The key findings of the original report are set out in the Executive Summary pages 8 to 10 of Appendix 4.
- 6.3.23. It is therefore evident that Coffee Shops perform a vital role within modern day shopping frontages and should therefore be considered as entirely appropriate for locating within primary areas.
- 6.3.24. Of particular interest is the research which shows that Coffee Shops attract consumers to businesses. This is also reproduced as an extract at Appendix 4. The research, documented at page 59, provides evidence that the footfall generated by Costa Coffee Shop is of benefit to other local businesses.
- 6.3.25. Surveys have been undertaken at different Costa Coffee shops across the UK in order to understand how they have impacted upon the vitality of local high streets. The following conclusions are helpful in understanding how they have a positive impact.
- 6.3.26. The survey carried out in Aberystwyth indicates that 40% of the people surveyed had planned to visit Costa before leaving home. This is seen as an indicator that the use is an attractor to the town centre in its own right. Similarly 65% of those surveyed in Bristol at the Whiteladies Road store had planned to visit Costa as part of their visit to the centre and a further 10% stated that they would visit Whiteladies Road more often since the presence of Costa Coffee.
- 6.3.27. Surveys such as these demonstrate that where a branded coffee shop is introduced to a High Street it has a beneficial effect on the vitality and viability of the centre as a whole.
- 6.3.28. The Officer Delegated report to application 15/02738/F states at page 3 that the proposal would not have an unacceptable impact on the level of retail within the Primary Shopping Area or the city centre overall. The Officer states:

"It is also recognised that food and drink uses are active uses which can generate significant footfall and activity and complement retail frontages. Therefore, it is considered that the proposal would make a positive contribution to the vitality and viability of the Primary shopping Frontage and the city centre as a whole."





- 6.3.29. Given the above (and the fact that A1 uses will continue to dominate the PSF) it is clear that the proposals are compliant with criteria i) of BCAP 16. It is helpful that officers have already concluded that a purely A3 use would have a positive impact on vitality and viability and would not cause any harm to the level of retaining in this part of the Primary Shopping Area.
 - ii) The proposed use would not dominate or fragment the Primary Shopping Frontage as a result of its scale, by creating a significant break in the retail frontage or by resulting in a harmful loss of retail floorspace
- 6.3.30. Importantly, the Inspector at the appeal at 87-89 Park Street recognised that the wording of this part of the Policy and its subtext do not quantitatively set out what constitutes a significant frontage break, instead leaving it to the discretion of the decision maker who should give consideration to whether the change of use would individually or cumulatively change the perceived frontage's function away from retail.
- 6.3.31. This criteria was identified as the sole criteria of Policy BCAP16 which the refused application for the change of use of this unit did not comply with. The Officer's report reacting to 11-13 Queens Road concluded that the frontage break caused by the change of use would, when considered alongside the nearby Caffe Nero, Berkeley pub, and Pret A Manger, constitute a 34% non-A1 frontage break and, due to the site's prominence in the frontage, would harm the perceived frontage.
- 6.3.32. The Council's Statement of Case for 11-13 Queens Road states that both Pret A Manger and Caffe Nero fall within the A1/A3 Use Class. Both the conclusions of the Officer's Report and Statement of Case are disputed for two reasons.
- 6.3.33. Firstly, the Officer's report categorises the Pret A Manger unit at 27-31 Queens Road as falling within the A3 Use Class. Whilst Pret A Manger units do contain an element of internal seating, they should be categorised as a sandwich shop and therefore, as explicitly stated in the Town and Country Planning (Use Class) Order 1987 (as amended), fall within the A1 Use Class. This has been accepted by Local Planning Authorities across the country. Notably, the Pret a Manger use has expanded recently and there has been no requirement to submit a change of use from the lawful A1 use of the buildings. It must therefore be considered as an A1 use in the assessment of this application.
- 6.3.34. Secondly, the Officer's report categories the Caffe Nero unit at 7-9 Queens Road as falling within the A3 Use Class. Permission has not been sought for either an A3 or A1/A3 use to allow occupation as a coffee shop and therefore there is no evidence to suggest that the Unit has a use other than A1. Even if the use were to be classified as an A1/A3 use, the conclusions of the 87-89 Queens Road Inspector at Para 9 are important:
 - 9. The two uses to the south-east have a retail function alongside their Class A3 uses, like other such uses in the area. One is an ice cream parlour and one is a bakery/patisserie and at both premises customers can walk in off the street to make purchases. There is an otherwise strong retail function in the remainder of the terrace and in the wider area, particular in the terrace on the opposite side of Park Road, between its junction with Queen's Road and Park Street Avenue, there is a particularly strong retail function. In this context, if the appeals were to be allowed and implemented and in the walk past the four properties, which would take no more than a few seconds, the perception would not be of any cumulative harm to the retail





function of the PSF.

- 6.3.35. The same reasoning can be applied in this case. The Inspectors decision means that a run of 4 non-A1 units would be created between 83-89 Park Street, of circa 30m. In this case (even if Caffe Nero were considered to be an A1/A3 use) two A1/A3 units would combine to form a break of 25m however, as the Inspector pointed out in Para 8 a mathematical assessment is not in itself of significance.
- 6.3.36. Importantly, the use sought as part of thus application is a hybrid A1/A3 use which will retain an A1 element through the sale of hot and cold food and drink for consumption off the premises. Due to the high levels of footfall and location of the site on a busy thoroughfare, the A1 sales element is likely to be significant. The Unit's frontage should therefore not be considered to constitute 15m of 'dead' frontage. The A1 retail function of the frontage will be material and active throughout normal shopping hours. Likewise, the pedestrian activity associated with Caffe Nero (see para 6.3.38 below) is significant and it does not constitute 'dead frontage'. The Inspector took into account the retail activity associated with the neighbouring non-A1 uses at 83 & 85 Park Street and concluded that the unit frontages were not harmful to the public's perception of the PSF.

Footfall Activity and Patronage

- 6.3.37. Within the delegated officer's report (for 15/02738/F) concerns were raised over the potential that a break in the frontage could be harmful to level of pedestrian footfall close to the application site.
- 6.3.38. In response the appeal statement submitted by Pegasus explores this in detail at paragraph 6.14 6.23 using an independent pedestrian footfall and patronage survey undertaken in November 2015. A copy of the footfall and patronage survey is reproduced at appendix 5. In this case the findings and interpretations of Pegasus are agreed with as follows:
 - The footfall between 1-39 Queens Road is high, showing that the frontage is well used;
 - The results show that the pedestrians cross 2 crossings in order to pass in front of the application site before travelling between the north side of Queens Road and Park Street;
 - The stretch of frontage in front of the application site is integral to the Queens Road and Park Street Centre and there is no reason to consider this stretch of frontage in isolation to other parts of the frontage given that it provides a fulcrum for pedestrians using Queens Road to the North and Park Street areas to the South;
 - The stretch of frontage in front of the application site is not considered to be sensitive to breaks in the Class A1 frontage and it would be highly unlikely to result in a lessening of pedestrian footfall through any change of use;
 - The role of this stretch of frontage means that it is not a sensitive area and shoppers
 perceptions of the shopping centre would not be altered as a result of any change of
 use;
 - The nature of pedestrian use of the area in front of the application site means that it should be considered as part of the shopping centre as a whole rather than as a





distinct entity within the PSF.

- 6.3.39. Pegasus also commissioned a Patronage Survey of the former outdoor clothing / equipment shop. This demonstrated that it was not attracting large amounts of patronage, particularly on weekdays. In comparison with other retailers it was significantly lower during the week and significantly lower than nearby 'White Stuff' at the weekend. In direct comparison with the adjacent Caffe Nero, the application site attracted significantly less patronage.
- 6.3.40. Evidence submitted as part of the appeal for the Costa use of 125 Whiteladies Road is relevant in this case. Bespoke surveys were undertaken to compare 125 Whiteladies Road with other retailers in the locality.
- 6.3.41. The Summary Table below shows to counts on each day, and an estimate over the week.

		Thursday	Saturday	Estimated Week (Mon-Sat)
1	Costa Coffee 123-125 Whiteladies Road	404	478	2,498
2	Charity Shop 111 Whiteladies Road	165	290	1,115
3	Cotham Pharmacy 3-5 Cotham Hill	514	364	2,934
4	Deli Delish Deli 2 Cotham Hill	95	n/a	n/a
4	Amphora Aromatics 36 Cotham Hill	n/a	45	n/a
5	Flight Centre Travel Clifton Metro Whiteladies Road	1	26	31

6.3.42. The counts took place between 10am and 5pm over a weekday (Thursday) and a Saturday. The main shopping hours for the district centre were chosen in order to show how the appeal site compares during the more general A1 peak shopping hours of the centre. The counts do not therefore reflect the full patronage of the unit given that it opens at 7am and closes at 7pm.





6.3.43. The transaction figures for the same periods as the count are shown in the table below:

	10- 11	11- 12	12-1	1-2	2-3	3-4	4-5	Daily Total	Hourly Average
Customers entering the appeal site (Thursday)	38	48	54	85	64	53	62	404	58
Number of Transactions Recorded (Thursday)	31	36	26	51	38	29	31	242	35

Customers entering the appeal site (Saturday)	64	72	50	65	95	73	59	478	68
Number of Transactions Recorded (Saturday)	32	48	40	42	41	36	35	274	39

- 6.3.44. The results are clear in that the coffee shop generates significant levels of activity during the shopping day and in all but one case (The Pharmacy/PO) actually generates more activity than comparative size A1 units.
- 6.3.45. Importantly, in terms of the role that a Coffee Shop use performs compared with say a restaurant use, the figures also demonstrate that the Coffee Shop is busy throughout normal shopping hours.
- 6.3.46. A broad comparison can be drawn between the likely patronage of the proposed Costa and the sites surveyed for the earlier planning application. The following provides an extract from the surveys submitted by Pegasus:

		09:00- 10.00	10.00- 11.00	11.00- 12.00	12.00- 13.00	13.00- 14.00	14.00 - 15.00	15.00 - 16.00	16.00- 17.00	17.00 - 18.00	Daily total	Hourly average
1	Café Nero	36	27	45	66	90	42	27	24	18	375	42
2	Katmandhu	6	18	12	45	36	18	21	15	6	177	20
3	Patisserie Valerie	12	24	48	30	45	21	18	27	3	228	25
4	Bills restaurant	9	27	36	63	48	27	12	18	6	246	27
5	White Stuff	24	18	33	48	75	54	27	24	33	336	37

- 6.3.47. The Costa at Whiteladies Road has 73 seats (internal) whereas the proposed Costa will have 81 (plus 10 external seats). It would be reasonable to expect that similar sized stores, in primary frontages in the same City would generate broadly similar levels of custom. If an hourly average of 58 customers is translated to Queens Road then the proposed use would be the highest generator of customers compared with the uses surveyed by Pegasus.
- 6.3.48. The high levels of patronage associated with the Costa use are positive characteristics that have been recognised widely as supporting the grants of planning permission for Costa





Coffee's in primary frontages in the past. On a wider level, Costa Coffee have commissioned surveys in order to provide a comparison on how well patronised coffee shop uses are against other Class A1 retailers.

6.3.49. The table below shows the results of a number of patronage surveys by PMRS, an independent market research company in order to demonstrate that the results at Whiteladies Road are reflective of other situations.

	Friday			Saturday	,		Estimated Weekly			
	Costa Coffee	Retailer 1	Retailer 2	Costa Coffee	Retailer 1	Retailer 2	Costa Coffee	Retailer 1	Retailer 2	
Durham	424	462	683	639	729	912	2501	2802	3753	
Farnham	259	207	101	282	289	139	1273	1167	565	
Horsham	544	118	422	622	180	549	2744	701	2285	
Salisbury	144	58	62	162	73	87	720	308	351	
Welwyn G.C	205	47	9	89	52	12	692	233	49	
Total	1576	892	1277	1794	1323	1699	7930	5211	7003	
Average	315.2	178.4	255.4	358.8	264.6	339.8	1588	1042.2	1400.6	

Location	Survey Dates	Retailer 1	Retailer 2
Durham	23 & 24 July	Stationery Box	Allsports
Farnham	11 & 12 June	Currys	Specsavers
Horsham	16 & 17 July	Wakefield Jewellers	Birthdays
Salisbury	16 & 17 July	Fat Face	Whittards
Welwyn Garden City	23 & 24 July	Holland & Barrett	Going Places

6.3.50. The table shows the patronage of Costa Coffee compared with other high street branded retail outlets such as All Sports, Currys, Specsavers, Whittards, Fat Face and Going Places, in a number of different town centres.





- 6.3.51. The figures demonstrate that Costa Coffee is consistently higher than the other surveyed retailers in terms of patronage on both Friday and Saturday (the only exception being Allsports in Durham). Averaged over the 5 towns, Costa attracts more footfall on both Friday and Saturday than the other retailers.
- 6.3.52. These surveys clearly demonstrate that a Costa Coffee shop generates significant levels of customers, comparable with, and indeed in excess of, other Class A1 retailers. Furthermore, the nature of the proposed use is likely to encourage combined / linked trips to the surrounding retailers.
- 6.3.53. Therefore, Costa coffee shop uses are well-used and generate comparative levels of footfall, patronage with standard Class A1 uses. Clearly, therefore, the proposed use will generate high levels of patronage which will impact positively upon the vitality and viability of the frontage.
- 6.3.54. The conclusions that can be drawn from the above are clear:
 - Park Street / Queens Road and is not therefore particular sensitive to changes of use in terms of their impacts upon footfall or pedestrian flows.
 - The coffee shop use is a proven attractor of patronage in comparison with other A1 uses. It is likely to attract a higher level of patronage than the existing charity shop use or its predecessor as an outdoor clothing / equipment shop.
 - The coffee shop patronage is spread throughout the normal shopping day. It can therefore be considered more beneficial to the retail frontage than the A3 use which the Authority has previously refused.
- 6.3.55. The overall conclusion is that the coffee shop use is likely to have positive effect on pedestrian footfall and certainly will not have any detrimental impact upon pedestrian flows within this area which might otherwise change the perception of shoppers if the change of use takes place. The proposal would not therefore harm shopper footfall as feared by officers in refusing the A3 application.
- 6.3.56. Regardless of how the break in purely A1 frontage is measured, the nature of the use proposed is such that it will not result in any significant break to the PSF or result in a harmful fragmentation which might otherwise be detrimental to its retail function. This is principally due to the proven high levels of patronage that are associated with the Coffee Shop use and the symbiotic relationship that the use has with surrounding retailers.
 - iii. The proposed use would be compatible with a retail area in that it includes a shop front with a display function and would be immediately accessible to the public from the street.
- 6.3.57. The proposed use would retain an active and vibrant shop front which will display the unit's interior to the outside. The access currently in place will remain and activity within the unit will be clearly visible to passers by. The outdoor seating proposed will add vibrancy to the frontage and increase the attractiveness of and activity associated with the frontage.
- 6.3.58. The proposals are compliant with each of the criteria of BCAP 16.





6.4. Other Considerations

- 6.4.1. The premises is currently let on a temporary lease to a Charity Shop. A successful application would lead to a long term lease to Costa and a significant investment in the building, providing a benefit in terms of a boost to confidence in the PSF, particularly when there are a number of prominent retail units elsewhere within the frontage which are vacant.
- 6.4.2. The following premises are currently vacant within the PSF:
 - 7 Park Street
 - 22 Park Street
 - 35-37 Park Street
 - 47 Park Street
 - 52 Park Street
 - 73 Park Street
 - 76 Park Street
 - 87 Park Street
- 6.4.3. All of the above offer suitable alternative accommodation for A1 retailers wishing to locate within the PSF, as will the unit that Costa plan to vacate as part of their planned relocation. The change of use proposed will not result in a barrier to new A1 retailers wishing to trade from the PSF. The Inspector in the Whiteladies Road Costa appeal found similar circumstances favoured an approval.
- 6.4.4. In addition, the following material considerations are highly relevant in this case:
 - The Use is materially different to more traditional A3 and now A4 and A5 Uses in that it is busy throughout the normal shopping/working day and not just at peak times such as breakfast/lunchtime. Trade is generated throughout the day as is activity which assists in maintaining and enhancing vitality and viability and proven through the patronage figures detailed above; and
 - The A1 element of the use adds to retail vitality and viability in a way that other more traditionally, wholly non-A1 uses do not, i.e. the sale of merchandise, takeaway drinks and sandwiches are classed as A1 activities.
- 6.4.5. In particular, the proposal is supported by the NPPF. The introduction of the vibrant café use would enable economic growth, will assist in improving the diversity of the frontage in which the application site is located. Likewise, it has been established that the proposed use contributes to the vitality and viability of the shopping area, and would likely improve the liveliness, attractiveness and character of the centre.
- 6.4.6. Other relevant policies (BCAP30 and BCAP31) encourage active frontages along primary pedestrian routes, making a positive contribution to the vitality and character of the area.





The footfall associated with the Costa Coffee use will make a positive contribution and the proposals are therefore compliant with BCAP30 and BCAP31.

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Supporting Statement (June 2016)

7. Conclusions

7.1. Conclusions

- 7.1.1. The proposal is for the change of use of a unit currently let on temporary terms to a mixed A1/A3 coffee shop.
- 7.1.2. It has been established that mixed A1/A3 is the most appropriate categorisation of the use for a coffee shop such as Costa Coffee given the appeal history detailed within this statement and within PSFs in Bristol.
- 7.1.3. This statement has demonstrated that the proposed coffee shop will contain a significant element of Class A1 use through the sale of coffee and sandwiches for takeaway purposes which are recognised as having a beneficial impact on primary shopping frontages. This has been recognised in two high profile appeal cases for Costa uses in Bristol where an Inspector has overturned decisions where the LPA had been concerned about impacts upon the PSF.
- 7.1.4. It is acknowledged that the LPA have recently refused an application for A3 use on the same site and that there is an ongoing appeal. This statement has explored significant and material changes since the last refusal which can allow the Authority to support this particular planning application. These changes are:
 - The application is for a mixed A1 / A3 coffee shop and not a purely A3 restaurant use. This is a material factor which has been taken into account by numerous inspectors when concluding the positive impact that Coffee Shops have upon primary shopping frontages. Local examples have been provided in Bristol whereby Costa uses have been found to acceptable and beneficial uses within the PSF.
 - An appeal has been allowed at 87 / 89 Park Street for a change of use from Class A1 to Class A3. The Inspector's decision provides some very pertinent interpretation of key policy BCAP13. Applying the same logic to this proposal in terms of the function of high street uses and interpretation of BCAP 13 shows that the Coffee Shop proposal is fully compliant.
- 7.1.5. This policy analysis has demonstrated that, in the light of the very recent and relevant appeal decision on 87-89 Park Street, the proposals are compliant with the most relevant policies, BSC 7 and BCAP 16. Furthermore, the proposed use is also supported by BCAP13, BCAP30, BCAP31 and BCAP42.
- 7.1.6. It is also highly material that the purpose of this application is to allow a relocation of the existing Costa use which trades from Unit 4, 70-78 Queens Road. A successful application will create a vacant unit at 70-78 Queens Road, which would then be put to the market.
- 7.1.7. The proposals comply with the aims of paragraph 23 of the NPPF as they will promote a competitive town centre that provides customer choice and a diverse retail offer. There is a presumption in favour of sustainable forms of development set out within the NPPF.
- 7.1.8. It has been demonstrated that the introduction of a Costa Coffee shop would be of benefit to



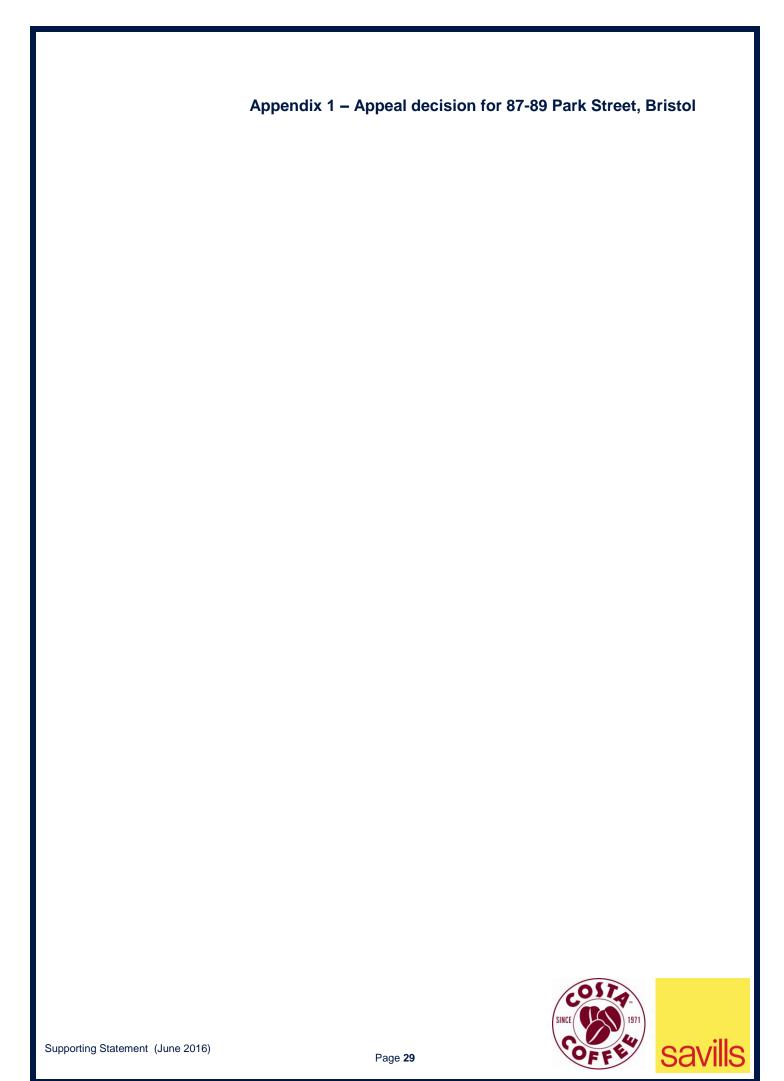


retail vitality and viability within the frontage given the significant merits associated with the use.

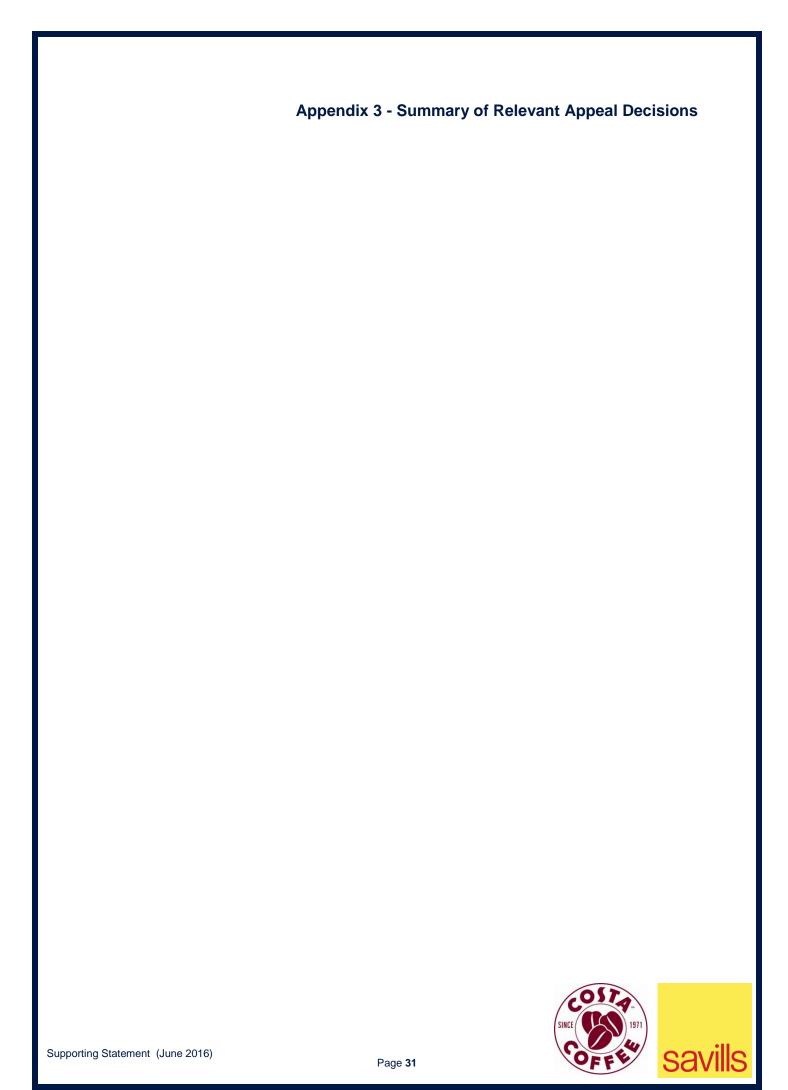
7.1.9. In view of the above material considerations, planning permission is justified.

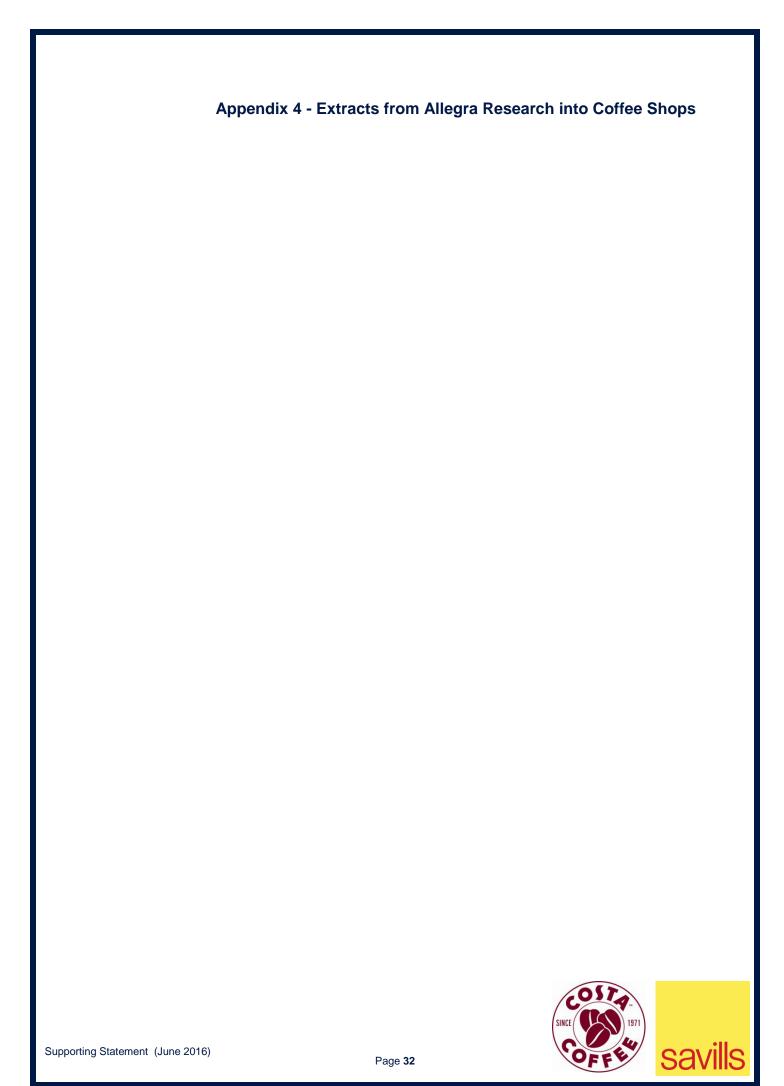






Appendix 2 – Appeal decisions for Costa uses at Whiteladies Road and **Gloucester Road, Bristol**

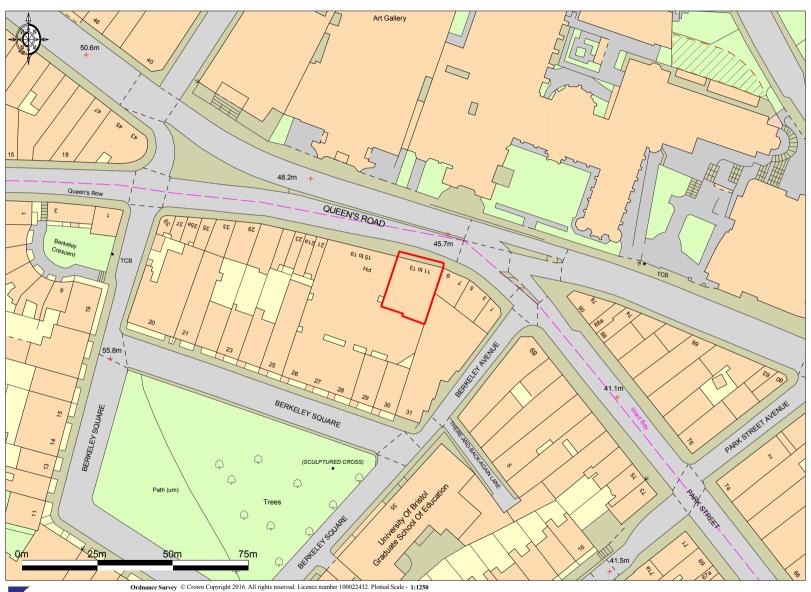




Appendix 5 – Patronage Survey Data
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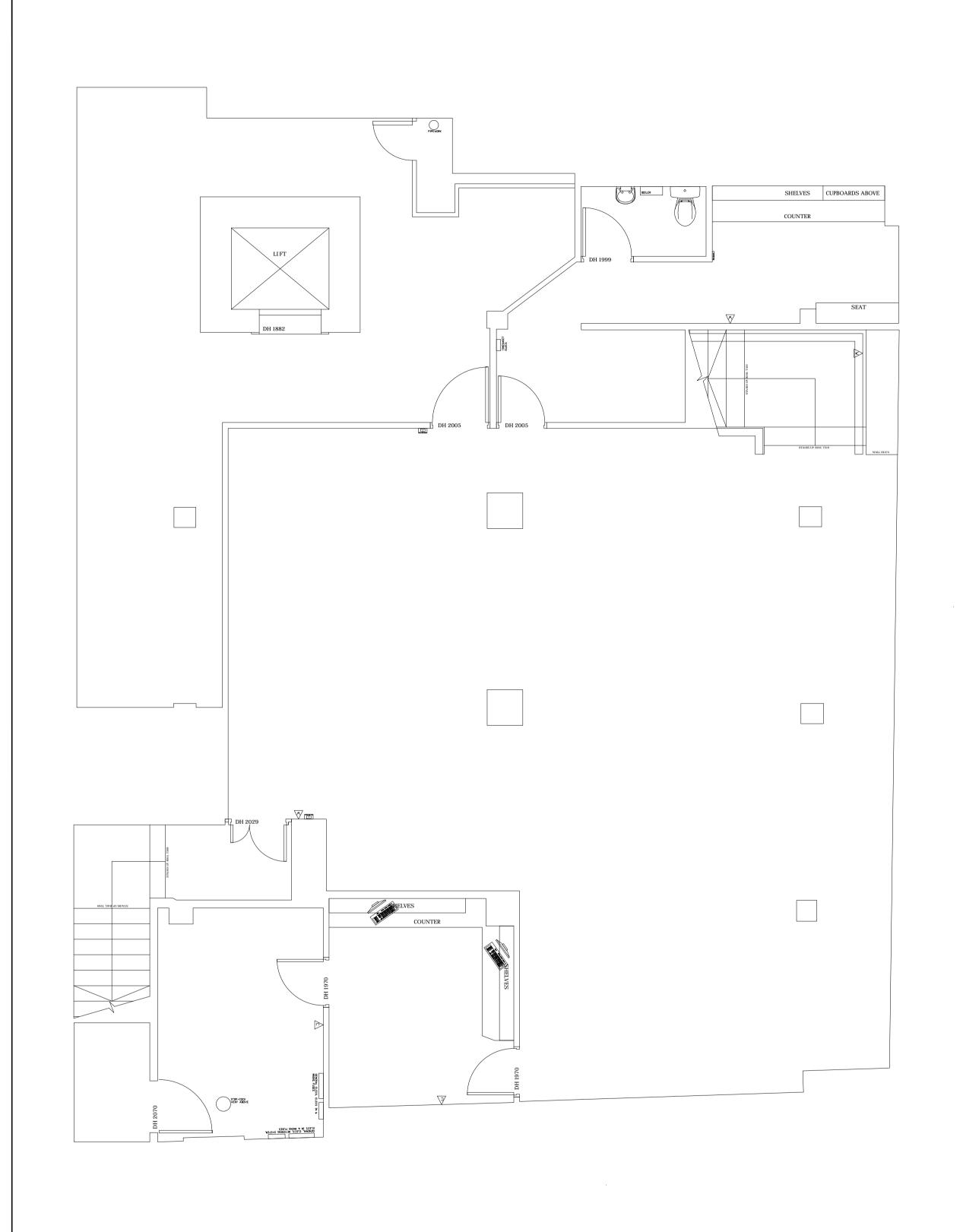
Page **33**

Supporting Statement (June 2016)



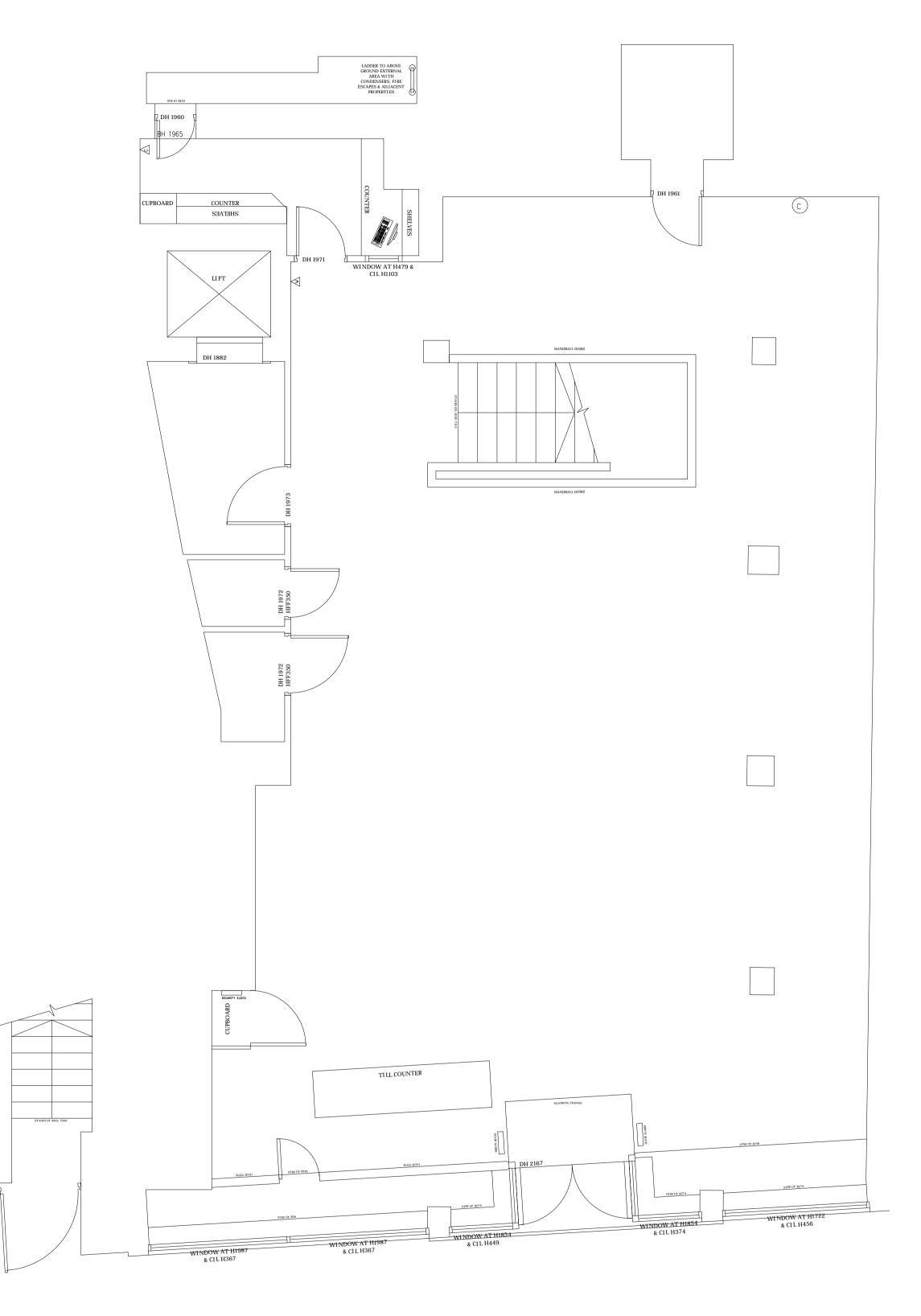
Promap[®]

Scale- 1:1250 at A4



1:50 EXISTING BASEMENT FLOOR PLAN

BASEMENT FLOOR AREA 218M2
GROUND FLOOR AREA 185M2
GRAND TOTAL AREA 403M2



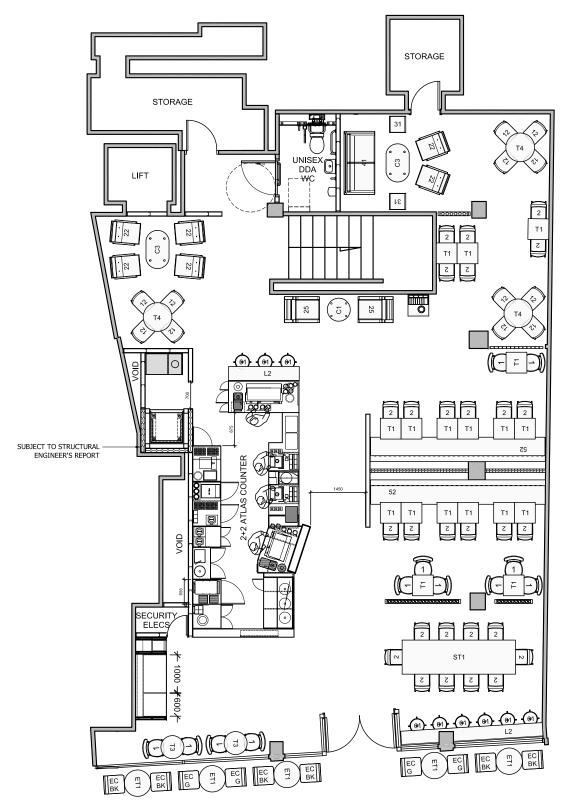
1:50 EXISTING GROUND FLOOR PLAN

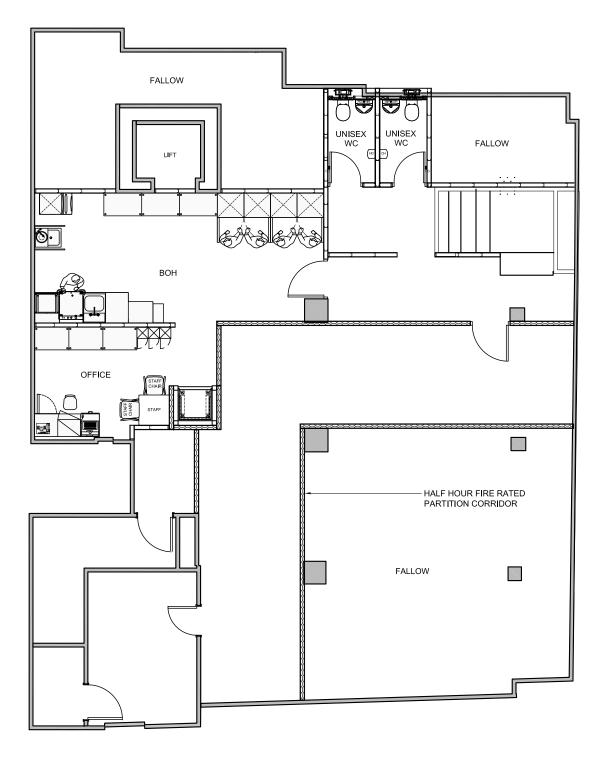


DRAWING NOTES

Please note: These drawings are for planning purposes only and should not be used for

construction.





TANGERINE/HYBRID/PARITY

GENERAL NOTES

INTERNAL COVERS: INTERNAL TABLES: 27 EXTERNAL COVERS: 10 EXTERNAL TABLES: SALES AREA: 1617ft² 150.3m²

BOH AREA: 734ft² 68.2m²

TOTAL AREA: 2351ft² 218.5m²

GROUND FLOOR BASEMENT

GENERAL LAYOUT SCALE 1:100@A3

THIS DRAWING IS NOT TO BE SCALED, ONLY FIGURED DIMENSIONS ARE TO BE FOLLOWED. CONTRACTORS TO CHECK ALL DIMENSIONS & CONDITIONS ON SITE & REFER ANY DISCREPANCY TO S.G.M MANAGEMENT AND DESIGN LTD. THIS DRAWING IS THE SOLE PROPERTY OF S.G.M MANAGEMENT AND DESIGN LTD., AND MAY NOT BE COPIED OR REPRODUCED IN ANY MANNER WHATSOEVER WITHOUT THE OWNERS CONSENT. © COPYRIGHT

A - FEASIBILITY - 01.06.2016 - BJ

REVISIONS:

CLIENT: COSTA COFFEE PROJECT NUMBER: 110170

11-13 QUEENS ROAD, BRISTOL, AVON, BS8 1QE PROJECT:

DRAWING TITLE: PROPOSED GENERAL LAYOUT

SCALE: DRAWN BY: PROJECT MANAGER:TBC

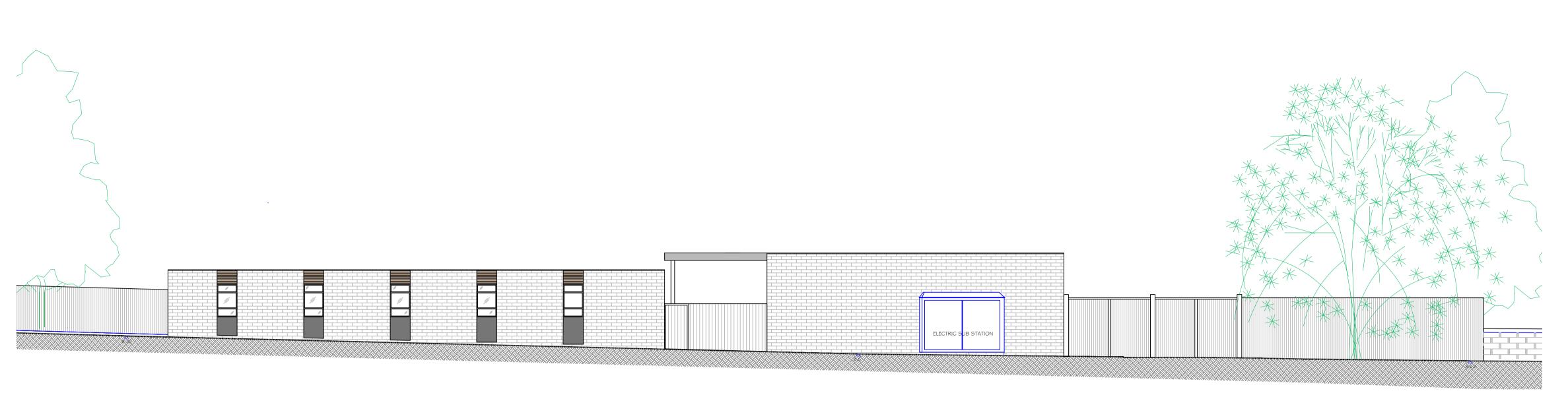


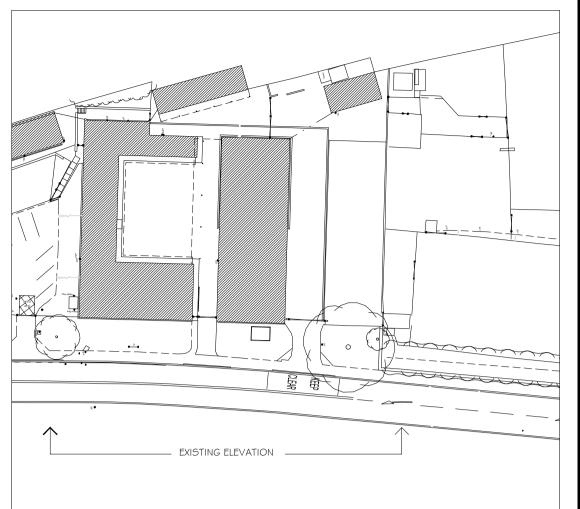
104 HIGH STREET, THAME, OXON, OX9 3DZ. TEL: 01844 218333 FAX: 01844 218444 sgm.admininstration@s-g-m.co.uk www.s-g-m.co.uk

Supporting Documents

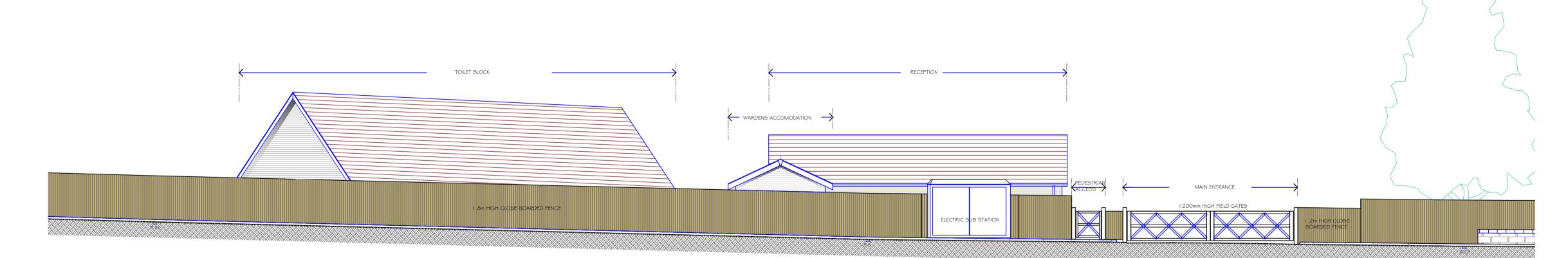
2. **Police Dog and Horse Training Centre Clanage Road**

- Existing & Proposed Street Elevation Existing Site Plan Planning Statement 1.
- 2.
- 3.
- Proposed Site Plan 4.
- Site Search Report 5.

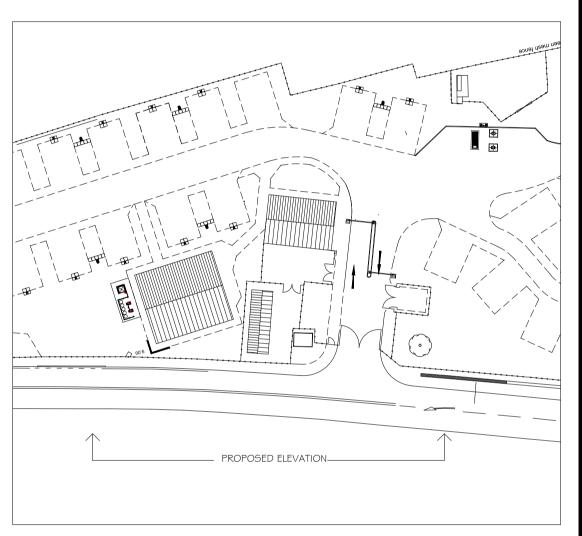




CLANAGE ROAD EXISTING PART ELEVATION 1:100



CLANAGE ROAD PROPOSED PART ELEVATION 1:100



EXISTING TREES

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be damaged or need replacement in connection with their engagement.				
Status	PLAN	NING		
Revisions				
Project/Site BRISTOL CC SITE				
PROPOSED CLANAGE ROAD ELEVATION				
Drwg no. BRT-2016-P-500		Date JAN 16 Checked by	Drwn. by AN	
^{Scale} 1:500, 1:100@A1		CAD Ref. BRT-2016-P-500		



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



Planning Statement

Land at Clanage Road, Bristol, BS3 2JY

Prepared for:

The Caravan Club

Prepared by:

Savills (UK) Limited 74 High Street, Sevenoaks, TN13 1JR



Planning Statement



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The Caravan Club July 2016



1. Introduction

1.1. Savills has been instructed by The Caravan Club to submit this planning application for:

"The 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 works including the demolition of existing buildings and erection of reception and amenity buildings and wardens accommodation"

- 1.2. This statement should be read in conjunction with the submitted plans and following reports:
 - Drawings
 - Existing Site Plan
 - Proposed Site Plan
 - Existing Clanage Road Elevations
 - Proposed Clanage Road Elevations
 - Proposed Reception Building Elevations & Floorplans
 - Proposed Amenity Building Elevations & Floorplans
 - External Lighting Proposal
 - Landscape Proposals
 - Existing & Proposed Photomontages
 - Tree Survey & Tree Constraints Plan prepared by CSA Environmental
 - Transport Assessment prepared by Stilwell Partnership
 - Statement of Use prepared by The Caravan Club
 - Design & Access Statement prepared by The Caravan Club
 - Site Search Report prepared by JLL
 - Flood Risk Assessment prepared by R.G.Parkins &Partners Ltd
 - Landscape and Visual Impact Assessment prepared by CSA Environmental
 - Phase 1 Habitat Survey & Bat Emergence Survey prepared by CSA Environmental
 - Statement of Community Involvement prepared by Savills



2. Site and Surroundings

- 2.1. The site is located to the east of Clanage Road in close proximity to the settlement of Bower Ashton. The western boundary of the site runs along Clanage Road, bounded to the south by the Bedminster Cricket Club and to the east by the railway line and is broadly triangular in shape.
- 2.2. Further to the east of the site is an area of allotments and an area of public open space. The River Avon and the city of Bristol lie further to the east of the site. To the west across Clanage Road is the grounds of Ashton Court and the associated parkland which is designated as a Registered Park and Gardens.
- 2.3. The site is designated as being within the Green Belt and the southern section of the site is within the Bower Ashton Conservation Area. The site is classified as being within Flood Zone 3. The surrounding land uses are predominantly related to recreation within the Green Belt.
- 2.4. The site was until recently occupied by the Avon & Somerset Constabulary Mounted Police Dog and Horse Training Centre. The northern section of the site is heavily developed and comprises a large building which includes stabling and a number of additional outbuildings and enclosures associated with training centre. There are also extensive areas of hardstanding used for parking of cars and horse boxes.
- 2.5. The southern section of the site is more open containing grassed fields used for grazing of horses and a large ménage for training of horses, this area is currently floodlit. As part of the existing use of the site, a tannoy system is used. The site contains a number of existing trees and hedges primarily located on the boundaries of the site.
- 2.6. The frontage of the site onto Clanage Road comprises a low level stone wall ending at the main vehicular entrance to the site with a high coniferous hedge running along the wall. There are some other trees and small plants in front of the main existing building which faces onto Clanage Road. The remainder of the boundary onto Clanage Road is marked by close boarded fencing.
- 2.7. A public footpath runs along the southern boundary of the site and part of the eastern boundary joining the railway footbridge. The footpath is separated from the site by a metal open mesh fence.



3. Planning & Site History

3.1. The application site has been subject to a number of planning applications relating to the use of the site by Avon & Somerset Constabulary Mounted Police and Dog Training Centre, none of which are considered relevant to this planning application.

Site Search

- 3.2. The Caravan Club have an existing site within Bristol City Centre, which is leased from Bristol City Council. The Council have decided not to continue to lease this site to The Caravan Club, in order to pursue comprehensive redevelopment of the site. This has lead to the need for the Caravan Club to identify a new site to continue their long standing touring caravan operations in the local area.
- 3.3. In response to this Bristol City Council and The Caravan Club jointly appointed the services of Jones Lang Lasalle to conduct a site search to assist in identifying appropriate sites for relocation to a larger "green" site rather than a smaller urban site. The Caravan Club requested a site which broadly fulfilled a set criteria including:
 - In close proximity to the city centre (up to 5 miles from the city centre)
 - Site area of between 5-7.5 acres to 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
- 3.4. Whilst these criteria were important factors to The Caravan Club, it was made clear to JLL that the Club would be flexible in their approach to identifying a site. At the beginning of this JLL search process the Club identified four sites they had identified through their own research, to be included in the overall site search assessment.
- 3.5. The site search initially identified 59 potential sites for consideration which were given a rating from A-C by JLL depending on how well the site fulfilled The Caravan Clubs criteria. It is key to note that 88% of the sites identified were within the Green Belt. Following this assessment JLL identified four sites considered most suitable, all of which were in the Green Belt (see full JLL Report for full details).

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- 3.6. This was subsequently reviewed by the Caravan Club who identified 16 opportunities to be further investigated with site inspections and further research, including the 4 preferred sites identified by JLL. Again all of these sites were located within the Green Belt. Following the site inspections a final shortlist of 7 sites (including the application site) were identified.
- 3.7. These 7 sites were further investigated by The Caravan Club, however 6 of the sites were not pursued due to constraints which could not be overcome including; ownership issues, timing issues and site constraints. Therefore the only site identified which was capable and available to accommodate a new Caravan Club site was the application site.
- 3.8. Please see the accompanying JLL site search report for full details.



4. Pre-Application Advice

- 4.1. Following the Site Search exercise and identification of the application site as the most appropriate local site to accommodate this development, both informal discussions and formal detailed pre-application discussions were held with Bristol City Council (BCC) under reference:15/04665/PREAPP.
- 4.2. The proposal submitted was for the change of use of the site to a 60 pitch touring caravan site including demolition of existing building and erection of 3 timber clad buildings comprising a toilet block reception and warden accommodation. This scheme reflected a reduction to that previously discussed with the Council.
- 4.3. The advice received from the Officer is summarised below:
 - The Officer advised that the application would conflict with Green Belt policy and could not be supported unless a very special circumstances case can be made. This could include evidence of a lack of suitable alternative sites (as demonstrated above by the Site Search exercise) or the economic/tourism/leisure benefits of retaining a caravan site in Bristol.
 - The Officer confirmed that the northern part of the site containing the buildings and hardstanding could be considered as previously developed and that the new buildings on the site of the existing built up area of the site would constitute appropriate development, provided they result in a reduction in the overall built footprint. The use of the southern section of the site by touring caravans however was considered inappropriate and would require a very special circumstances case. It is however acknowledged that the caravans will not be permanently pitched on the sites.
 - In terms of the Bower Ashton Conservation Area the Officer had concerns that caravans in the southern area of the site may have a potential impact on the openness of this part of the Conservation Area.
 - Given that the site is within Flood Zone 3 a sequential test would be required and if passed an
 exceptions test. The development would need to include significant flood risk mitigations
 measures to manage risk from tidal and surface flooding.
 - The Officer felt that the existing access to the site for vehicles was not adequate and would create an unsafe road environment.
 - An extended Phase 1 Ecology Survey will be required and further details of proposed external lighting provided at application stage.
 - An EIA screening would be required under EIA Regulations 2011.
 - Statement of Community Involvement will be required and pre-application engagement is encouraged.

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4.4. Following the pre-application response from Bristol City Council

- A very special circumstances justification for the proposals has been made, which is set out later in this Statement. This includes the lack of an alternative site, the benefits of the proposals and the positive impact on the appearance and openness of the Green Belt.
- Impact on the Conservation Area and wider surrounding area has been assessed and there will be no negative impact, as demonstrated in the supporting Landscape and Visual Impact Assessment and this Statement.
- Flood Risk has been assessed and this further detail is included in the accompanying Flood Risk Assessment.
- Alterations to the existing access to the site are proposed which will ensure safe access into and
 out of the site can be achieved and the proposal will no have a negative impact on the local or
 regional road network. Please see accompanying Transport Assessment.
- An Ecology and Bat Survey have been undertaken which confirm that the proposals will have no negative impact on Ecology or important species.
- An external lighting proposal has been included and details of the lighting scheme contained in the Design and Access Statement.
- An EIA screening is requested from Bristol City Council as part of this application
- Extensive pre-application engagement has been undertaken as detailed in the accompanying Statement of Community Involvement



5. The Proposal

5.1. The proposal is for the:

"The 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 works including the demolition of existing buildings and erection of reception and amenity buildings and wardens accommodation"

Existing and Proposed Buildings

- 5.2. The existing building, outbuildings and other structures on the site will be demolished. These buildings are of a low architectural quality and are typically flat roofed industrial style buildings. The largest building with accommodates the main offices and stabling has an eave height of 11.41m. The total combined footprint existing on the site, in the Green Belt is 988m².
- 5.3. The proposal includes the erection of 3 new buildings, all of which will be sited within the footprint of the large existing building. Overall the footprint of the 3 new buildings combined will be a total of 310m² (a 68% reduction in built form) with a maximum height ridge line of 13.4m and at eaves 10.45m. The proposed buildings will be clad in red brick with grey tiled pitched roofs.
- 5.4. The proposed amenity building will contain separate male and female washing and toilet facilities including self contained disabled and nappy changing facilities. The building will provide dishwashing and laundry facilities to guests. The building will have a level access to allow access for those with limited mobility. The proposed Reception building will be located close to the site entrance, to allow control of entry to the site and will contain a reception area, small office for administrative purposes and a workshop and storage area for site maintenance equipment, minimising the need for additional outbuildings.
- 5.5. The proposed warden accommodation is located at the site entrance for security purposes, and will allow for onsite wardens to be present all year round. This building will comprise a two bedroom living accommodation for the onsite warden and associated living facilities. This building would only be used by the warden associated with the use of the site by The Caravan Club and would not be used for any other type of accommodation.

Touring Caravan Pitches

5.6. The proposals include the installation of a total of 62 caravan pitches, made up of 58 all weather pitches and 4 grass pitches. Of the 58 all weather pitches, 20 will be serviced. The all weather hardstanding pitches will be located throughout the site with a row of 19 pitches in the northern area of the site and a further 39 pitches in a circular layout in the southern section of the site.

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- 5.7. The all weather pitches comprise loose stone chippings in a light grey colour which are porous to ensure no increase in flood risk on the site. This type of surface has been chosen as it provides a level area on which to pitch caravans which is particularly popular with elderly users, which make up a large proportion of The Caravan Club's membership and those with mobility issues.
- 5.8. Those all weather pitches which are serviced will have a permanent water and grey waste water connection, which again is beneficial to those who may have difficulties in transporting water or waste by hand to the communal service points.
- 5.9. The four grass pitches will be located in the centre of the southern pitching area of the site.

Management of the Site

- 5.10. The Caravan Club are committed to running successful and safe touring caravan sites to be enjoyed by their members whilst ensuring that the activities on the site create no adverse impacts on the surrounding area or local residents. The Caravan Club use a well-tested model of site management across their sites in order to achieve this. It is proposed that the site will operate all-year and will be permanently manned by a fully trained warden couple residing onsite. This allows for any onsite issues, for example noise, to be dealt with immediately in line with The Caravan Club members rules.
- 5.11. The pitches will only be occupied by caravans when their owners are staying on the site and again under Club rules, members will only be able to stay on the site for a maximum of 21 days (please see The Caravan Club's Supporting Statement).

Service and Waste Points

5.12. Two service and waste points are proposed, one located to service the southern pitches and one located to serve the northern pitches. These are of a standard and well tested design that The Caravan Club use across their network of sites. They provided a level access area to allow users access to drinking water taps, waste water discharge points and areas to empty and fill on board waste tanks. The service points are located to ensure that no pitch is more than 90 metres from a service point.

Access and Internal Roads

5.13. There are currently four entrances to the site from Clanage Road which will be reduced to one central access in the same location as the current main entrance to site. This will increase the safety of this road as there will be fewer places in which vehicles can turn onto or off Clanage Road. The access to and from the site will be managed by The Caravan Club to avoid site movements occurring at busy or peak times. This management method is used throughout the Club's sites and has been very successful (Please see The Caravan Club's Supporting Statement and the Transport Statement).

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- 5.14. In order to provide sufficient sight lines when entering and exiting the site approximately 15m of the existing stone wall will be lowered to a height of 600m. The coping stones on the existing wall will be retained and reinstated once the wall has been lowered, to ensure its character is retained and that the lower section integrates with the remaining wall. The sight lines will also be improved by removing the high non-native hedge behind the wall, which appears alien and incongruous with the surrounding area. This will be replaced by a new hedgerow consisting of native species.
- 5.15. The internal macadam roads have been laid out to ensure that the level of hardstanding is as minimal as possible whilst allowing safe vehicular movement around the site.

External Lighting

- 5.16. The proposed external lighting has been kept to the absolute minimum whilst allowing safe access around the site at night. The entrance area will have three 3m lights to ensure vehicles can safely enter and exit the site, and these will have shrouds to direct the light downwards reducing light pollution into the surrounding area. The reception building and amenity block include external LED wall lights with the semi-circular hoods, again to direct light downwards.
- 5.17. The serviced all weather hardstanding pitches will have a single low level LED light which will illuminate the location of the electrical cables, which could otherwise be a trip hazards. These are also shrouded to project the light downwards. Throughout the site 5 low level lights will be installed to highlight road and footpath edges in key locations. Please see the External Lighting Proposal drawing for further details on the location of the lights.

Landscaping

- 5.18. The boundaries of the site will be enhanced with a scheme of native planting and with existing mature trees retained. Two of the hardstanding pitches are within root protection zones of retained trees and therefore a "no-dig" technique will be adopted when constructing these pitches, to ensure the trees are not damaged. Please see the accompanying Tree Survey for further details of existing trees.
- 5.19. As highlighted above the large non native hedge running along the western boundary of the site will be removed and replaced with a native hedgerow which will provide both visual and biodiversity benefits, as well as improving safety when vehicles enter and exit the site. Low level native planting is proposed throughout the site however the southern section of the site particularly will maintain an open mown grass appearance.



6. Planning Policy Framework

National Planning Policy

- 6.1. The National Planning Policy Framework (NPPF) was adopted in 2012 and sets out the principle of the "presumption in favour of sustainable development" which should be seen as a "golden thread" running through the planning system. The NPPF sets out the 3 dimensions to sustainable development which should not be considered in isolation, these are:
 - **Economic Role** contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right place at the right time;
 - Social Role supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations and by creating a high quality built environment.
 - **Environmental Role** contributing to protecting and enhancing our natural, built and historic environment, built and historic environment...helping to improve biodiversity.
- 6.2. The NPPF sets out 12 Core Planning Principles of which the following are relevant to this application:
 - Not simply be about scrutiny but be a creative exercise in finding ways to enhance and improves the places in which people live their lives;
 - Proactively drive and support sustainable economic development to deliver...businesses...and thriving local places that the country needs. Plans should take account of market signals such as land prices;
 - Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - Take account of the different roles and character of different areas promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
 - Support the transition to a low carbon future in a changing climate and encourage the use of renewable resources:
 - Contribute to conserving and enhancing the natural environment;
 - Encourage the effective use of land by reusing land that has been previously developed (Brownfield land), provided that it is not of high environmental value;
 - Encourage multiple benefits from the use of land is urban and rural areas recognising that some open land can performs many functions such as for wildlife and recreation;
 - Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling;

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- 6.3. Section 1 Building a Strong, Competitive Economy sets out that the "government is committed to securing economic growth in order to create jobs and prosperity" (Para 18) and to "ensuring that the planning system does everything it can to support suitable economic growth" (Para 19). The planning system should encourage and not impede sustainable growth and "significant weight should be placed on the need to support economic growth" (Para 19).
- 6.4. Section 3 Supporting a Prosperous Rural Economy sets out that support should be given to sustainable rural tourism development that benefits businesses in rural areas, communities and visitors and which respect the character of the countryside. This includes support for the provision of tourist or visitor facilities in appropriate locations where identified needs are not met by existing facilities.
- 6.5. Section 7 Requiring Good Design sets out that the Government attaches great importance to the design of the built environment as a key aspect of sustainable development. Planning policies and decisions should aim to ensure that developments:
 - Will function well and add to the overall quality of the area over the lifetime of the development;
 - Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;
 - Respond to local character and history and reflect the identity of local surroundings and materials;
 - Create safe and accessible environments;
 - Are visually attractive as a result of good architecture and appropriate landscaping.
- 6.6. Paragraph 61 sets out that although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore planning decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.
- 6.7. Paragraph 66 sets out that applicants will be expected to work closely with those directly affected by their proposals to take account of the views of the community.
- 6.8. Section 9 Protecting Green Belt Land, sets out that the government attaches great importance to Green Belts and their fundamental aim is to prevent urban sprawl by keeping land permanently open. Paragraph 81 sets out that local planning authorities should look for opportunities to provide retain and enhance landscape, visual amenity and biodiversity or to improve damaged and derelict land.
- 6.9. Paragraph 87 sets out that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 88 goes on to set out that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

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- 6.10. Paragraph 89 sets out the circumstances in which the construction of new buildings in the Green Belt may be acceptable and include the "limited infilling or the partial or complete redevelopment of previously developed (Brownfield land) whether redundant or in continuing use 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".
- 6.11. Section 10 Meeting the Challenge of Climate Change, Flooding and Coastal Change, sets out in paragraph 100 that development should be directed away from areas at highest risk but where development is necessary, making it safe without increasing flood risk elsewhere. A sequential, risk based approach to the location of development should be utilised, including:
 - Applying the sequential test
 - If necessary applying the Exception Test
 - Using opportunities by new development to reduce the cases and impacts of flooding
- 6.12. Paragraph 102 sets out that following a sequential test if it is not possible for the development to be located in zones with a lower probability of flooding the exception test can be applied which includes demonstrating that the development will be safe for its users without increasing flood risk elsewhere and where possible will reduce flood risk overall.
- 6.13. Paragraph 103 explains that development must demonstrate that is appropriable flood resilient and resistance including safe access and escape routes where required and that any residual risk can be safely managed.
- 6.14. Section 11 Conserving and Enhancing the Natural Environment, sets out that the planning system should contribute to and enhance the natural and local environment by:
 - Protecting valued landscapes;
 - Minimising impacts on biodiversity and providing net gains in biodiversity;
 - Prevent new and existing development from contributing to unacceptable levels of noise pollution.
- 6.15. Paragraph 111 sets out that planning decision should encourage the effective use of land by re-using land that has been previously developed. Paragraph 118 sets out that biodiversity and conservation should be achieved by applying principles including by encouraging opportunities to incorporate biodiversity in and around developments
- 6.16. Section 12 Conserving and Enhancing the Historic Environment, sets out in paragraph 137 that "Local planning authorities should look for opportunities for new development within Conservation Areas...to enhance or better reveal their significance".

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Local Planning Policy

6.17. The adopted local planning policy framework for Bristol City Council comprises the Core Strategy 2011 and the Site Allocation and Development Management Polices Local Plan 2014.

Core Strategy 2011

6.18. Policy BCS6 - Green Belt

Countryside and other open land around the existing built-up areas of the city will be safeguarded by maintaining the current extent of the Green Belt. Green Belt sets out that land within the green belt will be protected from inappropriate development as set out in national planning policy.

6.19. Policy BCS9 - Green Infrastructure

Open Spaces which are important for recreation, leisure and community use, townscape and landscape quality and visual amenity will be protected.

6.20. Policy BCS10 - Transport and Access

Proposals will be determined and schemes will be designed to reflect the following transport user priorities as set out in the Joint Local Transport Plan:

- The pedestrian;
- The cyclist;
- Public transport;
- Access for commercial vehicles;
- Short stay visitors by car;
- The private car.

The needs of disabled people will be considered within all of the above headings.

Development proposals should be located where sustainable travel patterns can be achieved. Proposals should minimise the need to travel, especially by private car, and maximise opportunities for the use of walking, cycling and public transport. Developments should be designed and located to reduce as far as possible the negative impacts of vehicles such as excessive volumes, fumes and noise.

6.21. Policy BCS11 – Developer Contributions

Planning obligations may be sought from any development, irrespective of size, that has an impact requiring mitigation. Contributions through CIL will be required in accordance with the appropriate regulations.

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6.22. Policy BCS13 – Climate Change

Development should contribute to both mitigating and adapting to climate change, and to meeting targets to reduce carbon dioxide emissions. Development should mitigate climate change through measures including:

- High standards of energy efficiency and the efficient use of natural resources in new buildings;
- The use of decentralised, renewable and low-carbon energy supply systems;
- Patterns of development which encourage walking, cycling and the use of public transport instead of journeys by private car;
- Development should adapt to climate change through measures including:
 - Site layouts and approaches to design and construction which provide resilience to climate change.
 - Measures to conserve water supplies and minimise the risk and impact of flooding.
 - The use of green infrastructure to minimise and mitigate the heating of the urban environment.
 - Avoiding responses to climate impacts which lead to increases in energy use and carbon dioxide emissions.

These measures should be integrated into the design of new development. New development should demonstrate through Sustainability Statements how it would contribute to mitigating and adapting to climate change and to meeting targets to reduce carbon dioxide emissions by means of the above measures.

6.23. Policy BCS15 Sustainable Design and Construction

Sustainable design and construction will be integral to new development. In delivering sustainable design and construction, development should address the following key issues:

- Maximising energy efficiency and integrating the use of renewable and low carbon energy;
- Waste and recycling during construction and in operation;
- Conserving water resources and minimising vulnerability to flooding;
- The type, life cycle and source of materials to be used;
- Flexibility and adaptability, allowing future modification of use or layout, facilitating future refurbishment and retrofitting;
- Opportunities to incorporate measures which enhance the biodiversity value of development, such as green roofs.
- 6.24. New development will be required to demonstrate as part of the Sustainability Statement submitted with the planning application how the above issues have been addressed. All new development will be required to provide satisfactory arrangements for the storage of refuse and recyclable materials as an integral part of its design.

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6.25. Policy BCS14 – Sustainable Energy

Development in Bristol should include measures to reduce carbon dioxide emissions from energy use in accordance with the following energy hierarchy:

- Minimising energy requirements;
- Incorporating renewable energy sources;
- Incorporating low-carbon energy sources.

Development will be expected to provide sufficient renewable energy generation to reduce carbon dioxide emissions from residual energy use in the buildings by at least 20%. An exception will only be made in the case where a development is appropriate and necessary but where it is demonstrated that meeting the required standard would not be feasible or viable.

6.26. Policy BCS16 - Flood Risk

Development in Bristol will follow a sequential approach to flood risk management, giving priority to the development of sites with the lowest risk of flooding. The development of sites with a sequentially greater risk of flooding will be considered where essential for regeneration or where necessary to meet the development requirements of the city.

Development in areas at risk of flooding will be expected to:

- Be resilient to flooding through design and layout;
- Incorporate sensitively designed on or off site mitigation measures.

All development will be expected to incorporate water management measures to reduce surface water run-off and ensure that it does not increase flood risks elsewhere. This should include the use of sustainable drainage systems (SUDS).

6.27. Policy BCS20 – Effective and Efficient Use of Land

New development will maximise opportunities to re-use previously developed land. Where development is planned opportunities will be sought to use land more efficiently across the city.

6.28. Policy BCS21- Urban Design

New development in Bristol should deliver high quality urban design. Development in Bristol will be expected to:

- Contribute positively to an area's character and identity, creating or reinforcing local distinctiveness;
- Safeguard the amenity of existing development and create a high-quality environment for future occupiers;
- Promote diversity and choice through the delivery of a balanced mix of compatible buildings and uses.

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6.29. Policy BCS22 – Conservation and Historic Environment

Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including:

- Historic buildings both nationally and locally listed;
- Historic parks and gardens both nationally and locally listed;
- Conservation areas:

Site Allocations and Development Management Policies

6.30. Policy DM1: Presumption in favour of sustainable development

When considering development proposals a positive approach will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Bristol City Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the city.

6.31. Policy DM17: Development Involving Existing Green Infrastructure

Trees - All new development should integrate important existing trees. Where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided.

6.32. Policy DM19: Development and Nature Conservation

Development which would be likely to have any impact upon habitat, species or features, which contribute to nature conservation in Bristol will be expected to:

- Be informed by an appropriate survey and assessment of impacts; and
- Be designed and sited to avoid any harm to identified habitats, species and features of importance;

6.33. Policy DM23: Transport Development Management

Development should not give rise to unacceptable traffic conditions and will be expected to provide:

- Safe and adequate access for all sections of the community within the development and onto the highway network;
- Adequate access to public transport;
- For appropriate transport improvements to overcome unsatisfactory transport conditions created or exacerbated by the development.

Proposals should be supported by a Transport Assessment and/or a Travel Plan where development is likely to have a significant traffic impact.

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Public rights of way - Development will be expected to protect and enhance the function and amenity of public rights of way.

6.34. Policy DM26: Local Character and Distinctiveness

The design of development proposals will be expected to contribute towards local character and distinctiveness by:

- Responding appropriately to and incorporating existing land forms, green infrastructure assets and historic assets and features;
- Respecting, building upon or restoring the local pattern and grain of development;
- Retaining, enhancing and creating important views into, out of and through the site;
- Responding appropriately to the height, scale, massing, shape, form and proportion of existing buildings, building lines and set-backs from the street;
- Reflecting locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportion;
- Reflecting the predominant materials, colours, textures, landscape treatments and boundary treatments in the area.

Development will not be permitted where it would be harmful to local character and distinctiveness or where it would fail to take the opportunities available to improve the character and quality of the area and the way it functions.

6.35. Policy DM27: Layout and Form

Landscape Design - In contributing to green infrastructure, design should incorporate valuable existing natural and manmade landscape features, while reinforcing it with new structural tree planting where appropriate. Proposals for the landscape design and planting of development will be expected to:

- Take account of the function, circulation and servicing of places and site constraints including underground services;
- Use trees and other plants appropriate to the character of the site and its context, including native trees;
- Allow sufficient space for safeguarding valuable existing vegetation and the healthy establishment of trees and other planting;
- Integrate sustainable urban drainage systems;
- Incorporate hard detailing and materials and planting appropriate to context and fit for purpose, for all elements including surfacing, change of level, boundary treatments, and site furniture.

6.36. Policy DM31: Heritage Assets

Development that has an impact upon a heritage asset will be expected to conserve and, where appropriate, enhance the asset or its setting.

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Conservation Areas - Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.

Registered Historic Parks and Gardens - development will be expected to have no adverse impact on the design, character, appearance or settings of registered historic parks and gardens and to safeguard those features which form an integral part of their character and appearance.

6.37. Policy DM32: Recycling and Refuse Provision in New Development

All new non-residential development will be expected to provide, as a minimum shared recycling facilities and refuse bins of sufficient capacity to serve the proposed development.

Emerging Local Planning Policy

6.38. The City Council in conjunction with Bath & North East Somerset Council, North Somerset Council and South Gloucestershire Council, are currently preparing the West of England Joint Spatial Plan which will guide development in these areas until 2036. This plan is currently at an early stage with the Issues and Options consultation being carried out between November 2015 to January 2016.

Neighbourhood Planning

- 6.39. There is no designated Neighbourhood Plan area covering the application site however the Bower Ashton Residents Association produce a Community Plan. Whilst not an official planning document this has been taken into consideration as part of the development of the proposals. This identifies some key issues and opportunities including:
 - Promoting cycling and walking
 - Traffic Safety including on Clanage Road
 - Improvements to Footpaths
 - Improvement to Green Spaces and green way routes
 - Intrusive lighting on Clanage Road



7. Very Special Circumstances

- 7.1. The site is located within the Green Belt. As acknowledged in the pre-application advice received from Bristol City Council it is previously developed land with the southern section of the site being more open than the northern section. The site contains a large main building, outbuildings extensive hardstanding, enclosures and large ménage.
- 7.2. It is therefore considered that the proposed development is in line with paragraph 89 of the NPPF which states that the "partial or complete redevelopment of previously developed (Brownfield) sites, whether redundant to in continuing use 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" is acceptable in the Green Belt. Core Strategy policy BCS6 sets out that that in line with national policy the Green Belt will be protected from inappropriate development.
- 7.3. Although the site is considered to be previously developed, and the proposals when taken as a whole will improve the openness of the Green Belt, as the proposals would increase the level of hardstanding in the southern part of the site, a very special circumstances case has also been provided in line with paragraph 87 of the NPPF.
- 7.4. Paragraph 88 of the NPPF sets out that Very Special circumstances will not exist unless the potential harm to the Green Belt by reasons of inappropriateness and any other harm is clearly outweighed by other considerations. The Very Special Circumstances which exist in this case and are further discussed below are:
 - Regeneration of Brownfield Site at Baltic Wharf
 - Lack of suitable alternative sites
 - Support for local tourism industry
 - Contribution to local economy
 - Creation of local employment
 - Improvements to biodiversity and ecology
 - Improvements to local amenity
 - Road Safety
 - Overall reduction in built form on the site
 - Improvement in visual impact of the site

Planning Statement



Regeneration of Brownfield Site at Baltic Wharf

- 7.5. The Caravan Club have historically been located in the industrial heart of Bristol city centre. Over recent years this area has been subject to significant regeneration and redevelopment of much of the adjacent land for high density residential accommodation. The Caravan Club use is now out of keeping and not making the best use of a centrally located Brownfield site. The City Council, as landowner, is therefore seeking to redevelop the site for a more appropriate use either as a school or housing The Caravan Club will have to be relocated to enable this redevelopment to take place. The efficient reuse of Brownfield land is supported by the NPPF and Policy BCS20 of the Core Strategy.
- 7.6. Whilst the new use will make the best use of Brownfield land the City Council recognises the benefits that The Caravan Club brings to the tourism industry and employment. Relocation to a site as close as possible to the city centre will maximise these benefits and will be most sustainable. The City Council have therefore worked proactively with The Caravan Club to achieve these joint relocation aspirations.

Lack of Suitable Alternative Sites

- 7.7. Bristol City Council and the Caravan Club jointly instructed JLL an independent consultancy to conduct a site search to identify alternative sites for the Caravan Club to relocate to. As is clear in the Site Search documentation The Caravan Club remained open and flexible on their criteria for sites throughout the process, to aid in the identification of potential options.
- 7.8. As explained by JLL in their report, there is significant demand for development land in the wider Bristol area, which limits the number of sites available particularly in the city centre. This led to the search area being increased to up to 5m from the city centre. The area is also constrained heavily by the Green Belt, with the majority of the land surrounding the main built up area of the city designated as such. Whilst JLL were briefed to try and avoid Green Belt sites, 88% of sites they identified were within the Green Belt and 100% of the initial shortlist and final shortlist sites fell within the Green Belt.
- 7.9. The non Green Belt sites which were identified in the initial 59 sites were eliminated from the site search due to constraints which could not be overcome including existing planning permissions for other uses including for residential development, topography, fragmented land ownership, high land values and poor access.
- 7.10. Within no non Green Belt sites available, the application site has been pursued by The Caravan Club as it was the only site capable of meeting the basic needs for a touring caravan site. The previously developed nature of the site and proximity to the city centre was also considered positive. Despite this, there were no other sites that could accommodate this development with less impact on the Green Belt.



Support for Local Tourism Industry

- 7.11. The continued presence of the form of visitor and tourism accommodation which the proposals will provide is important to encouraging a diversity of local tourism opportunities. Bristol City Council's Local Economic Assessment undertaken in 2011 found that the Tourism sector contributes 17,800 jobs (7.7% of total jobs) and contributes a GVA of £582m to the wider economy of the area. Touring caravan sites, such as that proposed, deliver an alterative type of accommodation to typical hotel or B&B accommodation which is very popular particularly with older generations of tourists who also typically visit destinations in the UK rather than abroad.
- 7.12. Over the recent years the tourism industry has suffered due to the trend in low cost holidays abroad and the wider economic recession. The provision of this, often low cost, accommodation is a key area of the market and attracts many visitors to the area.

Contribution to Local Economy

7.13. The Caravan Club have undertaken extensive research into the benefits which their sites contribute to local economies and based on this, predict that based on typical levels of occupancy at their Baltic Wharf site, this proposed site will generate over £1m each year of direct off site spending in the local community (Please see The Caravan Clubs Supporting Statement). This is a huge benefit to the local community and the wider Bristol City Centre. As the Caravan Club have been asked to vacate their existing Baltic Wharf site, without the proposed new site this local spending would be lost. One of the three dimensions of Sustainable Development is an economic role and the NPPF explicitly supports ensuring that planning decisions contribute to building a strong and responsive economy, as does policy DM1 which aims to secure development that improves economic conditions.

Creation of Local Employment

- 7.14. In addition to the significant contribution that the proposed development can make to the local economy there is also a benefit to local employment. The development would provide employment initially through the construction of the site and following this ongoing local employment once the site is operational.
- 7.15. This Caravan Club site would directly employ a Warden couple on site as well as supporting employment elsewhere such as at key local attractions which primarily cater for the visitor economy.
- 7.16. Bristol City Council have no specific policies relating to the creation of employment in such circumstances however wider employment and economic policies support the continued prosperity of the economy. The proposed form of tourism accommodation is attractive to older generations who typically have more disposable income and all users of the site are likely to visit local attractions, use local shops and restaurants.
- 7.17. The NPPF sets out a commitment to securing economic growth to create jobs and the planning system and decisions on application should support this with "significant weight" being given to the need to support economic growth (Para 19).

Planning Statement



Improvements to Biodiversity

- 7.18. The site currently has very low biodiversity and ecology credentials, the majority of the site is taken up by buildings and other hardstanding and the open area to the south consist of low level grassland which is used for grazing. The site contains some sporadic planting and trees however there are a number of non native species namely the large hedge on the western boundary, which do not offer any ecology or habitat value. The nature of the use of the site is not complementary to supporting local wildlife due to associated noise and disturbance particularly due to the presence of police dogs and tannoys. The amount of external lighting including flood lights used as part of the previous use will be greatly reduced.
- 7.19. An extended phase 1 habitat survey was undertaken in September 2015 this included survey of the buildings and trees on site, to assess for potential for roosting bats. A bat emergence survey was undertaken on 5th May 2016. The survey found that there was very low potential for any bats to be utilising the existing trees or hedgerows to roost and this is further decreased by the extensive external lighting on the building and flood lighting in the surrounding open areas. No evidence of badgers was identified at the site and limited potential for habitats supporting dormice.
- 7.20. Generally the sites limited habitat value, lack of native vegetation and previous use has reduced the potential for any important species on the site. In terms of the proposals, the report found that the development would have no negative impact on the ecology of the site or surrounding sites and the proposed improvement and landscaping works could contribute to increasing the biodiversity of the site.
- 7.21. The proposals include an extensive landscaping and planting scheme which will greatly improve the level of biodiversity on the site, specifically through the use of native species of plants. In comparison to the existing use, the proposed use will be of a much quieter nature allowing for more species of animals to occupy the site. This is a key benefit of the proposals to the local area and contributes to the proposals positive impact on the Green Belt.
- 7.22. Contributing to enhance the natural environment is one of the Core Principles of the NPPF and paragraph 81 sets out that local authorities should use opportunities to enhance landscape, visual amenity and biodiversity, as is proposed in this application. In line with this Policy DM26 also supports development which use opportunities to improve the character and quality of areas and the use of native planting and additional landscaping is supported by Policy DM27.

Improvements to Local Amenity

7.23. We understand that the existing use of the site has created some negative impacts to local amenity. The surrounding land uses which are predominantly recreational including the cricket club, nursery and public open space to the west. The use of the external announcement system, which is used to give instructions to staff across the wider site creates noise disturbance which has a negative impact on surrounding recreational land uses. There is also a large amount of existing lighting including flood lighting at the site which has a negative impact particularly in winter when additional lighting is required in dark periods of the day.

Planning Statement



7.24. The proposed use of the site would reduce the noise and light pollution from the site significantly improving the impact on surrounding land uses and resulting in a much reduced level of noise and light pollution from the site. The proposal would enhance the recreational character of the surrounding Green Belt.

Road Safety

- 7.25. The proposals will reduce the number of entrances to the site from Clanage Road and include a number of measures to improve the sight lines into and out of the main entrance improving the safety of this turning onto Clanage Road. The Caravan Club would manage the usage of the entrance avoiding busy and peak times to further reduce the impact on vehicles accessing the site via Clanage Road. When compared to the current use of the site this will greatly improve the safety of this junction. There will also no longer be large horse boxes using this access.
- 7.26. The Transport Statement found that the three existing vehicular access points to the sites have poor sightlines, particularly looking left, caused by existing vegetation. This section of Clanage Road has a 30mph speed limit and a well maintained footway on the western side of the road providing access to the bus stop and surrounding public rights of way. A count of vehicles using the road and their average speed was undertaken, which shows that the road is very well used and vehicles often exceed the speed limit however no personal injury accidents have occurred in the last three years.
- 7.27. In relation to the proposed access the achievable sightlines are considered "more than sufficient" for the recorded speed on Clanage Road and the sightline to the south particularly is improved compared to the existing situation. The assessment includes a survey of existing Caravan Club sites vehicle movements in a "worst case scenario" when the sites were at full occupancy. Based on a more realistic 65% occupancy at this site there would be 76 two way movements, the majority by car and only 21 two way caravan movements per day. It is concluded that even on the busiest bank holiday weekend of the year with highest occupancy, the proposed use of the site will still generate less traffic than the historic police training use of the site. This is in line with Policy DM23.
- 7.28. The site is in close proximity to a bus stop which provides easy accessibility to public transport facilities connecting to the main city centre of Bristol from which wider public transport services can be accessed. The site also has good connectivity to surrounding public rights of way allowing access to open spaces and other attractions by foot. This is in line with Policy BCS10. The proposals provide a replacement caravan site in a highly sustainable location, reducing local vehicular movements and without any adverse impact on highway safety.

Planning Statement



Reduction of Built Form

- 7.29. As highlighted previously the proposed built form on the site constitutes a significant reduction in built form compared to the existing level. The existing buildings on the site have a combined footprint of 988m² and this excludes the large expanse of hardstanding, timber outbuildings and ménage area. The proposed built footprint of the site is a total of 310m², a significant reduction of 68% from the existing. Given that the three proposed buildings are set back from Clanage Road and are of a small scale with receding pitch roofs, they will be less visible from the surrounding area, particularly when compared to the large dominant nature of the existing main building which fronts this section of Clanage Road. In addition to the reduction in overall built form the change of use of the site, the proposals will remove the presence of large horse boxes from the site, which are significantly bigger than the typical caravan or motorhome, and currently detract from the openness of the Green Belt.
- 7.30. In the southern section of the site, specifically the large ménage area which has an area of approx. 1,200m², impacts on the openness of the Green Belt and is visible particularly from the areas to east of the site and the railway bridge. This also has a negative impact on the visual quality of the site. Although the proposal will introduce new hardstanding areas in this part of the site, in the form of an internal road and all weather pitches, when compared to the removed ménage and landscaping proposals the overall impact on the Green Belt will be beneficial.
- 7.31. The proposed development will have no adverse impact on the medium and long range views of the site as set out in the Landscape and Visual Impact Assessment. Short range views from the railway bridge will continue to be heavily screened resulting in a neutral impact compared to existing views of the site. From the footpath running along the south of the site it will be possible to gain views of caravans in the southern area when present, however the perceived openness of this part of the site will remain.
- 7.32. When occupied by touring caravans the level of "development" or activity on the site at certain times will appear higher than when unoccupied. As the caravan's will not be a permanent feature on the site and transitional in nature, a large proportion of the year this area will be completely open. Other than within the most popular period in the summer, the site is unlikely to operating at full capacity and even when there are caravans present on site, the low density and generous spacing of the pitches will allow the site to still appear relatively open. The overall impact on the site and surroundings will be positive.

Visual Impact of the Site

7.33. As set out in the accompanying Landscape and Visual Impact Assessment the existing buildings and other hardstanding on the site can be seen from both short and long ranging views of the site and generally appears scruffy and unkempt. This detracts from the visual quality and attractiveness of the area.

Planning Statement



- 7.34. The proposed new buildings and hardstanding will be visible from some surrounding short range viewpoints. However the impact on these views will be minimised by their form/distribution and the proposed landscaping and planting scheme. It will increase the openness of the site as a whole. The impact of surface level pitches and the internal road is less than the large industrial style building, extensive hardstanding and the ménage.
- 7.35. The views of the site along Clanage Road will be improved through the reduction of visible buildings on the road frontage. The proposed buildings are set back from the road and reduce the overall built form. They will only be visible from views immediately adjacent to the site and from the elevated railway bridge. From these views the overall site will appear as open in character as is existing. The proposed buildings reduce the overall built form and have a more attractive design and materials than the existing buildings producing more attractive short range views. The proposed native planting will assist the site as a whole to integrate with the surrounding area, rather than appearing out of character and incongruous as it does currently.
- 7.36. From longer range views, as demonstrated in the existing and proposed photomontages provided, the site is almost impossible to distinguish within the landscape and will not appear visually altered.
- 7.37. From medium range views in the south the openness will not appear materially changed. As with the longer range views, the site is not easily distinguishable within the landscape and the proposals will result only in views of the tops of caravans when present on site. This compares to the existing views of horseboxes and the south elevations of the buildings. This is shown in the existing and proposed views provided as part of the Landscape and Visual Impact Assessment.
- 7.38. The transient nature of the proposed use of the site, which is unlikely to operating at full capacity for the majority of the year, results in the day to day impact on views of the site being lessened. As confirmed in the pre-application advice received the proposed caravans are non-permanent being used for holidaying purposes only. This results in the visual impact of the site changing depending on occupancy, however even in a worse case scenario the overall impact of the proposed caravans on the southern part of the site is considered to be neutral.

Balance of Impact on Character and Openness of the Green Belt

7.39. A key factor in assessing the impact of the proposals on the character and openness of the Green Belt is the existing impact of the site. This consists of large, bulky existing buildings, extensive hardstanding and on site practices which cause negative impact to the surrounding area and neighbouring users. The surrounding land uses are predominantly recreational with public open space to the east, the cricket club and nursery to the south and public footpaths on the boundary of the site. The proposed land use is therefore considered to be more in keeping with these uses and more a more appropriate use of land within the Green Belt.

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7.40. In the northern section of the site the openness of the Green Belt will be significantly improved with a large reduction in built form and hardstanding. The southern section of the site (when fully occupied), will appear less open than the existing situation from short range views. This will however only be rare and transitory, for most of the time the openness of the southern part of the site will be improved. Overall the site will appear more open and there will be less overall development in the Green Belt which is supported by national and local planning policy.

Conclusion on Very Special Circumstances Balance

- 7.41. As previously stated the application site is previously developed and its redevelopment is acceptable under the Green Belt policies of the National Planning Policy Framework. When considered as a whole the benefits of the proposals significantly outweigh any negative impacts, resulting in an overall improvement in the character and appearance of the Green Belt and no adverse change in the openness of the area.
- 7.42. The key benefits of the scheme can be summarised as:
 - The release of a Brownfield site within the city centre for a more appropriate and high density use, as proposed by Bristol City Council. The relocation of the Caravan Club will allow for the best use to be made of this centrally located site.
 - Lack of an appropriate alternative non Green Belt or Green Belt site in the local area, as demonstrated by the accompanying site search document. The application site is the only site available which can accommodate the Caravan Club needs.
 - The retention of the significant economic and employment benefits that the Caravan Club contributes to the local area and creation of new opportunities to further enhance these benefits to the local and wider regional economy, local spending, tourism industry and local employment as part of the relocation of the site.
 - Reduction in the overall built form on the site resulting from the removal of existing buildings and other structures and replacement with buildings of a much smaller footprint and a more sensitive design.
 - An improvement in biodiversity and ecology on the site through increased landscaping and planting, introduction of native species and a quieter, less intrusive land use.
 - An improvement to local amenity and impact of the site on neighbouring users by removing the existing practices on the site which caused disturbance and replacing them with quiet activity better suited to the recreational character of the area.
 - Improvement to road safety particularly for vehicles entering and exiting the site, increased congestion management which can be tailored to the peak and busy periods on the road network and reduction in overall vehicular movements to and from the site
- 7.43. In addition to these clear benefits the views of the site will mostly remain unaltered from the surrounding area and any views of the site which will change minimally, will retain the current overall perception of openness for the majority of the year when the site is not fully occupied the site will appear more open than currently.

Planning Statement



7.44. When the beneficial impacts and neutral changes (worst case scenario) the scheme will create are considered as a whole, the planning balance clearly demonstrates that the benefits of the scheme outweigh any negative impacts. There are clear grounds for the proposal to be considered (if necessary) acceptable as very special circumstances.



8. Additional Planning Considerations

Flood Risk and Mitigation

- 8.1. The Environment Agency Flood Risk Map suggests the site is within Flood Zone 3 however historic records indicate there has been no significant flooding of the site in recent years. There is however a relatively minimal risk of flooding from tidal or surface water events. The proposed development of the site will reduce the overall level of hardstanding on the site and as the proposed hardstanding pitches are porous there will be no increase in the risk of surface water flooding. In addition due to a reduction in non porous hardstanding the risk of flooding will be reduced.
- 8.2. A minimal risk of surface water or tidal flooding does remain and would be likely to occur only in severe weather conditions. The Environment Agency issue indirect warnings in the event of a potential flooding event. As the site will be permanently occupied by a Warden, who as part of their role will monitor for such warnings, the Caravan Club will be able to effectively respond to any flood risk. In the event of significant risk of flooding of the site the Club will be able to evacuate any caravans on the site and if necessary close the site. The Caravan Club operate a number of sites which have in the past been subject to flooding and have a tested monitoring and response to such risks. The safety of members, their caravans and belongings is of upmost important to The Caravan Club and is reflected in the accompanying Evacuation Plan.
- 8.3. The Baltic Wharf Caravan Club site is also within Flood Zone 3 and is located closer to the River Avon than the proposed replacement site. Over the period the Baltic Wharf site has been in use by the Caravan Club there have been no incidents of flooding. The risk of flooding on the proposed replacement site is no worse than the existing site.
- 8.4. The pre-application advice received from Bristol City Council set out that a sequential test would be needed for these proposals. As set out in the NPPF the aim of the Sequential Test is to ensure new development is located in areas with the lowest probability of flooding. Development should not be permitted if there are reasonably available sites appropriate for the proposals in areas with a lower probability of flooding. This is also set out in Policy BCS16 which goes on to state that the development of sites with "sequentially greater" flooding risks will be considered where necessary to meet the development requirements of the city. The need for the proposals on the site is discussed in Section 7.
- 8.5. As part of the process of identifying this replacement site, an extensive site search was undertaken, which considered a range of criteria including flood risk. Of the 59 sites identified the proposal site is the only one which can accommodate The Caravan Club and there are no other sites with lower flood risk which can accommodate the needs of the development. Therefore a Sequential Test has been undertaken on this site and concluded that no other sites with a lower probability of flooding are available.
- 8.6. In this instance the NPPF sets out the need for an Exceptions Test which must demonstrate that the development:
 - provides wider sustainability benefits to the community that outweigh flood risk

Land at Clanage Road, Bristol

Planning Statement



- 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.
- 8.7. As is clear throughout this Planning Statement and within the Very Special Circumstances, the sustainability benefits of the proposals significantly outweigh the flood risk of the site. The proposals will create social, economic and environmental benefits to the site itself, surrounding area and wider community. In addition the proposed mitigation methods specific to this site, minimises the vulnerability of the users of the site being affected by flood risk and if in the event of a severe weather event the Caravan Club are in a position to act to prevent any hazard to on users or their possessions. As set out above the reduction in the built form and hardstanding on the site and use of porous hardstanding pitches will decrease particularly the risk of surface water flooding on the site and runoff into the surrounding area.

Impact on the Bower Ashton Conservation Area

- 8.8. The pre-application advice received from Bristol City Council highlighted a potential impact on the openness of this area of the Bower Ashton Conservation Area. As is set out in Section 7 of this Statement the proposals will not have a negative impact on the openness of the site or surrounding area and therefore the Conservation Area. The proposals will be more in keeping with the surrounding recreational uses within the Conservation Area and will improve the quality of the site which at present is poor. Overall the character of the Conservation Area will be preserved if not enhanced.
- 8.9. The NPPF sets out that opportunities for the enhancement of Conservation Areas through new development and policy DM31 sets out that development within Conservation Area should preserve or enhance those elements which contribute to their special character or appearance.

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9. Conclusion

9.1. Savills has been instructed by The Caravan Club to submit this planning application for:

"The 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 works including the demolition of existing buildings and erection of reception and amenity buildings and wardens accommodation"

- 9.2. The proposals will result in a sustainably located touring caravan site which is more in keeping with the character of the area and surrounding land uses. The proposals for this previously developed site, will decrease the overall built form on the site and enhance the openness of the Green Belt. As is set out in Section 7 (Very Special Circumstances) the benefits of the proposals outweigh any negative impacts on the Green Belt.
- 9.3. There will be no negative impact on the openness of the Conservation Area. The proposed development is more in keeping with the surrounding land uses in the Conservation Area. Its character and appearance will be enhanced.
- 9.4. The proposals will have no negative impact on the flood risk of surrounding areas and result in a decrease in on site risk of flooding. The proposed mitigation methods and evacuation plan demonstrate that the risk posed by flooding to the users of the site can be successfully managed.
- 9.5. The application scheme was supported by a number of local residents and community leaders when approached during public consultation many of whom felt the proposals would greatly improve the site.
- 9.6. Overall the application proposals will allow for the Caravan Club to continue to provide touring caravan accommodation to members in the area following vacating their existing Baltic Wharf site. The aspiration to relocated and retain the Caravan Club in the area has been demonstrated by the Bristol City Council involvement in identifying an alternative site, a process which resulted in the application site being taken forward. The proposals will result in overall improvement to the openness and character of the Green Belt, improve the amenity of the local community and overall provide benefits which significantly outweigh any minimal adverse impacts of the proposals.
- 9.7. We therefore respectfully request that this application is granted planning permission.

The Caravan Club July 2016 **30**

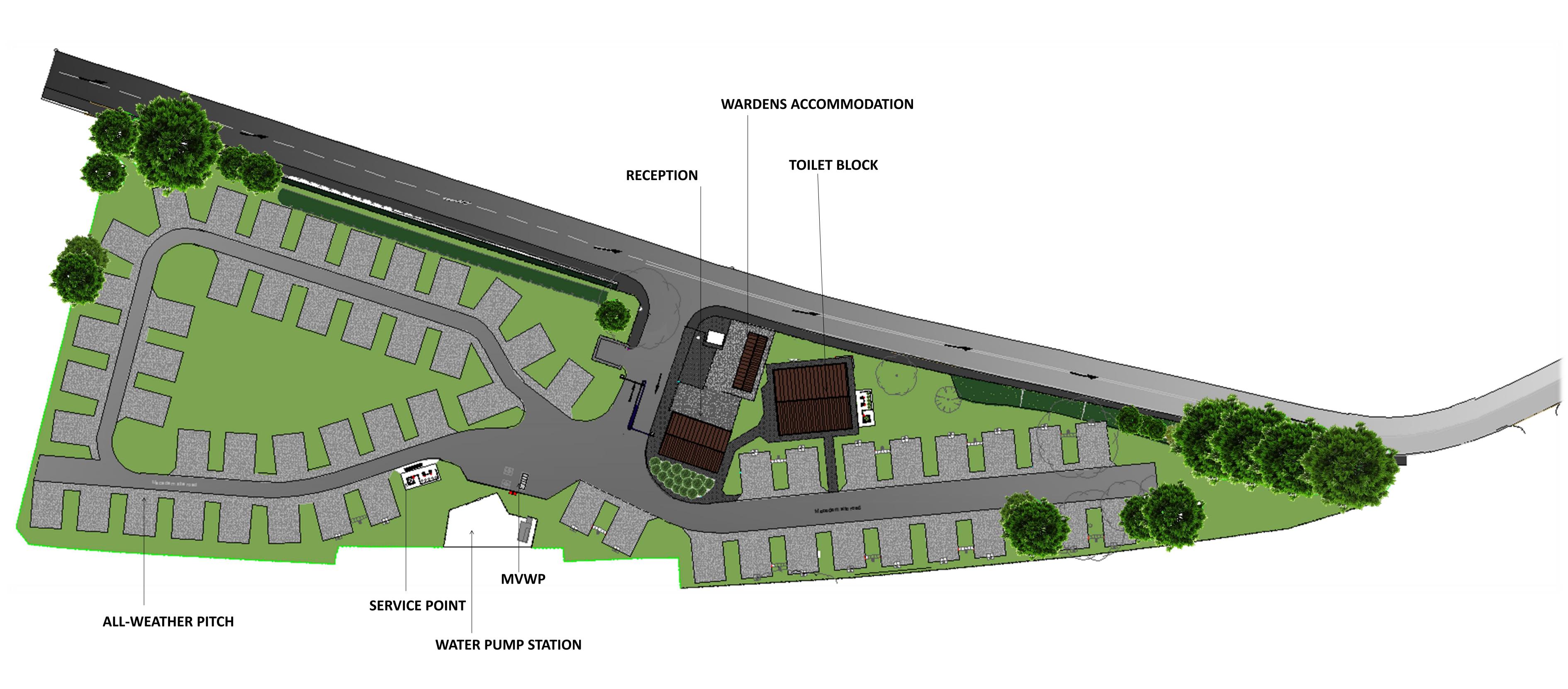
Ruth Bryan Planner

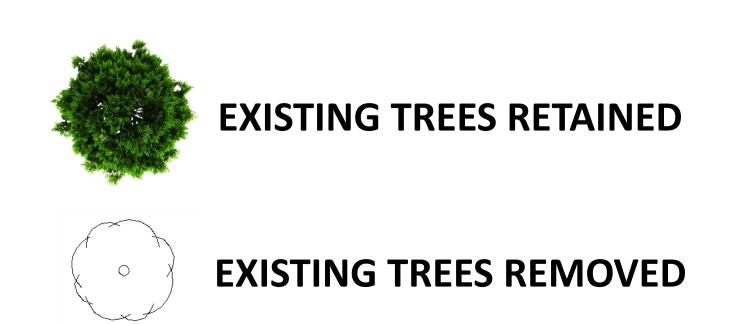
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A report on the *site search* process concerning the relocation of;

The Caravan Club
Baltic Wharf, Cumberland Road,
Bristol, BS1 6XG

27th June 2016

On Behalf of





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1 Introduction

We have been asked to produce a report explaining the site search process which took place and the outcomes of the search.

2 Request to Tender by Bristol City Council

JLL were invited on 7th November 2014 to tender our services to undertake a site search for Bristol City Council to relocate the Caravan Club from the existing site at Baltic Wharf, Bristol.

A copy of the letter to tender and The Caravan Club supporting information is attached at Appendix 1.

3 JLL Tender Submission

- **3.1.1** The Council's request letter emphasises whilst the Caravan Club preferences were set out in the accompanying brief showing they would be flexible on site requirements and location.
- **3.1.2** Only sites with a reasonable prospect of planning consent for the proposed use should be considered.
- **3.1.3** The JLL tender submission set out background information concerning;
 - The existing Caravan Club site to show JLL had an understanding of their business and members expectation on services, ambience and location.
 - Site search criteria was key to understanding proposed timescales to identify opportunities; key locations and surrounding environment; size to enable a more efficient use of space.
 - Site search strategy proposed by JLL to provide maximum site opportunities for the Caravan Club to consider.
- 3.2 Following the submission of the JLL tender on 17th November 2014 JLL were appointed and via email on the 25th November 2014. JLL were appointed initially on the basis of a site search 6.3 Option 1 of the JLL tender.
 - A copy of this tender which includes full details of the site search strategy, is attached at Appendix 2.

4 JLL Appointment Meeting

- **4.1** On the 3rd December 2014, JLL, Bristol City Council and the Caravan Club met at JLL's Bristol office to review the site search strategy. During the meeting we discussed in length the needs and requirements of the Caravan Club to maintain members expectations.
- 4.2 The document titled The Caravan Club Supporting Information- Appendix 1- formed the basis of this discussion. The key requirements and needs are highlighted in Section 4 of the JLL tender. JLL advised during the meeting that due to a significant improvement in market conditions land availability was becoming more scarce therefore a flexible approach concerning location, size and shape was required. This approach was accepted by the Caravan Club.
- 4.3 At the meeting The Caravan Club confirmed that their early research has identified the following opportunities;
 - 1. Parsonage Farm, Long Ashton
 - 2. Dovecote Public House, Long Ashton
 - 3. Land at Clanage Road, Bedminster
 - 4. Avon Valley Farm, Keynsham
- **4.4** JLL included use in the review.

5 JLL Site Search Results

- 5.1 The implementation of the search strategy yielded 59 opportunities. This information was consolidated into a Site Search Report and submitted to The Caravan Club on 14th January 2015. Each site was given a rating from A-C with A being of highest interest meeting the majority of the given search criteria. This was an informal rating given to The Caravan Club as an initial guide.
- **5.2** A copy of the JLL Site Search Report is attached at Appendix 3.

6 Analysis of Sites

6.1 The 59 identified opportunities provided the following results.

Opportunities		59	
In Search Area		84%	
In Green Belt		88%	
Rating	Α	7%	Meets all 5
	A/B	24%	Meets 4/5
	В	17%	Meets 4
	B/C	10%	Meets 3/5
	С	42%	Meets 3

The 4 options (all of which were in the Green Belt) initially considered by JLL of most interest with an A rating were:

Site	Address	Comments
Site 12	Beggar Bush Lane, Abbots Leigh	This option met the majority of the criteria but had the added benefit of a planning consent for a leisure park. Green Belt
Site 14	Gatcombe, Long Ashton	This was considered a strong option due to the access (both public and private) and within the search area. It was however considered to have long term potential for residential. Green Belt
Site 17	Barrow Guerney Former Hospital	A large residential site providing "strong hope" of a leisure consent. The site was considered generally flat with good cycle paths and nature walks. Green Belt

Site 47 Dovecote Public House (now The Ashton)	A strong location with surrounding attraction i.e. Ashton Court. Close proximity to existing site. Green Belt.
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A copy of opportunities is listed with the JLL Site Search Report at Appendix 2;

7 Review & Feedback of Site Search

7.1 The JLL Site Search was reviewed by the Caravan Club and following a telephone conversation the following 16 opportunities were considered of most interest to shortlist by the Caravan Club for inspection despite some having a low grade in our analysis.

1.	Site 7	Charlton Farm, Wraxall – GB
2.	Site 11	Leigh Court, Abbots Leigh – GB
3.	Site 12	Beggar Bush Lane, Abbot Leigh – JLL 'A rated' site - GB
4.	Site 14	Gatcombe, Long Ashton – JLL 'A rated' site - GB
5.	Site 16	Bridge Farm, Long Ashton - GB
6.	Site 17	Barrow Guerney Hospital – JLL 'A rated' site – GB
7.	Site 23	Norton Lane, Whitchurch – GB
8.	Site 24	Norton Lane, Queen Charlton Road, Whitchurch – GB
9.	Site 25	Norton Lane, Queen Charlton Road, Whitchurch – GB
10.	Site 46	Parsonage Farm, Long Ashton - GB
11.	Site 47	Dovecote Public House, Long Ashton –(JLL 'A rated' site) - GB
12.	Site 49	Bristol City FC Stadium Site, Ashton - GB
13.	Site 50	Bridge Farm, Long Ashton – GB
14.	Site 52 / 53	Yanley Lane, Long Ashton – GB

- 15. Land at Clanage Road, Bedminster (original site identified by The Caravan Club) GB
- 16. Avon Valley Farm, Keynsham (original site identified by The Caravan Club) GB
- 7.2 Other options were discounted due to planning complexities; access, location and topography.
- 7.3 A copy of the initial assessment of these sites by The Caravan Club is attached at Appendix 4.

8 Initial Site Inspections- Shortlist 1

8.1 The shortlisted opportunities were inspected by the Caravan Club on 29th January 2015 and their site inspection reduced the shortlist to the following:

1.	Site 12	Beggar Bush Lane, , Abbot Leigh – JLL site - GB
2.	Site 14	Gatcombe, Long Ashton – JLL site- GB
3.	Site 17	Barrow Guerney Hospital – JLL site- GB
4.	Site 23, 24, 25	Norton lane, Queen Charlton Road, Whitchurch - GB
5.	Site 46	Parsonage Farm, Long Ashton - GB
6.	Site 47	Dovecote Public House, Long Ashton – JLL site – GB
7.	Site 49	Bristol City FC Stadium Site, Ashton - GB

- 8. Land Clanage Road, Bedminster (original site identified by The Caravan Club) GB
- 9. Avon Valley Farm, Keynsham (original site identified by The Caravan Club)- GB
- **8.2** A copy of the feedback and the decision making is attached at Appendix 5.
- 8.3 Subsequently after the inspections JLL requested on 16th February 2015 further information, primarily the ownership boundaries and access, from David James & Partners Ltd who were representing the owners of the above sites excluding option 8. A copy of the required additional information table is attached at Appendix 6. David James and Partners responded on 24th February 2015 with site plans and confirming access had been arranged for The Caravan Club.

9 Final Review of Site Inspections – Shortlist 2

- **9.1** Following receipt of the additional site information, arrangements were made to undertake final detailed site inspections on 27th February 2015.
- 9.2 JLL reviewed final comments from the Caravan Club on 13th March 2015 confirming the final shortlist, as follows;

1.	Site 12	Beggar Bush, Abbots Leigh –Gl	В

- 2. Site 14 Gatcombe, Long Ashton –GB
- 3. Site 46 Parsonage Farm, Long Ashton –GB
- 4. Site 47 Dovecote, Public House, Long Ashton –GB
- 5. Site 49 Bristol City FC, Stadium Site, Ashton –GB
- 6. Land at Clanage Road, Bedminster- GB
- 7. Avon Valley Farm, Keynsham –GB
- **9.3** Of the shortlisting sites 17, 23, 24 and 25 (all green belt) were removed from the list following a site inspection (see Appendix 5)
- **9.4** Sites 46 and 47 were discarded as the Caravan Club had received a negative pre app response from North Somerset District Council (see letter at Appendix 7).
- 9.5 Site 12, 14 and 49 were the subject of a discussion with Neil Underby of NSDC and again rejected on the basis of being in the Green Belt.
- **9.6** Site 49 also had timing issues connected with the need for the football stadium to relocate.
- **9.7** The Avon Valley Farm Site was rejected as a lease couldn't be agreed.
- **9.8** A copy of the final shortlisting is attached at Appendix 7.

10 Conclusion of Process

- **10.1** In conclusion, JLL and the Caravan Club adopted an intensive wide ranging search strategy which identified 59 potential opportunities.
- **10.2** As previously highlighted due to market conditions traditional employment land / brown field sites were scarce in supply. Of the 59 options c. 84% were within the desired search area and c. 88% were within the Green Belt.
- **10.3** After careful consideration and with the Caravan Club adopting a flexible approach to size and location etc. the process reduced this to seven options.

Appendix 1 – Request to Tender by Bristol City Council & Supporting Information



Chris Miles, Associate Director, JLL, 40 Berkeley Square, Bristol, BS8 1HU Reply to Neil Piper, Telephon 0117 9224036

Minicom Fax

E-mail

Neil.piper@bristol.gov.uk

Your ref Date

7th November 2014

Dear Mr Miles,

SITE SEARCH FOR CARAVAN CLUB - BRISTOL

As you may be aware, the Caravan Club are seeking to find new premises in the Bristol area to replace their existing site at Baltic Wharf. Bristol City Council (the owners of the Baltic Wharf site) is looking to assist the Club in their efforts to find an alternative site. With this in mind, Bristol City Council wishes to appoint an agent to carry out a site search on behalf of BCC and the Club.

I attach a brief that has been prepared by Tony Barnett (Head of Estates at the Club) outlining the Clubs requirements. I would add that they are looking to be as close to the city centre as possible but would consider sites up to 5 miles out of the centre. This could therefore include sites of an urban or possibly rural nature. They recognise that they may ultimately need to compromise on some of these requirements in order to identify a site.

If you are interested in carrying out this search please can you forward your fee quote to me by 12.00 Noon on Monday 17th November 2014.

It is anticipated that the selected agent will have a period of 3 weeks to carry out the search. The agent will then provide a written report to include a list of potential sites to include the following:

- i) details on ownership and any occupiers.
- ii) a statement on the current status of the site together with any relevant planning information. (Only sites with a reasonable prospect of planning consent for the proposed use should be included on the list).
- iii) a plan identifying the site together with the postcode.
- iv) the relevant contact details to take any discussions forward.
- v) any other information that you might think relevant.

Please note that the fee quote should be expressed as a flat one-off fee. You are also welcome to forward any background information that supports your quote. Confirmation that you have the expertise to cover both urban and rural sites would be welcomed.

If you have any queries please do not hesitate to contact me. I would envisage that the selected agent will attend a meeting with Tony and myself very shortly after the appointment.

Yours sincerely

Neil Piper,

Principal Project Officer,

Property,

Bristol City Council

LAND SEARCH: BRISTOL

RECREATIONAL TOURING CARAVAN SITE FOR THE ACQUISITION, DESIGN, DEVELOPMENT AND OPERATION BY THE CARAVAN CLUB

BACKGROUND

Having operated a touring site on Baltic Wharf in Bristol since 1978 the Caravan Club is being requested to vacate to make way for a first school and several residential properties.

Occupying a site of 2.5 acres, a total of 55 touring caravan pitches are currently accommodated together with toilet and shower block, reception and equipment store. The site commands an all year occupancy totalling 18,500 pitch nights. Surveys carried out among visitors to Club sites show that each night of pitch occupancy translates into £50 of off-site spending in the local business community (excluding fuel sales). Applying a conservative multiplier of 5 to reflect the compounding effect of this inward spending, the Bristol economy currently benefits from the Caravan Club's presence by at least £4.625 million each year which is effectively index-linked.

REQUIREMENT

The strength of the existing site is its location within cycling/ walking distance of the City centre and in being even closer to a variety of nearby visitor attractions. The security and tranquillity of the property are also key attributes. The Club appreciates the chances of replicating these on a suitable site on satisfactory terms are remote and is therefore realistically prepared to compromise if the majority of the objectives can be achieved. The site would preferably be in the City Centre but sites within 5 miles of the centre would be considered.

Since this site was originally created, the Club's standards in developing and operating touring sites have improved substantially in line with the aspirations of modern caravanners, so that in order to provide a replacement site to accord with the Club's latest standards it proposes to develop a 75 pitch site on 5 acres and ideally in the order of 110 on 7.5 acres, giving a sparse density of 15 pitches per acre. This is

substantially less than the density one might expect on a commercial site and in addition to providing spacious pitches, offers generous scope for intermediate as well as perimeter indigenous screen planting.

To minimise the time that Bristol misses the economic benefit of the Club's presence and Club members are deprived of somewhere to stay whilst visiting the City, this requirement is immediate. It also needs to address as many as possible of the following criteria:

By virtue of its past/ present use and planning status it has the potential for gaining planning permission, ideally for all-year operation;

Ideally a reasonably level site or one which can feasibly be terraced;

Existing mature screen planting along outer boundaries;

Not previously history of excavations or filling operations;

Not highly sensitive ecology, or habitat for flora or fauna;

Absence of nearby hazards (eg fast flowing/ deep water, industrial fumes, etc);

Good natural drainage and no risk of flooding (although the Club is experienced in providing SUDS schemes);

Availability of all mains services (although neither gas nor foul drainage are essential);

Easily and directly accessible from the motorway network;

Availability of local convenience store(s) and public house/ restaurant;

Availability of local public open space/ footpaths within walking distance;

Close to local bus/ cycle/ footpath links to the City centre;

Pleasant natural environment;

Little ambient light and noise pollution;

Rectangular (min 100m x 200m) or near square (min 150m x 150m) shaped site;

Additional land for the provision of secure open storage for caravans (upwards of 0.5 acre) would be advantageous, yet not essential.

Examples of two of our most recently created touring sites are attached for your reference purposes. The first illustrates our site at Barnard Castle in Teesdale where we developed 76 pitches on pastureland classified as being of High Landscape Value. Opened in 2010, we have recently been granted planning permission by Durham County Council for a 50 pitch extension onto neighbouring grazing land (which is also illustrated on the attached drawing). The second relates to a similar sized touring site within the Heritage Coastline between Bridlington and Flamborough which was developed on former arable land. The latter incorporates a storage compound. All of the Club's 160 plus sites are unique and clearly differentiated. However, Uppermost on all of the Club's developments and acting as a common theme throughout is their high quality of design, construction and operation. Coupled with the aforementioned financial benefits, the Club's developments are widely welcomed in local communities.

Our developments are designed and implemented in a measured and sympathetic manner towards local environmental considerations and planning policies. They involve: a modestly proportioned reception; accommodation unit for the main warden couple who are periodically relieved by other wardens and manage the site on a 24/7 basis; store for grass cutting and other site maintenance equipment; and amenity building housing shower, toilet, laundry and disabled facilities. Where feasible we are willing to adapt/ reuse existing buildings. In ultimately seeking approval we endeavour to work with planners to streamline the approval process. In sustainability terms, our sites encourage the use of the existing public transport provision, footpaths and cycle-ways and incorporate renewable energy features. Their sensitive siting, screening and landscaping emphasise their minimal impact in terms of visual amenity.

To achieve the standards for which the Club is renowned, development expenditure in the order of £2m would be involved, so a freehold or a long lease of ideally 60 years or more, and a minimum of 50 years is envisaged.

Appendix 2 – JLL Tender Submission



A *Fee Quotation* for a site search for the re-location of:

The Caravan Club
Baltic Wharf, Cumberland Road,
Bristol, BS1 6XG

17 November 2014

On Behalf of





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1 Introduction

Thank you for the invitation letter dated 7th November 2014 to provide a fee quotation by 12 noon on Monday 17th November 2014, to undertake a site search for the re-location The Caravan Club based at Baltic Wharf, Bristol.

We understand the existing site which is owned by Bristol City Council is being redeveloped into a school and residential, and that Bristol City Council wishes to appoint an agent to carry out a site search on behalf of both Bristol City Council and The Caravan Club.

This fee quotation will provide an overview of the existing site whilst also discussing the detail of the search criteria; providing a clear strategy for the site search, and also demonstrating our capabilities and experience to act on your behalf. The report will conclude with our fee proposal.

The letter of invitation is attached within Appendix 1.

2 The Clients

2.1 The Caravan Club

The Caravan Club (The Club) was founded in 1907 and has its headquarters in West Sussex. It operates from 200 owned main sites and also operates from a further 2,500 privately owned sites in the UK and Ireland. The Club has approximately 1 million members and employs more than 800 staff which overall generates a business turnover of £100 million.

The Club continues to grow with 2014 recording more than 55,000 additional bookings compared to 2013 proving the high popularity of the "Staycation". The Club constantly strives to ensure a high level of satisfaction, maintenance, and refurbishment of sites' and during 2013/14 reinvested approximately £10 - £12 million.

2.2 Bristol City Council

Bristol City Council is the local authority of Bristol. It is a unitary authority having the powers of a non-metropolitan county and district council combined. The council's executive function is controlled by a directly elected mayor of Bristol, currently George Ferguson. Bristol comprises 35 wards electing 70 councillors.

3 Existing Site

We have read the supporting information kindly provided by Mr Barnett (Head of Estates at the Caravan Club) concerning the background of the existing site's location, size, amenities available etc. However the comments regarding inward annual spend by members within the region is most impressive at £4.625 million and effectively indexed link. This clearly demonstrates the importance of The Club to local economy. Because The Club have been at the existing site since 1978 we consider it important to investigate the current operation to enhance our understanding of the instruction.

Attached in Appendix 2 is the supporting information brief.

3.1 Location

The existing site is located within the Harbourside area known as Spike Island in Baltic Wharf, which is situated ¼ mile immediately south –west of the city centre. The site has strong communications fronting onto Cumberland Road (A370) which is a main arterial route providing access to the south via Long Ashton By-Pass; and the A4 providing access to the east via Bath Road and west via the Portway connecting at Junction 18 of the M5 national motorway network.

A location plan is attached within Appendix 3.

3.2 Description

The site is of trapezoid shape and is relatively level/flat. The site provides a relatively high degree of soft landscaping whilst predominantly surfaced with rolled stone/gravel within pitch areas and a tarmacadam road. The site also provides welfare facilities such as WCs, shower block, reception and an equipment store. The site is enveloped to the east by residential and to the west by a sailing club, public house and car park. The northern boundary is the water front of the Harbourside.

An aerial plan is attached within Appendix 4.

3.3 Site Area

The site has been measured on Promap extending to approximately 2.083 acres (0.843 hectares) but we note that provided information states a site area 2.50 acres. The site can accommodate 55 pitches which is c22-27 pitches per acre.

The OS street plan with the property edged red is attached within Appendix 5.

3.4 Rateable Value

The site is described within the Bristol City Council Valuation List as "Camping Site and Premises" with a rateable value of £33,500. The VOA website does not provide a breakdown of the valuation with accommodation areas.

3.5 Existing Tenancy Agreement

We understand from the invitation, that The Club has been requested to vacate the existing site and we would welcome the opportunity to review the existing tenancy agreement so that we can fully understand key items such as the anticipated expiry/vacation date. We note from the company website that the site is planning to remain open until the end of August 2015.

4 Site Search Criteria

We do not propose detailing the site search criteria in full however we have identified key items which we consider critical to safeguard The Club's goodwill, standards and reputation during this transition. The following are not in priority order but as part of the search strategy we recommend agreeing a structure and scoring matrix to aid decision making.

4.1 Timescales

We are aware of this importance. We understand that upon confirmed instructions the advisor will have 3 weeks to undertake and identify sites, and conclude with a written report in accordance with the letter of invitation detailing point's i)-v). Again we are acutely aware that members understand that the existing site will be operational until the end of August 2015.

4.2 Location

It is stated that the key attributes and strengths of the existing site are;

- Close proximity to city centre amenities and attractions
- Security
- Tranquillity

The brief suggests a search radius of 5 miles of the city centre. Attached within Appendix 6 is the proposed search area plan.

4.3 Size of new site

Clearly, The Club has an expansion programme whereby they are looking to increase the existing site from c2 acres to the proposed new site of between 5 and 7.5 acres. This will of course enable a greater volume of members but the aim is to reduce density from c22-27 pitches per acre at the existing, to c15 at the new site.

4.4 Tenure

We understand The Club is looking to purchase the new site by way of a freehold or long leasehold in excess of 50 years. The brief suggests an expenditure fund of £2 million however we query whether this is to include fees, planning, relocation costs etc. This gross fund suggests a budget of c£260,000 - £400,000 per acre.

Obviously the supporting brief highlights a number of other keys items which will be taken into consideration on this matter.

5 Site Search Strategy

With a 3 week period to search and report, we recommend direct approaches are immediately made to the following groups. We query at this stage whether The Club wishes to remain anonymous and the search is on behalf of a confidential client, or to give the search greater credibility The Club are identified. We recommend the latter.

5.1 Commercial Agents

We recommend the preparation of an in-house PDF document which can be circulated to agents for their clients' consideration, highlighting the requirement specifics i.e. timescales, size, location and tenure. We recommend keeping the search criteria brief to collate all opportunities. We recommend circulating this document to;

- Development Agents both private and public sectors specialists where land can be "hived-off" to "kick start" a scheme. Identify surplus land around the Park-and-Ride on the A370 or council owned land
- Residential & Land Agents explore option agreements on green field land where a sale to The Club
 could "kick start" a scheme. This could be farm land around Long Ashton
- Estate Agents & Auction Houses auctions are highly popular selling quirky, bespoke land opportunities on behalf of private individuals
- Retail & Leisure Agents identifying land opportunities where out of town retail demand has reduced and land could be "hived-off". Identify surplus land around the David Lloyd Centre, the "proposed" football stadium site (which is now a town green), Hengrove Retail Park
- Industrial Agents edge of town locations where redundant industrial buildings could be demolished
- Office Agents same as the above
- Planning Consultants where land has not yet come to the market but an allocation or planning application is being prepared for land bank/holdings

5.2 The Local Unitary Authorities

We would recommend an immediate meeting with Invest in Bristol & Bath (IBB) which is the collective four unitary authorities for the region in particular Bristol City Council and North Somerset which is the main search area to discuss the additional services that they can offer. This would primarily be the identification of council owned land.

5.3 Review of the Local Development Framework (LDF)

Working with our Planning Consultancy Team we would conduct a review of the search area to identify from the LDF allocated land. However we would not entirely rule out Green Belt land. Whilst this does present a planning/political issue, the use by The Club would be much more sympathetic to the surroundings compared to whole scale residential/commercial development. Given the instruction is a partnership with Bristol City Council, we would expect this discussion to be held immediately.

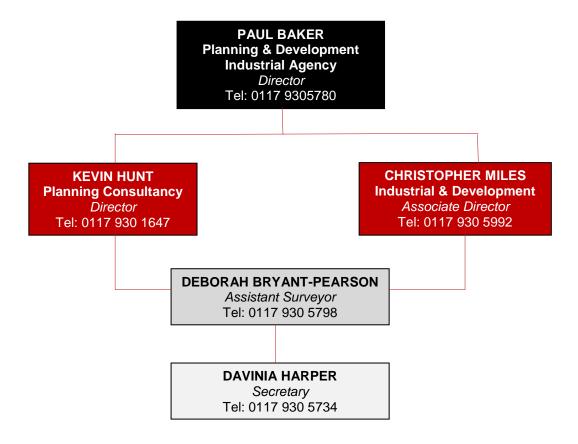
As a general market overview, we are sure you are acutely aware that market conditions have significantly improved in the past 12 months. The consequence is that the search size will be in direct competition with traditional developers.

6 Why JLL?

- We have the largest dedicated team dealing with commercial land disposal and acquisition.
- Strong local network.
- Strong national coverage.
- · Perfect market intelligence

6.1 Team

We confirm that Chris Miles – Associate Director, will work on this instruction on a daily basis over seen by Paul Baker – Director, in Charge of the Development & Industrial & Logistics Team in Bristol.



6.2 Experience

Within our team and department we have been involved in the following relevant examples;

- Education Funding Agency nationally retained to acquire sites for redevelopment into free schools. Have successfully acquired five sites within the region, the order of 1 – 3 acres.
- Disposal advice in relation to a 1.03 hectares city centre site adjoining Temple Meads on behalf of Ballymore;
- Development consultancy and disposal strategy advice for Urban Splash on a 100,000 ft² mixed use scheme in Bridewell Street, Bristol;

- Acquisition advice to City & Country Group in relation to the purchase of Bristol General Hospital a 200,000 sq ft Grade II listed hospital which is currently being developed as a high quality residential lead mixed use scheme.
- Development consultancy, marketing and disposal advice on 6.07 hectare (15 acre) office development site for Legal & General at Emersons Green, fronting the A4174 Ring Road
- Currently advising the Ministry of Justice on the disposal of a number of former prison sites in the South West;
- Advising the University of Bristol on the acquisition and development of a new 1,000 bed student village;
- Acting for a specialist hotel developer in the acquisition and development of a site in Central Bristol for a top
 quality hotel and conference centre;
- Working with Mendip District Council on the re-provision of a new state of the art multi outdoor sports facility funded by the development of existing sites for housing.
- Other projects range from greenfield development sites developed for offices at Emersons Green in Bristol, large scale distribution parks at Severnside in Bristol, industrial parks at Yate through to brownfield sites developed for housing, healthcare, hotels, restaurants and offices.

6.3 Fee

In accordance with the Estate Agents Act 1979 (as amended) upon written confirmation of your instructions, JLL suggest the following fee agreement to act on your behalf on the basis of sole selling/letting rights;

Option 1 – Site Search and report on findings - £4,000 plus vat

Option 2 – Option 1, plus identify sites and undertake negotiations to completion - £10,000 plus vat

We trust you find the above of assistance but if you have any queries then please do not hesitate to contact us.

Our Terms and Conditions are attached at Appendix 7.

Appendix 1 – Invitation Letter from Bristol City Council



Chris Miles, Associate Director, JLL, 40 Berkeley Square, Bristol, BS8 1HU Reply to Neil Piper, Telephon 0117 9224036

Minicom Fax

E-mail

Neil.piper@bristol.gov.uk

Your ref Date

7th November 2014

Dear Mr Miles,

SITE SEARCH FOR CARAVAN CLUB - BRISTOL

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Yours sincerely

Neil Piper,

Principal Project Officer,

Property,

Bristol City Council

Appendix 2 – Supporting Information

LAND SEARCH: BRISTOL

RECREATIONAL TOURING CARAVAN SITE FOR THE ACQUISITION, DESIGN, DEVELOPMENT AND OPERATION BY THE CARAVAN CLUB

BACKGROUND

Having operated a touring site on Baltic Wharf in Bristol since 1978 the Caravan Club is being requested to vacate to make way for a first school and several residential properties.

Occupying a site of 2.5 acres, a total of 55 touring caravan pitches are currently accommodated together with toilet and shower block, reception and equipment store. The site commands an all year occupancy totalling 18,500 pitch nights. Surveys carried out among visitors to Club sites show that each night of pitch occupancy translates into £50 of off-site spending in the local business community (excluding fuel sales). Applying a conservative multiplier of 5 to reflect the compounding effect of this inward spending, the Bristol economy currently benefits from the Caravan Club's presence by at least £4.625 million each year which is effectively index-linked.

REQUIREMENT

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By virtue of its past/ present use and planning status it has the potential for gaining planning permission, ideally for all-year operation;

Ideally a reasonably level site or one which can feasibly be terraced;

Existing mature screen planting along outer boundaries;

Not previously history of excavations or filling operations;

Not highly sensitive ecology, or habitat for flora or fauna;

Absence of nearby hazards (eg fast flowing/ deep water, industrial fumes, etc);

Good natural drainage and no risk of flooding (although the Club is experienced in providing SUDS schemes);

Availability of all mains services (although neither gas nor foul drainage are essential);

Easily and directly accessible from the motorway network;

Availability of local convenience store(s) and public house/ restaurant;

Availability of local public open space/ footpaths within walking distance;

Close to local bus/ cycle/ footpath links to the City centre;

Pleasant natural environment;

Little ambient light and noise pollution;

Rectangular (min 100m x 200m) or near square (min 150m x 150m) shaped site;

Additional land for the provision of secure open storage for caravans (upwards of 0.5 acre) would be advantageous, yet not essential.

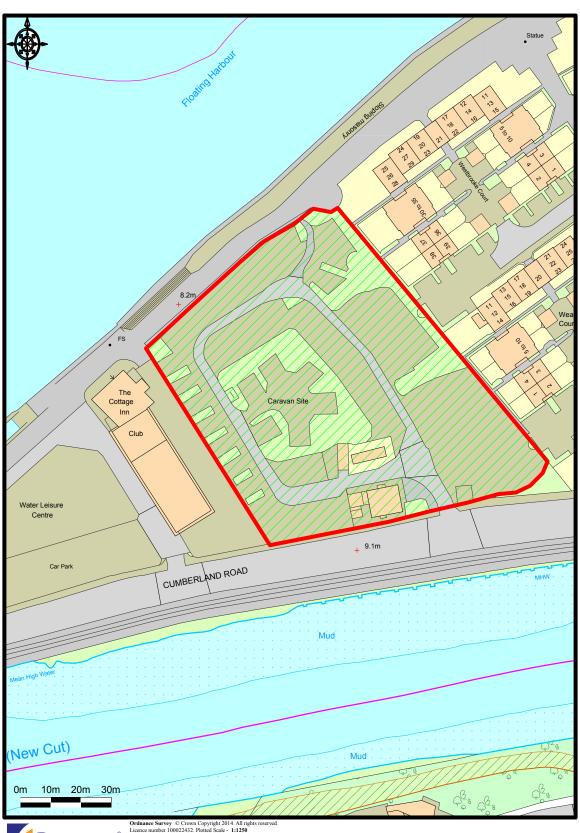
Examples of two of our most recently created touring sites are attached for your reference purposes. The first illustrates our site at Barnard Castle in Teesdale where we developed 76 pitches on pastureland classified as being of High Landscape Value. Opened in 2010, we have recently been granted planning permission by Durham County Council for a 50 pitch extension onto neighbouring grazing land (which is also illustrated on the attached drawing). The second relates to a similar sized touring site within the Heritage Coastline between Bridlington and Flamborough which was developed on former arable land. The latter incorporates a storage compound. All of the Club's 160 plus sites are unique and clearly differentiated. However, Uppermost on all of the Club's developments and acting as a common theme throughout is their high quality of design, construction and operation. Coupled with the aforementioned financial benefits, the Club's developments are widely welcomed in local communities.

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To achieve the standards for which the Club is renowned, development expenditure in the order of £2m would be involved, so a freehold or a long lease of ideally 60 years or more, and a minimum of 50 years is envisaged.

Appendix 3 – Location Plan

Caravan Club Cumberland Road Bristol BS1 6XG



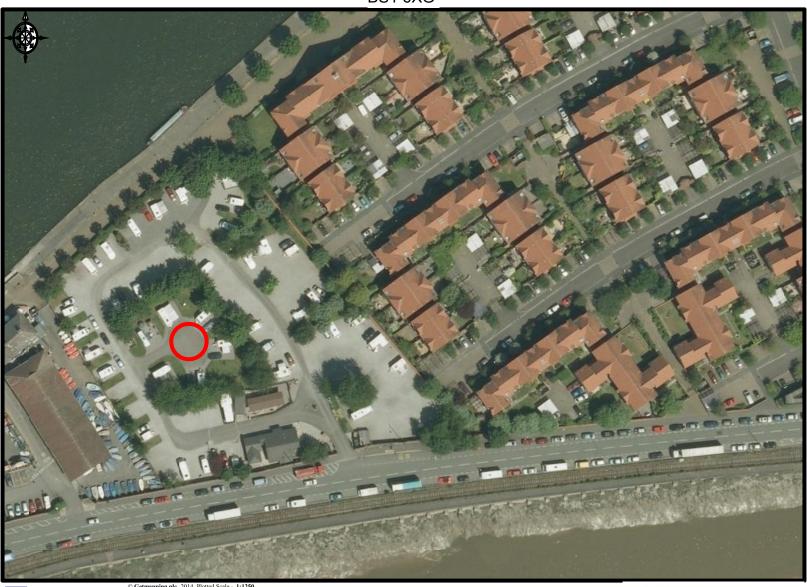


This plan is published for the convenience of identification only and although believed to be correct is not guaranteed and it does not form any part of any contract. © Crown Copyright. All rights reserved. Licence Number LIG0074.



Appendix 4 – Aerial Map

Caravan Club Cumberland Road Bristol BS1 6XG





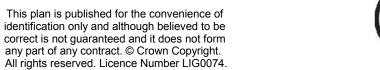


Appendix 5 – Street Plan

Caravan Club Cumberland Road Bristol BS1 6XG

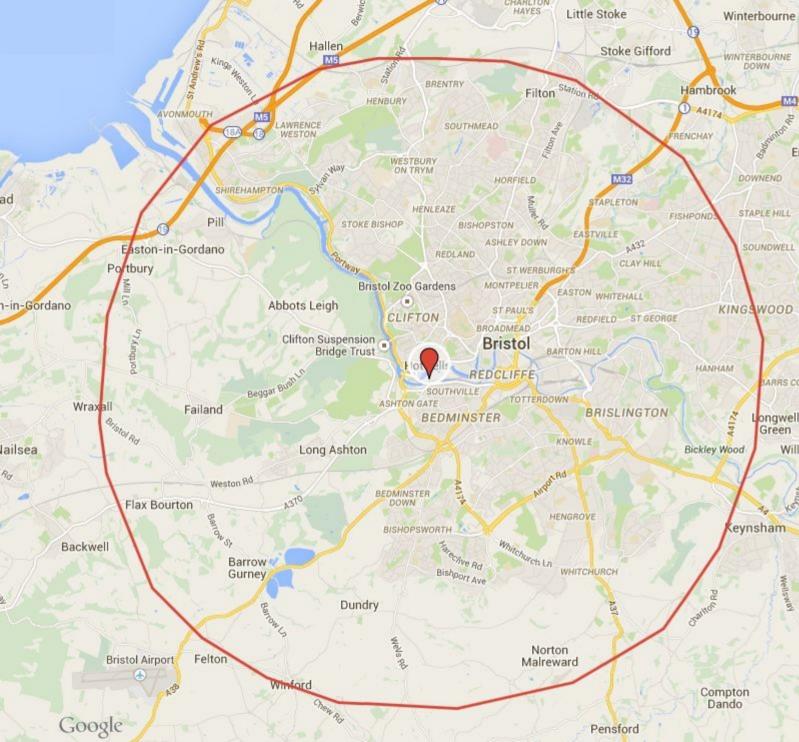








Appendix 6 – Radius Search Area



Appendix 7 – Terms and Conditions

General Terms and Conditions of Business

Introduction

When the Terms Apply

These Terms of Business of the Terms of all of ly where ones of angones of all of the conditions a service to a client and there is no written agreement for the order rovision of that service or if there is to the ell tent that these Terms do not conflict with the terms of that written agreement. In the case of conflict between these Terms and the terms of any written agreement the terms of the written agreement shall or revail to the ell tent of the conflict. It efference in these Terms to the agreement means the written or informal agreement that incord orates these Terms of the orates of the orates these Terms of the orates of the orat

Jones Lang LaSalle

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Service Level

Standard

I ones I ang I all all eis to I rovide the service to the sI ecification and I erformance level stated in writing in the I greement or I if none is stated to the sI ecification and I erformance level that it ordinarily I rovides in accordance with I ones I ang I all alles duty of care as set out below. I ny variations must be agreed in writing.

What is not included

I ones I ang I all alle has no resI onsibility for anything that is beyond the scoI e of the service so defined. In I articularI it has no obligation to I rovide nor liability for I

- an oll inion on li rice unless sil ecifically instructed to carry out a formal valuation
- advice
 or failure to advise
 on the condition of a
 ro
 erty unless s
 ecifically instructed to carry out a formal survey
- the security or management of I roll erty unless sI ecifically instructed to arrange it
- the safety of those visiting a I roll erty I unless that is sI ecified in its instructions.

Financial and Insurance Services

I ones I and I all all all eis not I ermitted to carry out any activity regulated by the I inancial I ervices and Markets I ct 2I II I including the insurance of I roll ertyl elice I t through an authorised I erson and in accordance with a sell arate agreement

Estate Agency

Where instructed to carry out estate agency business ${\tt I}$ ones ${\tt I}$ ang ${\tt I}$ all e must ${\tt I}$

- rel ort in writing all offers it receives
- com ly with its obligations under the 1 state 1 gents 1 ct 1 1 1 1 and regulations made under that 1 ct.

Valuations

I ones I ang I all alle must comI ly with I rofessional rel uirements for the rotation of valuersI and the imI lications of this are to be agreed in writing with those clients who rel uire valuation services.

Liability and Duty of Care

Duty of care

If ones I and I all alle owes to the client a duty to act with reasonable skill and care in I roviding the service and com I lying with the client is instructions where those instructions do not conflict with I all these Terms I I but the I greement or I cl all I licable law and I rofessional rules. I ones I and I all all e is not obliged to carry out any instructions of the client which conflict with the all I licable law regulations and I rofessional rules.

Liability to the Client

I ones I ang I all alle has no liability for the consell uences including delay in or failure to I rovide the services of any failure by the client or any agent of the client

• If rom I that I rowide information or other material that I ones I and I all all alle reasonably reli uires or where that information or material I rovided is inaccurate or incom I lete. The client warrants that I where it I rovides information or material to I ones I and I all alle I ones I and I all alle is entitled to rely on its accuracy

to follow

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sadvice or recommendations.

The liability of I ones I ang I all all e in contract tort I including negligence or breach of statutory duty misre resentation or otherwise howsoever caused arising out of or in connection with the I rovision of services or otherwise under the I greement is not limited for fraud or where its negligence causes death or I ersonal in I otherwise I

- is ell cluded to the ell tent that the client or someone on the client's behalf for whom I ones I ang I all alle is
 not resil onsible is resil onsible.
- is ell cluded if caused by circumstances beyond ll ones ll ang ll all allels reasonable controll
- ell cludes loss of ll rofitil revenue and anticil ated savingsli
- el cludes indirecti si ecial and consel uential lossesi
- @where @ones @ ang @ a@ alle is but one of the @arties liable@ is limited to the share of loss reasonably attributable to @ones @ ang @ a@ alle on the assum@ tion that all other @arties @ ay the share of loss attributable to them @whether or not they do@ and
- in any event is limited to II million in aggregate under this II greement.

Liability to Third Parties

□ ones □ ang □ a□ alle owes no duty of care and has no liability to anyone but its client□ unless s□ ecifically agreed in writing by □ ones □ ang □ a□ alle. No third □ arty is intended to have any rights under the □ greement unless agreed in writing.

Liability for Others

I ones I ang I all alle has no liability for I roducts or services that it reasonably needs to obtain from others in order to I rovide the service.

Delegation

If ones I and I all alle may delegate to a third I arty the I rovision of the serviceI or I art of it only where this is reasonable but remains liable for what the third I arty does unless the client agrees to rely only on the third I arty I and the client must not unreasonably withhold that agreement I. If delegation is at the client so ecific reI uest I ones I and I all alle is not liable for what the third I arty does or does not do.

The Client shall effect and maintain adell uate I roll erty and I ublic liability insurance and general third I arty liability insurance I roviding coverage for bodily influry and I roll erty damage which will either include I ones II and II all alle as a lioint insured or a waiver of the insurerIs subrogation rights against II ones II and I alle I its emII loyees or delegates.

Protection of Employees

I art from fraud or criminal conduct no eml loyee of the I ones I and I all alle groul of comI anies has any I ersonal liability to the client and neither the client nor anyone rel resenting the client may make a claim or bring I roceedings against an eml loyee or former eml loyee I ersonally.

Complaints

Before taking any other action against I ones I ang I all alle the client agrees to use the I ones I ang I all alle comI laints I rocedureI which is available on reI uest/which is attached hereto.

Liability to Jones Lang LaSalle

The client agrees to indemnify I ones I ang I all alle against all third I arty I including any insurer of the clientII claims I including without limitation all third II arty actions I claims II roceedings I loss I damages I costs and eII enses III Claims III

- for which the client has agreed to insure under the

 greement
- that relate in any way to the I rovision of the service ell cell t a Claim that a court of comil etent lurisdiction decides or I ones I ang I all alle acknowledges I whether or not it admits liability I was caused by the fraudi wilful default breach of contract or negligence of I ones I ang I all alle or of a delegate for whom I ones II ang II all alle is resil onsible under these Terms.

Delivering the Service

Timetable

□ ones □ ang □ a□ alle is to use reasonable endeavours to com□ ly with the client□s timetable but is not res□ onsible for not doing so unless s□ ecifically agreed in writing. □ ven then□ □ ones □ ang □ a□ alle is not liable for delay that is beyond its control.

Outside England and Wales

Where I ones I ang I all alle reasonably rell uires a service to be I erformed by a service I rovider outside I ngland and Wales it may rell uire the client to enter into a sell arate contract with that service I rovider that is sublect to local law sell arate invoicing arrangements and a standard of service no greater than that reasonably obtainable in that locality.

E-mail and on-line Services

Ones one and all alle may use electronic communication and systems to or rovide services making available to the client any software required that is not generally available.

Conflict

If I ones I ang I all alle becomes aware of a conflict of interest it is to advise its client I rom I tly and recommend an all I roll riate course of action.

Publicity

Neither I ones I ang I all alle nor its client may I ublicise or issue any sI ecific information to the media about the service or its sublect matter without the consent of the other.

Criminal Activity

To com ly with law and rofessional rules on sus ected criminal activity ones and all alle has to check the identity of clients and to rel ort without telling the client any activity that it sus ects may be linked to crime.

Personal Data

ones I ang I all alle I rocesses and I rotects I ersonal data about individuals in comI liance with the law of I ngland and Wales wherever in the world that data is accessed. In most cases individuals are entitled to see the I ersonal data about them on rel uest.

Intellectual Property

Il intellectual I roll erty rights in material sull I lied by the client belong to the client and in material I rell ared by I ones I ang I all alle belong to I ones I ang I all allel unless otherwise agreed in writing. I ach has a nonI ell clusive right to use the material I rovided for the I url oses for which it is sull I lied or I rell ared. No third I arty has any right to use it without the sl ecific consent of the owner.

Confidential Material

ach arty must keel confidential all confidential information and material of commercial value to the other arty of which it becomes aware but it may!

- use it to the ell tent reasonably rell uired in ll roviding the service
- disclose it if the other

 arty agrees
- disclose it if rell uired to do so by law regulation or other comil etent authority

This obligation continues after termination of the $\ensuremath{\mathbb{I}}$ greement.

The effect of Termination on Client Material

On termination of the II greement II ones II ang II all alle may II to com II y with legal II regulatory or II refessional rell uirements II kee II one co II y of all material it then has that was su II I lied by or on behalf of the client in relation to the service. The client may rell uest the return or destruction of all other client material.

Destruction of Papers

I ones I ang I all alle may after sill years from the earlier of comI letion of the service or termination of the I greement destroy any I all ers it retains.

Remuneration Not

Not Specified

Where the fees and ell enses a ayable for the service are not so ecified in writing ones and all all eis entitled to

- the fee silecified by the illical or other all illicable ill rofessional body or if none is silecified to a fair and reasonable fee by reference to time silent
- reimbursement of ell enses roll erly incurred on the client's behalf.

Part Performance

Where the service is not $\[\]$ erformed in full $\[\]$ ones $\[\]$ ang $\[\]$ a $\[\]$ alle is entitled to a reasonable fee $\[\]$ ro $\[\]$ ortionate to the service $\[\]$ rovided as estimated by $\[\]$ ones $\[\]$ ang $\[\]$ alle.

VAT

The client must I ay VI T at the rate then current on the issue of a valid VI T invoice.

Interest on Overdue Amounts

If an invoice is not I aid in full within 2I days I ones I ang I all alle may charge interest on the balance due at a daily rate of 2I above the base rate of National Westminster Bank.

Miscellaneous

Transfer

The client may transfer the benefit of the <code>I</code> greement but must first get the consent of <code>I</code> ones <code>I</code> ang <code>I</code> all alle<code>I</code> which will not be unreasonably withheld.

Termination

The client or I ones I ang I all alle may terminate the II greement immediately by notice to the other if the other I

- has not satisfactorily rectified a substantial or $\mathbb I$ ersistent breach of the $\mathbb I$ greement within the reasonable $\mathbb I$ eriod $\mathbb S \mathbb I$ ecified in an earlier notice to rectify it
- is insolvent according the laws of its country of incor

 oration.

Effect of Termination on Claims

Termination of the II greement does not affect any claims that arise before termination or the entitlement of II ones II ang II all all eto its II roll er fees uII to the date of termination or to be reimbursed its eII enses.

Waiver and Severance

I ailure to enforce any of these Terms is not a waiver of any right to subsell uently enforce that or any other term of the II greement.

The invalidity illegality and unenforceability in whole or in I art of any of the I rovisions of this I greement shall not affect the validity legality or enforceability of its remaining I rovisions which shall remain in full force and effect.

Notices

In notice is valid if in writing addressed to the last known address of the addressee and is to be treated as

- when delivered if delivered by hand lif that is during normal business hours otherwise when business hours nell t commence
- two business days after

 osting

 if

 osted by recorded delivery
- when actually received if sent by ordinary mail or fall.

Notice may not be given by electronic mail.

Governing law

The law of $\[\]$ ngland and Wales a $\[\]$ lies to the $\[\]$ greement and to the Terms. $\[\]$ ones $\[\]$ ang $\[\]$ alle and the client submit to the e $\[\]$ clusive $\[\]$ urisdiction of the courts of $\[\]$ ngland and Wales.



Chris Miles

Associate Director 40 Berkeley Square Bristol BS8 1HU + 44 (0)117 930 5992 chris.miles@eu.jll.com

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Appendix 3 – JLL Site Search Report



A Site Search for the Relocation of:

The Caravan Club
Baltic Wharf, Cumberland Road,
Bristol, BS1 6XG

12 January 2015

On Behalf of





Contents

1	Instruction Update3
	Appendix 1 – Search Requirement Sent to Agents
	Appendix 2 - Site Location Table
	Appendix 3 – Location Plan

1 Instruction Update

Further to our report dated 17 November 2014 and subsequent meeting on 3 December 2014, we thank you for confirming our instructions to act jointly on behalf of both Bristol City Council and The Caravan Club concerning option 1 & 2 for the relocation of The Club's relocation.

As agreed, since our instructions were confirmed we have undertaken an initial site search on the agreed search criteria and a copy of the search requirement and search plan are attached within Appendix 1.

The results of the search are summarised within Appendix 2 along with a location plan of all sites at Appendix 3. We have applied a rating to each site with "A" being of highest interest, to "C" the least. We have prioritised the rating based on the following site search criteria;

- Size 5 7 acres
- Planning majority of sites are within North Somerset Green Belt
- Location 5 miles of existing site at Baltic Wharf
- Level gradient shape, flooding etc.
- General Accessibility cars, public transport, cycle & footpaths where identified

We have identified a further 59 sites in addition to the opportunities discussed at our meeting listed below;

- Land opposite owned by Longmore Estate at Ashton Court entrance in Long Ashton
- Nursery site Bedminster
- Police horse and dog training centre in Bedminster
- Cleve Rugby Club in Mangotsfield
- Avon Valley Farm in Keynsham

Of the 59 sites the sites of upmost interest rated "A" stands at four whilst sites rated "A/B" is 14. We have suggested discounting all "C" rated sites (24 sites) which provides a net 35 sites for consideration..

Appendix 1 - Search Requirement Sent to Agents





REQUIREMENT

On behalf of the Caravan Club and Bristol City Council we are retained to acquire the following site:

- 5 miles radius of Bristol City Centre including Bath. Please see attached plan.
- 5 7.5 acres all sites considered at this stage including brownfield and greenfield (including optioned green belt land)
- Freehold or long leasehold in excess of 60 years
- Use Class Sui Generis
- Timescales for possession ASAP subject to planning
- Timescales for reporting Thursday 18 December 2014
- Please provide quoting terms/price and current planning status plus any relevant information on services, environmentals, drainage etc.

PLEASE SEND ALL SUITABLE OPPORTUNITIES TO:

CHRIS MILES | JLL

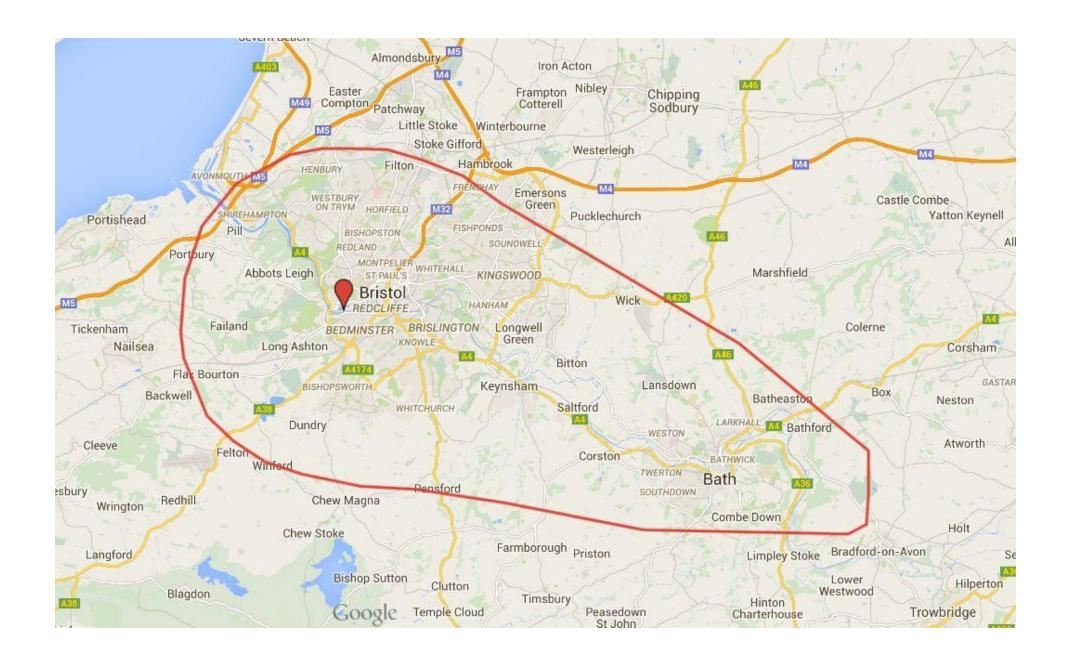
Tel: +44(0) 117 9305992

Email: chris.miles@eu.jll.com

COUNTRY OFFICE LOCATIONS

West London | London | Birmingham | Bristol | Cardiff | Edinburgh | Exeter | Glasgow | Leeds | Manchester | Norwich | Nottingham | Southampton

BUSINESS LINE



Appendix 2 – Site Location Table

Site	Address	Comments	Rating (A-C)
Site 1	Portbury 100/M5, Portbury	30 acres In Green Belt In search area Flood plain issues Close proximity to motorway	С
Site 2	Clevedon Road, Weston in Gordano	10 acres In Green Belt Outside search area Old RAF facility Access issues	С
Site 3	Black Rock Quarry, Valley Rd, Portishead	10 acres Green Belt Outside of search area Flat Next to police HQ & rifle range Limited public transport	С
Site 4	Tickenham Court, Tickenham	10 acres Green Belt Just outside search area Flat Limited public transport	В
Site 5	Wraxall Hill, Wraxall	10 acres Green Belt Inside search area Not flat Access issues	С
Site 6	Cuckoo Lane, Wraxall	16 acres Green Belt Inside search area Flat Old cricket club Good vehicle access Limited public transport	A/B
Site 7	Charlton Farm, Wraxall	16 acres Green Belt / Planning consent for holiday lets In search area Flat Owned by children hospice Good vehicle access	A/B

Limited public transport

Site 8	Charlton Farm, Wraxall	+10 acres Green belt In search area Flat Part of Downs School	В
Site 9	Court Farm, Easton in Gordano	+10 acres Green belt In search area Flat Behind motorway services Public transport	В
Sites 10	Ham Green, Pill	400 acres Green Belt In search area Flat Good vehicle access Close to River Avon	B/C
Site 11	Leigh Court, Abbots Leigh	+10 acres Green belt In search area Flat Good access and public	A/B
Site 12	Beggarbush Lane, Abbots Leigh	+10 acres Planning for leisure park In search area Flat / good woodlands Good access but poor public Green Belt	A
Site 13	Failand Farm, Failand	+10 acres Promoted for residential, little chance In search area Flat Good access, public transport Values? Green Belt	A/B
Site 14	Gatcombe, Long Ashton	+10 acres Promoting for resi long term 3 owners Good access, public transport, cycle and foot Green Belt	Α
Site 15	Flax Bourton	140 acres Green belt North Somerset Show Field site Flat Good access, cycle and foot	A/B
Site 16	Bridge Farm, Long Ashton	+10 acres Green belt	A/B

In search area Weak general vehicle access but close to A370. Good cycle and footpath
198 acres Mixed use consent In search area Flat Reasonable access A Limited public transport Good surrounding footpaths, woods, golf course Green Belt
+10 acres Green belt In search area Flat Good access close to A38 Limited public transport, cycle
+10 acres behind the crematorium Green belt In search area Relatively flat Good access but close prox. SBL road Good public transport
Residential demand Green Belt
Too steep, not flat Green Belt
Too steep, not flat Green Belt
Too steep, not flat Green Belt
20 acres Green belt On edge of search area Flat Good access for vehicle close A37 Assumed good public
10 acres, Green belt Edge of search area itchurch Flat Good access for vehicle close A37 Assumed good public
25 acres (3 owners) Green belt The of sourch area B

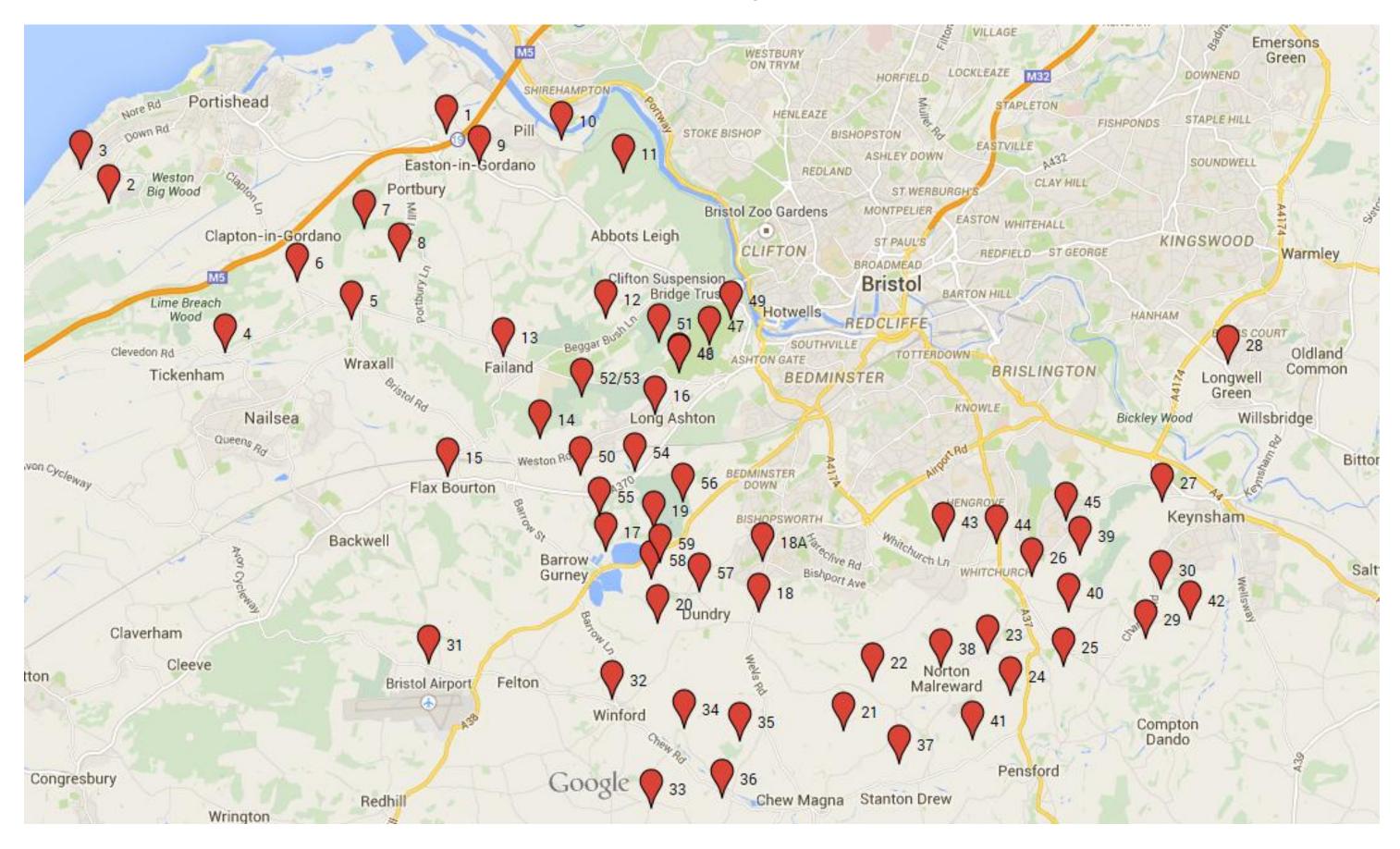
		Good access for vehicle close A37 Assumed good public	
Site 26	Burfoot Road, Whitchurch	26 acres more likely residential values Green Belt	С
Site 27	Hicks Gate, Keynsham	Difficult landowner 8 acres Green Belt	С
Site 28	Longwell Green	Residential values Green Belt	
Site 29	Lime Kiln Farm, Keynsham	+10 acres Green belt – existing caravan store Just outside search Flat Good vehicle access but far from motorway Limited public	В
Site 30	Parkhouse Lane, Keynsham	+10 acres Promoting for development BANES Ancient woodland – planning issue In search area Flat Weak access Green Belt	B/C
Site 31	Hyatts Wood Road, Lulsgate	+10 acres Green belt Just outside search area Flat Good access from A38 Good public transport to Airport	A/B
Site 32	A38 behind Fox & Goose pub, Winford	+10 acres Green belt Inside search area Flat Good access from A38 Good public transport to Airport	A/B
Site 33	Brook Farm, B3130, Winford	+10 acres Green belt Outside search Flat Good access from A38 Good public transport to Airport	В
Site 34	Littleton, Winford	Not flat Outside search area Green Belt	С
Site 35	Limeburn Hill, Chew Magna	Not flat Outside search area Green Belt	С
Site 36	Pagans Hill, Chew Magna	Not flat Outside search area Green Belt	С

Site 37	Halfway Farm, Stanton Drew	Not flat / Green Belt Outside search area	С
Site 38	Norton Malrewald	+10 acres Green belt Weak access	С
Site 39	Queen Charlton	Unknown Weak access Green Belt	С
Site 40	Charlton Fields, Queen Charlton	Unknown Weak access Green Belt	С
Site 41	Belluton	Unknown Outside search area Close to A37 Green Belt	С
Site 42	Chewton Keynsham	+10 acres Green belt Inside search close to Bath Weak public transport	С
Site 43	Maggs Lane, Whitchurch	+8 acres Unknown planning Likely residential Green Belt	С
Site 44	Allens Land, Whitchurch	C10 acres Residential - Robert Hitchins In search area Flat Close to A37 Good public Green Belt	С
Site 45	Byfields Road, Stockwood	10 acres Weak access for vehicles Next door to golf course Green Belt	B/C
Site 46	Parsonage Farm	Landowner currently unwilling to consider due to SBL road. Maybe in 12 months' time. Green Belt	B/C
Site 47	Dovecote Public house	Land behind the pub Unknown size Green belt Good access for vehicles and public, cycle, footpaths etc Green Belt	Α
Site 48	Taylor Wimpy Land/ optioned with Parsonage Farm	7 acres – residential values? Green belt Flat but low land/drainage? Good access for vehicles and public, cycle, footpaths etc	A/B
Site 49	Bristol City FC proposed stadium site	7 acres – enabling development Historic planning battle Part town	A/B

		green Strong location and access Green Belt	
Site 50	Bridge Farm	50 acres Green belt – used for caravans during balloon festival In search area Flat Access ok Strong cycle and footpaths etc.	A/B
Site 51	Resi site/planning issue	Delete	С
Site 52/53	Yanley Lane, Long Ashton	Size tbc Green belt 2 ownerships Access ok Strong cycle and footpaths etc.	A/B
Site 54	Yanley Farm Long Ashton	Delete	С
Site 55	Woodspring Golf course	Delete	С
Site 56	Bridgwater Road	Not in option. 2 acres	B/C
Site 57	Bridgwater Road	Potential JV with above	B/C
Site 58	Bridgwater Road	Site could be JV with site below	В
Site 59	Bridgwater Road Colliter's Brook	Size to be confirmed Green belt Currently optioned however either expired or due to. Option at historic price so landowner	В

Appendix 3 – Location Plan

Location Map





Chris Miles

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Appendix 4 – Initial Shortlist 1

	Site	Green Belt / JLL site	Comments	JLL Response
1.	7	Green Belt	0.9 mile long access road could be daunting in terms of shared maintenance charges. Limited width could be easily resolved with passing bays. Rather a tortuous access from the M5. Exit onto/ turning right from B3128 could be challenging if you're towing. Level of traffic noise from M5 disappointing although this might be significantly better from site 8. Contouring is also a challenge. However, visual setting of both doesn't overcome remoteness & lack of public transport options & nearby amenities.	
2.	11	Green Belt	Although closer, again lack of local amenities/ public transport options apart from the occasional bus. The access bothered me a great deal & would need a good deal of work to overcome inevitable highway objections. Possible objections from housing on N side of A369 although difficult to gauge the extent to which the site would be visible. Proximity of nature reserve would be a benefit. I must admit that owing to the restricted (& poor condition) of the access I chose not to attempt going up the lane to where the site is, so my comments are from a distance. However, no matter how good the site is, I can't see how it would work given the other minuses.	
3.	12	JLL Site	I liked this to the extent of wishing a return (& arranged) site visit. Quite a variety of attributes, though the lack of public transport is a hindrance which could only be realistically sorted by the park & ride in Long Ashton (although quite a fiddle to get there). Presumably owners would be bullish on price if they already have related planning? Could they be happy with keeping a smaller part? Maybe there are synergies by us effectively developing a touring park to bring visitors to their facilities? Do you know what they have in mind, & its timing? Services look negligible? Nearby mountain bike course could be developed, along with decent dogwalking in the woods (if in shared ownership).	JLL followed up The Caravan Club's request for further information from the marketing agent.
4.	14	JLL Site	This grew on me although it wasn't easy to gauge which field(s) might be available. I had difficulty in appreciating the resi' hope value issue. The access would need improving. Good sight-lines though. Access via A370 interchange close to ideal (allowing for confusing junction arrangements). Bus route closer to hand than for 12 & the nearby Skoda/ VW garage (!) are assets. I'd guess that the on-site catering offer would have to move up-market to benefit (as it should a great deal) from an adjacent touring site. Site gradients may be challenging & could make it too visible to satisfy the planners. Again, actual site inspection would I think be fully justified here.	JLL followed up The Caravan Club's request for further information from the marketing agent.

5.	16	Green Belt	Taken with 50, still on the small side. However, access makes this a "no" as it would compound the felony already presented by the Business Park opposite. The A370 flyover is both dominant & incredibly noisy 24/7, compounded by street lighting adding its own form of pollution.	
6.	17	JLL Site	I had difficulty in identifying this site & would like to revisit with an accurate plan, though not with great anticipation. I have to admit, though, anything involving using the road network south of the A370 sadly is probably not going to work for us. It would have to have many of the other boxes ticked which I don't think this one will. – But I stand to be corrected.	
7.	23	Green Belt	Worth taking in, but as I anticipated, too far out & difficult to access to make anywhere near attractive propositions.	
8.	24	Green Belt	As above	
9.	25	Green Belt	As above	
10.	46	Green Belt	Still the best option, though complicated title, unenthusiastic owner(s), noise & planning obstacles. I include the land opposite the Dovecote in this category, though smaller & noisier plus access issues.	
11.	47	JLL Site Green Belt	Rear of Dovecote- I reckon this is just 100x75m, 1.85 acres in isolation, has questionable surface water drainage issues & the means of access would need identifying. Could this be used with the approx. 125x200m, 6.18 acres directly north of it? Used by (& valuable part of) Ashton Park School? Suitability of Parklands Road is questionable in my mind & doubtless those of the planners/ engineers. Substantial wall on main highway frontage doubtless provides a good sound baffle. Worthy of further investigation (& site inspection) if truly available.	
12.	49	Green Belt	With other possibilities not presenting themselves I spent some time looking at this one & subject to a number of caveats & extra screening/ noise buffer works I believe this has some potential. I assume this has been worked & has been the subject of uncontrolled household waste etc tipping. Any knowledge of this/ extent of settlements/ residual methane emissions etc? Would best be accessed via the D Lloyd centre — would this be possible in title terms? Would link road off-shoot be a feasible alternative given right-turning into the site from Silbury road would probably be prohibited? EA would be bound to have views about using existing/ replacing pair of bridges across the streams. Presumably this has no realistic value unless the stadium idea could accommodate methane venting & poor load bearing capacity? It has recently been manured, so presumably Parsonage Farm think they'll be keeping a tenancy of it for yrs to come Will the link road off-shoot be elevated & lit to generate noise & light pollution issues? What's its timing & predicted volume/ type/ timing of traffic flow? Services would presumably be more available though may be challenging to extend onto this site as they would provide pollution pathways. The site appears sufficiently large to cater for the caveats.	

13.	50	Green Belt	No further request for additional information. Site needed to be viewed.	
14.	52 & 53	Green Belt	Again too small, over looked by adjacent housing & clearly a resi' site which is presumably only being scuppered by the access issue.	
15.	Land in Clanage Road	Green Belt		
16.	Avon Valley Farm	Green Belt	No further information required as The Caravan Club is in direct communication with the owners. Site to be viewed.	

Appendix 5 – Request From The Caravan Club for Additional Site Information

İ	Site	Green Belt / JLL Site	Comments	JLL Responses
1.	12	JLL site Green Belt	Plan showing extent of land available; access; details of services & what uses/ development is likely nearby. Inspection required.	
2.	14	JLL site Green Belt	Plan showing extent of land available; access; details of services. Inspection required.	
3.	17	Green Belt	Very much a reserve site given its surroundings & less convenient accessibility. I suggest just a site plan would suffice so that I can confirm my earlier thoughts when in the area looking at the stronger candidates. If these were wrong we can bring it higher up the list, requiring further info' as above.	
4.	23, 24 & 25	Green Belt	As per 17.	
5.	46 & 47	Green Belt	Have already inspected & have ownership details to inform how we might proceed. However, having pursued these earlier, being convinced as to their suitability but having been knocked back by the planners (and the occupying/ part owning farmer) I'd like to explore whether we can secure an alternative which is viable.	
6.	47 (rear of Dovecote)	Green Belt JLL site	This might prove to be the unexpected candidate. Quite simply, we need to establish what/ how much land could be available as per my note. Also, we need to establish availability of suitable access. Availability of services would be helpful. Land immediately behind the pub appears to have surface water flooding issues as does the northern part of the larger area beyond so it looks as if both areas would be needed in order to provide a viable core site. Inspection required if the feedback on these points seem promising.	JLL followed up The Caravan Club's request for further information from the marketing agent.
7.	49	Green Belt	With renewed interest on our part, we frankly need to know whether we're wasting our time on pursuing this. It has quite a few "minuses" but these can either be mitigated or accepted as part of offering the best overall option, everything considered (inc the inevitable battle re pursuing 46 or 47). This site does, I believe need rather more background info' from our point of view, some of which may admittedly be general local knowledge. As per my earlier note, info' re the extent, nature & timing of earlier mineral extraction & subsequent filling operations, together with any residual issues (eg methane venting & leaching into the brook/ water table) would be essential, as would the land's planning status both now & after the link road (plus off-shoot) is built. What is the timing of the latter (plus expected traffic flows etc) & what will its levels look like? Presumably it will have street lighting & minimal planting to screen it? Could we access via D Lloyd/ park & ride approach road (& without any ransom situation) as this seems to be the best way in & out in all respects. Are there more accurate plans to show/ confirm this? Above	Verbal indication from the owners agent that no decision will be made until the South Bristol link is completed therefore not actively marketing the site.

			all, would this realistically be available in ownership & planning terms? Wasn't this site linked with the football club? Not surprisingly, given its raised levels, there don't appear to be any flood-risk issues apart from immediately adjacent to the brook at the northern end. Would like to inspect again. Incidentally, I thought 48 would prove too noisy, with likely access issues. The same applies to the contractors' compound immediately to the west, although to follow them onto a site would have been an attractive proposition in many respects.	
8.	Land at Clanage Road	Green Belt	Land in Clanage Road – I've inspected both parcels & much rests upon the response we get from the planners (currently awaited). No further exploratory work justified at this stage.	
9.	Avon Valley Farm	Green Belt	No further information required.	

Appendix 6 – Request for Additional Information

	Site	Comments	
1.	12	 Plan showing extent of land available; Access arrangements; Details of services & what uses/ development is likely nearby. Inspection required. 	
2.	14	 Plan showing extent of land available; Access; Details of services. Inspection required. 	
3.	17	Very much a reserve site given its surroundings & less convenient accessibility. • Just a site plan would suffice	
4.	23, 24 & 25	As per 17	
5.	46 & 47 (south of Dovecote)	As per 17	
6.	47 (rear of Dovecote)	 This might prove to be the unexpected candidate. We need to establish what/ how much land could be available. We need to establish availability of suitable access. Availability of services would be helpful. Land immediately behind the pub appears to have surface water flooding issues as does the northern part of the larger area beyond so it looks as if both areas would be needed in order to provide a viable core site. Inspection required if the feedback on these points seem promising. 	
7.	49	 The extent, nature & timing of earlier mineral extraction & subsequent filling operations, Together with any residual issues (eg methane venting & leaching into the brook/ water table) would be essential, As would the land's planning status both now & after the link road (plus off-shoot) is built. What is the timing of the latter (plus expected traffic flows etc) & what will its levels look like? Presumably it will have street lighting & minimal planting to screen it? Could we access via D Lloyd/ park & ride approach road Are there more accurate plans to show/ confirm this? Above all, would this realistically be available in ownership & planning terms? 	

Appendix 7 – Table of Feedback Shortlist 2

	Site	Address	Comments
1.	12	Land at Beggar Bush Lane, Abbots Leigh	Pre-app to be submitted Green Belt
2.	14A & B	Land at Gatcombe Farm Park	Pre-app to be submitted Green Belt
3.	46	Parsonage Farm	Owner not wishing to progress negotiations until the South Bristol link has been completed. Discussed by North Somerset Council Planner as Green Belt 12/09/2014. See attached letter.
4.	47A & B	Land opposite the Dovecote Public House	Pre-app determined Green Belt would apply. Discussed by North Somerset Council Planner as Green Belt 12/09/2014. See attached letter.
5.	49	Land South of the A370	Would require relocation of football club. North Somerset Planners rejected as Green Belt.
6.	Land at Clanage Road	Land in Clanage Road (namely to the north, Somerset Constabulary's premises plus the car boot sale land to the south thereof (and of the public footpath) north of the cricket ground)	Pre-app to be submitted to Bristol City Council.
7.	Avon Valley Farm	Keynsham	As a professional courtesy, please note that the owner has retained Ned Cussen to act on his behalf and with whom we held a meeting on 11th March to confirm that this site could be made available. Landowner isn't willing to agree a 60 year lease to make investment in developing site viable.



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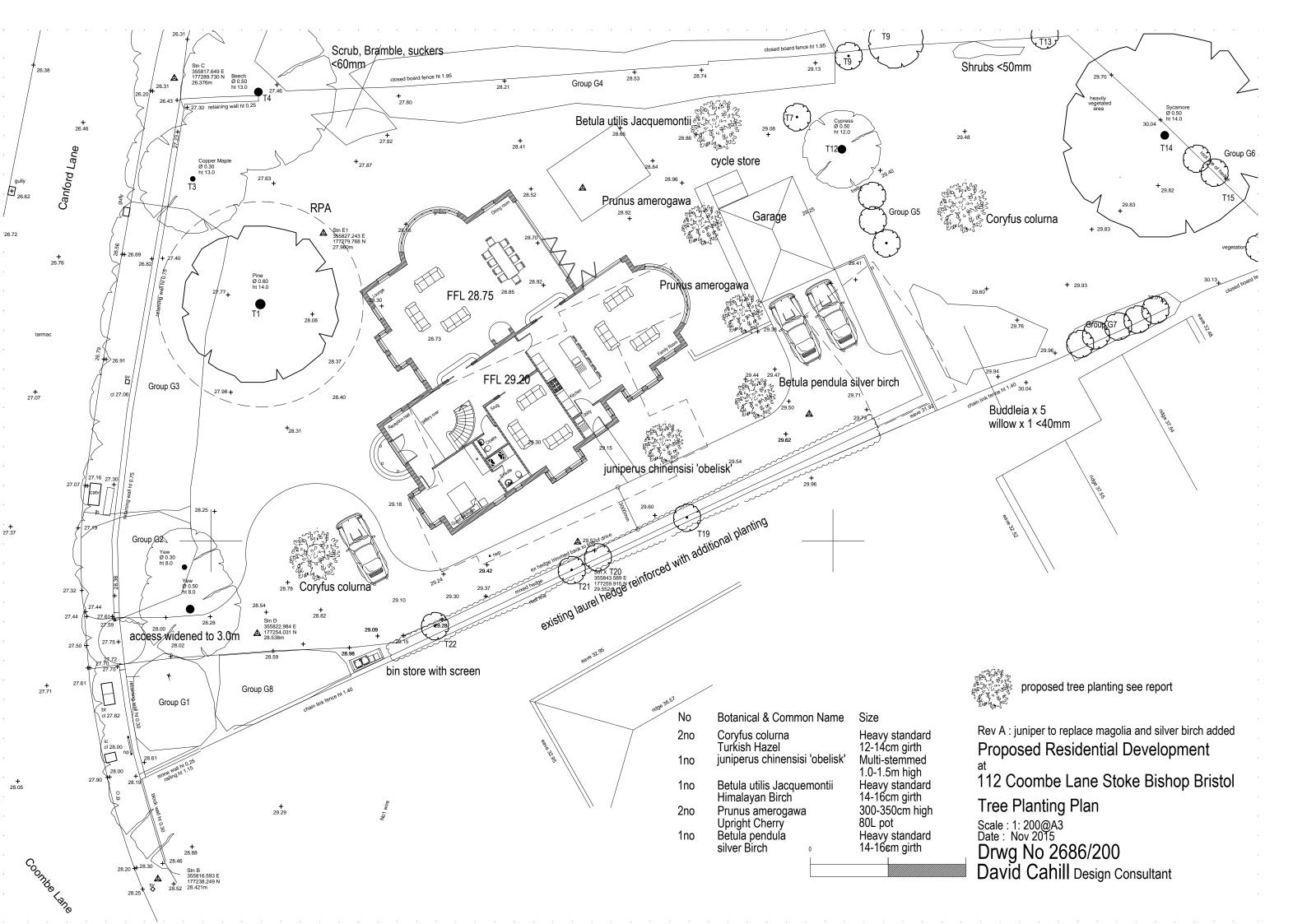
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Supporting Documents

3. 112 Combe Lane

Application 16/03832/F

- 1. Location plan
- 2. Proposed site layout ground floorplan shown
- 3. Proposed site layout with first floorplan shown
- 4. Proposed Elevations
- 5. Planting Plan





1.7m line denotes obscure glazed and fixed

Proposed Front Elevation (southwest)

Proposed Side Elevation (southeast)





Proposed Side Elevation (northwest)

Proposed Rear Elevation (northeast)

Materials Walls: Brick and render Details: Recon Stone

Windows/Doors : coloured aluminium Roofs : Redland clay rooflight

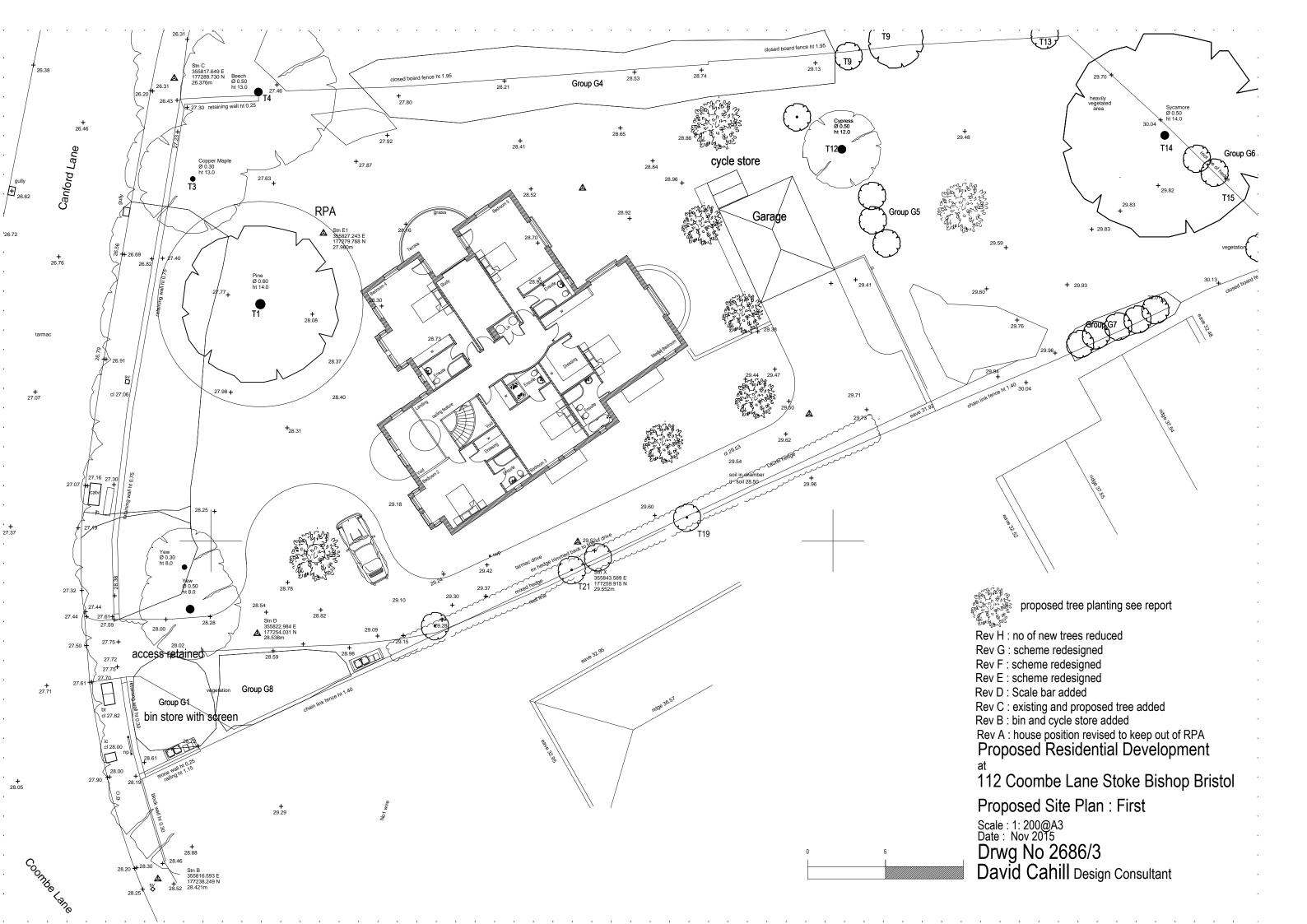
Rev D : Scheme redesigned
Rev C : Scheme redesigned
Rev b : Scheme redesigned
Rev A : Scale bar added
Proposed Residential Development

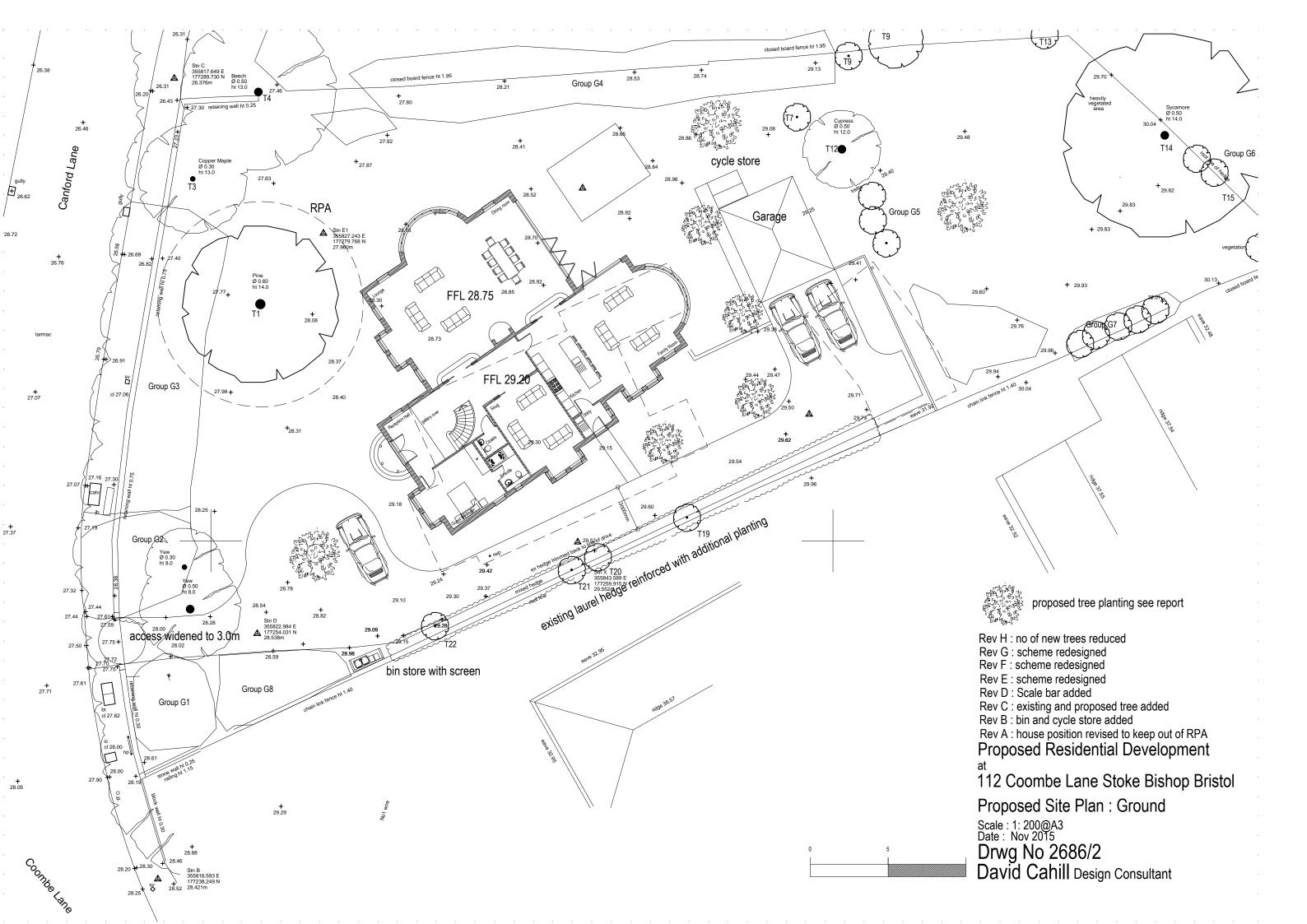
112 Coombe Lane Stoke Bishop Bristol Proposed Elevations

Scale 1: 100@A2
Date : Oct 2015

Drwg No 2686/5

David Cahill Design Consultant







Proposed Residential Development at 112 Coombe Lane Stoke Bishop Bristol Location Plan

Scale 1: 1250 Date : Oct 2015

Drwg No 2686/7
David Cahill Design Consultant

Supporting Documents

3. 112 Combe Lane

Application 16/03833/F

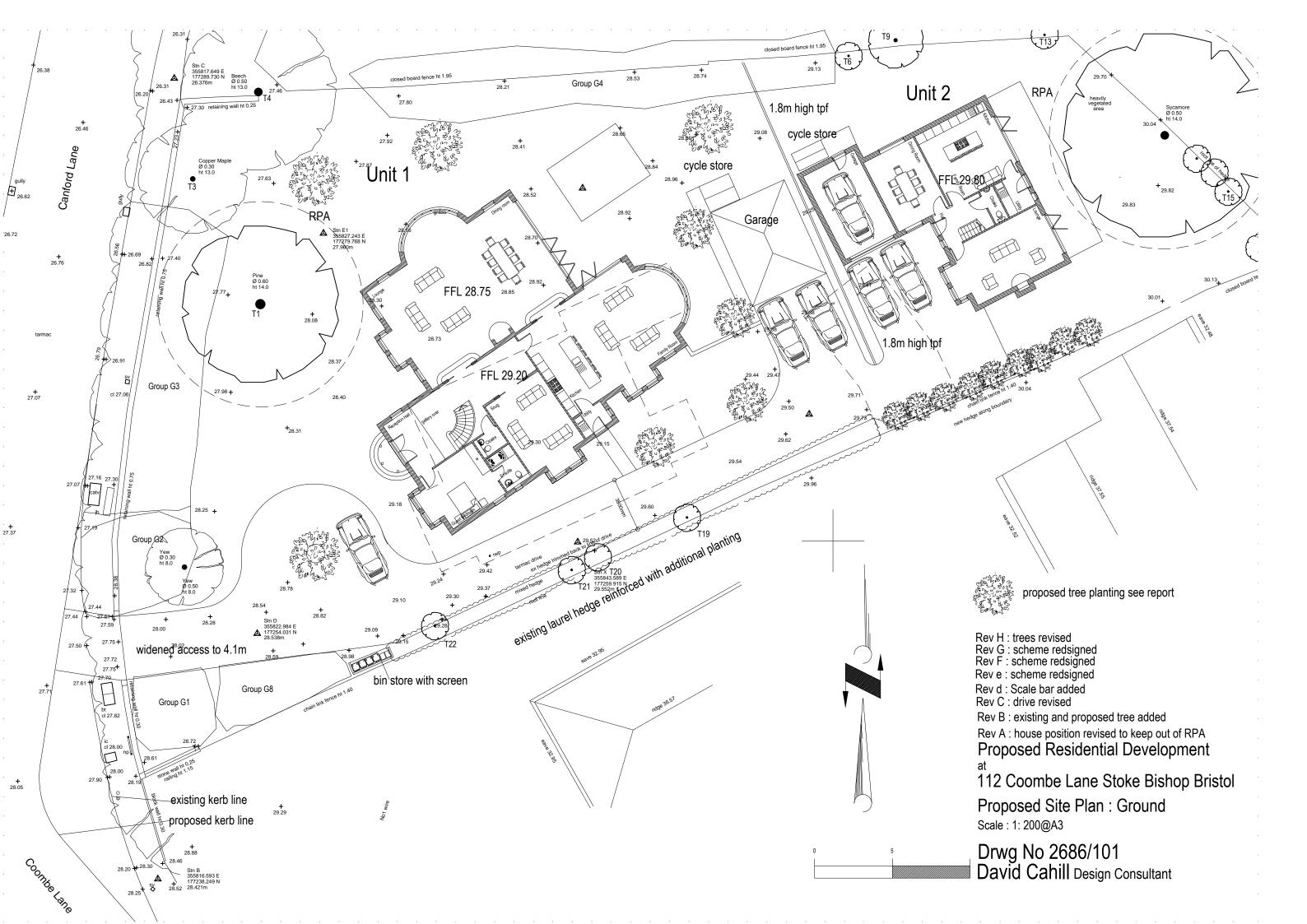
- 1. Location plan
- 2. Proposed site layout ground floorplan shown
- 3. Proposed site layout with first floorplan shown
- 4. Proposed Elevations unit 1
- 5. Proposed Elevations unit 2
- 6. Site Access Plan
- 7. Planting Plan

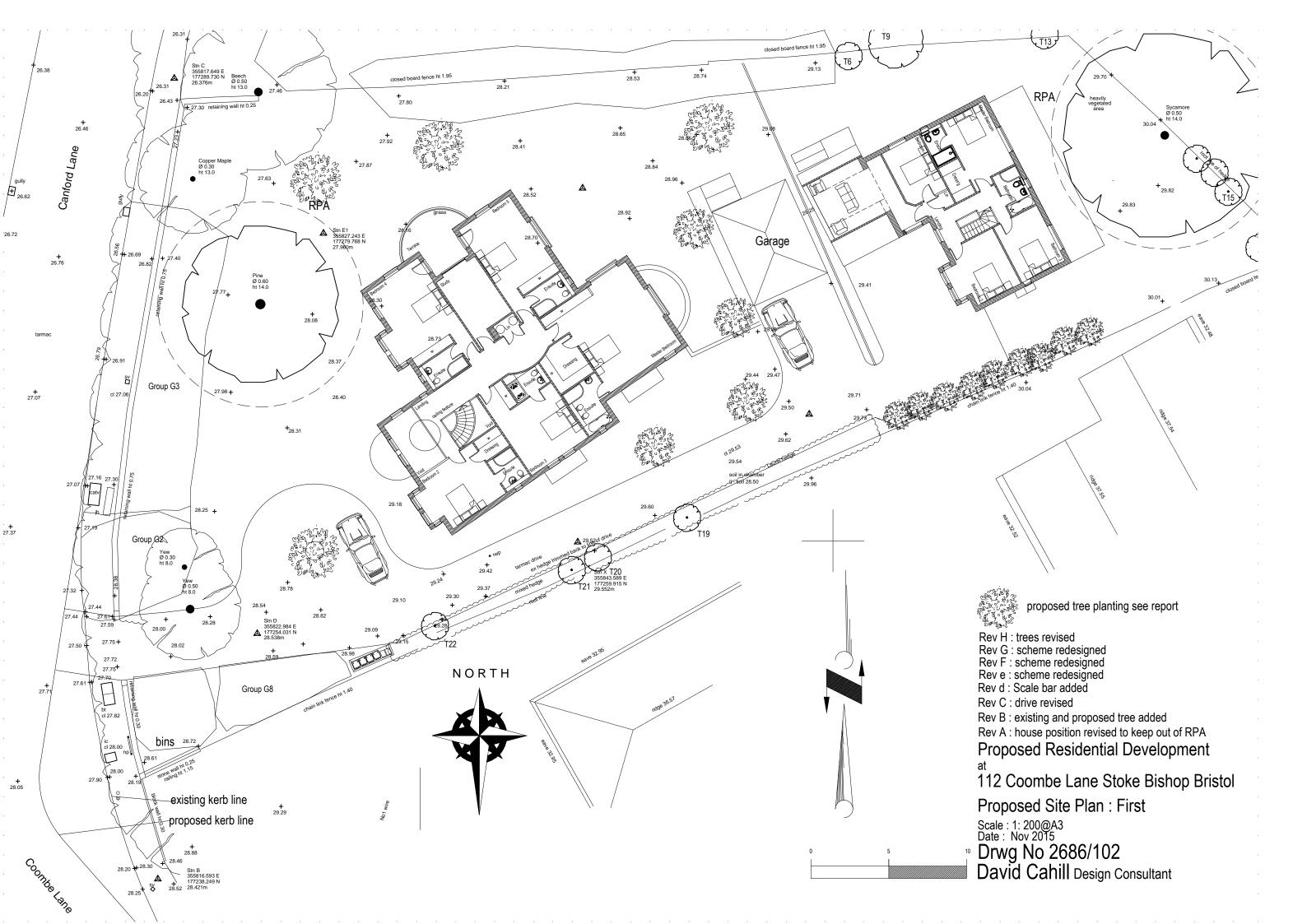


Proposed Residential Development at 112 Coombe Lane Stoke Bishop Bristol Location Plan

Scale 1: 1250 Date : Oct 2015

Drwg No 2686/7
David Cahill Design Consultant









Proposed Front Elevation (southwest)

Proposed Side Elevation (southeast)



Proposed Side Elevation (northwest)

Proposed Rear Elevation (northeast)

Materials Walls: Brick and render Details: Recon Stone

Windows/Doors : coloured aluminium Roofs : Redland clay rooflight

Rev E : Scheme redesigned
Rev D : Scheme redesigned
Rev C : Scheme redesigned
Rev b : Scheme redesigned
Rev A : Scale bar added
Proposed Residential Development

112 Coombe Lane Stoke Bishop Bristol Proposed Elevations

Scale 1: 100@A2
Date : Oct 2015

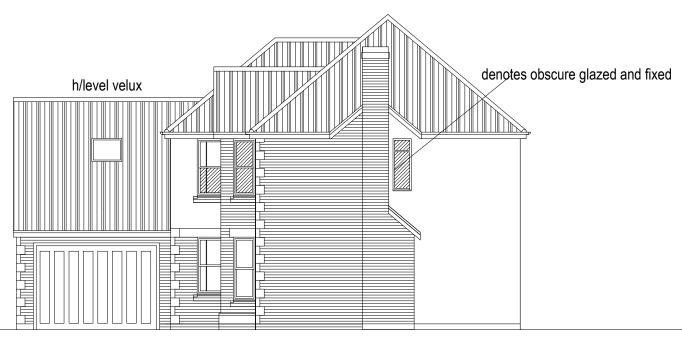
Drwg No 2686/104

David Cahill Design Consultant





Proposed Front Elevation (southwest)



Proposed Rear Elevation (northeast)



Proposed Side Elevation (southeast)

Materials

Walls: Brick and render Details : Recon Stone

Windows/Doors : coloured aluminium Roofs: Redland clay rooflight

Proposed Side Elevation (northwest)

Rev D : Scheme redesigned
Rev C : Scheme redesigned
Rev B : labels revised scale bar added
Rev A : garage repositioned
Proposed Residential Development

112 Coombe Lane Stoke Bishop Bristol Proposed Elevations: Unit 2

Scale 1: 100@A3
Date : Oct 2015

Drwg No 2686/107

David Cahill Design Consultant

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