

Development Control A Committee Supplementary Information



Date: Wednesday, 9 August 2023

Time: 2.00 pm

Venue: The Council Chamber - City Hall, College Green, Bristol, BS1 5TR

8. Public Forum

Up to 30 minutes is allowed for this item

(Pages 3 - 77)

Any member of the public or Councillor may participate in Public Forum. The detailed arrangements for so doing are set out in the Public Information Sheet at the back of this agenda. Public Forum items should be emailed to democratic.services@bristol.gov.uk and please note that the following deadlines will apply in relation to this meeting:-

Questions - Written questions must be received 3 clear working days prior to the meeting. For this meeting, this means that your question(s) must be received in this office at the latest by 5 pm on **3 August 2023**.

Petitions and Statements - Petitions and statements must be received on the working day prior to the meeting. For this meeting this means that your submission must be received in this office at the latest by 12.00 noon on **8 August 2023**.

PLEASE NOTE THAT IF YOU WISH TO SPEAK AT THE COMMITTEE, YOU ARE REQUESTED TO INDICATE THIS WHEN SUBMITTING YOUR STATEMENT OR PETITION. ALL REQUESTS TO SPEAK MUST BE ACCOMPANIED BY A WRITTEN STATEMENT.



In accordance with previous practice adopted for people wishing to speak at Development Control Committees, please note that you may only be allowed **1 minute** subject to the number of requests received for the meeting.

9. Planning and Development

(Pages 78 - 80)

Issued by Allison Taylor, Democratic Services

City Hall, Bristol, BS1 9NE

E-mail: democratic.services@bristol.gov.uk

Date: Tuesday, 08 August 2023



Public Forum
D C Committee A
2pm 9 August 2023



1. Members of the Development Control Committee A

Councillors: Richard Eddy (Chair), Phillipa Hulme (Vice-Chair), John Geater, Fi Hance, Tom Hathway, Farah Hussain (Steve Pearce substituting for Farah Hussain), Chris Jackson, Ed Plowden and Andrew Varney

Statement Number	Attending to speak	Name
22/01221/F - St Christophers School Westbury Park Bristol BS6 7JE		
1	Yes	Robin Hambleton
2	Yes	Jenny Buterchi - PRP
3	No	Darren Jones MP
4	No	David Wallace
5	No	Sue WJ
6	No	Professor Sarah Purdy
7	No	Nicholas Elliot
8	Yes	John Tarlton for Mark Ashdown – Bristol Tree Forum
9	Yes	John Tarlton - BTF
10	No	Becky Warren
11	No response	Barbara Crockford-Smith
12	No	Irene Cleghorn
13	No	Matt Greenslade
14	No	Roger Saxon
15	No	Dr Rebecca Collis
16	No	Andrew Lewis-Barned
17	No	Carol Simmons
18	No	Revd Emma Langley
19	No response	Zak Coles
20	No	Alistair Neil
21	Yes	David Tingay – Key Transport Consultants Ltd
22	No response	Nigel & Gillian Naden
23	No	Roz Pooley
24	No	Maureen Phillips
25	No	Clare Cullis
26	Yes	Anita Bennett

27	No	Naomi Slade
28	No	Jacqueline Evans
29	Yes	Cllrs Smith, Gollop & Scott – Cllr Smith to speak
30	No	Rosemary Ward
31	No	Anesh Chauhan
32	Yes	Henry Lumby
33	Yes	Chris Cox for Ian Monger
34	No	Simon Taylor
35	Yes	Sarah Trahair-Williams – Fore Partnership
36	No response	Nigel Wallis
37	No	Hilary Gallery
38	No response	Sam Taylor
39	No response	Oliver Phillipson
40	No response	Jane Payne
41	No	Katherine Aston
42	Yes	Cllr Christine Townsend
43	Yes	Paul Hassan
44	No response	Henry & Yvonne Cowell
45	No	Michele Maurice
46	Yes	Mark Ashford - SCAN
47	No	Ann Bowes
48	No	Caroline Gooch
49	Yes	Mary Carroll
50	No response	Dr Lee Salkeld
51	Yes	Jean Ellison
52	No response	Alderman Stephen Williams
53	No	D Jones
54	No	Christine & Ken Comrie
55	No response	Caroline Fletcher
56	No	Elizabeth Henderson
57	No response	Dan Comerford
58	No response	Dr. Bruno Bubna-Kasteliz
59	No response	Glynn Holloway

60	No	Dr Francis Bennett
61	No response	Gil Henderson
62	No	Alice Huntbach



Public Forum Statement for Development Control 'A' Committee meeting on 9/8/23.

St Christopher's School, Westbury Park, Bristol BS6 7JE (Planning Application 22/01221/F)

MUCH BETTER IS POSSIBLE

Professor Robin Hambleton BA MA PhD MRTPI FRSA FAcSS

24 July 2023

This planning application proposes a truly massive over-development of a spectacular green space which lies within the Downs Conservation Area. This appalling scheme has attracted over 1300 formal objections to Bristol City Council (BCC), including objections from all local councillors, our MP, and the two leading national heritage organisations - Historic England, the national body charged with protecting our historic environment, and The Twentieth Century Society.

I am a member of the St Christopher's Action Network (SCAN) and I want to stress that SCAN is in **favour of the sensitive and appropriate development of this site**. We are, however, strongly against this misguided development because it will disfigure our city and impose major social and environmental costs on the community.

In this statement I wish to draw attention to misleading statements the applicant has made relating to the financial viability aspects of developing this site. The applicant has consistently argued that they need to cram 116 new housing units, in large blocks of unattractive flats, onto this small site for the scheme to be financially viable. They also argue that, for financial reasons, it is not possible to provide any affordable housing, nor any meaningful provision for children with special education needs and disabilities on the site – two requirements demanded by BCC in written Pre-App guidance given to the applicant in November 2021.

To **prove** that the developer's claims relating to financial viability are unfounded, SCAN has arranged for a leading firm of Bristol architects to prepare an alternative 'indicative scheme' for the St Christopher's School site. This detailed professional work shows that it is perfectly possible, by taking a landscape-led approach, to develop this site in a way that retains many of the magnificent mature trees that now give the site its 'verdant park setting', to quote the report of BCC Conservation Officers (28/4/23). Our 'indicative scheme', which comprises low buildings that blend into the local townscape (they are mainly 2-storey in height and no building is over 3-storeys), **complies with all BCC planning policies** (relating to heritage, urban design, conservation, highways, parking, housing, public safety, biodiversity, environmental policy, SEND provision and so on).

In line with BCC Pre-App guidance this 'indicative scheme' delivers a significant number of affordable housing units (75 units in total with 40% (30 units) affordable), provides much needed day education/care services for SEND children in Grace House (a building specifically designed for this purpose), and creates allotments and community space to be used by the local primary school. Most important, this scheme, which has been thoroughly appraised by independent financial experts, is demonstrably financially viable and **can be delivered at no cost to Bristol City Council**.

Councillors, I urge you to refuse planning permission for this entirely misguided scheme. In making this decision you can rest assured that **there are much better ways of developing this magnificent site**. Financial analysis shows that it is not difficult to bring forward a very high-quality scheme that will deliver a range of significant social, economic, and environmental benefits to our city. SCAN will be very happy to meet with your officers to explain our practical and affordable scheme.

The Design for St Christopher's Square will deliver an exemplar, ultra-sustainable Integrated Retirement Community for Bristol; it is the culmination of a rigorous period of research, design and community engagement.

St Christopher's Square is an innovative senior living development which will benefit the wider community of Bristol. The proposals include 6 key architectural elements comprising:

1. The rejuvenation of Grace House, a Grade II Listed Building at the heart of the masterplan, as a new community clubhouse open to the wider community of Westbury Park. This will preserve the legacy of the listed building ensuring the future of this important heritage asset.
2. The five existing Victorian lodges fronting Westbury Park will be restored to their former use as residential properties, with restored formal front gardens celebrating the grand domestic scale of the Frontage Villas of the Westbury Park Conservation area.
3. North House, a Victorian cottage in the south east corner of the site, will be restored to create a new intergenerational village hall for use by the wider community, as well as the residents of St Christopher's Square
4. Four new residential villas, in the centre of the site and to the rear of the existing Westbury Park Lodges, will provide the majority of new homes on the site. The architectural reference for the design of these villas has been influenced by Westbury Park Conservation Area; this will embed the design into its local vernacular context with regards to form, materiality and elements of detail. This approach will ensure these new residential villas will add to the variety and richness of the conservation area.
5. A new spa building (to the rear of Grace House) and an individual cottage sit within a cluster of retained mature trees to the north east corner of the site. The architectural and landscape response in this setting compliment the Woodland Glade character.
6. A collection of cottages present a reduced two storey scale of development adjacent to smaller scale existing neighbouring dwellings in Bayswater Avenue and The Glen.

The proposed integrated retirement community at St Christopher's Square includes the following key attributes:

- The creation of a vibrant and inclusive community that celebrates ageing in place.
- An integrated approach to care with a comprehensive range of services and amenities available on site.
- Delivery of a high-quality development with beautiful, liveable, low maintenance homes set within a luscious landscaped setting.
- Inclusion of a high specification clubhouse within Grace House, at the heart of the development providing community, care, and lifestyle services and facilities.

- **Rejuvenate a key heritage asset at the heart of the scheme**
- Focus on health and wellbeing throughout design and operation for residents, visitors and staff.
- Creation of new buildings of architectural distinction that make a positive contribution to the conservation area
- Retention and re-purposing of key heritage assets across the site
- Deliver outward facing facilities open to the public and wider community
- Provide a variety of outside spaces including gardening facilities with a focus on food and urban farming, in partnership with local social enterprises, schools and businesses
- Drive innovation in sustainability, low carbon design and operation, and principles of circular economy.
- Deliver a net zero carbon in operation development, through the use of solar electricity generation, district heating, electric air source heat pumps, low-carbon building materials, innovative construction techniques.
- Contribute authentically towards the social value throughout construction and in operation
- Deliver on the core objectives of sustainability, social impact, health and wellbeing

The design at St Christopher's will provide beautiful homes for its residents, a valuable resource for its community and a benchmark for design and sustainability for Integrated Retirement Communities across the UK.



The Planning Inspectorate,
Temple Quay House,
2 The Square,
Temple Quay,
Bristol
BS1 6PN

5th January 2023

Sent by e-mail only.

Dear Planning Inspectorate,

Re: Community opposition to the proposed St Christopher's development, reference: 22/01221/F

I wrote to you last April to share my constituents' reservations about plans to build a luxury retirement community at the St Christopher's School site in Henleaze. Among their concerns, residents have noted the lack of affordable housing that the development will offer, the obtrusive size of the buildings and the large number of apartments that will be packed into the site. Residents also believe that the car parking provision will be insufficient for the number of people living there.

I am writing to you again following the publication of revised plans in December. Constituents have contacted me to say the revised plans do not go far enough to address their concerns. For example, the number of apartments has only been reduced by 5%, meaning there would still be 116 households on the grounds.

I hope that appropriate consideration is given to the concerns raised by my constituents on this issue.

Yours sincerely,

A handwritten signature in black ink that reads "Darren Jones".

Darren Jones MP
Member of Parliament – Bristol North West

Application no. 22/01221/F Site address: St Christophers School Westbury Park Bristol BS6 7JE

I am a resident of the area and I have objected before to the above development proposal.

I support the refusal of these plans on the grounds of over development of the site, specifically

Visual impairment of area due to density and height of proposed new building and tree removal

Danger to residents due to increased traffic in narrow streets

Lack of adequate parking provision, again increasing traffic in adjoining area.

Yours

David Wallace

Dear people

Thank you for continuing to refuse planning permission for this site.

Very annoyed that the developers feel they can add potential bribery in cash form as a way of pushing this through!

There is very sparse parking available already, which makes accessing local amenities difficult and almost impossible for the older population in this area.

Having another large gated forbidding development that excludes locals is really detrimental. Please continue to refuse this planned development unless significant changes made to the plans.

Thank you

Sue WJ

Dear Councillors

St Christopher's School, Westbury Park, Bristol BS6 7JE (Planning Application [22/01221/F](#))

I object to this proposal for the following reasons:

The adverse impact of over 200 frail elderly on the health and social care system of Bristol needs to be considered - Bristol hospitals have been some of the worst in the country for A&E waiting times and having large numbers of elderly patients awaiting discharge. At least one local GP surgery has closed (Helios practice Spring 2022) and others are struggling to meet demand generated by increasingly complex patient need.

When the evidence quoted by the applicants about the potential benefits of the proposed scheme on health and social care utilisation is scrutinised in detail it does not substantiate the claims made by the developer with regard to a reduction in service utilisation. Indeed, rather than being 'beneficial' as the developers suggest, the addition of several hundred frail elderly people into an area with overstretched GP, community and secondary care services is likely to be detrimental. It will result in increased pressure on services and reduced quality of care and quality of life for other local residents who need this support from the NHS and social care.

In summary, I oppose the application on the basis that this will add to the burden on local health and social care services, in addition to over developing the site, adding to traffic and parking chaos and destroying natural habitat. I do not intend to speak at the meeting but have previously outlined in detail, in a planning objection, my review of the evidence supplied by the developers and the impact on the local NHS.

Yours faithfully

Sarah

Professor Sarah Purdy

To whom it may concern

The proposed development of the St Christopher's site has been rightly challenges and criticized by locals (including myself) and planning officers. The arguments against have all been made eloquently. The strength of feeling against this development and the developer (consistently misleading) is strong. Please respond and empathize with the local community.

Regards
Nicholas Elliot



Statement to Development Control Committee A meeting, 09 August 2023

22/01221/F | St Christopher’s School Westbury Park Bristol BS6 7JE

There are 121 trees growing on the proposed development site. 40 of these will be removed to facilitate the applicant’s plans. Under DM17 and BTRS, 104 replacement trees will need to be planted.

However, the applicant has used BNG 3.0, a flawed and outdated version of Natural England’s Biodiversity Metric, which does not work when calculating the habitat value of the trees on the site. The flaws were corrected with the publication of BNG 3.1 & BNG 4.0, which offer the only viable approach to a proper valuation of Urban tree habitat. As BNG 4.0 is the most recent version, we have adopted it for calculating the baseline habitat value of the trees growing on the development site. Using this methodology, we calculate that they have a baseline habitat area of 3.1988 ha of which 2.5230 ha will be retained. We accept the use of BNG 3.0 for all the other habitat calculations.

Please look at the table below. It is taken from the BNG 3.0 Guide to the Biodiversity Metric, used for calculating the habitat area of Urban trees. It is one of the key components in the calculation of the biodiversity value of trees such as those growing on the site. However, as we have previously pointed out, this table is unworkable.

TABLE 7-2: Urban tree size by girth and their area equivalent

Size	Diameter at Breast Height (cm)	Stem Diameter (cm)	RPA (radius in metres)	Area equivalent (ha)	No. of Trees equivalent to 1 ha
Small	30cm	10cm	1.2m	0.0005 ha	2,000 trees
Medium	90cm	30cm	3.6m	0.0041 ha	244 trees
Large	150cm	50cm	6 m	0.113	89 trees

You will notice that this table contains several errors:

1. The heading to the second column is wrong - it should read ‘Girth (cm)’.
2. The Area equivalent (ha) value for ‘Large’ trees is wrong by a factor of ten - it should be 0.0113 ha.
3. No transition point is given between the three tree habitat sizes to enable any of the trees on the site to be assigned to their correct habitat area category. I challenge any committee member to do this in a consistent way. We have modelled three possible interpretations of this table, all of which produce very different results.¹

The applicant has used this table to calculate the habitat area of the trees growing at the site but has omitted to say how it has applied it.

The applicant’s Urban tree habitat calculation cannot be relied on because they use this unworkable table. This is why we say that the applicant’s proposals will result in a net loss of biodiversity of at least 8.60% (assuming a zero net gain is applied) if they are allowed to

¹ <https://bristoltrees.space/trees/developments/analyse-BNG.xq?name=stchristophers>



Statement to DCCA – 09 August 2023

proceed. If the aim is to achieve at least 10% net gain, then the loss will be much higher given that as they would need to achieve at least 32.96 HUs but have only achieved 28.06 HUs using our calculations - a net loss of 14.87%.

We endorse the planning officer's recommendation and urge the committee to refuse this application as currently proposed.

**Statement to Development Control Committee A meeting (9th August 2023)****22/01221/F | St Christopher's School, Westbury Park, Bristol BS6 7JE**

Bristol Tree Forum maintains our objections to this application on the basis that it does not comply with Core Planning Policies BCS9 and BCS13, Development Management Policy DM17 and the National Planning Policy Framework. As such, we endorse the comments of the Councils Arboriculture Officer and the recommendation of the Planning Officer to refuse planning permission for this entirely inappropriate development.

Many high category trees will be lost as a result of this development, which is not acceptable and does not comply with core policy BCS9.

Policy DM17 states that if trees are lost as a result of a development, these must be replaced in line with a compensation standard defined in the Planning Obligations SPD.

We previously commented that the required off-site replacement tree planting of 104 trees required under the councils tree compensation standard as detailed in the Planning Obligations SPD was entirely unrealistic, as there were very few, and certainly insufficient, tree planting sites available within the permitted area. The Developers modified their application to, instead, claim that 109 trees will be planted on site. The councils Arboriculture Officer commented that this planting density is also unrealistic as the density is much too high and trees would need to be planted adjacent to buildings, where they would be unlikely to survive in the long term. Therefore, this application again fails to comply with BCS9, DM17 and the Planning Obligations SPD.

The loss of an English oak (T7) was of particular concern as this has been designated a veteran tree based upon fulfilling the required 4 of 5 characteristics needed to be so defined. BCS9, DM17 and the NPPF agree that development that results in the loss or damage of a veteran tree will NOT be permitted. The developers modified their application to supposedly retain this tree. However, building work associated with the development would still encroach on the root protection area, therefore likely to damage the tree. As such, in accordance with national and local planning policies, this development cannot be permitted.

In light of the inevitable tree loss, and the crucial role trees will play in keeping our city livable in the face of more frequent and severe heat waves, this development plan has not demonstrated that it is resilient to future climate change, and therefore is not compliant with BCS13.

Bristol Tree Forum

Dear Sir or Madam,

Further to my previous comments and in regard to the developers new proposal regarding the above site, I am writing again to note my concerns.

As a resident on the corner of Etloe Road, where it meets Royal Albert Road, we already frequently witness dangerous driving and parking, due to an excess of cars, and volume of traffic. Cars already park on the corners, on both sides of the road, often making it impossible to turn the corner, or pass through. We have had our car hit/scraped numerous times. I am extremely concerned about the potential for increased traffic when the development arrives, both with work lorries, and also for the newly proposed residents. There is not enough room as it currently stands, without adding an increase of even more cars looking to park. There is simply not enough parking in the proposed development for the number of houses they insist on building.

I am concerned for the safety of my children who walk these pavements and cross the roads every day, often witnessing cars parked so dangerously they can't see to cross safely, or cars driving at speed down an already tight road.

We currently have an increase in volume of traffic due to the garage, school and nursery, please don't allow for a development which is only going to increase this significantly.

I am concerned about the damage to wildlife and nature on the land. The trees are home to many birds and other wildlife, surely at a time when global environmental damage is at the forefront of our minds, the focus should be preserving our natural habitat, rather than lining the pockets of developers whose only interest is profit?

Would it not be a suitable and less obtrusive and damaging plan to convert the existing buildings? Less profit for the developers, I agree, but safer for the wildlife and local residents I'm sure.

Kind regards,
Becky

Dear Sirs,

I have written previously objecting to the above development on several grounds, but the main objections are as below:

1) over development -

The Plans show enormous buildings, far too high and too many of them, which will tower over, creating shadow and a feeling of being enveloped by this new development.

2) loss of habitat -

Too many well established trees will needlessly be destroyed prohibiting cover and protection to our wildlife.

3) lack of parking spaces -

Due to the low number of parking spaces, the residents and their visitors as well as daily staff will of necessity have to use the surrounding roads. Impacting the narrow roads, blocking them, causing difficulties for pedestrians and especially children crossing from a nursery and infant school.

4) public amenities/benefits -

I am not aware of any, particularly the Listed Grade 11 building, Grace House, now being off limits to the public.

Frankly, these developers seem greedy, demanding, and selfish. It is blatant they are not interested in Bristol or its people, only MONEY counts and they have thought, "what a perfect site for them to develop" with immediate access to our beautiful Downs. No care has gone into this development, they haven't even tried to fit in.

Yours sincerely,

Barbara Crockford=Smith

Dear Sir/Madam,

It seems that the developers have made no change to their planning application despite the many legitimate objections raised by planning and the local community.

Therefore my view also has to remain the same and I request that the revised plan be rejected.

Thank you.

Your faithfully,

Irene Cleghorn

Dear Councillors,

like many other local residents I have followed this application and would like to point out that this is nothing more than a luxury, gated complex with no guarantees of public access.

I am also deeply concerned to see that developers are being allowed to offer a derisory cash alternative in lieu of replacing any SEND provision onsite. This is a dangerous precedent regarding SEND funding and the planning process.

I would therefore request that you accept the planning officers recommendation of REFUSAL for this blatant and lazy attempt at a money-grab by the developers.

Not only would it save the environment and conform to the vision of a genuinely better future for the area, it would send a clear message that wasting the City Council's time with gestures that don't change the original submission and don't respect the city and its citizens will not be good enough in future either.

kind regards, Matt Greenslade

Dear Councillor,

As a local resident I am strongly opposed to the present planning application for the St Christopher's School site. It is a massive over development of the site, with too many large buildings and too much destruction of trees and green spaces.

I am also opposed to the substantial under provision of on site parking. The developer's calculations are dishonest in that the onsite parking proposed is calculated as for nursing homes, where no residents have their own cars. The developer's aim is to provide retirement flats for well-off people, most of whom will have cars. The developer's survey of street parking in the area was carried out in the evening when a few places were identified. However, during the daytime when visitors to the site will require parking there are virtually no spaces available for some distance as they are widely used by commuters coming to work in Bristol, as this area is the last before the controlled parking zones nearer the City Centre.

I hope that this application will be unanimously refused.

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Best wishes, Roger Saxon

I have lived locally for many years. My 4 children all went to Westbury Park School. I am a GP. Over the years we have seen the traffic in this area increase dramatically and with it the number of reported and unreported road traffic accidents and near misses. I am opposed to the proposed development of St Christopher's as I believe that it is a massive overdevelopment of this site and will give no public benefit to local residents but will in fact put pressure on local services such as doctors and district nurses and increase the traffic on already congested roads around the site which will further impact road safety. The plan to cut down a number of significant old trees on this beautiful site is also a reason why I urge you to reject the planning application.

Dr Rebecca Collis

Dear Sir/Madam

I am writing to lodge my comments regarding this application. Sadly, given the short notice of the new timing of the hearing I, like others, will not now be able to alter holiday dates to be there in person.

I strongly oppose the application and am critical of the methods employed by the developers in trying to 'trick' the system.

Let's hope that they don't pull another 'fast one' at the 11th hour!

The plans have not changed at all - they are the same as last time. So

I support the planning department in remaining highly critical of the scheme, being that there are two main reasons for refusal: 1) overdevelopment and 2) unacceptable loss of trees.

I would support a 3rd reason that overheating and sustainability are additional, undesirable outcomes of the scheme.

I disagree with the complaints by the developers of 'unfairness', which delayed the decision last time. Road safety and parking are serious concerns still, as is the offer of a derisory cash alternative in lieu of replacing any SEND provision onsite. This is a dangerous precedent regarding SEND funding and the planning process.

The developers also make exaggerated claims of public benefit - this is nothing more than a luxury, gated complex with no guarantees of public access. In fact, the report now states that Grace House and the spa WILL NOT be open to the public.

In essence, this over-development is unsuitable for this crowded and sensitive area and the density that is being requested by the developers is disproportionate to the scale of the surrounding residential properties which will be dwarfed and heavily compromised in every possible way.

As responsible citizens we cannot allow this blight which will be a curse put upon generations to come.

Please pass my comments on to those processing this application in readiness for the imminent hearing.

Thank you

Andrew Lewis-Barned

Dear Sirs

Thank you for the notification of the meeting on Wednesday 9th August 2023 regarding St Christophers School Westbury Park Bristol BS6 7JE.

I have written on this matter before and have not changed my view from my previous opinion.

I live in Belvedere Road, opposite the proposed development which will impact upon me considerably. I live in a basement flat which would be overlooked by the flats. My flat is north facing and a towering block would cut out more light to my flat. This is not acceptable in an 'urban leafy residential street'.

I have struggled badly with parking since the nursing home in my road was developed and caused considerable chaos in the streets around here. If this development goes ahead, it will cause further chaos because the parking allocation is nowhere near sufficient for the development needs and there will be more overspill onto the road.

This is a highly dense development in a conservation area that is out of keeping with the victorian area. We applied to have VPVC double glazed windows and were refused because of the changes it would make to the area. This development makes the refusal for my application for UPVC windows look foolish small fry! If it is granted, it would appear to be one rule for the developers and another for ordinary folk.

Please uphold the decision to refuse the development.

Kind Regards
Carol

Written submission for planners re St Christopher's School

Although we were extremely sad when St Christophers closed its doors and would love the school to still be part of our community we recognise that the site does need a new life and that requires development.

However, the development we need in Westbury Park is not reflected in the plans that have been brought to the planning committee. We live in a climate emergency and in a society where divisions are becoming more profound and ingrained. A development which brings such a strong environmental deficit in terms of its destruction of trees and high volume of traffic is unsustainable. Making Westbury Park even more of a ghetto for the wealthy will seek to further cut it off from the rest of the city.

We were hugely disappointed that the legacy of St Christophers working with the SEND community was not reflected by the awarding of an ACV to the site and believe strongly that given the SEND crisis in Bristol and indeed the country that provision needs to be at least maintained - if not built on for those who most need that support.

We would absolutely welcome a mixed development on the site, one which take seriously the climate crisis and the need to build bridges in society by including those who are not wealthy, and those who live with SEND. The proposed development does not fulfil these criteria - it would have a massive environmental impact, exacerbate economic inequality and fail to honour and support the members of the SEND community who need it so badly.

I urge the planning committee to reject the application that is before them and encourage any future developers to come back with plans which better fit the building of the sustainable, inclusive and forward thinking community that I know the Council wants to create in our city.

Revd Emma Langley, Vicar St Alban's Church, Westbury Park and Ecumenical Minister in the Church in Westbury Park.

I am a local resident and I am strongly opposed to this development. I have read the proposal and I am troubled by the intensity of the development proposed and the knock on effect this will inevitably have on road traffic and road safety, air quality and already scarce parking.

I am also very unhappy about the proposed sacrifice of so many beautiful, mature, valuable trees in order to create exclusive housing out of the economic reach of most people.

This development seems very selfish and self serving to me. I can see no benefits to our local community that would offset the losses that it represents.

Zak Coles

Dear Sir / Madam,

Kudos to the experienced planning officers and the wider council for their holding firm on the refusal of the above planning application and dismissal of the un-founded points of un-fairness from the developers. This type of application and approval would set a dangerous precedent for socially irresponsible development that is totally unjustified and adds the compounding insult of being presented in the form of platitudes and guff.

Look forward to this being rejected and the time of this council and our planning officers being given back to focus on truly responsible and socially kind development projects.

Thanks for your leadership.

Kind Regards

Ali

St Christopher's Square application (Ref: 22/01221/F)

The proposals are for the reuse of an existing site, formerly a school, into new extra living accommodation. The site is in a sustainable location with a short walk to local shops, services, bus stops and The Downs.

On-street parking is an issue for local residents, given their proximity to Cotham North and Redland residents parking.

Highway issues have been resolved or can be resolved with conditions. Transport Development Management officers have no objection to the proposed scheme provided the scope of the area-wide parking measures or level of contribution is agreed, which we have yet to discuss with them.

The parking we have proposed for the site is in excess of the policy maximum standards for C2 use, which this scheme will be.

We have demonstrated, using recognised industry standard methods and data that the parking is sufficient for the site and should not lead to overspill parking on the neighbouring roads. Transport Development Management have not advised on the appropriate number of parking spaces needed on site for the scheme.

David Tingay

For Key Transport Consultants Ltd

We wish to object to the proposal re St Christopher's School.

The abundance of protected and mature trees should be regarded as a great asset and take precedent over any proposed building. The suggestion that building could be made beneath the canopy without killing the trees is ludicrous.

The site proposal is over developed- buildings too high- not in keeping with the surrounding area.

Increased traffic which will be endanger children attending the school and nursery.

We continue to believe this planning application should be refused.

Sincerely,

Nigel and Gillian Naden

Hi

I am disappointed to learn that Bristol City Council are considering permitting expansion of the crematorium onto the surrounding farm land.

In doing so, you threaten the livelihood of one of the oldest farms in the area.

I use the farmland for walks away from the busy city and do not support this proposal. If we are not careful, we will have no rural land on the outskirts of the city at all- which hardly meets the carbon emissions criteria.

It's all very well charging motorists with old cars who wish to drive through the city (CAZ), but what about the dissemination of green space which the council do not appear shy of allowing? Green spaces are a crucial component of creating clean air!

Roz

24

I'd like to thank the Planning Officers for recognising that the applicant is providing insufficient parking to avoid overspill and that any overspill would cause unacceptable safety hazards to the surrounding roads.

I am submitting this statement to support the Officer's report; although this is not given as a reason for refusal, in making their decision I would like the Committee members to be fully aware of the road safety risks of this development as it stands.

I believe it is well recognised that the location cannot absorb any overspill – it is on the edge of the RPZ and is already faced with a daily influx of commuters (who use it as a free park and ride or are trying to avoid the new LEZ), and has to accommodate numerous staff and visitors for the schools, nurseries and care homes in the area.

The safety implications of increasing the demand on the limited on-road parking cannot be underestimated. The neighbouring Bayswater Avenue/Etloe Road houses a primary school and three nurseries. The local roads are effectively single lane, due to parking on both sides. During peak hours these roads are already full of drivers circling round in search of a rare space when it becomes available – this leads to careless driving and examples of road rage in competing for the spaces. Cars continuously park on the pavements and corners of roads (as has been evidenced in a high volume of photos submitted to the website) which limits visibility and forces pushchairs and wheelchair users into the road. For the children and families who walk to school/nursery, this is already hazardous, and an independent survey of local residents showed that 81% of the respondents saw parking in Westbury Park having a dangerous impact on road safety.

These existing problems can only be made worse by an influx of residents, staff and visitors also trying to park in these roads – with the peak hours for staff overlapping with rush hours. This additional volume of circling traffic, and likely increase in dangerous and obstructive parking, will increase the safety risks for all road users to the point where most families will not feel it is safe for children to walk to school – there will be an accident just waiting to happen.

The applicant claims they are providing sufficient parking, but this is solely based on their comparison with parking ratios at other retirement sites.

- However, they have selected comparison sites which are demonstrably different – largely socially rented housing, with a predominance of single-bedroom flats, and/or in locations where overspill is either impossible or can be readily accommodated.
- The St Christophers units are targeted at a wealthy demographic, with largely 2-bedroom flats appealing more to couples, of which one may be under the age of 65. I simply don't believe such buyers will willingly give up their cars, when they will think they can park them on the surrounding streets if they don't get one of the limited on-site spaces.
- We know from the nearby nursing homes that most carers want to drive to work – they do specific hours, often arriving early and leaving late, and need to minimise their (unpaid) travel time – this limits their ability to use public transport or share lifts, and a mini-bus will not be attractive as it will simply waste more of their valuable time
- And fundamentally, the amount of parking provided on other sites does not show that there will not be overspill on this site!

For these reasons, I ask the Committee to recognise the safety issues that would entail if this development were to go ahead as planned.

I also ask the Committee to reject the application on all other grounds recommended in the report.

Regarding the proposed **St Christopher's School development**, I would like to express my views **against** the proposed project.

My criticism of the developer's scheme remains the same and I support the recommended refusal. My main concerns for this proposal are:

- Overdevelopment of a heritage and conservation area, which will lead to harmful impact on the area, notably an unacceptable loss of trees, leading on to.....
- The "sustainability" of the project (the arguments are weak).
- Continued concerns about volume of traffic (both during and after construction), road safety and parking (this is residential area with a primary school and there is already sufficient traffic and limited parking).
- Pollution during demolition and reconstruction.
- Potential flood risk with the overdevelopment and all that would be needed for a construction of the proposed size.
- The relationship between some of the proposed cottages and private properties on Bayswater Avenue is unacceptably close
- Surely proposed loss of education use on site is acceptable only the basis that suitable alternative provision can be made - do we have updates on this?
- There is local concern that developers are being allowed to offer a cash alternative in lieu of replacing any SEND provision onsite (£543,170.00?). This would be a dangerous precedent.
- There are numerous questions over the the claims there will be "public benefit", especially as the report now states that Grace House and the spa will not be open to the public.

Clare Cullis

Local resident

Dear friends,

I would like to speak in person to my public forum statement below next Tuesday at 2pm.

Please can you kindly confirm?

Warm greetings,

Anita

Anita Bennett

**Chair, national Rescare, the family learning disability charity
Trustee, the Alliance for Camphill (Steiner)**

St. Christopher's School Public Forum Statement for Development Control 'A' Committee meeting on 9/8/23 - in person

Provide only on-site SEN, no to off-site bribes

I'm Anita Bennett, Chair of national Rescare, trustee for the Alliance for Camphill, and mother to Isabel, with Downs Syndrome. I'm here to thank the officers for recommending a solid rejection of these plans, and implore that you all add a third, and most important objection, which is the lack of any on-site SEN provision. Officers are selling off our special children's legacy very cheaply. With the £5m+ value of Grade 2 listed Grace House, members of this committee should reject developers' derisory offer, a bribe in fact, of a mere £543k to build an extension off the school site. As the UK's oldest family learning disability charity lobbying for the right to choose special schools, we in Rescare have been working for years to save St. Christopher's. When US property company Aurora Octopus deliberately ran the school down, it caused allegations of abuse and child cruelty, but because they were not CQC-inspected, no legal action could be taken against Aurora.

We are asking this committee to please reject the application clearly on the grounds that the developers have failed to comply with the clear 2021 requirement to provide "on-site education/community provision." FORE's revised application shockingly ignores Development Plan BCS12 (Community Facilities) and DM5 (Protection of Community Facilities). We ask members to show some ambition and courage and seize this golden opportunity for greater SEN provision. To claim that the Education Dept. "accepted" this small amount for a mere extension ignores the fact that the new head of education has just quit after only seven months in the post. More importantly, why were Social Services not consulted? They paid for many of the pupils. We do happily note that in the last five years that there were 7.25 local Bristol pupils attending and so FORE's minimum offer of £543k does acknowledge that St. Christopher's did indeed serve the local community. But why go back to only 7% of the school's total life? Why not accurately factor in 70 years times 30 Bristol students (miniumum) yearly at today's equivalent of £74,920? That means 2100 pupils X 70 years @ £74,920 which today equals £11 billion, to properly compensate the city for what we have paid.

We are asking you to retain Grace House, plus the urgently-needed respite care Colombo Lodge, plus at least one of the Grade Two listed big houses. They were given, donated for

the sole use of the learning disabled, in perpetuity. The elderly ladies who gave these homes freely would turn over in their graves to see our Council effectively gift millions of pounds to this US multinational. Please, it will cost you members nothing to stand up to provide for SEN on site, and it will be the correct moral decision to ensure that charitable and council funds are spent for what donors intended.

Grace House was 'built specifically to provide classrooms for SEND children'. It is one of only four Grade 2 listed Steiner buildings in the UK, and developers' failure to offer any meaningful SEN onsite provision is an insult to the thousands of Bristol citizens who donated the millions to build and maintain it. Would one reason to bribe the council with this off-site provision is that having learning disabled children on site would make it much less desirable and profitable for the prospective wealthy elderly clients?

Cutting down the many trees planted near Grace House, in memory of children who died, is tantamount to wrecking gravestones.

St. Christopher's is a jewel in our crown, and is indirectly a tribute to Jewish survivors of the Third Reich, who set up the UK's first special schools in Camphill. Dr. Karl König worked closely with the founder, Catherine Grace OBE.

Members tell us that there is a 3-year waiting list for overnight respite care in the city. Only if you are a parent of a child, student or adult, in need of respite, could you understand what this means to the whole family. So, we would ask two things: One, that there is a city-wide consultation on the existing purpose built 10-bed Columbia Lodge respite home being given over for the use of the city. It is a mistake to only consult the unelected education department, because all the costly out-of-county placements are also financed by social services. They need to be consulted and they clearly were not.

Dear councillors, it is important to recall that, on 8 November 2021, your planning officers gave the developer clear Pre-Application guidance stating that 'there is a need for an ongoing education/community use of this site for SEND provision'. It is a disgrace that the developer has ignored this demand. The current lawful use of this land is as a residential school for children with special educational needs, not for the wealthy elderly. Moreover, there is an urgent need to expand provision for SEND children in Bristol. I urge you to refuse this planning application because it fails to make any meaningful provision for SEN children in our city at this historic school site.'

Good afternoon,

I am writing to express my opposition to the plans submitted for the former St Christopher's School in Westbury Park (**Planning Application 22/01221/F**).

Redeveloping the site as proposed would overcrowd an already densely populated and busy neighbourhood and create traffic, parking and road safety issues. Cutting down trees would destroy an iconic Bristol skyline and remove vital habitat for wildlife, as well as taking away greenery that cools and shades, and fights pollution.

I urge the councillors to wholeheartedly reject the planning proposals and seek more sustainable, aesthetic and socially responsible solutions for the site.

Best wishes

Naomi

Naomi Slade

Re Planning Application 22/01221/F

To Whom it may Concern,

I am writing to confirm my previous objection to this proposed development.

1. I think this development plan with its collection of multi-storey apartment blocks up to 5 storeys high, with 116 new apartments, is too dense, too big and too high.
2. There is no proposed increase in parking places - so traffic and parking would become a huge problem for local residents.
3. It is proposed that 40% of the trees would be chopped down, including two mature trees that the cultural arboreal officer said were of cultural significance. This is unacceptable in these times of understanding how desperately important trees are for wildlife and well-being, and to maintain coolness in times of heatwaves.
4. There is no provision for special needs education, which is so desperately needed.

I believe this would be an entirely inappropriate over-development that fails to respect the unique heritage of a wonderful site that lies within a Conservation Area and contains a listed building.

The idea that this development might be of public benefit seems to me to be utterly unfounded. On the contrary I can only see that there would be great disadvantages for the general public who have no guarantee of access - in fact Grace House and the spa would specifically not be open to the public - and local residents would simply have to deal with more traffic, less parking, less wildlife, fewer trees, blocked views and overshadowing by big buildings.

So, as before, I recommend that this proposal is refused.

Yours sincerely,

Jacqueline Evans

Public Forum Statement to DCA, 9th August
Application 22/01221/F – St Christophers School

This is the biggest planning application in our ward for many years, and it is with regret that we are urging the committee to follow the officer recommendation and refuse it.

We support the principle of development on this site, and the proposed use for a retirement community is a good one in our view. We also support the idea that the site which has been closed to the public for many years should be opened up with new rights of way and public realm.

While we recognise that many of our residents have had a different experience, we have found that the developers have engaged well with us as ward Councillors throughout the process and we thank them for that. However, we are unable to support the scheme as it stands.

A very large number of residents have raised a wide range of concerns about this scheme, both individually and on behalf of local campaign and amenity groups. Over 1000 public statements were received through the planning portal, which were overwhelmingly opposed to the scheme. We have no doubt that this will be reflected in public forum. We support our residents in this.

Our greatest concerns as ward councillors are around the impact on local roads and parking, and the scale and massing of the scheme. Expert / statutory consultees support our concerns on both counts.

On parking, the site is in an area characterised by narrow roads and very little private parking on driveways. It sits just outside the boundary of existing Resident Parking Schemes so is a magnet for commuters and suffers from very high levels of congestion already from both parked and moving traffic. The proposed scheme relies on these narrow and congested roads for access and does not provide sufficient on-site parking, which would make the situation much worse. **These concerns are all reflected in the TDM report, which recommends refusal. We note that this is not included in the recommended reasons for refusal and would ask that the committee considers including it.**

We appreciate the officer recommendation is to condition an “area-wide parking scheme” which could make these impacts acceptable, but we all know that the Council’s policy is not to implement such schemes. We are concerned that if this is not included now as a reason for refusal, the issue could be difficult to uphold either at appeal or for future schemes on the site.

On design, the site sits in a conservation area characterised by large Victorian villas which make up the frontage, and open green space behind. The proposal is to place large modern tower blocks behind those villas which would take up a significant amount of the open space and be clearly visible from the Downs. While this height and density would be reasonable in a city centre setting, we believe that it is simply too high and too dense for a suburban conservation area and would harm the character of the area. **These concerns are shared by City Design, who recommend refusal.**

On those grounds, as well as the wide range of concerns raised by residents in many other areas, we ask the committee to refuse this application. We hope that in the future a revised application will come forward which produces an acceptable future for the site.

Councillors Geoff Gollop, Sharon Scott and Steve Smith.

Ward Councillors for Westbury on Trym and Henleaze.

Re Planning Application 22/01221/F

To Whom it may Concern,

I am writing to confirm my previous objection to this proposed development.

I think this development plan with its collection of multi-storey apartment blocks up to 5 storeys high, with 116 new apartments, is too dense, too big and too high.

There is no proposed increase in parking places - so traffic and parking would become a huge problem for local residents.

It is proposed that 40% of the trees would be chopped down, including two mature trees that the cultural arboreal officer said were of cultural significance. This is unacceptable in these times of understanding how desperately important trees are for wildlife and well-being, and to maintain coolness in times of heatwaves.

There is no provision for special needs education, which is so desperately needed.

I believe this would be an entirely inappropriate over-development that fails to respect the unique heritage of a wonderful site that lies within a Conservation Area and contains a listed building.

The idea that this development might be of public benefit seems to me to be utterly unfounded. On the contrary I can only see that there would be great disadvantages for the general public who have no guarantee of access - in fact Grace House and the spa would specifically not be open to the public - and local residents would simply have to deal with more traffic, less parking, less wildlife, fewer trees, blocked views and overshadowing by big buildings.

So, as before, I recommend that this proposal is refused.

Yours sincerely, Rosemary Ward

Re Planning Application 22/01221/F

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So, as before, I recommend that this proposal is refused.

Yours sincerely,

Anesh Chauhan

I am Henry Lumby from Amicala.

We will be the long term operators of this new community where we will support residents to age in place by providing support, lifestyle and community facilities and services, and well-designed homes that adapt as needs change. We enable older people to live independently for as long as possible.

The Amicala team has a track record from the UK and Australia.

We've worked closely with officers at the council as well as social support groups including Age Friendly Bristol and Bristol Older Peoples' Forum. This has ensured our plans align with what Bristol's older people need.

Projections show that by 2043 almost 18% of Bristol's population will be over 65 years old. Integrated Retirement Communities also ease local housing pressures as residents' free up family homes for upsizers and in turn smaller homes for younger families or first-time buyers.

It has been shown that communities like this contribute to a 46% reduction in routine and regular GP visits and reduce unplanned hospital stays from 8-14 days to 1-2 days.

Support will be on site at St Christopher's Square 24/7 to provide assistance for residents.

We will also provide a range of activities to support and promote independence such as volunteering in the local community.

Residents will own their own homes within St Christopher's Square providing further independence.

Research shows that Integrated Retirement Communities offer better outcomes when they properly integrate with and welcome local communities.

We'll open the site to the wider Westbury Park community with access to new open green spaces alongside a café, an Urban Village Hall, a wellness centre featuring a hydrotherapy pool and gym, plus activity rooms.

Ian Monger – Arboriculturist, Barton Hyett Associates

The team have carefully viewed how the development can be cited within the existing constraints and vegetation and we have responded and adapted the scheme through the process. Working with the Council we have been able to respond to concerns about protected trees and the design has been amended so that 12 of the 13 protected trees are retained.

Two Category A trees cannot be retained because of the need to excavate to divert the sewer and to provide the access route, while maintaining spacing from the listed Grace House. Their unfortunate loss is however fully mitigated in excess of Policy DM17 and the Bristol Tree Replacement Standard requirement (for 98 replacement trees) by providing new on-site planting of 109 trees. Overall, the scheme is providing a 43% biodiversity net gain.

Oak T7 is not a veteran tree for the reasons I've set out and is not protected by a TPO. It is currently in an unsatisfactory condition with significant tarmac having been installed at its roots by the previous occupants. The Council, and in particular the Tree Officer on this scheme have previously inspected this tree in 2017 where they neither addressed the unsatisfactory habitat nor identified it as a veteran tree. The Council has never protected the oak tree, despite making three TPOs at the site.

As part of our proposal, taking on board the desire to preserve this tree, elements of the scheme have been re-sited to accommodate it with only a low to negligible impact on it. By removing existing tarmac around it and returning the area to open ground (a very significant 184% increase in open ground around the tree) there will be a significant improvement in its rooting environment that far outweighs the minor root protection area incursion.

Further points of note are the creation of a new woodland to the northeast of the site and reducing the paved public square originally submitted to a meadow in response to consultation feedback.

I write to record my OBJECTION to the above planning application on the following grounds:

1. the site would be over developed,
2. the proposed new buildings are too high,
3. the architecture of the new buildings is incompatible with the style of the surrounding properties,
4. the likely increase in traffic this development will generate in the area,
5. increasing pressure that would be put upon on-street parking in Westbury Park and surrounding roads, due to totally inadequate on-site parking for residents and employees.

Regards, R S H Taylor

St Christopher's Square – Applicant's speech to committee

My name is Sarah Trahair-Williams and I am an Associate Director at FORE Partnership, the developer behind St Christophers. We are a B Corp Certified, purpose drive real estate investment firm and one of the UK's leading "sustainable developers", with the most ambitious Net Zero targets and many awards to our name. We delivered Glasgow's first net zero office scheme in 2022 and are currently on site with our zero carbon TBC.London scheme set for completion next year.

Over the past 2 years we have we have worked in close consultation with the council and community, to create a highly sustainable, economically viable and much needed scheme within the heart of Bristol's Westbury Park. Always actively responding to comments raised, we have reduced the original submission from 122 homes to 116, decreased the size of the tallest building from six to five storeys and moved buildings away from boundaries.

We are proud to be delivering much-needed purposely designed homes for our aging parents and grandparents, helping those we love live independently for longer. Our scheme helps frees up local family-sized homes thereby providing a solution to help achieve Bristol's required 5-year housing supply.

In line with our firm's commitment and as evidenced by our other schemes, the project will be:

- Net zero in operation
- Open up a site that has been sealed off for decades, including new vibrant community space
- Respectively retore listed building Grace House which has been falling into disrepair
- Provide a biodiversity net gain of 56% and a net increase of 109 new trees
- Recognising embodied carbon as vital to combating climate change, we are retaining and refurbishing 7 existing buildings

We will continue to create a positive social impact, building on the activities we have already done including:

- Housing 90 young adults
- Providing refugee accommodation for 12 people
- Providing a vaccination centre in partnership with Whiteladies Medical Centre
- Running programmes in partnership with local scouts, drama groups, Bristol WORKS, Age UK and the university

This large brownfield site in a sustainable urban location is a critical opportunity to provide a desperately needed solution to the local housing crisis – and address the urgent climate emergency. At only 60 dwellings per hectare, considerably less than the policy compliant scheme a housing developer might provide of 120 dwellings per hectare, we believe the scheme strikes the right balance in respecting site's constraints and meeting the city's most urgent needs.

We hope the committee feels able to approve these plans so we can get on and deliver for Bristol, creating new jobs and new homes for the city.

I have read the reasons, given by the planning officers, for the refusal of this planning application and I strongly agree with their decision. The plan drawn up by the developers is a gross over development of this sensitive site and is, among other things, totally out of keeping with the surrounding area of Westbury Park and the Downs. This development must be stopped !

Nigel R Wallis

I am opposed to this planning application for the following reasons:

Density and height of the buildings.

There is a block that is far too high and too close to residents in the The Glen.

Inadequate parking for both residents and staff.

Residents will have family members who will want to visit and there will be very limited parking on site. I live on the corner of Royal Albert Road and Westbury Park. Already there is traffic congestion and a struggle to find parking places, brought about by the RPZ finishing at the end of Redland Road and commuters using local roads for parking. Unless the council is willing to expand the RPZ to include all roads, including Westbury Park (the road), a development such as the one proposed will make matters a lot worse for those of us living here.

Lastly, I wonder if there is a need for such a large scale development, which looks as if it is aimed at the luxury end of the market. We already have The Vincent and St Monica's nearby, both of which cater for the more well off. Surely this is an opportunity to build affordable housing with adequate parking, reducing the need to cut down so many trees.

Yours sincerely

Hilary Gallery

To the councillors and Planning department:

The changes proposed in this revised application are minimal. It is still a hopelessly overcrowded site. The buildings proposed are still too high for this conservation area.

Worst of all is the decision to make a rear vehicle access via The Glen. This would simply encourage residents, staff and visitors, for whom there is already inadequate parking provision on site, to try and use The Glen and Belvedere Road as overspill parking. There is already insufficient parking for the residents of these two roads. Belvedere Road is regularly blocked by delivery vehicles and ambulances and, as a resident myself, I find myself circling the area for 20 minutes or more, trying to find a space in neighbouring streets. It can only get worse - much worse.

It's a recipe for chaos in this part of Redland.

I continue to object to the proposed development.

Sam Taylor

It appears that the developers, having dodged an earlier hearing of this application, cynically engineered a new meeting in the holiday period, issued a 'rebuttal' of the Council's earlier refusal response to the plan, and still fail to address the comments I and many hundreds of others have made.

So, since the developers plan is unchanged, consequently the refusal is also not changed.

To summarise; it seems there is no significant change to

1. Parking deficiencies in the area.
2. Overbearing density of the villas (height, scale, massing).
3. Tree losses (regardless of TPOs and 'conservation area' category of the site).

Even worse for the developers' case is the new and surely damning conclusion of Council planning officers in their latest refusal is that the plan would result in "unacceptable living environment for future **occupiers** of the site."

In other words poor outcomes for both occupants and neighbours!

OTP

5/8/23

PS: with many thanks to the numerous individuals who have meticulously dissected and examined the detailed implications of the application and reported the results to us.

Sent from [Mail](#) for Windows 10

A resident of Bayswater Ave for 35 years I hope you will refuse the above
In my view the site is overdeveloped. There is derisory parking provision in an area where road safety is already an issue, this especially on an increasingly busy road used by children from a nursery and a primary school . We have seen numerous accidents at the St Helena /Bayswater junction where due to parked cars vehicles have to pull into the road with no visibility either side.

Developers from the first consultation have made false claims . There is no green space provision for school children to play (they have none) There are no allotments as promised for public use . Grace house won't be open to the public . No SEND provision or any where adequate compensatory provision of funds.

I could go on

I think this development plan with its collection of multi-storey apartment blocks up to 5 storeys high, with 116 new apartments, is too dense, too big and too high.

There is no proposed increase in parking places - so traffic and parking would become a huge problem for local residents.

It is proposed that 40% of the trees would be chopped down, including two mature trees that the cultural arboreal officer said were of cultural significance. This is unacceptable in these times of understanding how desperately important trees are for wildlife and well-being, and to maintain coolness in times of heatwaves.

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The idea that this development might be of public benefit seems to me to be utterly unfounded. On the contrary I can only see that there would be great disadvantages for the general public who have no guarantee of access - in fact Grace House and the spa would specifically not be open to the public - and local residents would simply have to deal with more traffic, less parking, less wildlife, fewer trees, blocked views and overshadowing by big buildings.

So, as before, I recommend that this proposal is refused.

Objection Planning Application – St Christopher’s Site

Education officers consider that ‘loss of SEND provision on-site could be accepted if a suitable contribution towards SEND provision could be secured’

Who are these officers that consider this to be acceptable? No officer has had this conversation with me as the opposition lead for Education and Children’s Services, the Green Party do not accept the loss of SEND provision on this site, the confidence with which these unnamed education officers make this statement therefore can only be based on this Labour Administration’s attitude toward children and young people with SEND. It’s been there for 75 years and must again be used to meet the known growing needs of young people in this city.

The need for more, localised SEND places in this city has been well documented for years, this local authority sees a mere 6% of adults with learning difficulties in paid employment – a woeful number – this represents a loss of potential and independence levels for the other 94% of children and young people as they grow into adulthood.

The acute failures to adequately plan and deliver the needed increases in school places, be those mainstream or SEND, has been a political backdrop since before the Mayoral model became a thing in this city. G Ferguson was elected at a time when there was an acute shortage of primary school places, this then became a shortage of secondary places because (who would have thought it) children grow up!

Inadequate planning for suitable SEND places, within the LA boundary, for our city’s most vulnerable children, has seen the High Needs element of the Designated School Grant grow to be the biggest bankruptcy threat to this authority. Reducing the sites dedicated to providing SEND works against any attempts to bring this deficit under control or ensure that children and young can be educated and accommodated close to their families and communities – an element the words in the Belonging Strategy say is wanted and very much needed.

The scramble to ensure enough SEND places, in the right place is ongoing and will be for at least the medium future term such is the historic levels of neglect this statutory area has been subjected to.

Post 16 SEND provision is barely on the radar of this administration despite having known about the additional responsibilities placed on authorities for over decade.

The ‘planning agreement’ that sees almost £550 000 ‘contribution’ to places off site is totally inadequate – there is no monetary amount that can be placed on the value to children, young people, their families and society as a whole in ensuring the next generation is supported to achieve their potential and live the most independent and fulfilling lives, they are capable of.

Whichever education officer/politician that signed off this apparent ‘acceptable’ contribution need to take a long hard look in the mirror and ask themselves what they are working to achieve in their roles. If the ‘cost’ of specialist SEND provision provided on a site for the last 75 years has, in their mind, a monetary value of just over half a million quid then maybe they’re in the wrong job. Working in the public sector or being elected to represent the residents of this city means putting people before profit, if you can’t or won’t do then step aside, our city’s children don’t need you or your attitudes anywhere near their education services.

Dear Sir/Madam,

I would like to request to speak in support of the St Christopher's Square application (Ref: 22/01221/F) at next week's Development Control Committee A on 2pm Wednesday 9th August .

Please see below my written statement, which I would like to speak to.

My name is Paul Hassan. I'm the partnership manager at ACH.

ACH Supports refugees to have full and successful lives by offering them access to housing, employment support, enterprise support but also supporting their training needs.

We're delighted to be working with the applicant and support their plans to develop an integrated care home in central Bristol.

We're taking advantage of the opportunity to use this space whilst they go through planning process. The building is set to house 12 refugees who are looking to take the final step into securing either their own property or opportunities within the private rented sector. By giving them the opportunity to be located here in this place. We've provided an opportunity for those individuals to be able to go on and secure really effective and long-term employment opportunities.

This is the first project of its kind in the city and the partnership is already getting talked about across the sector, nationally, as an example of best practice. We are in a number of discussion with partners to replicate this model in other local authority areas.

We look forward to continuing to work with the applicant to support refugees in Bristol.

As well as working with ACH, the applicant is also providing housing to 90 Guardians, in addition to rent-free space to local groups such as Redland Scouts, and open outdoor space to the neighbouring Westbury Park School.

Please acknowledge my email and advise me on the next steps in my application to speak at next week's committee.

Yours sincerely,

Paul

Dear Sirs, We are again pleased to hear that this application is hopefully being recommended for ' REFUSAL'. We would consider the ' Overdevelopment /harm to heritage & conservation area' being our main concern, in particular the units are far too high and too dense.

We refer to Developer's Visual Assessment Summary (10.10). The 'HIGHEST LEVELS OF ADVERSE VISUAL EFFECT ' relate to available views from the residential properties immediately adjacent to the Site. How very true for all these unfortunate local residents. Many times we have commented on the 'overlooking', 'over-powering' and 'over-shadowing ' of our property from every proposed adjacent unit and dwelling. Multiple windows and balconies look directly into our habitable rooms and garden resulting in a complete 'invasion of privacy'. We would have to have our curtains permanently drawn making us feel like caged animals in a zoo. How can this proposal possibly be considered in a conservation area?

On any future applications could we ask that the height of any proposed development, unit or building is not considered if higher than any adjacent existing unit or residential property?

Thank you in anticipation of your refusal of these outrageous and unacceptable proposals.
Henry and Yvonne Cowell.

Statement on St. Christopher's School, to be read in person

I am a mother to a 30-year-old autistic son, with challenging behaviour, who is non-verbal. I am happy that the officers are recommending refusal of these plans, but I want people to also turn them down because there is nothing left on site for people like my son. If developers say that the site is inhospitable that is their fault, because they have failed to maintain it with all the rents they are getting from their property guardian tenants.

My experience over the last 28 years of SEN schooling show that respite is invaluable to all parents and carer's to enable them to keep their loved ones in the family home.

Children with special needs need a stable and happy environment, to help with basic learning skills, and to be accessing the community. There was hardly any respite services 20 year's ago and it's still not any better, so why not use the big house at St. Christopher's which is already built for respite? If there isn't enough resources then you will have breakdowns in families, which will result in more money spent placing them in residential, when the right solution is to be within the family home with help like respite. We desperately need you to use your power to insist on keeping these important parts of the site for the use of our community's children.

My son has had a private provider since 2020 and I have put in three safeguarding complaints because I am not happy with them. Even though my son's care plan has been advertised on the website for other providers, not one has come forward to take on his care package. It just shows that there isn't enough provision within the current system. Please help us by keeping provision at St. Christopher's, not somewhere else. Thank you.



Statement from SCAN for Development Control Committee A, August 9th 2023

SCAN wholeheartedly supports the officers recommendation for refusal and thanks the team for their hard work. This woeful application has resulted in more than 1300 objections from across Bristol. We trust our elected councillors to refuse it on the grounds mentioned in the report and draw your attention to a few additional aspects.

1 Heritage We consider the permanent and irreversible nature of the large overbearing buildings in close proximity to heritage buildings in a conservation area constitute ‘substantial’ harm. We ask that you amend the refusal reasons accordingly.

2 Trees/Environment It's simply not acceptable to fell a large number of high quality trees in a conservation area when we have a climate emergency. We support the officer's decision that the presence of a veteran tree means permission should be refused. We note the difficulty in replacing sufficient trees due to lack of space.

3 Sustainable Development We highlight 2 further areas that councillors may wish to additionally record to support a refusal. i) Living conditions for future residents described as ‘unacceptable’. In the CR there is an obvious conflict with local planning policy and SPD1 and this is a clear reason for refusal. And ii) CO2 emissions. It is clear that the developers have failed to comply with the council's basic sustainability policies which are critical to Bristol's strategy for tackling the climate emergency and they have no solution to address this shortcoming.

4 SEND use The applicant has failed to mitigate the loss of SEND use and the sum discussed as a payment in lieu is derisory. SEND provision should not be used as a bargaining tool in the planning process to exonerate developers from their statutory obligations. Grace House was built for SEND children and should be used for education.

5 Transport We thank the Highways officers for confirming the area around the site already suffers from parking stress and that the scheme will result in parking overspill. This will clearly have an adverse effect on road safety. The report states that the development “must be refused unless a scheme of area-wide parking measures can be implemented”, but BCC's current position is against RPZs. If such a scheme is to be a pre-condition, it would need to be subject to local consultation, and be fully enforceable by BCC. Given the absence of a mitigating scheme, the applicant has failed to demonstrate safe highway conditions. This is unacceptable.

6 Housing We acknowledge that the officers have had to class this in the C2 category. However, a future scheme that aligns with council's 40% affordable housing policy, a point raised in many objections, and which properly addresses Bristol's housing crisis and offers genuine community and citywide benefits would be preferable.

7 Public benefits We believe claims of public benefit are exaggerated, unspecific, highly impractical and not guaranteed. The ‘openness’ and ‘access’ that the applicant promises in theory (to make their application more appealing) are entirely unfeasible and impractical in reality, due to the presence of vulnerable residents and the inherent conflicts between the private and public realms within the design. There are NO specifics or defined conditions around meaningful community use and promises of access could easily be withdrawn or considered financially unviable in the future. We note the CR now states the scheme will no longer provide public access to Grace House or the spa. Occasional use of North Lodge is impractical for the same safeguarding reasons as well as road safety impacts. Developers have not consulted about would be beneficial to the community.

We ask you to consider these additional comments. As you all know, should the applicant appeal, the reasons for refusal need to be specific, extensive and robust enough to ensure the council's decision is not undermined. Also, if the applicant submits future applications, they may assume that any issues not given as grounds for refusal, or mentioned on record as problematic, can be disregarded.

In summary, this is a poorly conceived and badly designed scheme, way below the standards required. It would lead to a gross overdevelopment of the site, causing substantial harm to listed buildings, trees and wildlife habitat within a Conservation Area. Weighing all these aspects carefully against any purported benefits there is only one obvious conclusion. We urge councillors to reject this application based on the recommendation of officers and the wealth of evidence provided by the many parties who have commented.

I object to this application on the basis of loss of amenity -our ground is 2 metres lower than St Christophers. Parking is already very difficult . It will become impossible with the proposed parking arrangements. Biodiversity will suffer. Cutting down mature trees would have a major impact on all wildlife and nature in the whole area.

--

Ann Bowes

Dear Councillors,

As a neighbour of the St Christopher's site and local political campaigner, I support the planning officer's recommendation that planning application 22/01221/F be refused, and urge you to back that recommendation.

Overcrowding

The plans are overly dense for the site, resulting in the loss of too many trees and biodiversity, and the buildings are too high, causing overlooking and overshadowing of existing properties on Royal Albert Road and The Glen.

Conservation area

The proposed villas would be visible from the Downs and detract from the lodge's appearance and nature of the area.

Parking

There are far far too few parking spaces proposed, probably half of what are needed. The applicant's assumption is that overspill can be accommodated in surrounding roads, but the site sits on the edge of the Cotham North RPZ and parking is already oversubscribed, as people use the area as an unofficial park and ride. Residents of The Glen and Belvedere Rd have already requested an extension of the RPZ, but the road has too many residents, (owing to the presence of 3 care homes and sheltered housing for adults with learning disabilities) for it to qualify for a street extension. The only alternative is to create a new RPZ, which has been ruled out by the current administration. Therefore we hold no hope of an RPZ, and dangerous parking across corners, blocking bin lorries and ambulances is a daily occurrence as it is.

Lack of affordable housing

The plans contain no affordable housing, residents would need to be considerably well off to be able to afford to move there. As such the development would likely be quite exclusive, and residents are not likely to want to share facilities with the local community. There are already a number of extra care communities in the area, St Vincent's, St Monica's, Carfax Court, all of which have empty flats, as well as a large number of nursing and care homes. Family housing is in short supply. Therefore the proposed development would not supply the extra housing the area actually needs.

Loss of SEND provision

Despite the applicant's claims, Bristol's SEND provision is not adequate. A decision pathway report [SB Innovation Fund Feb 2023.pdf \(bristol.gov.uk\)](#) from Cabinet on 7th February 2023 highlights that the council has had to put in place a 12 month bridging service to deal with 129 autistic children who are missing education due to anxiety. The Council are also paying for private tutors to see children with SEND who have been pushed out of education by schools which cannot cope with them. These are anxious autistic children that have been failed by the existing SEND provision. There is currently no provision in Bristol for anxious autistic kids to study for GCSEs, yet these children are bright and capable if they are given the right environment. If Grace House is to have change of use permission granted, we really need to be sure first that Bristol is not bussing children to school neighbouring local authorities, or having to homeschool children because there isn't adequate SEND provision within Bristol.

Kind regards,
Caroline Gooch

I welcome the Planning Officer's recommendation to refuse this application and ask that Members do refuse it on all the grounds suggested.

My comments relate to the issues relating to shortfall of parking, acknowledged in the report. As this is not given as grounds for refusal, **I would ask that the following points are noted and formally recorded as conditions.** This may seem hypothetical if the application is refused on other grounds, but it will be important to establish these conditions in case this is appealed (or for future applications).

Firstly, I am grateful that the report recognises that the limited on-site parking would result in overspill and that the area surrounding the site cannot safely absorb this. In support of this:

- SCAN have provided independent evidence-based research, based on ONS data for car ownership by age and a PINS-appointed expert view of the typical care requirements for "extra care" residents, indicating that at least 126 spaces would be required, resulting in a likely overspill of at least 50 cars
- The applicant has not based their parking provision on a needs-based analysis, but on a selective comparison with other retirements sites, which are very different from this in terms of demographics, nature of property and location. In fact, comparable developments, such as the local St Monica's Trust Westbury Fields site, typically provide at least one space per unit
- The current parking stresses on local roads are well known, acknowledged by BCC, and were recognised by the Planning Inspectorate in upholding refusals of other recent applications. The area is on the border of the Cotham North RPS, which means that it is already flooded on a daily basis by commuters using it as a free "park and ride" or trying to avoid the new Clean Air Zone. Any overspill from St Christophers simply cannot be safely accommodated.

The report subsequently suggests the plans could be approved if a "scheme of area-wide parking measures can be implemented...". This is confusing in light of the TDM's comments (report dated 12/5/23) "Whilst it is not possible to extend the existing RPS...". If this is not possible, then what type of scheme is suggested?

This condition therefore is currently too vague to be relied on to address the safety risks of overspill.

Please can it be recorded that such an "area-wide scheme" would need to be:

- Clearly defined to prevent any parking in the local area from residents, staff or visitors of St Christophers
- Enforceable by BCC traffic officers (ie similar to the existing RPSs in Bristol)
- Designed to cover a sufficient area to avoid simply shifting the problem to a different set of roads
- Subject to local consultation of residents and businesses and found acceptable (ie, not unilaterally imposed on this area at the request of the developer, especially if there would be permit costs for residents or adverse impact on local businesses)
- Fully implemented before any residents moved into the site.

It should be confirmed that, if an area-wide scheme is not implemented which meets these conditions, the development would not go ahead under any circumstances.

I very much hope and trust that Members will refuse this application on all the grounds given; even so, I believe it important that the requested conditions are formally documented, to avoid any risk of any version of the scheme going ahead with insufficient parking and inadequate mitigation.

Dear Sir/Madam,

I would like to submit a statement regarding the St Christopher's Square application (Ref: 22/01221/F) at this week's Development Control Committee A on Weds 9th August.

I am a local GP and Partner at Whiteladies Health Centre in Clifton (I am also a local resident).

I would like to thank the applicant for providing our Primary Care Network with space to administer Covid-19 vaccinations to the local community, to prevent the spread of the Omicron Variant.

The vaccine roll-out at St Christopher's began in December 2021 and was still in use until May 2023 for the provision of spring boosters. Over 12,000 Covid vaccinations have been administered from the St Christopher's site. In the autumn of 2023, we are planning to provide joint Covid and flu immunisations to the at-risk groups in the PCN population of 72,000 local residents.

The team at St Christopher's are keen to continue exploring health/wellbeing partnership working opportunities, as part of the applicants' plans for an Integrated Retirement Community. How we provide care for an aging population needs reimagining with new ideas to enhance independence.

Yours sincerely,

Lee

[Dr Lee Salkeld](#)

PUBLIC FORUM STATEMENT FROM JEAN ELLISON (transcribed) Lived in the area for 37 years!

[This is actually in accordance with Bristol city council rules namely my objection is on one side of A4, I've had to write on alternate lines because I have (in the words of the eye hospital) 'complex advanced glaucoma']

1. The proposed development – **OVERDEVELOPMENT** – of the former St. Christopher's school is flawed and unwise and this is in the Downs Conservation area. Westbury Park has a large number of care residential homes already and does not need a luxury retirement complex. Many of these homes already have vacancies (leaflets put through our doors attest to this) and a similar local high-end retirement complex is not full!) The addition of this luxury complex would create Costa Geriatrica up with added demands on already overstretched doctors, dentists, therapist and counsellors etc. Many elderly people are opting for care in the home, so another luxury retirement complex is simply surplus to requirements. The site would be of more value to the community if the developers proposed an area of mixed affordable accommodation where different age groups could mix and derive benefit from one another – a real community of all ages.
2. **Hopelessly in adequate parking provision on site.**
This will inevitably lead to overspill parking nearby roads already at breaking point because there are used to shortcuts to avoid the jams at White Tree roundabout and as free artificial 'park and ride' facilities. An area of mostly Victorian and Edwardian houses (and therefore few garages) parking space is essential as these houses need frequent repair and maintenance and workmen need a parking spot near there working. Many elderly residents here could have carers coming three times a day who also need to park close by. The residents themselves need close access to parking.
3. I object on health and safety grounds to this increased traffic.
BCC [Bristol City Council] according to its own leaflets, is committed to "CLEAN AIR FOR ALL" and a "HEALTHY LIFESTYLE". It surely, then, cannot countenance the increased traffic and air pollution engendered by the creation of this 'EXTRA CARE' facility with totally inadequate parking spaces and yet an army of on-site employees and visitors. There are 3 schools nearby and the area is used a walking healthy route for 3 secondary schools as well.
4. The demolition of mature trees and the destruction of habitat would be disgraceful trees newly planted will take years to mature. The prospect of seeing a luxury retirement complex next to vans for the homeless of Bristol fills me with shame.

I hope BCC will refuse this tweaked application. Jean Ellison

**STATEMENT FOR BRISTOL CITY COUNCIL PLANNING COMMITTEE A WEDNESDAY 9TH AUGUST 2023
FROM ALDERMAN STEPHEN WILLIAMS**

ITEM 1 – APPLICATION REF 22/01221/F FORMER ST CHRISTOPHER’S SCHOOL SITE

I urge members of the committee to endorse their officers’ recommendation and REFUSE the application, for the following reasons:

1 Harm to the Downs Conservation Area and the setting of the grade 2 listed building on the site, Grace House. The proposed new “villas” containing 81 flats are of a height that will damage the view from the Downs of the actual Victorian villas/lodges fronting Westbury Road. The proposed villas will over-fill the green space that is the setting for Grace House, as noted by Historic England.

2 Over-intense use of the site and domination of surrounding houses. The application is for a total of 116 residential units plus ancillary uses. This is an attempt to cram too much into the site, with the unacceptable solution of building the “villas” to a height that is over-bearing to neighbouring residential properties, affecting light and potentially invading privacy. It is also arguable that the application will present light and privacy problems for the potential future residents of the “villas” as the buildings will be in too close proximity to each other.

3 Parking. With 116 residences in what is likely to be a high-end retirement living complex it is unrealistic to assume that 65 spaces will be sufficient for wealthy residents, on-site staff and visitors. The neighbouring streets are already packed with vehicles. As the current administration of the council has halted the roll out of residents’ parking schemes, there is nothing to stop parking from the proposed scheme spilling out into Royal Albert Road, Queen Victoria Road, Etloe Road, Bayswater Avenue and other neighbouring streets.

General comment – there is undoubtedly a need for more retirement living complexes for older people. That need will grow in the coming years as we all live longer. Such managed complexes enable people to right-size into accommodation that is suitable for their stage in life, potentially freeing up larger homes for younger families or shared households. But such sites should not be over-intensely developed, both for the good of the occupants and the existing surrounding community. The applicant should be encouraged strongly to return with a scheme that is less intensive, with real evidence that they have listened to the many concerns of residents and civic amenity groups.

Stephen Williams (Alderman and on behalf of Westbury and Henleaze Liberal Democrats)

28 Sefton Park Road, BS7 9AJ

Please find below brief comment on our objection to application 22/01221/F

We will not speak to this brief at the meeting.

Thanks

D Jones

We live adjacent to the St Christophers site in The Glen. The site was maintained by the school to be very green and includes a number of large and impressive trees. The proposed development will involve the removal of many of these trees and replace them with high rise buildings as high as those trees and dramatically change the character of our street. The outlook will change from green, to high rise urban with many overlooking windows. It is no surprise then, that in the townscape and visual impact assessment report, the effect of the height and mass of the new buildings on ourselves is judged as 'substantial-adverse' (para 11.8 page 35 TVIA report). The landscaping plans show the proposed building density is so high there is insufficient space on site for replacement trees, and many are planned for another site elsewhere.

We are emailing as neighbours of the proposed development site to state that we fully support the recommendation to refuse the planning application 22/01221/F

Our objectives centre mainly around:

1. The overdevelopment of and the high density of buildings on the site, which is out of scale with the surroundings, intrusive and out of keeping with the neighbouring Edwardian and Victorian terraced houses and the Downs conservation area. Furthermore, the dearth of on-site parking will also lead to increased congestion and poor and dangerous parking in the neighbouring streets. This leads to concern about road safety in an area where there is a primary school and several nurseries.
2. An unacceptable loss of beautiful and well-established trees and natural habitat which will have undesirable environmental and aesthetic impact.
3. At a time when Bristol is screaming out for SEND provision, it feels counterintuitive that an established site, which is more-or-less ready-made for SEND provision, is not being utilised for that purpose.

Thank you for taking the time to read this email.

Kind Regards

Christine and Ken Comrie

To whom it may concern

I confirm my earlier objection to this application. I think that the developer's amendments to the original plans will not lead to any meaningful improvements to a scheme that seems fundamentally unsuitable for this site.

The plan is an example of obvious overdevelopment. The traffic and parking problems in the immediate area are already severe. This proposal would exacerbate these problems and the situation would quickly become completely unsustainable.

I also believe that the scheme is environmentally damaging. The buildings are too high and too dense and will significantly increase pollution. As well as making life really difficult for residents, the scheme seems to flout current concerns about trying to solve some pressing environmental concerns.

Any claim that this scheme would offset serious damage to life in this area by offering benefit to local residents seems to be spurious.

Bristol City Council has this important opportunity to listen to the serious and well-informed objections of people living in this area.

Caroline Fletcher

Dear Sir/Madam

I remain wholly against this proposed development. As per my comments when the proposal was withdrawn, the previous changes in no way adequately address any of the concerns raised.

I remain extremely concerned about the proposals, including in relation to the following points:

- The increase in road traffic in an area that already feels unsafe and where parking is impossible. Particularly given the nursery and primary school on Etloe Road/Bayswater Road.
- The completely inadequate and frankly dangerous precedent of the way they are proposing to deal with the loss of SEND provision.
- That the development's scale and design is out of keeping with the area.
- The loss of trees and green space, particularly the proposals around the green space currently outside the development which we enjoy daily.
- That the developer's have failed to evidence their claims of "public benefit".

I recommend the proposals are rejected.

Kind regards

Elizabeth Louise Henderson

As residents of Bayswater Avenue, overlooked by the proposed development, we continue to strongly object to the revised planning proposal ref 22/01221/F.

We echo submissions made by the St Christopher's Action Network (SCAN) and the Westbury Park Community Association (WPCA) relating to wider community concerns. Whilst we support sensitive development of the site in principle, we object to the height and density of the proposed new buildings, which are not in keeping with the local conservation area. The gardens, mature trees and wildlife form an important setting for Grace House, which we believe should be protected as part of Bristol's architectural heritage. We object to the height of the new cottages, and their proximity to the boundaries of Bayswater Avenue dwellings, which we believe have been communicated in a misleading way (by not measuring the closest dimensions). We object to the loss of light and privacy to our small rear garden and directly overlooking windows to the rear of our house. In fact we believe the proposed "cottages" (H02) will result in a mutually unacceptable overlooking and overshadowing.

The boundary wall of 21 Bayswater Avenue (our property) is directly integrated into the existing North House/Gardener's Cottage. It would appear this is now proposed to become an 'Urban Village Hall', which leads us to question what noise impact this will have on us.

There has still been no clarification provided regarding land levels. We estimate that the site is between 1 and 2m higher than garden levels on Bayswater Avenue and we are therefore concerned that the proposed new buildings will tower over those on Bayswater Avenue.

We believe the serious lack of adequate parking provision will further exacerbate traffic and parking issues in the area and create additional safety risks to local school children.

Fewer trees are due to be felled in the latest proposal; however the number of mature trees due to be removed is still very high which will be detrimental to the character of the neighbourhood.

In summary, the development is too dense, too high and too close to site boundaries with too many mature trees being removed. There is clearly a serious lack of parking provision leading to increased traffic in an area with two nurseries, a pre-school and a primary school in close proximity.

PUBLIC FORUM STATEMENT

From Dr Bruno Bubna-Kasteliz MBBS FRCP Dip CSCT

REF PLANNING APPLICATION NUMBER: 22/01221/F

As a former Consultant Geriatrician dealing with health issues in older people, as well as being the Chairman of a charitable Housing Association looking after a sheltered unit for elderly people, I am drawing attention to a number of issues within the officers' report which highlight the unsuitability of this category C2 development for older people.

1. Unacceptable quality of living environment

There are four areas of concern about overbearing proximity, oversteering or lack of daylight for residents:

- (i) The proposed 'Cottages' (H2) , of which only 11 rooms meet the required standard of adequate daylight, the proximity of Villa D causing both overshadowing and oversteering.
- (ii) Too close proximity of Villas C and D result in oversteering of some flats.
- (iii) Villa A flats also suffer from close proximity to Kenwith Lodge and the rear of Villa A flats only have a view of the site refuse collection and offloading area. The east-facing flats in Kenwith Lodge also offer a restricted outlook.
- (iv) There is also the fact that mitigation of climate change impacts has not been included in the design of accommodation, resulting in possible overheating.

2. Equalities Assessment

Section 149 of the Equalities Act 2010 clearly reveals the inequality of living environment for residents in the density, overcrowding and loss of daylight of some of the accommodation, not to mention the overcrowding in the public spaces for elderly people with possible mobility issues, disabilities and dementia. The mixing of vehicular and pedestrian traffic at the entrances/exits and circulation onsite is a potential hazard.

3. Management and Governance

While the management and governance issues of the site and its operations are not strictly part of the planning application, I have concerns about the lack of clarity in Allegra/Amicala providing the 'integrated care' in C2 accommodation for the residents and identifying any management structure. The planning application suggests that there will be a mixture of Local Authority and 'private' carers; how will this be subject to accountability and supervision by the operator? How will the operator assess any proposed residents for suitability to move into the accommodation and what rights have residents who are deemed to need care beyond what can be provided?

I ask the councillors that these points be considered and reflected in their final decision.

Bruno Bubna-Kasteliz

Dear Sir/Madame,

I would like to take this opportunity to raise my objections to the plans for the development of St. Christopher's School in Westbury Park.

The new plans are, to all intents and purposes, the same as the last set of plans, which were turned down. The site will be over developed. There will be massive parking problems. Light pollution and development will probably be of no benefit to the local community, which is becoming a ghetto for the affluent aged. There are already plenty of old peoples home in this part of Bristol.

Britain is already the least biodiverse countries in the world and this won't help. We have already lost wildlife from St Christopher's gardens. Owls and bats seem to have completely disappeared from what was once a wildlife haven. The overdevelopment of this site will make matters worse.

There is little or no provision for Special Needs children in Bristol. Parents have to go to Cheltenham or even further afield to visit children in special schools. Why is there no provision in Bristol and why can't it be in St Christopher's?

Glynn Holloway

Hello,

I am writing as a concerned resident of Bristol, the brother of a sister with Down's Syndrome and a doctor working in Child and Adolescent Mental Health. Through all three of these different perspectives, I have seen just how acute the shortage of good SEN provision is in Bristol.

I welcome the officer's recommendation for rejection of the current plans, but it is important that a third objection is also included- the lack on any on-site SEN provision.

The idea to sell-off this incredible site for flats seems incredibly short sighted. But to do this when there is such a shortage of SEN provision, including respite facilities, is bordering on completely illogical. Who is in more need here- desperate families struggling to cope with extreme caring responsibilities or wealthy retirees who can afford a flat overlooking the Downs?

It is clear that Aurora have been very underhand in their tactics- deliberately running the school down, leading to accusations of abuse and child maltreatment and then turning around and saying that the school isn't viable therefore must be sold off for other purposes (eg. flats). It is absolute textbook private mismanagement of public services- I see it happen every day in the NHS. There is always one motive- profit. Given that Grace House is worth £5mil+, FORE's offer of £543k to build an extension off the school site is laughable. And you know as well as I do that FORE will do their best to wriggle-out/water-down/renege on this offer as soon as you accept it.

I am asking this committee to please reject the application on the grounds that the developers have failed to comply with the clear 2021 requirement to provide "on-site education/community provision".

It is important to recall that, on 8 November 2021, your planning officers gave the developer clear Pre-Application guidance stating that 'there is a need for an ongoing education/community use of this site for SEND provision'. It is a disgrace that the developer has ignored this demand. The current lawful use of this land is as a residential school for children with special educational needs, not for the wealthy retirees. Moreover, there is an urgent need to expand provision for SEND children in Bristol. I urge you to refuse this planning application because it fails to make any meaningful provision for SEN children in our city at this historic school site.

Many thanks

Dr. Francis Bennett

Dear Sir/Madam,

I just wanted to register my ongoing regarding the proposed development.

I feel that the proposed changes in no way adequately address any of the concerns raised.

Our 2 kids use the nursery and I am concerned about the increased traffic - the road is already full of cars parked on both sides often on the pavement - it feels very unsafe. We use the green space with our kids nearly every day and am concerned about the loss of the trees and green space, particularly the proposals around the green space currently outside the development.

I would also agree with the other points that have been previously raised including

- The development's scale and design is out of keeping with the area.
- That the developer's have failed to evidence their claims of "public benefit".

I feel for the reasons outlined above that proposals are rejected.

Best wishes,

Gil Henderson

Dear Planning Department

I am writing with reference to tomorrow's hearing regarding the above planning application and I am asking that you please reject this application for the following reasons:-

- The current proposals are a massive overdevelopment with not only a huge impact on those properties that immediately abut St Christopher's site but also will impact greatly on the surrounding area due to increased activity and traffic. You will already know that this area of Westbury park is suffering from a substantial amount parked vehicles as it is effectively a park and ride site and also an area where van dwellers live because there is such a lack of decent, affordable housing. Further more, this area is already suffocating with the amount of vehicles that park here or just pass through as these small streets are used as a rat run to avoid the main roads.
- Regarding the provision of retirement accommodation, there is already The Vincent (still not fully occupied), St Monica's and of course Carfax Court, all of which are in the immediate vicinity. Is another development aimed solely at the well off, really needed?
- Under current proposals a significant number of mature trees and green space will be lost impacting on already diminishing habitat for nature. Here, in the UK, we are one of the least biodiverse countries in the world and this will be just another nail in nature's coffin.
- Finally, the loss of SEND provision in Bristol. St Christopher's School provided SEND provision for 75 years and that is now lost – where do all these children now go? We read a lot in the local press of the stress that parents of SEND children suffer due to lack of provision today – It does seem a shocking state of affairs when our vulnerable children have no place to go locally for SEND provision; our young people cannot get on the housing ladder due to lack of affordable, decent homes and yet the more privileged seem to be the beneficiaries of this application.

Please reject this application and let's look at a much more creative way of helping the young vulnerable and our future generations – this application is in respect of a short term situation as we baby boomers (and I am one) are dying breed (literally!)

Kind Regards

Alice Huntbach

Amendment Sheet 9 August 2023

Item 1: - St Christophers School Westbury Park Bristol BS6 7JE

Para. no.	Amendment/additional information
154-157	<p>The Flood Risk officer has provided their final comments in response to the Drainage Strategy, received on the 27th July 2023. These are:</p> <p>“Flood Risk officer – No objection, subject to conditions.</p> <p>In principle the drainage strategy provided in drawing number RAM-XX-XX-DR-C-00101 Sheet 1 and Sheet 2 is acceptable and we welcome the use of Green Roofs, Permeable Paving, Basins and Tanks with surface water discharging from the site at an overall rate of 27.3l/s; which provides benefit to at least 3 out of the 4 SuDS Pillars (Water Quantity, Water Quality, Amenity and Biodiversity). However the applicant has not provided detailed design of these SuDS features including drawings, sizing, storage volumes and make-up for each of these features as well and a maintenance plan for the site, this can be provided to us upfront or secured via condition.</p> <p>The applicant has followed the Drainage Hierarchy in so far as discounting infiltration, connection to a waterbody and connection to a surface water sewer through desk-based studies and this is acceptable in principle; however the applicant is proposing to undertake infiltration/soakaway testing once planning has been approved. Before we can fully approve this application we would need to see the results of this infiltration testing and if it shows infiltration is suitable for the site then the drainage strategy for this development would need to be updated accordingly. This would be secured via condition.”</p>
158-163	<p>Sustainability Officer – No objection, subject to conditions.</p> <p>Concerns are raised that the submitted Thermal Comfort Overheating Analysis (Waterman, July 2023) is incomplete and does not confirm that the additional measures would address the risk of overheating against the 2050 weather file.</p> <p>That said, officer’s have considered the professional judgement of the Applicant’s consultant in assessing this. If the proposed measures will be integrated into the design from the outset and the consultant is correct that the proposed development will very likely result in a ‘pass’ for the 2050 scenario, we could apply a pre-commencement condition requiring evidence that these measures have been integrated into the design and that they achieve a ‘pass’ when assessed against the 2050 weather file. In the event that these measures alone are not sufficient to achieve a pass then some further changes (without increase to energy and CO2 emissions) to the design may be required, and we’d need to approve these.</p> <p>I’d also suggest that you condition a ‘pass’ for the 2080 weather files and detail of how the proposed adaptation measures will be implemented in the future together with evidence that the current design supports (and does not hinder) their integration.</p>
260	<p>Paragraph 260 noted that many of the proposed trees onsite would be planted too close together to be viable, however following amendments to the scheme, officers’ objection to the proposed development focuses solely on the loss of the important trees on site.</p>

Para. no.	Amendment/additional information
262-273	<p>The applicant has provided an updated Thermal Comfort Overheating Analysis (Waterman, July 2023) which identifies a high risk of overheating in the 2050 weather scenarios based on the current design. The Analysis includes several ways that this risk can be addressed through in-built design measures, as well as some less preferable measures such as internal cooling.</p> <p>The Analysis sets out that the consultant considers that measures such as having openable windows and improved g-values would likely address this overheating risk and as such, these measures are incorporated into the proposed development before Committee.</p> <p>Whilst the success of these measures hasn't been confirmed, officers are willing to rely upon the professional judgment of the applicant's consultant that the measures would be sufficient. In the interests of minimising the reasons for refusal, it is suggested that a revised Analysis with this updated modelling, inclusive of the in-built measures, could be secured via condition if Members are minded to approve the application.</p> <p>Suggested wording is available below, however any condition would need to be agreed with the Applicant.</p> <p>Prior to the commencement of the development hereby approved, an updated Overheating Assessment / Thermal Comfort Analysis (based on a recognised methodology and criteria such as C.I.B.S.E TM52/ TM59, or equivalent, and a medium emissions 50th percentile scenario) shall be submitted and approved in writing to the Local Planning Authority.</p> <p>The updated Assessment shall include the in-built measures set out in the Thermal Comfort Overheating Analysis (Waterman, July 2023) that demonstrate the development would pass the 2050 weather file and therefore is adapted to the effects of climate change.</p> <p>Reason: To ensure the development incorporates measures to minimise the effects of and can adapt to a changing climate.</p> <p>Based on the above, it is considered that the proposed development would reduce carbon dioxide emissions from energy use through the use of a sustainable heating system. Subject to the implementation of the measures in the Thermal Comfort Overheating Analysis and confirmation that these measures would address overheating risk, it is considered that the proposed development would be sufficiently adapted to climate change.</p>
277-282	<p>Following receipt of the comments from the Flood Risk officer set out above, it is concluded that the proposed development would be acceptable in terms of the impact upon flood risk and drainage, subject to a condition(s) being added to any decision for approval to secure the following:</p> <ul style="list-style-type: none"> - Detailed design of SuDS features. - A maintenance plan for SuDS. - Outcomes of infiltration testing and confirmation whether this is a suitable strategy. - Agreement with Wessex Water that the proposed connection to a surface water sewer is accepted.
304	<p>[For clarity, para. 304 is updated to confirm that there is a loss of existing green infrastructure assets.]</p> <p>It is considered that the adverse impacts arising from the overdevelopment of the site, the less-than-substantial harm to heritage assets, the existing loss of green infrastructure assets and the lack of resilience to climate change demonstrably outweigh the benefits of the scheme. Officers therefore consider full planning permission should be refused, even</p>

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	when the tilted balance, as prescribed by Paragraph 11(d) of the NPPF, is applied.
Page 43	Reason for refusal no. 3 is deleted.