

Development Control A Committee Supplementary Information



Date: Wednesday, 24 April 2024

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.

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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 5pm on Thursday 18th April 2024.**

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 Noon on Tuesday 23rd April 2024.**

PLEASE NOTE THAT IN ACCORDANCE WITH THE NEW STANDING ORDERS AGREED BY BRISTOL CITY COUNCIL, YOU MUST SUBMIT EITHER A STATEMENT, PETITION OR QUESTION TO ACCOMPANY YOUR REGISTER TO SPEAK.

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.

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9. Planning and Development – Amendment Sheets

(Pages 95 - 111)

Issued by: Democratic Services

City Hall, Bristol, BS1 9NE

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

Date: Tuesday, 23 April 2024



Public Forum

D C Committee A

Wednesday 24th April 2024



1. Members of the Development Control Committee A

Councillors: Richard Eddy (Chair), John Geater, Fi Hance (Green Party Group Spokesperson), Tom Hathway, Philippa Hulme (Labour Party Group Spokesperson), Farah Hussain (Subst by Cllr Rippington), Chris Jackson, Paula O'Rourke, Andrew Varney (Liberal Democrat Group Spokesperson)

2. Officers:

Jonathan Dymond, Philippa Howson, Simone Wilding.

Statements	Request To Speak Made Where Indicated S = Speaker	Name	Application
A1		Suzan Hackett	Baltic Wharf Caravan Club, Cumberland Road 21/01331/F Erection of residential dwellings (166), commercial floorspace, integrated car and bicycle parking, refuse storage, landscaping, and associated infrastructure and services.
A2	S	Ann Hughes Devereaux	“
A3	S	Jill Tarlton	“
A4	S	John Tarlton	“
A5		Mike Nicholas	“
A6		Paul Sander-Jackson	“
A7	S	Mark Ashdown	“
A8	S	Peter Herridge	“
A9	S	Valerie Steel	“
A10	S	Stephen Wickham	“
A11	S	Gaby Solly (for Anita Bennett)	“
A12	S	Christiana Makariou Goram Homes	“
A13	S	Glyn Mutton	“
A14		Carol & Chris Paul	“
A15		Bristol Civic Society	“
A16		David Redgewell	“
A17		Mary Montgomery	“
A18		Richard Cooper	“
A19	S	Cllr Patrick McAllister	“
A20	S	Martin Rands	“

A21		Helen Johnson – Spike Island Community Association	
B1	S	Charlie Royle	(Former Debenhams & Building To West) 23/04490/F The Horsefair, The Haymarket, St James Barton Bristol
B2	S	Charlotte Burchell	“
B3	S	David Finch	“
B4	S	Tom Brown	“
B5	S	Jamie Furse	“
B6	S	Simon Hickman	“
B7		Bristol Civic Society	“
B8		David Mellor	“
B9		Geoffrey Collard	“
B10		David Redgewell	“
B11		Lydia Franklin	“
B12		Richard Davoll	“
B13	S	Stephen Wickham	“
B14		Sue Ellis	“
B15	S	Kim Hicks	“
B16	S	Rob Harding	“
B17		Nicholas Kidwell	“
B18		Cllr Stafford-Townsend	“
C1	S	Stephen Dawes	Plot 1, Bedminster Green 22/06085/F Redevelopment of the site comprising the erection of three buildings to provide purpose-built student accommodation (sui generis) with new vehicular access, disabled parking and servicing arrangements, public realm works and landscaping. (Major)
C2		Daniel Fryer	“
C3		Kenneth Moore	“
C4		Albert Testani	“

C5		Dorothy Withey	“
C6		Anne Chadney	“
C7	S	Cllr Lisa Stone	“
C8	S	Helen Adshead	“
C9		Victoria Cole	“
C10		Charlotte Cameron-Beaumont	“
C11		Claire Barnard	“
C12		Callum and Kate Yeo	“
C13	S	Andrew Kemp	“
C14		Cllr Plowden	“
C15		Lucy Sansom	“
C16		Tilia Astell	“
C17	S	Cllr Tessa Fitzjohn	“
C18	S	Tom Brynolf	“
C19		Angela Truell	“
C20	S	Ben Wrighton	“
C21	S	Sally Davis	“
C22	S	Nick Townsend	“
C23		Leigh Archer	“
C24	S	Stephen Wickham	“
C25		James Young	“

A1

21/01331/F Public Forum Statement for DCCA 24/04/2024

This development will be unsafe until strategic flood defences are constructed in 2040. The Environment Agency (EA) have objected to the developers flood risk assessments on seven separate occasions, and the Council's own Flood Risk Manager has objected on three separate occasions, all on the basis of a lack of safety from flooding, and so contravening national and local policy. Since these objections, nothing has materially changed, other than an increase in the flood risk. So what HAS changed to motivate the EA to withdraw their, up until now, consistent objections to this development? The Bristol Avon Flood Strategy (BAFS), a joint project between the EA and BCC, is short of funding by around £100 million. However, it has recently been agreed that harbourside developments will contribute to BAFS, helping to close the funding gap. Therefore, the Baltic Wharf development, and more importantly the greater Western Harbour developments that Baltic Wharf will open up, will help provide the required funding. As such, there is a potential conflict of interest with respect to this application for both the EA and BCC. The hopelessly optimistic flood risk assessment presented by the developer recognises that there will not be free access and egress to and from the development during a flood, as required by national and local policy. Furthermore, this assessment makes no allowance for fact that the development site would be surrounded by water considerably deeper than that on-site, preventing access for emergency services. The likely completion date of BAFS, if indeed it is completed, will be, at the earliest, 2040, so the site would be unsafe for around 15 to 20 years. Planning policy (FR2) states that developments must "incorporate adequate mitigation measures to make the site safe from flooding in the period up to the delivery of strategic flood defences", which this proposal clearly fails to do. Therefore, it is up to this committee to put the lives of occupants before financial expediency, and refuse planning permission.

Suzan Hackett

A2

Dear Democratic Services.

I would like to submit the following statement for the 24th April DCCA meeting for the planning application 21/01331/F.

I will be personally attending the meeting and wish to present my statement to the committee.

To approve this development will put the lives of many Bristolians at risk

If the Baltic Wharf site is approved for development at this meeting it will be the first time that a site in the highest flood risk zone without any means of escape for residents or access for emergency services during a flood will EVER have been approved in Bristol. This precedent will seriously undermine flood safety in Bristol, as it will be virtually impossible to refuse permission for any other such dangerous site in the future, potentially putting thousands of Bristolians at risk of death. Members should be reminded that **flooding kills more people worldwide than any other form of natural disaster**, and in this case flooding will involve very fast moving water, travelling between 5 and 20 MPH. The flooding that residents would be expected to endure has a hazard rating of "Danger for All", meaning a risk of death for residents AND emergency services.

The people of Bristol are relying on this committee to safeguard current and future generations of Bristolians in the face of corporate and political interests.

Best Wishes

Ann Hughes Devereaux

A3

Baltic Wharf is a fatally flawed development.

Baltic Wharf development has many failings...

Proposals include the loss of 82 valuable trees in contravention of several Council policies. There is no credible plan to replace them, as there are few, if any, replacement tree sites within the required distance.

The site is falsely described as brownfield, despite not complying with the NPPF definition (it has never been occupied by a permanent structure) and is not on the council list of brownfield sites.

The development is out of keeping with the area and goes against the Bristol Central Area Policy as well as advice from the Secretary of State.

The development fails to provide the required amount of onsite play space for children who live there (Urban Living SPD).

There is no offsite play area within the required distance, no school on Spike Island, and no nearby GP surgery or supermarket. The nearest park can only be reached by crossing one of the busiest roads in Bristol. It is simply not suitable for families or children.

Worst of all, it is in a severe flood risk area, with no escape route or access route for emergency services. The developers themselves recognise this. It has inadequate mitigation measures. This contravenes both local and National planning policies.

Part of the development includes some 'affordable' housing at 80% of market rent. But in such a premium area this would not be within the means of people on low income. Even if the rental was genuinely affordable, why should low income people be located in a high flood risk area? Are we willing to endanger residents in order to facilitate the Mayors flagship development?

Why not create a Baltic Wharf Nature Park instead? The trees could be saved, which is what thousands of local residents have asked for, and local children and other residents would benefit from a natural play area.

Baltic Wharf application is a Trojan Horse for the wider western harbour developments.

Despite all its failings, which include contravention of many local and National policies, all the stops are being pulled out to get this development pushed through. If approved, it would make it difficult to reject any further developments nearby on the basis of flood risk or being out of character.

Its failure of greatest concern is to override the policies set to protect residents living in the highest risk flood zone with no access or escape route. The Environment Agency and Bristol City Council need to raise money (of around one hundred million) to pay for future flood defences. They are gambling on there not being a flood before these are built, probably in the 2040s if at all.

Developing Baltic Wharf, and to a greater extent wider Western Harbour developments, would raise some funding towards the strategic flood defences. They have used unreasonably optimistic modelling to claim it would be safe from floods until 2050, but as any climatologist will tell you, it is not possible to predict extreme weather events that would cause such floods.

If allowed, it would set a precedent for the rest of harbourside to be approved, despite this also being in a high flood risk area. It would also set a precedent for very high build complexes which don't fit the local character.

It seems the EA has decided to put the funding of the strategic flood defences ahead of safety of residents, as a result the enormous responsibility has now landed upon the shoulders of the Planning Committee members.

This development has been shown to be unsafe, unlawful and unsuitable. Is the committee now prepared to take such a risky decision with its wide ranging consequences?

Jill Tarlton

A4

1. This development results in an unacceptable loss of trees contrary to planning policy

With 102 mature trees and nearly 40% tree cover, this is the last substantial tree covered green space on the harbourside, an area with only 7% tree cover - one of the lowest in Bristol.

In fact, the trees on Baltic Wharf represent **nearly a quarter of all trees on the harbourside**. Should the Western Harbour be developed for residential properties, the value of this green space would be enormous. Once it is gone it is gone forever.

The developers propose to remove 82 trees, with little or no opportunities for replacements, contrary to Bristol Core Strategy (BCS9) and Development Management policy (DM17).

This is recognised in the Bristol Central Area Plan (BCAP 6.13) which states **“opportunities for additional major green assets are limited Important to integrate green infrastructure within new developments”**.

The developers have propose 162 off site replacement trees as required by policy. However, there are no available spaces in the vicinity of the development site, and only 2 available sites within the required 1 mile radius. There are no open ground sites available, and no hard standing planting sites have been identified, contrary to the Planning Obligations supplementary planning document (SPD), which states that specific locations must be **“identified through the planning approval process”**.

According to the requirements of the recently implemented Environment Act, the site must achieve at least 10% biodiversity net gain (BNG), and the required level of tree replacement is 224 trees, a shortfall of 222 trees.

If the developers choose to ignore the requirements of BCS9 and DM17, a compensatory payment is mandated. As no open ground sites are available or been identified, such payments must be, according to the Planning Obligations SPD, £3,318.88 per tree (index linked from 2012). As such, the minimum obligation for compensatory payment must be £531,000 (in line DM17) or £736,790 (in line the Environment Act). **This is the basis of the objection submitted by the councils Tree Officer**. Because the developer is wholly owned by Bristol City Council, it would be entirely inappropriate for the Committee to be seen as being lenient on this issue.

To disregard BCS9 and DM17 would also be contrary to the declared Climate and Ecological Emergencies, and the Council’s Ecological Emergency Action Plan which purports to **“embed nature into all decisions”**.

If the committee continues to undervalue the environment by disregarding the councils own policies DM17, BCS9, POSPD and BCAP (and indeed these same policies carried over to the new Local Plan), central Bristol will be entirely devoid of trees.

2. This development is in the highest flood risk zone with no route of escape or rescue

Both local and national planning policy in relation to flooding requires:

“The development will be safe for its lifetime”

“Access routes should allow occupants to safely access and exit”

“vehicular access to allow the emergency services to safely reach the development”

The latest flood assessment by the developers admits that access to, and escape from, the development will not be possible for over 1 and a half hours. However, because the site is entirely surrounded by deeper channels, a fact disregarded in the developers assessment, residents will not be able to escape, and emergency services will not have access for a much longer period of time, perhaps hours. As the developers cannot guarantee free access to the site for emergency services AT ALL TIMES, this development is not safe and therefore fails the Exception Test and is contrary to the NPPF and local policy.

As it would not be possible to provide medical assistance of any sort during a flood, to approve this development would put residents and rescue services in mortal danger.

As well as failing the Exception Test, this development has also **clearly and demonstrably failed the sequential test**, which states:

"Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding."

A short distance away there is a development site, the SS Great Britain car park, which is available and, unlike Baltic Wharf, adjoins lower flood risk areas. The developer, Goram Homes, even has this listed on their website as a potential development site. This alternative site, therefore, exactly matches the NPPF condition and as such the “development should not be allowed”.

A5

To the Planning Committee;

This is my 4th objection - the previous 3 being on the planning portal for this application.

I will not reiterate all the valid concerns and reasons to refuse this application.

In summary: I think it would be a huge mistake to allow this density of development at this relatively undeveloped, quiet, amenity end of Harbourside - the welcome respite to the overdeveloped Wapping Wharf end.

Reading between the lines of the consultations and the hundreds of comments, 2 viable options emerge:

1. Retain the Caravan site with all its trees and biodiversity,
OR

2. Provide the Social Housing - the site is perfect for the proposed 50 dwellings but as proper HOUSES, with ground floor access and private amenity space. This would allow the retention of the majority of existing trees (not planting compensatory trees miles away!) and the hedgerows and the site's biodiversity. It would be a wonderful place to live, without destroying what makes it such a good location. The other 116 "dwellings" are not **proper** houses and are not justified by any reasonable measure **on this precious site**.

Please, please refuse this application.

Thank you and kind regards Mike Nicholas (retired architect)

A6

During the years 1989 to 1992 I served as landscape manager for Treework Services Ltd. As part of my work during that period I was responsible for planting and maintaining many of the trees at Baltic Wharf for the Caravan Club site.

The client was very concerned to get a high quality landscape for the site, and unusually for a commercial client, we were able to plant trees to the highest possible standard, and were then contracted to do the structural pruning essential for early establishment and shaping.

The consequence is that there is now a fine array of mature trees that have paid dividends for that early investment. The trees are now providing a high level of ecosystem services for the benefit of the community of Bristol - in terms of shading, temperature modification, surface water filtration, support for biodiversity, and carbon sequestration.

It has taken 35 years of growth to achieve all this. No replacement planting could achieve this in the next generation; and in fact it is not possible to begin to achieve adequate and legally required planting within a one mile radius.

Given the many policies adopted by the City Council to counteract the climate emergency and nature deprivation, it is unthinkable that permission can be given to the decimation of these trees. I urge councillors to do the right thing and not approve this application.

Paul Sander-Jackson



Avii

**21/01331/F | Caravan Club Cumberland Road Bristol BS1 6XG
DCC A Meeting, 24 April 2024**

Before the Committee considers decide this matter, we wish to draw its attention to our detailed submissions pointing out the officer's many omissions and mistakes as well as the publication of new evidence too late or at the eleventh hour.¹

Four documents are new and contain matters which are material to this application but have been published too late, contrary to the requirements of section 100B of the Local Government Act 1970.³ This requires that 'any document which is required by subsection (1) above to be open to inspection shall be so open at least five clear days before the meeting'. Documents pertinent to a planning decision must be made available in plenty of time in order to allow proper public scrutiny, and the limit of five clear days is set as the final deadline for a good reason.

Even if section 100B is not engaged, it still must be contrary to the accepted principles of fair treatment to produce this new evidence at the 'eleventh-hour' and so deny us (and others) a proper opportunity to engage with the planning process. We have done the best we can in the little time we have been given but is really not enough for a proper analysis. Others must also have an opportunity to comment.

We must also express our disappointment that the applicant, as the direct development arm of Bristol City Council, relies on the strict letter of the law rather than on its spirit and is insisting that it is only bound to deliver biodiversity gain no more than the bare minimum biodiversity gain (not less than zero) required under the NPPF (December 2023)² rather than the 10% now required under the Environment Act 2021. This is despite the fact that the Council has:

- Declared climate and ecological emergencies which, among other things, seeks to ensure that '*10 per cent net gain will become mandatory for housing and development, meaning habitats for wildlife must be left in a measurably better state than before the development.*'³
- Approved the Bristol Local Plan Publication Version in November 2023, which includes policies intended to achieve 10 % biodiversity gains (BG3) and has cited this document in support of other pending planning applications.

Even if this is considered acceptable, this report demonstrates a 'schizophrenia' about which parts of the new biodiversity net gain obligations (which became law on 12 February last) the applicant must comply with. On the one hand the applicant need not deliver the 10% biodiversity gain now required or comply with the Statutory Metric trading rules, yet the conditions to be imposed are all premised upon its compliance with a complex web of rules and regulations, all of which have been prepared in order to ensure compliance with these very obligations. This issue needs to be resolved before this application is approved, not afterwards.

We ask that the committee defer its decision until these issues have been resolved and we and others have been given enough time to consider this new evidence.

¹ <https://bristoltreeforum.org/wp-content/uploads/2024/04/Request-to-adjourn-DCC-A-meeting-fixed-for-24-April-2024.pdf>.

² https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

³ <https://www.bristol.gov.uk/files/documents/794-ecological-emergency-action-plan/file>

A8

I would like to object to the above application on the following grounds and I would like to speak at the meeting.

OVERSHADOWING, OVERLOOKING AND LOSS OF LIGHT

My house is one of sixteen properties directly adjoining and overlooking the caravan site. I have lived here for 32 years and for all that time enjoyed total privacy and good sunlight with a sunny and very secluded South West facing garden. I oppose the proposed development of the caravan site on the grounds of overshadowing, overlooking and loss of light which will cause me and the other properties effected to suffer a total loss of privacy. We will also be effected by over shadowing and a significant loss of light throughout the year.

If the proposal goes ahead in its current form, I will have about 80 windows overlooking both my house and my garden. Some of these windows will look straight across directly into my lounge and bedroom windows. A local architect produced some 3D computer modelling for me and this revealed that as a result of the proposed development my house and garden will be cast in shadow from early afternoon onwards throughout the entire year. I would also add that I asked the developer several times to produce this modelling during the so called "consultation" and they consistently failed. In the end I had to procure it myself.

The developers did produce a table of numbers regarding loss of light but when questioned by confused local residents they reluctantly admitted that they couldn't explain exactly what the figures meant.

I suggested to the developers that the proposed building should be moved to the West and placed further away from the existing dwellings at Baltic Wharf. The developers replied that the West side of the development was "sensitive" as the Cottage pub is a listed building! I personally fail to see how a listed building is sensitive whilst causing a loss of light, loss of privacy and overshadowing to sixteen households is not!

The buildings on the existing Baltic Wharf development are predominantly of three storeys in height. The only four storey building (Portland Court) is to the far East of the development and overlooking and overshadowing nothing other than the boat launch slipway. The proposed new development needs to be significantly reduced in height and moved further to the East to reduce the degree of overshadowing, loss of privacy and loss of light caused to the existing dwellings. As it stands it will result in a significant reduction in the quality of life for sixteen neighbouring households.

A9

There have been 410 objections to this application, covering a wide range of issues, but the following quotes illustrate some of the main ones.

Responding to the suggestion more trees should be retained, 'the applicant has advised the scheme is already not viable, and therefore a further reduction in units would likely result in a scheme which would never be built' (case officer's report). The financial viability report by Redloft concludes 'based on the outcome of the objective viability appraisal assessment the scheme is not economically

viable. It is therefore conclusive that the provision of affordable housing, section 106 obligations, or other planning gain contributions, exceeds the maximum viable level at the site in planning terms'.

How then is 40 percent affordable to be achieved? Or 100 percent as recently revealed at the January Cabinet meeting? If by grant money, shouldn't this be secured before planning permission is granted? If from the public purse, is this development really value for money?

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

'Section 16 of the national guidance within the National Planning Policy Framework (NPPF) 2021 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with any harm or loss requiring clear and convincing justification. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight shall be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. (from the case officer's report) It is agreed that there 'is harm to the setting of the listed buildings and conservation area caused by the proposals'. Please note that the list of assets affected is not complete as Avon Crescent Grade 2 has not been included, and views from here will be adversely affected.

'Due to the orientation of the buildings, the property has the potential to impact on sunlight to neighbouring properties and have an overbearing impact. Overlooking between the two sites also requires careful consideration'. (case officer's report) This scheme does indeed have an overbearing impact. Saying it is 6 storeys disingenuously ignores the 2 storey podium it is built on, which takes the roofline to a height in excess of twice its neighbour's.

'The proposal involves the removal of the majority of trees on site, some of which are sizeable and of good form, in order to make way for the development'. (Arboricultural officer)

'the tree loss on this site is significant and detrimental to the area' (ecology report) There is nowhere to put replacements locally so they will just be added to the city-wide pot which is already overflowing.

'The proposal is considered to be an inappropriate level of development on this site, with the taller elements of the scheme standing taller than B Bond. The height, scale and massing of the proposed buildings must be addressed and reduced significantly, by at least two storeys.

On balance the Panel considers that in its current form and as a result of an inadequate assessment of all views the proposal does not meet the relevant heritage policy tests contained within the Local Plan and the NPPF. It does not generate sufficient public benefits that outweigh the significant harm that it will cause and therefore this application cannot be supported'. (Conservation Advisory Panel)

'Whilst BCC planning position statement (July 2022) on development in areas of flood risk is clear that new development proposed in areas at risk of flooding cannot rely on future defences being built, it also notes that confidence that the Strategy will be delivered is increasing'.

'With regard to financial contributions the applicant has agreed to provide in principle, amongst others tree replacement, fire hydrants in a bilateral S106 Agreement. In addition, the applicant will be

contributing towards the Bristol Avon Flood Strategy.

However, the level of contributions are still subject of deliberations at the time of writing this report'. (case officer's report)

It's nice to know that 'confidence is increasing' in the possibility of flood defences, but is this enough?

As the scheme cannot provide 'section 106 obligations, or other planning gain contributions', because this would be 'unviable', where are the 'contributions' coming from? This information, and how much will be paid, should be available before permission is given otherwise its just wishful thinking.

'The application site does not have a site-specific allocation within the Bristol Local Plan but does sit in the Harbourside neighbourhood of the Bristol Central Area Plan 2015, and is within the wider Western Harbour draft allocation for 2,500 homes in the emerging Local Plan'. (case officer's report) So if this is given permission it sets all sorts of precedents for the proposed 'Western Harbour' - the excessive height, the over-riding of conservation/heritage concerns, the possibility of building in a flood zone with no defences in place, that developers can just promise to pay towards them an unspecified amount at an unspecified time and then find they can't afford it as they are 'unviable'.

Please refuse to be party to this and refuse this application.

Valerie Steel

< The Site Seen From South East Beauty Spot P29 >



April 10th Spring Tide 2024 , viewing the site from the City's Panoramic viewing point P29 (CDCA section 6.2.5) below Coronation Road BS3, ground level circa 8m AOD.

View L to R the Underfall Yard Chimney, Boathouse , Caravan Park Walls and Trees , Baltic Wharf 1980's housing development. And in the background Leigh Woods and Clifton Landmarks.

In three years of asking, Griffith have rebuilt the river wall, and the Goram Homes design team have still failed to produce a TVIA of their proposal from this popular iconic viewpoint 100 m away.

At up to 10 m above the lamp posts on Cumberland Rd it now seems fair to assume they were afraid of it, ashamed of it, or really didn't care what the public thought of the reality of the rear of their proposals from the public realm..

In 2021 the Conservation Advisory Panel (CAP) supported the position taken by Historic England and the comments they made. The design team did not budge. The proposal remains considered to be an inappropriate level of development on this site, with the taller elements of the scheme standing taller than B Bond. The height, scale and massing of the proposed buildings must be addressed and reduced significantly, by at least two storeys , in the view of the panel .

The proposal as it currently stands will result in an adverse impact on the views into and out of the conservation area (CDCA) and does not show any applicable views from the south of the site, particularly P28 and P29 (publicly accessible panoramic view points to Clifton etc, listed in 6.2.5 of the character appraisal, page 18, opposite circa #200-205 Coronation Road BS3). The Landscape and Visual Impact Assessment must be reviewed with a comprehensive assessment undertaken and resubmitted as part of the application. It is considered that the potential adverse impact of the proposal has been downplayed.

On balance the Panel considers that in its current form and as a result of an inadequate assessment of all views the proposal does not meet the relevant heritage policy tests contained within the Local Plan and the NPPF. It does not generate sufficient public benefits that outweigh the significant harm that it will cause and therefore this application cannot be supported

< The site, viewed from Panorama point P28, at street level, Coronation Road BS3 >



The site viewed from the upper panoramic viewpoint CDCA P28 during a different mid-March high-tide in 2024. P28 which at 13m AOD provides a different view North from that at P29 below, including more of the Clifton Escarpment. Tidal Water is seen at Chocolate Path level and flushes twice daily. Note also the winter views late October to March/April are not obstructed by any deciduous trees, the adjacent trees have been pruned by the Council to enhance the view, the Council clears the bin at least weekly, and the benches are in use daily, year round. This is very much part of the City's invisible tourist offer. Built by Bristol City Council 1991, incorporated into detail of CDCA review 2010.



The Panorama sites in use March 2024. P29 is seen below from P28 above, with Clifton Wood and Royal York Crescent in the distance. The existing Baltic wharf is of a more appropriate foreground height. The New Cut friends group FrANC also tidies and litter-picks the embankment annually.

STATEMENT

This report is a mixture of downright untruths and selective quoting of policies positive to the application. Any decision should be postponed until after the elections.

All of the policies which should disallow this development are ignored.

There are no sites for tree replacements, let alone 162, 152 or whichever random number they chose.

This IS NOT a brownfield (previously developed) site as it is not, and has never been, occupied by a permanent structure, which the NPPF definition demands.

As of now, there will be no safe escape route for residents or access for emergency services, as the developer admits.... and they do not take account of the fact that the site is surrounded by deeper channels.

The promise of funding for BAFS is nothing other than a bribe to the Environment Agency to keep quiet about the true dangers of the flood risk to residents.

The development is not financially viable with the promised affordable housing, which, at 80% market rent in one of Bristol's most expensive areas, is not affordable for anyone other than those most well off.

The list of reasons why this should not be permitted go on and on....



A12

Baltic Wharf

Application number: 21/01331/F

Application speech in support

Christiana Makariou, Goram Homes

As development director at the council's own housing company Goram Homes, it's my job to transform council land into the new homes so desperately needed in our city.

On any given night, around 3,000 people are homeless. Many in temporary accommodation.

We must provide high-quality homes in central Bristol that will house people for generations to come.

Baltic Wharf has been a caravan park for visitors to our city. It could become home to hundreds of Bristolians.

While not without its challenges, we've worked tirelessly on this development to make it the best it can be

To create high quality, sustainable homes, and new public spaces, on this part of the waterfront for the first time in decades.

The development is safe, and the Environment Agency has removed its objection.

We've kept as many trees as we can, while making space for much needed new homes. We'll plant 220 new trees too.

40% of the homes will be affordable. With grant funding, 100% could be council homes for social rent, and shared ownership.

Thank you to everyone who has got involved in this scheme, who has challenged it, and helped us make it better.

These decisions aren't always easy. But I'd ask you this - if not here, where?

Baltic Wharf

Application number: 21/01331/F

Application speech in support

Members, this application sits within the city centre limits, where policy promotes mixed use development and the efficient use of brownfield land.

It's in a highly sustainable location, well connected to local amenities, employment opportunities and travel connections.

Policy and Planning Guidance encourages development within the harbourside that provides enhanced public spaces and improved connection to Bristol's celebrated waterside history.

This Baltic Wharf scheme will do just that.

It will create a thriving new waterfront area, the creation of dedicated culture space, with new public access to Cumberland Road through a high-quality landscaped space, allowing the residents of Bristol to experience and enjoy its harbourside setting.

The design is moderate and appropriate in scale, achieving policy targeted density. Homes are spacious, tenure blind, designed to a high quality, and offer accessibility for changing needs. They will be powered by low carbon technology and ready for connection to Bristol's heat network.

A significant challenge has been the loss of trees and their resultant biodiversity, which is regrettable. However, retention of as many as possible has been prioritised, particularly to the eastern boundary where they offer additional screening. Mitigation measures are comprehensive, and commitments made to reach a positive position as part of the planning agreement.

Many of the replacement trees will be around 5m tall at the time of planting; we've increased hedgerow provision, provided living roofs, and added more biodiverse plant species as part of the proposals.

This is a fantastic opportunity to deliver not just much needed homes, but also an opportunity for business space, cultural engagement, and new public space for Bristol.

A14

Application no 21/01331/F

Site address: Caravan Club Cumberland Road Bristol BS1 6XG

Bristol's Floating Harbour is **UNIQUE** & a huge asset to Bristol. Why destroy it?

The West end conservation area at Baltic Wharf currently has a peaceful & diverse community, a popular recreation site & the Caravan Site is part of this.

Yet another multi story block of flats is **NOT UNIQUE** & will destroy this.

Do you want this on your conscience?

The Council needs to be forward thinking, respecting the conservation area the CAZ zone & heritage of this site in Bristol.

Proposing to fell 74 of the 91 mature trees & replace with some saplings is environmentally disastrous. Mature trees have many advantages: **Shade** needed for hot days & reducing UV light which can cause cancer. **Transpiration**. A process that causes water to rise from the tree roots to the leaves where it evaporates & provides a cooling process + helps with flood prevention. **Reducing green house gases**: Plants use Carbon Dioxide in the process called photosynthesis so reducing carbon dioxide in the air. Planting saplings is great, but you have to wait more than 40 to 70 years before they become mature have the same affect as the trees that you have felled.

PLUS Bristol City Council, in 2011, made a Heritage Statement that they would **NOT** allow high rise buildings in this area. **So, why are you allowing it?**

The height of the building is given in stories. But cleverly they forgot to count the ground floor & just simply renamed it lower ground floor so they could add an extra layer! (ie Ground floor is 2 stories!)

FLOODING: Disturbing the ground at the caravan park & placing this multi-story building there is likely to cause flooding both on the site & other sites in the Bristol Harbour. The recent high tides have shown how vulnerable Bristol is.

Are the developers going to build a high level bridge for evacuation of residents?

Are the developers going to pay for flooding they cause in adjacent buildings?

Obviously this proposed development is all about **MONEY**.

The Council needs to be forward thinking, respecting the conservation area & heritage of this site in Bristol. Why not convert unwanted office buildings & shops into new homes? Not destroying assets.

Just think: Why do people choose to take holidays in Venice? –

Because it is **UNIQUE**

Why do people currently want to live in Bristol? –

Because it is **UNIQUE**.

Are you going to be the Council members that destroy this, all for the sake of money?

From Mrs. C Paul

STATEMENT BY BRISTOL CIVIC SOCIETY re 21/01331/F – primarily residential redevelopment of Caravan Club site, Cumberland Road Bristol, BS1 6XG

The site is within the City Docks Conservation Area, has an impact on the setting of listed buildings and a scheduled monument and is likely to serve as a precedent for development proposals affecting Western Harbour. It is **important therefore to take time and care to ensure the proposals do in fact respect the sensitive context.**

We **appreciate the strongly held views of those opposing the development.** The caravan site does contribute openness to an otherwise largely built frontage to the harbourside and this, together with the site's tree cover, is an important foil to the more bustling and intensively built-up eastern harbourside. **For many, it provides an oasis of tranquillity.** We **also recognise the pressing need for housing** not least affordable homes. We do not therefore object to the principle of redevelopment, but **the loss of what is seen by many as a valuable contribution to the harbourside's character underlines the importance of delivering a well-designed development that can secure broad backing in the community.**

The most sensitive elevation is the north or harbourside one but in saying this we have been concerned to avoid the southern elevations being treated as the development's 'back door'. Equally, we have argued **the design should have full regard to the established views across the site from the south** (including views over the site to Clifton from the council-designed viewing platforms on Coronation Road).

As they stand, we consider the proposals will in all likelihood deliver a disappointing outcome. An improvement, in our view, would be the reduction by at least one storey of the eastern gable of building B and the western gable of building A and building F also. **Nothing other than a well-designed development should be acceptable, notwithstanding the important planning benefits arising from redevelopment.**

In this regard, we note the assertion that height reductions to deliver acknowledged design improvements are not viable without impacting on the affordable housing yield. It is therefore **important councillors reassure themselves that the option of focussed height reductions has been fully explored.** Councillors **also need to be confident that all aspects of the viability assessment are reasonable,** not least the assumption that a landowner's profit is taken (given the city council owns the land) and the assumed developer's profit (given the involvement of the council owned Goram Homes). There may also be unexplored scope to recycle the CIL liability monies to secure a better legacy for future users of harbourside.

We have read the advice about flooding, and the relative reassurances provided about safety, at least for the short term. Given what we know about the implications of climate change on sea and fluvial flooding, **councillors will want to reassure themselves about the wisdom of adding to the number of harbourside homes already exposed to risk.** And whether reassurances on flood protection works still to be delivered can be relied on. There is also the **question of whether we should be locking in future generations to a legacy of financing the management of (likely non-static) flooding risks and the carbon / visual consequences of doing so.**

A16

Public statement,

We welcome this planning application by Gorman homes owned by Bristol city council, for new affordable home on Bristol Harbourside on the Baltic wharf caravan park, Bristol.

We welcome this planning application for new homes in the Harbour and especially the affordable housing in this tourist area hot spot of the Harbour

With many second homes and weekend homes ,

Rented and affordable home in such a location in Bristol is to be welcomed,

The site is well connected by public transport to long Ashton park and ride site and Bristol Temple meads station old Market, Bristol cabot circus Bristol Broadmead shopping centre and Bristol city centre, by the metro bus service m2 and by changing at Redcliffe Hill bus services to Bedminster and Southville shopping Quarters ,

But no mention is made of working with the west of England mayoral combined transport Authority and North Somerset council Mayor Dan Norris to extend this service to Bishopsworth Withywood Hartcliffe and Hengrove Whitchurch,

And at long Ashton park and ride interchange for bus 505 to Hotwells Queens Road Clifton village, Bishopston and Southmead hospital bus station

Via the southern side of the Harbour, the Transport comments were very poor by the officers with no comments about the importance of the cross Harbour ferry services or the Bristol Ferry services around the Harbour with need to improve landing stages for ferry passengers but no contribution to the ferry services or the need for a wheelchair accessible boat ,

The importance of the Quayside walkway is pick up which needs to be fully accessible for wheelchair users,

The Harbour is also a major Tourist area in South west England

So incorporating the Harbour walkways is very important,

Tourism is worth over 4 billion pound to the city Region economy,

So waterfront housing Harbour need to be very careful planned ,

The landscaping and new tree planting is very important to soften the Development,

The estate agent pitch by the Transport office of the link to Bristol Temple meads station by walking cycling and metro bus is interesting by worrying it good to Bristol Harbour and Tourism facilities are so well connected by the West of England mayoral combined transport Authority and North Somerset council railway Network of local trains across the city Region,

Metro west railway Network stations to Bath spa Westbury and Salisbury service or Bristol Temple meads station to Clifton Down, stations to Avonmouth and seven Beach,

Or or Bedminster and Parson street and stations to weston super mare and Taunton ,

Filton Abbey wood, Bristol parkway station yate cam and Dursley station Gloucester central

Cheltenham spa Ashchurch for Tewkesbury Worcester Shrub Hill Worcester Forgate Street,

Are metro west railway Network

But Newport, Cardiff, Reading London Paddington Plymouth, or Birmingham

This is just causing The Very Problems

the city council trying to address.

Stopping people moving to Bristol and especially the Harbour and driving up house prices for local residents,

We hope Bristol city council and it housing company's not marketing affordable housing outside Greater Bristol,

We still want to see move houses and flats that are accessible with wheelchair standard m standards,

With play facilities for children,

On Tourism we are very very concerned that Bristol city council still not been able since the failed planning permission of the for a tourist caravan park at Bower Ashton,
That Bristol city council has not been able to fund and find an alternative caravan van touring site to pitch tourist caravans and Tents to replace the caravan park site at Ashton Court estate, Blase castle estate, Oidbury court estate, or another site in the city

This is not good news for the city Region Tourism economy,
This issue still needs addressing by the new City council committee system,
The planning application could have made reference to a financial contribution to improvements in Toilets and changing places facilities in Bristol Harbour such facilities are very much welcome by local residents and visitors, and again a contribution could have been made improvement to coach parking facilities,
As this new housing which is welcomed in Bristol Harbour with ss Great Britain and m shed Underfall yard ,Harbour railway and the boats and ferry services make Bristol Harbour one the top tourist areas in South west England,

We welcome the approach to affordable and rented homes built by Bristol city council in the Harbour,
The concern being what we prevent an homes being sold on in such a tourist hot spot of the Harbour
We welcome this housing Development and wish to see this planning permission granted with high quality landscaping and Tree planting and the need to address the Historic Harbour and its Tourism facilities,
Improvement in public toilet, public transport links ,including the ferry services in Bristol Harbour,
Working class communities should have the right with Goram homes to live in Bristol Harbour,
And especially from Bristol disability equalities forum point of view more accessible homes,
Please grant planning permission
David Redgewell South west transport Network and Railfuture Severnside,
Bristol disability equalities forum Trustees,

A17

I would like to submit the following statement for the 24 th April DCCA meeting for the planning application 21/01331/F

To allow development here would be unprecedented in Bristol

The developers cite two examples of “precedents” where developments were allowed at appeal in high flood risk areas; student accommodation on Feeder Road and on Silverthorn lane.

Both developments are fundamentally different to Baltic Wharf, in that both sites adjoins land with low flood risk with **“a high -level walkway to allow free access/egress for people and the emergency services”**.

This was crucial to the Secretary of State finding in favour of the development, stating **“The Secretary of State notes that a key flood design feature is the proposed high level walkway”**. No such evacuation or access route for emergency services is provided, or indeed possible, for Baltic Wharf, as the nearest flood-free access point is over 200 metres distant. As such all residents, and emergency services, would be at risk.

Instead, a more comparable planning site is the refused development of a caravan park at Clanage Road (20/09130/F). This site had a slightly lower flood risk than Baltic Wharf, in that a small part of the site is flood risk 2, and was adjacent to a low flood risk area with a potential (if poor) evacuation route. The appeal for this was rejected by the Secretary of State on the basis of flood risk.

It is worth emphasising that between the site and potential escape/access routes there are areas of considerably deeper water. Therefore, even if the site escapes the worst flooding, there will still be no route of escape for residents or access for emergency services.

All the best

Mary Montgomery

A18

I cannot believe that you are still trying to push through planning permission on this beautiful city site, the last green field site directly on the docks. Yes green field, you down graded it to brown to justify your outrageous building plan

You plan to cut down 82 mature trees aged 50 years and hedge rows around the perimeter. There is little chance of replanting this number of trees elsewhere in the city as there is not the space.

Instead any compensatory monies legally due will go into your fund.

Emergency egress off this site cannot be relied upon via the Cumberland Rd. as it runs between the new cut ie. river and the docks and will likely also be under the flood water. Do you believe that residents can safely wade 100 yards plus through the flood water with open man hole and drain covers, and flood debris to the only high point, the footbridge over the cut?

I was part of a group of local people, remember the Tree Brides, who collected over 6000 thousand signatures in support of the preservation of this wonderful site.

Listen to the will of the Bristol people. You are so obligated.

Richard Cooper, long term resident

A19

Preface

This is a complex and long-running application, with a lot of factors to consider. My statement is therefore structured for ease of comprehension.

Process

I have been concerned at glitches on the planning portal in the days leading up to this meeting, which have included documents not loading properly for multiple people, myself included. I would like to note that this has made public engagement more difficult for this application.

Trees

It is always deeply upsetting to see the loss of trees and green space. It is comforting to see that effort has been made to identify which trees will be able to be retained and replaced, and that the retained trees will be strictly protected during works.

I agree with the Arboricultural Officer that the applicant should pay the higher rate for replacing trees in hard standing, and I'm pleased to see a lot of thought has been given to protecting the retained trees.

The improvements to the public realm and the opening up of much of the area for pedestrian traffic will make areas of green space more accessible, even if the overall area of tree canopy coverage is reduced.

However, I am concerned that in the officer's view some of the proposed tree loss is not sufficiently justified and that overall the ecological enhancement falls short. If this application is granted, then the Council must impose planning conditions to bring this enhancement up to standard.

I am also sceptical of the true ecological value of green roofs, which often fail to live up to expectations, and I urge the committee to properly interrogate this aspect of the proposal.

Height & Heritage Impacts

I was pleased to see that the proposed heights of the blocks were reduced in order to mitigate concerns over heritage impacts, and that changes have been made to minimise overlooking of neighbours, including removing a gable roof to increase light to neighbouring properties, removing certain balconies and reorientating accommodation along the eastern boundaries of the development, lowering some parapet levels, and an overall reduction in height of one story. The change of brick colour to improve the visual relationship with the Bonded Warehouses is also to be welcomed.

This seems to me to be a sensible compromise between the housing and viability concerns and the particular sensitivities of the site.

This said, the widely-expressed concerns over heritage impacts of the development and worries of neighbours about overlooking and light levels remain important, and I ask the Committee to bear these concerns in mind when making its decision.

Flooding

I appreciate the widespread concerns over flood risk that this proposal has prompted. With an academic background in climate change, I share many of these concerns. Notably, residents of nearby Avon Crescent have recently reported they have been unable to obtain home insurance on grounds of flood risk.

However, I recognise that I do not have the same level of expertise as the Environment Agency or Bristol's own Flood Risk Manager, both of whom withdrew objections to the proposal on grounds of flood risk. To be clear, if they had not it would clearly be wrong for this proposal to even be considered.

Clearly if this development is to go ahead it makes the implementation of the Bristol Avon Flood Strategy that much more urgent. It will also be vital that the planning conditions relating to flood risk are fully implemented and enforced. The Committee should ensure that it fully comprehends the issues relating to flooding regarding this application, and whether it believes that construction of flood defences *in the future* is sufficient protection for a development which could be built imminently.

Construction

I hope that if this proposal is passed, consideration will be given to neighbouring residential amenity during construction. The start time of 08:00 on weekdays and Saturdays seems very early – especially on Saturdays – I do not believe this time is appropriate.

Housing

I welcome the ambition for 100% affordable homes – this is an unalloyed good that would substantially benefit the local economy and contribute to alleviating Bristol's housing crisis. In particular the inclusion of 3 bed social rent flats and several wheelchair accessible and adaptable flats will make a real difference to disabled people and people on low incomes trying to find suitable housing right now.

I am deeply concerned therefore at the May 2023 viability report, which deems the scheme not economically viable to deliver this affordable housing without grant funding. I believe that Bristol deserves the best and should not settle for anything less. If this proposal is likely to fail at delivering a sufficient number of affordable homes, then I would urge the Committee not to approve it, so a scheme that would properly help those in need of affordable housing could come forward instead.

As an aside, I would be keen to hear the calculations of the Council Tax that would be collected from these properties, set against the income currently received from the site.

Commercial Uses

I welcome the possibility of more commercial space in the area and am intrigued by the possibility of providing storage for the nearby sailing businesses.

There is an important need for more public realm in the area, and a current lack of amenities for local residents which could be addressed here.

Planning Conditions

Bristol Council has a poor record of planning enforcement and of fulfilling planning conditions on Spike Island. Members of the Committee will be aware of the long wait that residents of Avon Crescent – very close to the Baltic Wharf site – are experiencing for fulfilment of planning conditions relating to

the Metrobus development. Several of the mitigations and benefits of this proposal – notably around flood risk – depend upon the implementation of planning conditions. I urge the Committee to fully interrogate these, and to reject the application if it is not satisfied that they are likely to be upheld.

Wind

Businesses on the harbour have relayed concerns to me that this development would disrupt the wind patterns they rely on for sailing and water sports. I am concerned that the wind report was carried out in December 2020 and there have been changes to the proposal since then. I ask that the Committee carefully consider the potential impact on harbour users, given the importance of the harbour industries to Bristol's tourist and cultural sectors.

Summary

The proposed opening up of new high-quality public realm, new business space, and a large number of affordable homes is to be welcomed. However, the appropriateness of this application hinges on several planning conditions and future developments, without which this proposal is not acceptable and should be rejected. In making its decision, I urge the Committee to consider the application not only on its own merits, but also how it sits within the wider context of Bristol Council's planning enforcement, flood defence development, and the other factors outlined above.

Patrick McAllister
Councillor for Hotwells & Harbourside

A20

Hi Democratic Services

Please submit the statement below to the members of D.C.C. A

I would like to speak at the meeting please - Martin Rands

Dear members of D.C.C.A

I understand that the applicant (the council) has privately shown you a glossy 'sales' presentation of the benefits of the development

at Baltic Wharf, showing one very complimentary graphic mock up. Please look at the graphics in the actual application, and how many harbourside trees will be destroyed. This may be a 'six storey' building, but you have to bear in mind the considerable extra height required for the 'sacrificial' floodable, half-price rents, flood zone 3 basement. This adds considerable extra height, and the proposed building will dwarf and dominate all the surrounding buildings in the City Docks Conservation Area. The case officer lists numerous listed assets that will be affected (curiously not Avon Crescent) which is one of the closest.

The glossy presentation that you have been shown by the council/developer, is very reminiscent of the way that Metrobus A.V.T.M was sold to the D.C.C. and the community. It sounded absolutely marvellous. One of the major benefits of Metrobus A.V.T.M. was to be better flood defences for local residents, but the budget was cut and the flood defences along Cumberland Road (part of the Metrobus A.V.T.M. consented scheme), were not built. Consequently, when I re-insured my Avon Crescent house for buildings cover last year, I could find no insurer at any price to insure me for flood risk. All kinds of benefits were promised with Metrobus A.V.T.M. Non-diesel buses, bus routes on the new south Bristol road - which are still nowhere to be seen, shared space at Avon Crescent, and all the trees destroyed at Avon Crescent were to be replaced. The tree replacement and the shared space were secured by planning conditions that came with the Metrobus A.V.T.M. 2014 planning consent. This was another council to council planning application.

We have complained to Bristol Planning Enforcement on numerous occasions that the conditioned trees and shared space at Avon Crescent have not been delivered, and the response is that the council cannot enforce planning conditions against itself! Conditions are pointless without effective enforcement. Bristol City Council will not enforce against itself!

I therefore implore this committee to take planning conditioned promises attached to this Baltic Wharf application, with a pinch of salt. They will not be enforced.

Therefore it is a nonsense for the Environment Agency to say, 'if you promise to make an undisclosed future contribution to the Bristol Avon Flood Strategy, we will withdraw our objection which we have iterated seven times in the past' or words to that effect. And 'we suggest that you do this by means of planning conditions', or words to that effect. I cannot even see a condition about this future contribution, and how much and who will pay it, and how, anyway.

It is frankly stupid to build in a flood risk zone 3 before flood defences are at least guaranteed, and preferably built!. The B.A.F.S. is still £100 million short of funding. Which could explain the E.A.'s unprecedented volte face. Let Metrobus be a warning of budget cuts reducing flood defences! Climate change is not safely predictable. It is arrogant and dangerous to pretend that it is.

Eighty two of the one hundred and two trees will be destroyed, and Bristol Harbour will lose even more of its few remaining trees. They will not be replaced. Ten years later, Avon Crescent is still waiting!

Finally, these three major controversial planning applications have been cynically brought days before council elections. I am sure that members' minds are not only on these three major applications.

Planning applications ought to be heard with open minds in a quasi-judicial manner, when members have proper time to consider them properly. I do not see how that is possible when there is so much to read and consider, and there are election considerations. It looks to me like this committee is being played by the administration.

Statement from: Spike Island Bristol Community Association
For: Development Control Committee A – 24 April 2024
Re: Application No. 21/01331/F : Caravan Club Cumberland Rd BS1 6XG

Should Bristol City Council decide to give the green light to the Baltic Wharf Caravan Park development on 24th April, it will be seen as another example of it breaking its promise to meaningfully engage with communities, and going against its own, and national, principles to protect the natural and historic environment.

Over the last month, the procedure and communication with stakeholders seeking discussion and transparency may or may not meet the requirements of the law, but it does not meet the spirit of democracy. There has been no communication for over a year, then with a few days' notice, the decision is being rushed through in the final days of the current administration – why? Citizens have expressed their dissatisfaction in large numbers in recent times, and the Council should be listening - these are decisions that should be made with proper consultation, as part of the wider plan, and not just by committee members, acting against the will of the majority.

Instead of fulfilling promises made around Harbour Vision and Western Harbour, the Council seems about to make irrevocable changes to the face of this community without proper consultation - for the sake of a relatively small number of dwellings, which may not even benefit local people. With no guarantees on 'affordable' quotas, priority for Bristolians, or safeguards against purchase by outside (or inside) investors, a decision to proceed with the current plan cannot be seen to be for the benefit of the wider community.

The Harbour is cherished by people across Bristol and it should be preserved and enhanced, in line with the City Docks Conservation Plan. As a community, we are working on plans to further promote the area as a destination – celebrating its cultural and maritime heritage – with a much needed green space for local people and visitors for leisure and events, something that would add much greater social, environmental, cultural and economic value in the long-term.

Almost 99% of around 600 public comments are objections, and they are not just from local residents - only around 15% are from neighbouring Baltic Wharf Development. We welcome the building of new homes for the people of Bristol, but a plan to cram a large development of this scale and nature into this sensitive area requires a lot more consideration for the affected community. With at least three other developments in planning / under way in the immediate vicinity, and at either end (Western Harbour / Redcliffe Wharf), we need to be hearing about plans for essential amenities and infrastructure, not having our last green space destroyed for 116 flats.

The glossy presentation by Goram Homes paints a pretty picture, but glosses over the negatives. The Summary of the Officer's Report does the same - it lists our main causes for concern (flood risk, loss of mature trees and green space, damage to heritage value) but does little to reassure us, as the solutions are nothing more than promises to the planning authority (the Council) by the developer (the Council), and the failure to honour past commitment, particularly on biodiversity, does not inspire confidence.

As the plans stand, we object, and we ask that the decision is postponed until we have a new administration, and plans for proper representation and consultation, in place.

Helen Johnson
Spike Island Bristol Community Association
23rd April 2024

23/04490/F Redevelopment of Debenhams' site Statement in support – Charlie Royle

Dear Councillors

I am one of the senior directors at the company seeking to redevelop this site.

Three years ago Debenhams closed its doors for the last time. As specialists in complex urban regeneration, we are seeing this same continuing decline in high streets across UK.

At the same time Bristol faces an unyielding housing crisis. Which is why housing-led, mixed use redevelopment is the obvious, and only, answer.

For the past two years we have worked in partnership with your officers, statutory consultees, Design West, police and many other stakeholders to bring this site back to life.

Our proposal would repurpose and transform the site into a green, attractive, safe and vibrant place to live, work and socialise – and would provide a massive spending boost for the struggling Broadmead area.

We are proposing more than 500 new homes set above a new, tree-lined pedestrian retail street. 100 of those homes – 20 per cent – would be affordable. All homes would be highly energy-efficient and exceed national space standards.

With hundreds of additional people living in the city centre, Broadmead retailers would benefit from forecasted increased spending of £11 million a year.

The boost to the local economy would also see 264 new jobs plus an additional 380 construction jobs while the development is being built.

This major regeneration would bring millions of pounds to Bristol City Council, including £1.9M Community Infrastructure Levy, £1.8 million New Homes Bonus, £920,000 a year Council Tax, and £125,000 a year Business Rates.

It has been a complex and challenging journey to get to this point, but I think the scheme before you is outstanding. I hope you feel you can support the application - and look forward to starting this major investment in your city.

Your sincerely
Charlie Royle
Executive Director
AEW

23/04490/F Redevelopment of Debenhams' site Statement in support – Charlotte Burchell

Dear Councillors

I'm one of the Associate Directors at Savills, Bristol, working on this application.

Firstly, we really do appreciate the hard work of officers and members throughout this long process. As planners – including former local authority officers – we understand the amount of time and effort that goes into determining these important, large regeneration schemes.

Like all city centre development there are impacts, including to heritage assets. However, the level of 'harm' must be weighed against the extensive public benefits.

That list of benefits and contributions is substantial: one third of the site has been given over to public open space; the scheme would deliver 100 affordable homes; it proposes to reinstate the historic route through the site with increased 24 hour activity; it would deliver a new 'green lung' with 40 new trees and a biodiversity net gain of more than 100 per cent; the additional financial revenues stretch into millions of pounds...the list goes on.

By definition, the 100 affordable homes themselves require building mass and height, as do those apartments which – effectively – fund those affordable homes. So, scale and height are simply a consequence of delivering these benefits.

The requirement to provide two cores for reasons of fire safety also reduces the amount of floorspace that can be developed for new homes, with a direct impact on height and mass.

On the question of retaining the existing building, an attempt by an unknown third party to list the existing building was rejected by Historic England; this clearly demonstrates the building is not of sufficient heritage value to protect. It is also worth noting the site is not in a Conservation Area.

It is impossible to build in any city centre without having an impact on heritage assets – and we wholeheartedly agree with officers that the public benefits clearly outweigh any harm.

The proposals meet national and local policy requirements, maximising the use of a vacant brownfield site, and are aligned with BCC's Development Delivery Plan which looks to redevelop the site with a new through route and buildings of amplified height.

Bristol needs these homes; the city centre needs this regeneration; and Broadmead needs this investment and spending.

Your sincerely

Charlotte Burchell, Associate Director, Savills

23/04490/F Redevelopment of Debenhams' site Statement in support – David Finch

Dear Councillors

I'm the lead landscape architect working on this scheme.

It is extremely unusual for a third of a site in the heart of a major city to be set aside for public open space – not least when the existing building covers the entire site.

But that's exactly what we've done – 30 per cent of the site (1,420m²) would be opened up as beautifully landscaped public open space.

We've done this to reinstate the historic street – which we're calling Barr's Street – that was blocked off during the post-war redevelopment. This will connect Broadmead to the Bear Pit and Stokes Croft. In fact, you'll actually be able to see all the way to Castle Park from the top of the new street.

Reinstating this route was a key ambition of the Council's adopted City Centre Development Delivery Plan. The new c.18.5-metre-wide street matches the width of Merchant Street, the pedestrian street that runs through Broadmead, so you can see how wide and generous it is.

Despite its 4.5 metre drop in height, we've also managed to ensure the route is designed in line with the best accessibility guidance for wheelchair and pushchair users, by winding a gently sloping route through the site, alongside a more direct route with stairs.

We've incorporated extensive landscaping and tree planting throughout the length of the new route that would help create a destination in its own right with cafes and restaurants along the pedestrianised street.

With a 100+ per cent biodiversity net gain and 40 new trees, this site will be transformed into a new 'green lung' for the city centre.

As well as extensive planting along new pedestrian street, we're also proposing trees and planting on all the rooftop terraces to provide further high-quality external resident amenity space.

The area that will have green planting is more than 1,200sqm in total – that's the equivalent in size to an Olympic swimming pool, like the big pool at Hengrove Park Leisure Centre.

This is exemplar landscaping in the heart of an area that is currently unwelcoming, unsafe and unattractive.

Your sincerely

David Finch, Director, Churchman Thornhill Finch

23/04490/F Redevelopment of Debenhams' site Statement in support – Tom Brown

Dear Councillors

I'm the team lead on sustainability for this project. I am a chartered environmentalist at award-winning environmental engineers Hoare Lea. I am based in Bristol.

Our role has been to assess the carbon and energy performance of the proposed development to ensure it meets or exceeds not just your own policies but stringent and demanding industry standards.

On all accounts I can reassure you that the proposed development performs extremely highly, far exceeding your own policies.

Barr's Street has been designed with a focus on sustainability, delivering standards that significantly improve over existing planning policy and enable future local plan metrics.

The building will achieve a 50% reduction over current Building Regulations and a 42% reduction in residual CO₂ emissions - double the planning policy target. This will be achieved by high efficiency building fabric, connection to the district heat network, a priority for the Council, and provision of on-site solar PV.

The project is using the UK Green Building Council Net Zero Carbon framework to deliver leading, in-use energy performance and to minimise upfront carbon emissions. A whole life carbon analysis has been undertaken demonstrating alignment with LETI standards and future local plan Net Zero policy aspirations. A BREEAM Excellent rating is also proposed for commercial areas.

The Passivhaus methodology had been used to calculate operational energy use, demonstrating performance in line with RIBA 2025 targets.

This is a highly sustainable development.

Your sincerely
Tom Brown
Senior Associate Sustainability
Hoare Lea

23/04490/F Redevelopment of Debenhams' site
Statement in support – Jamie Furse

Dear Councillors

I'm one of the directors at AWW, based in Bristol, and I lead the team of architects working on this project.

The design of this scheme has not been done in isolation, but is the result of a thorough, careful & collaborative approach.

We've worked closely with design officers, Design West, Avon & Somerset Police Secure by Design officers for the past two years. Importantly, City Design Group raises no objection and has been hugely supportive through the process.

Is this the right place for a tall building? You've heard from Savills why the height is necessary to deliver all the benefits, but – as a team of designers – we have thoroughly analysed the local and wider context and fully believe a tall building in this location is the right response, creating a striking landmark and gateway to Broadmead.

But we have also taken a very considered approach, with a range of heights stepping up as we move away from neighbouring buildings and heritage assets. This has been tested and agreed with the Council's design consultants and officers throughout the design process.

However, this isn't just about height, but about placemaking...the question I ask is: will this be an attractive, safe and vibrant place to live, work, travel through and spend time socialising in?

With the quality of buildings, both inside and outside, the high quality material palette, the design detail, articulation and texture, the safe and active frontages, the 19.5 metre wide pedestrian street, the extensive landscaping...the answer is an emphatic yes.

I truly believe we have designed a place that will absolutely transform this redundant and abandoned site that currently detracts from this vibrant and beautiful city.

Your sincerely
Jamie Furse
Director
AWW Architects

B6

**Debenhams Proposal
23/04490/F
Simon Hickman
Historic England**

This is a critical time for Bristol; a moment for all of us with a role in the city's future to seize positively.

We recognise that renewal brings significant opportunities - the potential to provide much-needed housing, reconnect parts of the city, and right past planning wrongs. Our ambitions should be high.

But ambition needn't come at the cost of what makes Bristol special. Its long history has produced a cityscape rich in character and meaning.

Yet this scheme risks erosion of that special character. It requires substantial harm to stately Debenhams building, a non-designated heritage asset. The scheme falls short of the quality Bristol deserves.

Quite simply, the proposals should be better. Better in terms of design excellence for our regional capital. A better response to the city's character. It is achievable and it's what the city and its communities deserve.

One of our duties as a society is to ensure that we pass our heritage on to future generations in a better state than we found it in. Places must and should change, but change should incorporate and celebrate what makes a place special.

If we get it right in Bristol, the city will continue to thrive, and to move us, inspire us, and make us proud. Bristol and its people deserve the very best - a future built on a remarkable past.

STATEMENT BY BRISTOL CIVIC SOCIETY re 23/04490/F | Redevelopment of former Debenhams building for mixed use development comprising residential and commercial floorspace | The Horsefair Bristol

Bristol's housing crisis... like anybody who cares about Bristol, we want to see more affordable homes, and in numbers that make a difference. But we don't support cutting corners: in liveability, tackling the climate emergency or in delivering good design. **We don't have to panic ourselves into accepting second-best, including for those who need a home in Bristol.**

This won't be a liveable development... is it really acceptable a **fifth of the rooms won't get enough daylight** and **half don't meet BRE's sunlight target**? Or only a third will function as dual aspect flats? Or many homes would **look out onto 24/7 service courts**? It's no way to live and we have a responsibility to those in housing need to do better. The housing crisis doesn't justify 'anything is better than nothing'. We can house **our citizens in decent, affordable homes and densify with dignity, keeping the essence of Bristol.**

What happened to the climate emergency...? You'd think twice before throwing away a coffee cup but officers are relaxed about binning the Debenhams building. You're not told the carbon cost, but it's probably more than 12,000 tonnes. Roughly equivalent to 40,000 flights to New York. Add in the new build, upfront, carbon, **approving these proposals costs over 36,000 tonnes of carbon.** If you plant a tree, in 100 years, it will have sequestered one tonne. To offset the carbon, you'd need to plant a mixed-use woodland getting on for 10x the size of Queen Square.

Many towns and cities are converting their old Debenhams... including high-rise Manchester. But not Bristol, here it's all too difficult. **You're told without knocking down Debenhams you won't get Barr's Street... but is the carbon price worth it?** And **the promised boulevard in reality will be a lengthy, windswept, zig-zag ramp** set between two towering blocks - **Barr's Canyon**, not Barr's Street. Yes, we want better access to Stokes Croft and beyond. But without remodelling the Bearpit and taming the traffic we don't get that.

Bristol deserves better... the 28-storey tower is another so-called landmark building helping to destroy what makes Bristol special. **Local people keep saying they don't want tall buildings, but between elections they get ignored.** They don't want them because they **privatise public views and cut them off from the countryside and nature.** They don't want a **claustrophobic city dominated by the anywhere architecture** being served up. They want **human scale buildings**, not a budget version of **the anonymous downtown high-rise of a North American city.** That's what we get with these proposals and the Premier Inn redevelopment. **Bristol is losing its USP, and that damages the city, including economically.**

Planning law sets a presumption against harming listed buildings and their settings. Historic England says the tower is eight floors too tall. We agree. Research tells us it makes economic sense to look after historic buildings. And don't we have a **responsibility to pass on John Wesley's New Room**, the oldest Methodist building in the world, **as we found it?**

Planning law requires applications to be determined in accordance with the local plan, unless material considerations indicate otherwise. There is **nothing in the local plan which says these proposals must be approved. And many local and national policies, including the Urban Living SPD, point to refusal. The presumption doesn't bite if you think the damage to Bristol's heritage is unacceptable. Look at paragraph 11(d)(i) in the NPPF. Irrespective of the officer's recommendation, the decision is your choice.** **Page 43**
Legacy to Bristol.

The views the developer's PR campaign doesn't use....



NPA Visuals
 Prepared by NPA Visuals
 Project: [illegible]
 Location: [illegible]
 Date: [illegible]

Before and after...



NPA Visuals
 Prepared by NPA Visuals
 Project: [illegible]
 Location: [illegible]
 Date: [illegible]



NPA Visuals
 Prepared by NPA Visuals
 Project: [illegible]
 Location: [illegible]
 Date: [illegible]



NPA Visuals
 Prepared by NPA Visuals
 Project: [illegible]
 Location: [illegible]
 Date: [illegible]

“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.” NPPF

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).” NPPF



NPA Visuals
 Prepared by NPA Visuals
 Project: [illegible]
 Location: [illegible]
 Date: [illegible]



NPA Visuals
 Prepared by NPA Visuals
 Project: [illegible]
 Location: [illegible]
 Date: [illegible]



NPA Visuals
 Prepared by NPA Visuals
 Project: [illegible]
 Location: [illegible]
 Date: [illegible]



NPA Visuals
 Prepared by NPA Visuals
 Project: [illegible]
 Location: [illegible]
 Date: [illegible]

As an architect living and working in Bristol for over 40 years ,and promoting good architecture and place making, I am deeply worried and saddened by this proposal .I can see that a technical planning case can be made to offset significant damage by supposed benefits but the reality would,I am clear ,be very different .

The new link provided on the line of Barr street is much praised as a benefit but the description appears misleading.The officers report states that *'the creation of a new retail street and a significant area of public realm will provide further support to the wider Broadmead area creating an attractive setting and driving footfall. ...'* The design of this space of is inevitably heavily influenced by the significant change of level down to the Horsefair– there are more than 30 steps to negotiate between the landscaped terraces.

Retail units are only located at the very top and bottom and occupy less than 50 % of the west side frontage and less than 40% on the east side.At the top most retail frontage faces directly onto the traffic of the roundabout .Barr street is clearly not a new retail street.

I use that area regularly and units adjacent to the top ones come and go,- I question whether the top retail frontages would attract much footfall .I also question whether the terraced space would in fact be the attractive setting suggested – landscaped terraces may look ok but have limited uses- or would drive footfall .

Altogether the proposed reinstatement of Barr Street is highly problematic and certainly not a major benefit to balance the significant acknowledged harm.

National and BCC policy calls for a high quality of new residential units but many of these would lack adequate daylight and about 50 % very little if any sunlight .Most lack balconies and are not meaningfully dual aspect as strongly advised by your urban living SPD .

Placing a 28 storey block here is simply much too tall and overbearing ,.A few years ago we wouldn't have been contemplating such height in this city .Its massing will seriously damage the characteristics of both nearby Conservation Areas ,particularly Kingsdown ,and the wider historic assets – as recognised in the officers report .If permitted this would change the nature the city -and particularly so when seen as it would be in close conjunction with the now consented Premier Inn site towers .

One of Bristol's strengths is the quality of its built environment and one reason why new businesses locate here.Such change is irreversible in any realistic timescale .

This could be an opportunity to improve an area that needs it but this proposal would not do that whilst at the same time seriously damaging adjacent areas .

The Premier Inn consent -was partly argued on the basis that the existing building is tall and therefore a tall building (albeit significantly taller) was justified.There is no such justification here .

I note the officers view that a lower building would not be financially viable.There is no evidence for this and it is known that buildings of this height are very expensive to build (as well as to maintain) .I question that assumption

Looking at the design of the buildings it is regularly stated that commenting on 'design' is subjective but as an assessor of designs nationally I know that it is quite possible for experts to agree about overall quality.These buildings do certainly not meet the criteria of high quality design required by NPPF or your own emerging policies.

The above concerns are also strongly expressed by Historic England ,your own Conservation unit and many others and reflect the criteria of both the NPPF , your own Urban Living SPD and other policies which you are required to consider

The large number of objections give some measure of the wide public opposition to this proposal.

National planning policy looks for high quality,beautiful,sustainable buildings

Regrettably this application does not meet any of those characteristics .It would not enhance this area but do significant long term harm .

I strongly urge you to reject this proposal

B9

To Democratic Services, Bristol City Council

I wish to submit this statement (below) in relation to the above planning application to be heard by the Development Control Committee A on Wednesday April 24th 2024

This whole development proposal is clearly unacceptable because of its sheer huge scale and height. There is clearly something very wrong with the proposal when respected charities and other groups all object. Historic England, Bristol Civic Society, The Council for British Archaeology, Save Britain's Heritage, The Twentieth Century Society, The Kingsdown Conservation Group, and even the city council's own City Design Team all object to this proposal. The City Design Team support Historic England's objection to this proposal. The Bristol Civic Society also strongly objects to this proposal.

These objections include particularly the huge height of up to 28 storeys of some of the buildings. Most of the societies also mention the scale of the development and its inappropriateness for Bristol city centre, and the loss of Bristol's historic character. Castle Park, a highly valued public city centre green space, would become even more overshadowed by huge towering buildings than it already has become recently, and the city landscape views, especially from Kingsdown, would be destroyed by this high rise proposal. Such a high rise high density increase in population will alter the whole character of Bristol city centre. To be sure, more housing is needed, but this proposal is not the responsible way to achieve it.

When so many respected public societies and charities object to such a proposal, it is incumbent on the Development Control Committee to listen to them and so to refuse this application. I too object to this proposal and ask the Committee to refuse the application.

Yours sincerely,
Mr Geoff Collard

B10

Public statement,

Whilst we support the need for more homes and flats especially affordable housing,

We are concerned about the lost of 19 50 Debenham building and like Gloucester former Debenham store being incorporated into university of Gloucestershire campus with extra stories to be added we would have like to have seen this in Bristol Bond Street and Haymaker especially with it closeness to the Historic priory and park ,

But we do welcome the housing in central Bristol and retail space .

But we are very very concerned about the lack of homes to m standards for disabled people with reduced mobility,

Bristol disability equities forum are concerned about the lack of accessible homes within Bristol and especially access for wheelchair users

On Transport planing we welcome the need Public open space ,

But their appear to be no reference to Haymaker bus hub for improvement in Bus interchange in Bond Street and the Haymaket ,

This is plan that be to Bristol city council Transport Board and the west of England mayoral combined transport Authority mayor Dan Norris and North Somerset council in it bus service improvement plan, But is the reference in this report or money being sort to for improvement to public Transport waiting facilities shelters Real-time information or improvement for coach waiting facilities which depart from Bond Street both Megabus Scottish City link coaches or Flixbus coaches who at present do not even have waiting facilities for their coach services on Bond Street North ,

By Hampton by Hilton Hotel is welcomed ,

But we have £ 376,130 for cycling facilities,

£175 for a surface access for the Haymaket toward the bus and coach station is to be welcomed,

£110 440 for a green travel plan

But only £199 526 towards the bus and coach interchange facilities on the Haymaker,

A key bus interchange when Penn Street and the Horsfair closed to public Transport services,

We welcome the financial contribution but the site is at the Heart of shopping and Tourists Quarter in city centre.

With clean air zone

Bristol city council should have been planning with the west of England mayoral combined transport Authority and planning Authority better interchange and integration of public transport Network, Including providing for mass transit system,

The plan should have included the removal of the Roundabout and Bear pit which Doe not say welcome to Bristol

With it Historic st James proriy,

The building and highs have effect on st Paul's Church a grade 1 listed building,

St Stephen Church grade 1 ,

John Wesley chaple new rooms

All of which are important Tourists destinations in South west England,

We welcome the mixed use and new public Sq improvement in retail facilities,

But the Debenham building does have a quality design to it and is adds character to the city shopping Quarter along with the former John Lewis building now primark,

We welcome the extra homes ,student living,

But we can not turn Bristol into Hong Kong island or New York to find housing sites ,

City Region like Greater Manchester combined Authority Mayor AndyBurnham, or West Midlands combined Authority mayor Andy street

Work together on city region plans,

With each borough working together on housing number and housing.

In Greater Bristol their should be region plan by the 4 planning Authority's have failed to work together on a city region plan for Greater Bristol and Bath city region, Banes ,south Gloucestershire county council,

North Somerset council and Bristol city council, (including the west of England mayoral combined transport and planning Authority, and North Somerset council.

The west of England mayoral combined Authority with North Somerset council joint committee lep being in special measures,

We can just build up tall buildings we need to plan Greater Bristol city Region housing need as well, The city centre and Broadmead are subject to a number of proposals some with planning permission for tall buildings but without the quality in public realm opens spaces and an essential public transport Network

Of which the Haymaker interchange and Bond Street is key ,

Whist we welcome the new home and retail shop facilities,

We still have concerns about the need for more disabled housing, the public realm and the lack of any joined up plan for St James Barton Roundabout

And the need to improve the quality of the public transport interchanges facilities on the Haymaket and Bond Street,

With a sum of £376 ,529 for public transport Network,

The lack of comments from the Public Transport Network Authority and the metro mayor Dan Norris officers

on the Transport elements of the scheme ,

No reference is made to city centre Bristol Broadmead shopping centre Cabot circus and Harbourside as a Tourist destination,

Yer £ 4 billion pound is generated through Tourism to the city Region economy,

Whist welcoming this planning application we would like to see the Debenham building like Gloucester incorporated into the development,

But the lack of vision to incorporate the Bear pit into the Development is short sighted planning,

When the Badger centre a new shopping centre and Bus and coach station at lest dealt with the Bearpit .

But we would also like to see public realm improvements and a better contribution to the cost and design of the Haymaker and Bond Street bus and coach interchange

The new flats and home should have been part of a master plan for this area

Please bring our comments and concerns to the planning committee.

David Redgewell South west transport Network Railfuture Severnside,

Trustee of Bristol disability equities forum which has concerns about accessible housing ,

Democratic Services
City Hall, PO Box 3399,
Bristol,
BS1 9NE

By email to: democratic.services@bristol.gov.uk

Our reference: 24007

22nd April 2024

Dear Councillors,

23/04490/F | (Former Debenhams & Building To West) 33-47 (odds) The Horsefair, 6-10 (consec) The Haymarket, St James Barton & 29 - 31 (odds) The Horsefair Bristol BS1 3JE

I write on behalf of SAVE Britain's Heritage to reaffirm our **strong objection** to the above planning application and our call that you refuse planning permission on heritage and climate grounds at Development Control Committee A on 24th April 2024. As set out in our previous objection of 8th February 2024, we consider that the demolition of this important Non-Designated Heritage Asset (NDHA) and the proposed 28-storey building in its place would be substantially harmful in heritage terms, and the failure to seek reuse and conversion of the existing building unsustainable in planning terms. For these reasons, we object to this application and call on Development Control Committee A to refuse planning permission.

Assessment

1. Impact of demolition

We wish to reiterate our **objection** to this proposal on the grounds that it would entail the total demolition of a NDHA of considerable heritage significance and clear architectural quality. Para 209 NPPF (2023) provides that when weighing applications that affect NDHAs, a balanced judgement must be reached regarding the "*scale of any harm or loss and the significance of the heritage asset*". The former Debenhams building is of landmark quality which echos the wider area's architectural language, scale and civic grandeur, and is a key element of the post-war master planning and redevelopment of Bristol's city centre, a civic achievement which remains remarkably intact and legible today. The building's positive contribution to the surrounding townscape is recognised in the City Centre Framework (June 2020). The scale of harm caused by demolishing the site must therefore be considered substantial in Framework terms and would constitute both the loss of a landmark building and the breaking up of the wider historic civic townscape. For these reasons, SAVE considers that this application does not satisfy the policy test of NPPF 209 and fails to comply with national and local policy for the protection of non-designated heritage assets.

2. Impact of proposed tower

We object to the radical scale and massing of the proposed tower block, which at 28 storeys would dominate its setting and render incoherent the city centre's intact post-war urban plan. Whilst we note that revised plans submitted on 16th February 2024 have sought to reduce the tower's height by 3.1m, we do not consider this adequate to mitigate the heritage harm caused by a tall building in this prominent, landmark location. This vast increase in scale from the existing building, which strikes a positive and harmonious relationship with its surroundings, would have far reaching harmful impacts on the historic character of the city. Whilst we consider this harm to be less-than-substantial in Framework terms, the cumulative instances of the harm caused by the tower across a larger area could be considered to reach the bar of substantial harm.

3. Opportunity for retention and reuse

Bristol Debenhams features in SAVE's report [Departing Stores: Emporia at Risk](#), published in April 2022 as a strong candidate for retention and reuse, as has been the case with the neighbouring Lewis' building, which dates from the same year (1957). Reuse is not only more sustainable in terms of embodied carbon terms, but also brings clear heritage benefits by retaining the historic connection to a building of landmark quality. The potential for this site's practicable reuse is signposted in the applicant's Planning Statement, which states that the building has generous floor heights and floor plate depths. Whilst conversion can present challenges, the building's sizable floor to ceiling heights would greatly facilitate a successful conversion scheme.

4. Unsustainable development

In this context, the applicant's demolition and rebuild approach carries an extreme and unjustified embodied carbon footprint and cannot therefore be considered compliant with NPPF para 157 and the overarching goal of the planning system to promote sustainable development.

Taking this with the substantial degree of heritage harm identified above, these proposals cannot therefore be considered sustainable development in Framework terms and should be refused.

Conclusion

For these reasons, we call on Development Control Committee A to refuse planning permission.

Yours sincerely,



Lydia Franklin

Assistant Conservation Officer, SAVE Britain's Heritage

Ref. 23/04490/F

46 Alfred Place,
Kingsdown,
Bristol BS2 8HD
18th April 2024

(Former Debenhams & Building to West)

I hope it is not too late for me to entirely endorse the recent response of Kingsdown Conservation Group to this proposal.

If the meeting of Development Control Committee A on 24th April is open to the public, I would like to attend.

RICHARD DAVOLL



23/04490/F- Former Debenhams & Building to West Horsefair BS1

Revised drawings had been submitted showing small changes to the proposed scheme. However, the Panel considered that these did not address their original concerns set out in the minutes of the meeting held on January 16th, and the comments set out in those minutes stand.

“The panel objects in the strongest terms to this Application for a development whose grossly excessive scale and massing would cause significant harm to the City’s historic core. Its dominance would adversely impact not only the setting of nearby significant heritage assets but also impact long-distance views across the City from Castle Park and multiple nearby Conservation Areas.

The Panel endorses the view of the Twentieth Century Society that the existing landmark building with its ‘impressive and sophisticated five-storey stone-faced’ façade should be identified as a Non-Designated Heritage Asset ‘in recognition of its clear historic significance and its architectural and townscape merit’. It should be re-furbished and repurposed, thus avoiding the carbon cost of demolition, in line with the Secretary of State’s recent decision to refuse planning permission to demolish the unlisted Marks & Spencer building on London’s Oxford Street.

National Planning Policy requires high-quality, beautiful and sustainable buildings.

This development, destructive of any sense of human scale, is the antithesis of that.”

A view of the fine existing Bristol Landmark Building in April 2024



A view from Castle Park. April. If all of this is become tall where will be the sunny side of the street.?

Local Resident Public Forum Statement: 23/04490/F | Redevelopment of former Debenhams building for mixed use development comprising residential and commercial floorspace | The Horsefair Bristol

I urge councillors to reject this scheme.

The housing it provides is substandard and will blight lives for years. Just because you are poor doesn't mean you should live in poor quality housing in a noisy polluted area. Tower blocks are unsuitable for families - research proves that. And so does local experience. Here children are being expected to play on roof terraces at least 11 stories above street level. Shelters are being provided because of likely wind gusts. Which parent wants that for their child?

This is not housing - it's warehousing for people.

The cumulative effect of this development and the Premier Inn scheme will degrade the street environment and will deliver windswept canyons no one wants to walk down. Bristol has always felt a human scale city.

As experienced by Marwa Al-Sabouni writing recently for Bristol Ideas: "I loved Bristol when I visited for the first time in 2017. By being less pretentious than London, and more welcoming in its human-scale buildings and topologytracing streets, it reminded me of my own city, Homs, where simplicity didn't necessarily mean failure. Where people were as nice and welcoming as their streets." She now feels Bristol is changing, and not for the better.

Marwa is an award-winning architect and author, her books include *The Battle for Home* and *Building for Hope: Towards an Architecture of Belonging*. We should listen to our critical friends, before it is too late. We will lose yet another part of the special appeal of our city with this development.

Finally, I would ask councillors why developers are now apparently writing officer's report to the committee (Savills letter of 19 April refers, uploaded onto the planning portal on 22 April)? If the officer's advice is so flawed, the application should be deferred and considered at a later committee when a revised, legally robust officer's report is available for councillors to consider.

B15

I would like to make the following statement at the development A meeting on 24/04/24..I intend to be at the meeting to speak to my statement.

Thank you

Kim Hicks

Statement:

Once again we see a proposal that further erodes the human scale of Bristol city centre.

Once against the environmental cost is being ignored

So, Once again, people are asking - is this the best we can do? Create sub standard housing for desperate people in a location where the air quality will be dreadful due to the busy roads just outside the windows and the looming height will negatively impact the lives of countless others.

I do not believe that reintroducing a historic route to link pedestrians from Broadmead to Stokes Croft is a genuine ambition (and even if it were this could be achieved without the staggering height of the design you are looking at). The Bearpit roundabout and major road layout that surrounds it will still provide a huge barrier between the two areas. In my view this is just an excuse to justify demolishing the existing building without finding a way to refurbish and re-purpose it.

Please listen to the mass of voices that have objected to this unsightly development which will further destroy beautiful views across the city following the decision you made on the nearby Premiere Inn site. When will we get proposals that will be entirely beneficial to the people of Bristol - not ones that are trading off harmful effects which they admit to with 'sweeteners' of 'improvements' to the public realm.

People are losing heart in this system as they see all their comments and objections batted aside. Most Bristol people I speak to see no point in taking the time to send in their heartfelt objections because they believe they will not be listened to.

B16 Statement to Development Control Committee A on 24 April, 2024

Re. Planning Application 23/04490/F Former Debenhams and Building to the West BS1 3JE.

Submission by the St. James Priory Project

- St. James Priory Project strongly objects to the planning application for the redevelopment of the Debenhams' site.
- Our principal concern is the negative impact the proposed development will have on the setting of the Grade 1 listed church and grade II* listed Church House which are in our care, as well as the harm the proposals will have on the St. James churchyard and St. James Parade Conservation Area. The proposed new development is overbearing and will completely dominate these valued heritage assets.
- Your planning policies talk about the need to protect key views and that, " the height, scale and massing of development should be appropriate to the immediate context."
- This development does not even attempt to meet these criteria. Indeed, it is difficult, for us at least, to understand why the Council has such policies when it has so little regard to them.
- The Council is developing a comprehensive strategy for Broadmead. Current applicaitons should conform to existing planning policies until the Council adopts a

new approach to development. Approval of this planning application would cut across this emerging strategy.

- Lastly, improvements to the public realm could be achieved with a much more modest scheme, one which respected neighbouring properties and complemented rather than dominated this part of Broadmead. We urge committee to reject this application.



23/04490/F - (Former Debenhams & Building To West) 33-47 (odds) The Horsefair, 6-10 (consec) The Haymarket, St James Barton & 29 - 31 (odds) The Horsefair Bristol BS1 3JE

23rd April 2024

Public Forum Statement

The Kingsdown Conservation Group urge the committee to refuse this application.

Councillors are facing a choice that could set the course that redevelopment of the centre of Bristol will take. While the Premier Inn site was a different issue, there already being a tall building on the site, this application could set a precedent that will be hard to resist.

But is it right to allow Bristol to be engulfed in tall buildings even though we know that tall buildings are so disproportionately unsustainable, despite Bristol having declared a climate emergency? Is it right to expect people to live at such high densities, more than twice the recommended maximum for housing, or to make them live in homes that will never see sunlight and with so little outside space? Do we want to lose the wonderful free views across the city, a special feature of Bristol, or to diminish the setting of our many historic buildings and our Conservation Areas?

The answer is surely "No". But it isn't inevitable. High density housing is possible without building tower blocks. Look at Finzal's Reach, Wapping Wharf and Clifton. The problem appears to be the obsession with recreating Barr's Street which we, together with Historic England and others, consider to be of questionable benefit. The case officer seems to consider its creation overrides all other concerns. But is it really a good idea? With the Horsefair due to be pedestrianised Broadmead will become one of the few areas in Bristol free traffic, so why open it up to one of the noisiest and polluted roads in the city? Certainly the new Barr's Street would be an unlikely place to want to "play". Nor in reality will it link with Stokes Croft, the issue of a rather large roundabout between the two seems to have been overlooked! The loss of Barr's Street would result in a considerable gain to the scheme, with the tall element no longer necessary (although we still believe the density to be too high).

If we want our city to be fit for the 21st century we need to abandon an outdated and discredited building form and look to more creative mid-height solutions. Compare the lively character of Finzal's Reach with that of Nelson Street, which despite recent planning efforts remains a place of no character. We need to create beautiful places where people want to live, work and spend their leisure time. Sadly the direction that redevelopment of the centre appears to be taking makes that seem very unlikely. But that direction could be changed.

I am pleased to see that the public realm elements of the design are in keeping with the Broadmead Redevelopment Plan, opening up historic routes and the vista towards Castle Park. Housing is an important usage of Broadmead, but we must ensure we use the planning processes of our city to deliver the housing that our city requires. We need sustainable development on this site, with a mixed and non-transient population. That means units that provide accommodation to the wide range of people who live in the city centre, affordable and with the community infrastructure we require to live such as medical surgeries and affordable, healthy food provision. I echo the concerns regarding a lack of community infrastructure provision, the nearby doctors surgery is on the site of the soon to be redeveloped Galleries building. I share the many concerns about the height and density of the proposed building, and the poor visual design. If we are to have tall and imposing buildings, it would be preferable for them to have architectural merit. I would argue that this development does not answer the need of our city now or in the future, and should be reconsidered.

Cllr Ani Stafford-Townsend (them/they)

Green Party Councillor for Central Ward, Bristol
Green Co-Shadow Cabinet Member for Culture, Communities, Equalities & Public Health
Committee Chair for Development Committee B

C\

To: Development Control Committee A
democratic.services@bristol.gov.uk

From: Stephen Dawes,

Regarding: Application no. 22/06085/F

Date: April 15th, 2024

I strongly object to the proposed development in its current form (Application no. 22/06085/F) and **I wish to request to speak please at the upcoming planning meeting on 24 April 24**. As a long-term Bedminster resident, I'm deeply concerned about the project's negative impact on our community and its misalignment with the Bedminster Green Framework.

Bristol's Housing Crisis: Bristol's housing crisis is undeniable, with average house prices rising 50% in the last decade while wages increased only 20%. It's imperative that we build more homes that people can afford to buy. The Bedminster Green Framework emphasises "a range of new homes, in a mix of affordable housing, private rented homes, homes for sale, and student accommodation." Prioritising even more student development, while developments like Plot 4 offer only expensive rental only options, ignores the Framework's commitment to affordability and offering homes to buy. We have 5-6 large blocks currently under construction, however none of them are available to buy.

Overconcentration of Students: The 1000+ student units already under construction on Plot 3, coupled with this proposed development, creates an unsustainable overconcentration of students in a very small area. This influx of transient residents will alter the character of Bedminster and risks straining essential resources like parking and public services.

Building Community: The Bedminster Green Framework envisions "a revitalised local economy...by bringing new people to the area." However, student and rental-only housing undermine the goal of building a stable, invested community. Homeownership fosters a sense of belonging and encourages long-term contributions to the neighbourhood, which Bedminster deserves.

Conclusion: I urge the committee to reject this proposal as it currently stands. The Bedminster Green Framework calls for diverse housing options to create a

truly revitalised community. This plot represents a crucial opportunity to provide desperately needed homes that people can actually purchase. Prioritising homeownership fosters a deep, meaningful sense of community in Bedminster, contributing to the long-term, sustainable future the Framework envisions.

C2

To Whom it May Concern

This is my statement for the meeting on 24th April. I cannot attend in person because I work. I work during the day and these meetings are always held during the day. But, I object most strongly to this proposal. I live at 32 Malago Road and am the leaseholder. My bedroom window looks out onto Malago Road. It will look out on whatever you end up building there. Considering every single proposal has been a rule-breaking, regulation breaking monstrosity, I think it's high time you gave up and turned it into a green space. South Bristol is in dire need of more green spaces and more biodiversity. What it does not need and what it does not want is more tower blocs for students. This development will not only impinge on my view and my right to light, it is too high. In fact, you have added more height to it since the last proposal. It will not solve Bristols housing crisis. You are already building enough student accommodation in Bristol as it is, we certainly do not need any more. It will create massive traffic problems for everyone, especially at significant pick up and drop of term times. It is far too high, the gaps between buildings are far too narrow. Not only will it negatively impact daylight access to all the residents on Malago Road, it will impact the night and the nearby residents privacy with artificial light. The lack of active frontage is a concern. The blatant disregard shown by architects and developers is a massive concern. It is a massive 'no' from all the residents of Malago Road and Windmill Hill, including myself. The fact that this has popped up from out of nowhere and appears to be rushing through right before an election is highly suspicious. Don't do it. You have ruined this area enough. Do not ruin it any further. Do not allow this development to be approved. Thank you.

Daniel Fryer

C3

Hello,

I am writing in opposition of the current Watkin Jones proposal for Pring St Hill Site (plot 1- 22/06085/F) at Bedminster Green.

1. The blocks are too high - this will affect light and light pollution.
2. The developers are offering no benefit for the community - please revisit the plans and bring active frontage like shops, restaurants, health centres, cinemas and accessible thoughtfully designed new landscaping along with their investment.
3. Please provide more extensive details for the plans to the community.

I would support a more considered proposal and am in favour of redevelopment of the area in general but the current plan is not good enough.

Regards,
Kenneth Moore

C4

I would like to submit my written Public Forum Statement for 22/06085/F - Former Pring & St Hill (Plot 1) Malago Road Bristol BS3 4JQ as follows:

In regards to the application of the Student Accommodation on Malago Road, I would like to submit my strong objection to the proposal which aims to stack and squeeze an unsupported number of buildings and residents into what is soon to be an overpopulated area.

This development, like those only a few hundred meters down Malago Road, are prioritizing bed spaces for short term residents, at the expense of the local community.

Student accommodation itself is not a negative; rather the lack of balance to residential accommodation, and long term investment to the area. Three more large buildings with a focus on students in an area already facing what has become over development rather than renovation and redevelopment feels like an exploitation of the area to maximize rent with support to local infrastructure an afterthought.

Environmentally, the three buildings of 6 to 10 stories, or 484 bedspaces, will have a significantly negative impact on wildlife, natural light, and air quality while offering no benefit to the current residents and the proposed future residents.

This proposal needs significant revision and reduction in scope in order to keep the area a home to residents who call it that, both for the long and short term.

-Albert Testani

C5

Dear Sir/Madam,

I would like to submit a statement for the above Planning Application on the Pring site at Bedminster Green.

Here it is:

I was horrified to read the latest planning application for the Pring site, have we not got enough highrise buildings for students already? I thought there was a shortage of local homes for families, have they been forgotten? Are we having any new doctors surgeries, or enough dental practices? There is already a shortage here. And can the Developers help with funding this please as they will be the main beneficiaries? Please can the Planners look at this again and have another think?

Thank you and best wishes,

Dorothy Withey

C6

Dear Sir/Madam,

I would like to submit a Statement for the Planning Application on the Pring site at Bedminster Green.

Here it is:

While accepting the need to develop city sites, it is in the hope of addressing the national shortage of affordable homes and improving and enhancing an area. It is not to erect highrise monoblocks for one demographic only, who are already well catered for. It is not to create an urban ghetto which will not improve the lives of those who are briefly living there, or those who live nearby on a more permanent basis.

This is an opportunity for those involved to rise to the challenge and build something for posterity that Bristol City can be proud of.

This is a grim development. The blocks proposed are too high, too close together and show scant regard for both the families living a mere roads width away, and for the surrounding area. The doctors' surgeries and dental practices are already overpressed. We can do better!

Thank you and best wishes,
Anne Chadney

This new application for planning, does not actually rectify any of the previous reasons for its refusal.

The overheating report submitted on the 5th March 2024 still states that most, if not all the rooms in the buildings will be subjected to possible overheating, that the windows in some cases are fixed , and not adequate to ensure lifesaving ventilation.

As well as the lack of ventilation, we also see no change in the energy brief and the architects have designed into the buildings Gas and Biogas boilers as well as Combined Heat and Power systems, in fact 60% of the energy being supplied to these 486 student units will be provided with outdated methods of energy supply, not making the building sustainable or future proof. Only 40% will come from a Water Source Heat Pump.

This new application for planning is a waste of our time because the new design does not address the concerns and reasons for refusal previously, so why should the committee grant approval now!

Cllr Lisa Stone

C8

To the Planning Committee

For PA 22/06085/F - the proposal to build student accommodation on the old Pring and St Hill site on Malago Rd.

I would like to make the following statement, objecting to the planning proposal.
I would also like to attend and speak at the planning committee meeting, and will try to get there after work. I don't have an option on not working on Wednesday.

This planning application should be refused for the same reason that earlier planning applications were refused – the height, scale and massing would harm the character and appearance of the area and be unacceptable in design terms. The Planning Inspector refused a similar application a couple of years ago for these very reasons, saying it would create an oppressive wall of development. This application is no better, in fact it is higher. The size of the giant blocks means there are only narrow gaps between. The PI gave this judgement, and refusal for permission, so that a very different and much more suitable design could come forward. This application has just tinkered round the edges and remains in essence exactly what was refused before, but taller.

The height of this proposal would almost completely obliterate views to and from Windmill Hill, hiding the very hill from people in Bedminster, unless they stand directly opposite one of the 2 gaps between the large blocks. It will mask the topography of Windmill Hill from the rest of the city, in direct contravention of the SPD on urban living. The blocks would cast shade over houses and flats opposite on Malago Rd and restrict light from existing residents homes. Roof gardens will overlook neighbours to the north and south and create noise and lighting issues, possibly late into the night due to the demographic of the students intended to live there. Privacy issues will abound, both into and out of these student units, with the single aspect rooms and their floor to ceiling windows, creating constant overlooking to houses behind and flats in front of the blocks. The tallest block will be as tall as the hill itself. Quite inappropriate.

The light and noise created by all the windows and the roof gardens, after dark, will affect the protected bat species that use the railway line as an important corridor from roosts to feeding grounds. Some of these bats are known to be very light averse, and it is really important that in depth surveys are done to make sure any lighting proposals after dark will not compromise this vital bat route. Bristol is supposed to be working towards increasing and protecting its biodiversity, not allowing new builds that may directly harm protected species.

The proposal seems to indicate that windows will be fixed shut to the rear of the buildings. Not ideal for students, or for anybody, and not helping with wellbeing and mental health issues. Also, will need mechanical ventilation, another ongoing cost. Good to see that some of the energy will be supplied by a water source heat pump, but the rest of the energy looks like it will not be sustainably sourced.

We would need a guarantee that student cars will not be parked on the local, already overcrowded, streets. No plan is given here, other than a claim that students will not have cars.

And finally, why are so many more students planned to come and live at Bedminster Green? The Framework for BG, states that 1000 students would be plenty for this area. There are already going to be over 800 living in the other block being built by this company, so almost 500 here takes us way over the suggested limit. How will the students assimilate into the local community? And what will the development offer to the local community? There seems to be no Active Frontage here or other community facilities. No offer to help support more doctors surgeries locally or improve the local station or park. The application seems to be all about using our existing facilities (local park, local station, good bus routes) and giving little back in return. All for financial gain for the developer. We would like to hear what is being given back in return, what this development will offer to the community. The proposal offers no housing for much needed local community so it needs to offer something else really useful to the existing neighbourhood.

Very disappointing. After the PIs very clear comments when an earlier proposal was refused, I hoped for something different and much better this time.

Thank you.

Helen Adshead

C9

Hi, I wish to submit a statement for the committee meeting on Wednesday 24 April at 2pm at City Hall, which is as follows:

I am a resident of Windmill Hill and have already registered an objection to the proposed development of this plot on numerous grounds. The current proposal will have an overbearing and detrimental effect on the character and appearance of the area, and has not fully taken into consideration the feedback from the A2Dominion application which was declined, and nor does it address the concerns of those in the local community.

The proposed blocks appear as one substantial building and such intensity of development would adversely affect the important low rise qualities of the surrounding area. The proposal doesn't take into account the imminent high-density developments of flats in other parts of the huge 'Bedminster Green' development i.e that there already are enough high rise developments and given the close proximity to Bedminster town centre and residential area, a lower density and height should be considered.

Why is Watkins Jones going over the agreed number of student accommodation which was 1300. With 819 already built and 40 more nearby, there is only requirement for an additional max 440 which would mean the buildings could be lower height, less imposing and more in keeping with the area. This is not a university campus (the nearest campus is both miles and TempleMeads Campus is years away). The regeneration of Bedminster Green requires a greater mix of people and housing not just student accommodation and endless apartments.

There should also be consideration for the impact of lack of daylight on Malago residents, the increased noise and light pollution for all in the vicinity, as well as the limited parking, impacting nearby areas which are already over capacity. We are not adverse to development in the area, however it should be well considered, in keeping with area and with better consideration for those already living and contributing to the Bedminster community.

Victoria Cole

C10

Statement for planning application no. 22/06085/F by Dr. Charlotte Cameron-Beaumont

I would like to comment on four aspects of this development:

1. Light spill affecting the rare bats which are known to use the railway line and river as commuting routes between roosts and feeding grounds

The following two bat surveys are relevant to the Pring and St Hill site, due to the fact that the railway line and the River Malago run alongside the site:

- *Victoria Park, West Site. Bat Acoustic Surveys and Examination of Lesser Horseshoe Bat Activity*, undertaken by Wild Service, November 2016
- *Ashton Park environmental assessment (Section 6: Bats)*, undertaken by Baker Shepherd Gillespie, 2009

These documents both show that Lesser Horseshoe bats, Bechstein's bats and Brown Long-Eared bats are known to use the railway line as a commuting route between roosts and feeding grounds, along with other species including Serotine, Noctule, Leisler's, Common pipistrelle and Soprano pipistrelle, and possibly other Myotis species. The first three species are rare, in particular the Lesser Horseshoe bat, which is a Priority Species under the UK Biodiversity Action Plan.

In fact, more than eight species of bats are known to use both the railway line and the river as commuting and foraging routes. The railway line and the river run immediately alongside the development plot, just metres away from the prospective buildings. A portion of the River Malago is actually contained within the site boundary.

The Bat Conservation Trust guidance note states that "*Artificial light can cause a flight path to be severed, and thus disrupt the populations*". Lesser Horseshoe bats have been shown to move their flight paths which link their roosts and foraging grounds to avoid artificial light installed on the usual commuting route. Severing a key flight path, even at some distance from the roost, can cause desertion of the roost. Indeed, in the city, a severing of a major commuting route would leave the bats with no other commuting route option.

Lighting which causes disturbance and potential abandonment of a roost can constitute an offence (Information taken from Bat Conservation Trust guidance note "Bats and Artificial Lighting in the UK"). It is currently illegal to cause disturbance that affects populations of bats, under the Wildlife and Countryside Act 1981 (as amended).

Lesser Horseshoe bats, along with Bechstein's and Brown Long-Eared bats, are known to be extremely light-adverse, **and, therefore the Bat Conservation Trust recommend that commuting routes for these species should not be lit at all, and recommends dark buffer zones to be used around key bat habitats.** (Information taken from Bat Conservation Trust guidance note "*Bats and Artificial Lighting in the UK*"). The Lesser Horseshoe bat in particular is very rare and a Priority Species under the UK Biodiversity Action Plan.

We know from the two documents listed above that there are Lesser Horseshoe roosts in the vicinity of the railway line which are considered of regional and potentially national importance. I have not included the locations here because this is supposed to be protected information. However it is all in the two documents listed above. **All of these roosts are known to use the railway line as a commuting route between maternity roosts and feeding grounds. The River Malago is also known**

to be a commuting route and an area to forage. In the city, commuting routes such as these are particularly important to connect disparate foraging areas, because in a city there are few options for bats, which need dark routes and areas through which to commute and forage. If these routes are severed by light then there are no other green corridors for the bats to use.

The survey carried out by Wild Service in 2016 (the consultancy arm of the Wildlife Trusts) states that the railway line provides a linear linkage for bats from the River Avon to Bedminster Down and beyond. It further recommends “the creation of a dark corridor along the railway line”.

The Bat Conservation Trust guidance note informs us that any light at all will have an adverse effect on these species of bats, as apparently the average light level on hedgerows most regularly used by Lesser Horseshoe bats has been recorded at 0.45 lux, and it goes on to state that **“a no-lighting approach should be taken on foraging or commuting habitat of rare species such as Bechstein’s bats and horseshoe bats”.**

Given the fact that this is a commuting route used by a nationally important Lesser Horseshoe maternity roost, surely it is crucially important that we do not underestimate the importance of darkness on the railway and river?

I am also concerned about the light from student’s windows. Students’ tendency to be up all night working could considerably increase the amounts of light falling on the river and in the flying space above it. The document from the Bat Conservation Trust specifically says *“sources of lighting which can disturb bats are not limited to roadside or external security lighting, but can also include light spill via windows. Additionally, glare may affect bats over a greater distance than the target area directly illuminated by the luminaire and must also be considered on your site”.*

According to the Bat Conservation Trust guidance, a visualisation of the effects of illumination at the various heights at which different bat species fly is important. This seems relevant given the fact that light will be coming down from student’s windows 9 , or even 12, storeys high.

I also feel this is of ongoing planning consideration as further development is expected all along Whitehouse Lane, some of which also backs onto the railway line.

2. Character and appearance of surrounding area

A development on this site has already been rejected both by the local councillors and by the national Planning Inspectorate.

This new application has the same qualities as the old; therefore the inditement by the planning inspector that a high and dense development on this site would harm the character and appearance of the area is as relevant for this application as for the last. Details below:

Jonathan Parsons, the Planning Inspector of the Planning Inspectorate ruled that the previously submitted plans for this plot of land were not to be built. He had only two reasons to rule against these applications, one of which was because of the “harm to the character and appearance of the area”; I quote below from his report:

- *“there would be harm to the character and appearance of the area in conflict with the CS and SADMP policies” (see paragraph 48).*
- *“each proposal would not be high quality urban design due to the abrupt and dominating adverse impact of the blocks which would harm the character and appearance of the area. The benefit of the public realm provision would not overcome the considerable*

adverse impact of the blocks. Accordingly, the proposals would conflict with Policy BCS21 of the CS and Policies DM26, DM27 and DM29 of the SADMP. There would be additional conflict with DM28 of the SADMP.” (See paragraph 33).

- *“there would be harm to the character and appearance of the area in general, which the Conservation Area would be part of” (see paragraph 46)*
- Note that he says this is all relevant **despite other high rise blocks being already given planning permission** (see Paragraph 22 and 23).

I put it to you that this new planning application is not of any material difference to these two previous applications in that it will also cause “harm to the character and appearance of the area”.

He talks about the harm which would be bestowed in some depth: *“The blocks appear as one substantial building”* and, *“Such intensity of development would adversely affect the important low rise qualities of the surrounding area”*. He goes on to say that *“The developments would not function well, add to the overall quality of the area, be sympathetic to local character, including the surrounding built environment . . . Consequently, the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits.”* (paragraph 45). Furthermore, he says in paragraph 46 that: *“There would be harm to the character and appearance of the area in general, (which the Conservation Area would be part of). There are historic and architectural qualities to the Conservation Area, notably its low-lying residential character and appearance, that contribute positively to it. ”*

Do YOU think his comments still apply to this new application?

The fact that this application meets the floor parameters of the Bedminster Green Framework does not mean that permission should be given. The Inspector says: *“These parameters [in the Bedminster Green Framework] are indicative only and have not been subject to testing through proposal led design process. Assessing high quality design involves the assessment of considerations other than floor levels only. Therefore the parameter guidance of is of limited relevance to the assessment of the appeal proposals.”* (Paragraph 30).

I would ask councillors to take a look at Mr. Parson’s paragraphs 21-30 & 33 , entitled ‘Character and Appearance’, which explain why he considers the applications would cause harm to the character and appearance of the area, and which reference the relevant policies; in order that you can decide for yourselves whether his comments could also apply to this new application.

I have copied these paragraphs below for those who may find it difficult to locate the said report from Mr. Parsons and the Planning Inspectorate. (For those who would like to find the original document, it can be found on the planning portal under the documents for application 19/05740/F where it says “Appeal Dismissed”).

Relevant Paragraphs 21-30, 33 from Mr. Parson’s (Planning Inspectorate) report.

21 Parts of the site’s context are fragmented and in mixed-use, with variation in scale provided by tall buildings, differing building designs, irregular patterns of development and valley-type topography. However, the residential areas, notably the Malago Road apartments, the terraces along St John’s Road and Church Lane, and at Windmill Hill dominate due to their built coverage in the immediate area. They have an attractive low-level scale and domestic character and the Malago Road industrial and commercial units, although in a different use, do not detract from this due to their small scale and smaller extent. Despite the embankment and green open space, the Windmill Hill residential area is part of this by reason of its significant extent and visibility

from Malago Road and its immediate vicinity.

22. Further high density development will take place within Bedminster. There are proposals for the redevelopment of BGF Plots 2, 3, 4 and 4B where planning permissions have been granted or have resolutions to permit. Upon completion of legal agreements, the Little Paradise Street Plot 4 planning permission would have a tall building with a stepped storey level from 8 to 16 storeys. Under the BGF, the adjacent Plot 5 has the same floor parameters as the appeal plot with the exception of a taller building in its far northern part.

23. Nevertheless, these plots are in closer proximity to Bedminster Town Centre and the residential areas, contributing to the low-rise context of the appeal site, would be unlikely to be developed at a significantly higher density. Unlike Appeal Decisions APP/Z0116/W/19/3242232 & APP/Z0116/20/3249159 <https://www.gov.uk/planning-inspectorate> 5

the BGF sites, firm proposals and detailed guidance to redevelop the Malago Road industrial and commercial units at high density have not been advanced.

24. Within this context, the appellant's Public Realm Diagram¹ shows separation between the Malago Road blocks and the apartments opposite to narrow from 43m to 33m. Within the narrowing section of gap, the Appeal A blocks A/B and C/D would be 10 storeys (primary façade) and 8 storeys (linking façade).

Despite setbacks and varied facing materials, this would result in combined façades of extensive width, height and massing. The setback for the linking façade for blocks C/D would be limited for a building of this scale and height, and blocks A/B higher storey primary façade would be uncomfortably close at approximately 26m in relation to the apartments. Although designed as a landmark building, these blocks would appear particularly overbearing within the street because of their cramped relationship with the new footway due to limited areas of intervening landscaping/amenity areas. Such intensity of development would adversely affect the important low-rise qualities of the surrounding area.

25. Block G's siting would lie directly adjacent to another plot within the BGF. Nevertheless, this block would markedly stand out above the lower scale of neighbouring development because of its 10 and 12 block storey scale and height, massing due to its combined elements and width, and its siting so close to a footway along an extensive stretch of road. For all these reasons, the Appeal A proposal would give rise to an abrupt and overly dominating built development unsympathetic to the low-rise domestic appearance and character of the area.

26. In Appeal B, blocks A/B and C/D would be 9 storeys (primary façade) and 7 storeys (linking façade) within the narrowing gap but despite setbacks, the combined façades would still be of extensive width, height and massing. Given the building's scale and height, the linking façade setback for blocks C/D would also be limited and blocks A/B higher storey primary façade would be uncomfortably close to the apartments opposite. Furthermore, these blocks would appear particularly overbearing within the street due to their cramped footway relationship, despite a smaller footprint compared to Appeal A.

27. The 8 and 9 storey block G would markedly stand out above the lower scale of neighbouring development because of its storey scale and height, massing due to its combined elements and width, and its siting close to a footway over an extensive road stretch. For all these reasons, the Appeal B proposal would give rise to an abrupt and overly dominating built development unsympathetic to the low-rise domestic appearance and character of the area.

28. For each proposal, the Townscape and Visual Assessments (TVA)² indicated the schemes would have moderate beneficial effects on townscape character, including the adjacent BCA and Windmill Hill neighbourhood, and appearance (visual) including from viewpoints on Windmill Hill, Malago Road, St John's Churchyard and Bedminster Station. However, my findings indicate that it downplays the value and sensitivity of the character and view receptors, and importantly, the magnitude of change.

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

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

Appeal Decisions APP/Z0116/W/19/3242232 & APP/Z0116/20/3249159 <https://www.gov.uk/planning-inspectorate> 6

29. In both appeal proposals, the shaded photograph montages show the blocks' height, scale and massing would be substantial relative to their surroundings, even after having regard to development floor parameters on the adjacent BGF

plot. There would be gaps between the blocks and the gap between blocks E/F and G would ensure a view to Windmill Hill and with future development, it would be inevitable the existing views of Windmill Hill would change. Nevertheless, the gaps between the Malago Road blocks would appear relatively small given they form only a minor proportion of the built coverage on this part of the site. In TVA views from Malago Road, St John's Churchyard and Windmill Hill (adjacent to the open space), the blocks appear as one substantial building due to the relatively small nature of the gaps and would highlight the incongruous nature of the blocks' massing in both appeals.

30. The BGF 'mid-rise' floor parameters would be exceeded in Appeal A but not in Appeal B. However, these parameters are indicative only and have not been subject to testing through a proposal-led design process. Moreover, assessing high quality design involves the assessment of considerations other than floor levels only. Therefore, the parameter guidance is of limited relevance to the assessment of the appeal proposals.

33. For all these reasons, each proposal would not be high quality urban design due to the abrupt and dominating adverse impact of the blocks which would harm the character and appearance of the area. [] .

Accordingly, the proposals would conflict with Policy BCS21 of the CS and Policies DM26, DM27 and DM29 of the SADMP. In Appeal A, there would be additional conflict with DM28 of the SADMP.

3. A 'wall' of development: Visual elevations are incorrect.

The 'wall' these blocks will create will be higher than Windmill Hill; will stand only metres from the bottom of the hill; and will be as long as half the hill, visually obliterating most of it. The top of Windmill Hill, according to the Ordnance Survey map is 35 m, and the Pring site is 10m above sea level. Therefore the height of Windmill Hill from the Pring site upwards must be 25 m. The height of the Pring building Block B is 42.4 above sea level, and Block C is 41.8 above sea level, so their heights are 7.4m and 6.8m higher than the hill itself . Taking this into account, some of the proposed visual elevations provided by the developer are completely incorrect (see for example PROPOSED SITE ELEVATION (MALAGO ROAD) uploaded on 4th Jan). These show the top of Windmill Hill being seen behind all of the tower blocks, but the reality is that from Bedminster, Southville, and the City Centre, most of Windmill Hill will be visually obliterated; whilst the neighbourhood of Windmill Hill will directly face a wall higher than the hill itself, and not many metres away either.

4. If councillors and planning officers consider that less people have commented on this proposal than the other Bedminster Green applications, they might like to consider that these numerous applications, revised applications, and appeals on the many Bedminster Green development sites have been going on for over 7 years now. Whatever the community writes and speaks is largely ignored. 'Community consultation' responses are also ignored, and appear to be mere tick box exercises. As a result, many people have given up bothering to give an opinion. Is that what you want?

Statement submitted by Dr. Charlotte Cameron-Beaumont, 37 Somerset Terrace, BS3 4LJ

Application number 22/06085/F Pring St Hill Site (Plot 1) Bedminster

Statement from Claire Barnard, Neighbour.

It makes me despair that the developers have the gall to add more height to this development after so many objections were put in about the size and massing of the project. It really does feel like no one who has any power really cares what local people think, feel or experience.

A lot of money, time and effort has been put in to assess the effect of the proposed buildings on how much light will be reduced in the homes of the people living on Malago Road. It has been decided that the reduction is acceptable but 30% sounds like a lot to me. It's not just windows receiving light it's people. It will surely affect resident's health. Also no consideration seems to have been given to the way that these tall buildings will block evening sunlight onto Windmill Hill.

Of course there are other considerations, which many people have raised such as no infrastructure or services to cater for the influx of so many more people. Traffic and parking will no doubt be an issue.

This development does nothing to add to our environment or community. It's not going to make it a better place to live. The developers are will take the money and leave and we will be left with these awful concrete blocks. "Bedminster Grey" indeed!

1. The proposed development is too high. 10 storeys would block evening sunlight to the houses on Windmill Hill as well as overshadow them. My garden would be affected. It would be even worse for properties on Malago Road. 3 or 4 storeys would be plenty. The blocks may not appear "overly dominant" from surrounding areas but they will nearby.

There is a development behind Temple Meads where you can hear the wind whistle and howl between the buildings. Such tall structures with narrow gaps between them would create the same effect.

2. The design is ugly and unimaginative. It lends nothing to the local area.

3. Roof top gardens would impinge on the privacy of neighbours and it is likely that there would be a lot of noise.

4. This land should be used for building homes for local people. We have a major homelessness issue in this city. There are already a lot of units being made available for students in this area.

5. It is unlikely that the students would come without cars. There is no room for more cars either on Windmill Hill or in the proposed development.

6. Artificial light at night affects wildlife and this would impact on the Malago and surrounding areas.

C12

To whom it may concern. The facade was already too high and overbearing given the proximity to Malago Road... and in this most recent proposal they have increased it.

7% of students are registered disabled and the qualifying criteria for blue badge. Car parking permits was recently expanded to include non-visible disabilities, so it is reasonable to expect that the site will require significantly more parking if only to avoid disadvantaging those students, (and irrespective of the other 450+, many of whom will have vehicles). Also though... The other 450+, many of whom will have vehicles!

There are not nearly enough spaces for students in doctor's surgeries nearby, many of whom (e.g. Bridge View Medical) are only open for around 1 hour each morning at 8:30 for new appointments. This is without another thousand+ (800+400+400) students being added to their registers, so how will they all be registered to local doctors? There are no spaces! It's even worse for dentistry.

The narrow gaps between the blocks will create wind tunnels - just as the buildings currently going up have done.

A final point:

Student wellbeing had been shown to be impacted severely when there is overcrowding. This is not the same situation as living in halls, where there is crowding but also some element of pastoral support. Bristol must provide good places for students to live, if these were substantially smaller, better equipped and better connected then this could be those places. But not this design. Not this scale. Not without any green, any front aesthetic. We can do better.

Hi, I would like to oppose this design on discriminatory grounds as well as planning and aesthetic ones.

7% of students are registered disabled and the qualifying criteria for blue badge. Car parking permits was recently expanded to include non-visible disabilities, so it is reasonable to expect that the site will require significantly more parking if only to avoid disadvantaging those students, (and irrespective of the other 450+, many of whom will have vehicles).

There are not nearly enough spaces for students in doctor's surgeries nearby, many of whom (e.g. Bridge View Medical) are only open for around 1 hour each morning at 8:30 for new appointments. This is without another thousand+ (800+400+400) students being added to their registers, so how will they all be registered to local doctors? There are no spaces! It's even worse for dentistry. This would again be particularly dire for disabled people.

The narrow gaps between the blocks will create wind tunnels - just as the buildings currently going up have done.

A final point:

Student wellbeing had been shown to be impacted severely when there is overcrowding. This is not the same situation as living in halls, where there is crowding but also some element of pastoral support. Bristol must provide good places for students to live, if these were substantially smaller, better equipped and better connected then this could be those places. But not this design. Not this scale. Not without any green, any front aesthetic. We can do better.

Katie Yeo,

I am concerned that there are acknowledged issues with this design that contravene planning guidance, a few examples include:

The scheme is tall enough that it will mask the existing topography of Bristol, namely Windmill Hill which contravenes the guidance in the SPD on Urban Living.

2 of the three buildings are 10 storeys high which is above what is set out in the Bedminster Green Framework, to the detriment of the neighbours living directly to the north.

The previous applications were refused on the grounds that the height scale and massing of the scheme, should not be increased to the detriment of the development's relationship back to the existing community, (outlined in the Bedminster Green Framework), the revised scheme has increased height and exaggerated the difference between itself and the existing context (not the transition between neighbourhood described in the framework). The revisions have ignored the previous planning concerns and the agreed framework.

The overheating report says the scheme fails against the 2050 and 2080 projections; the officer's report says that it is being 'looked at' but no solution is provided. The design should be compliant now, not approved knowing it falls short of the need and will have to be adapted in the future. This is against the core context of Bristol City Council's climate change policy, which says that:

4.13.3 Bristol City Council is committed, through the Core Cities Climate Change Declaration and the Climate Change Act 2008, to an 80% reduction in CO₂ emissions by 2050. Mitigating and adapting to climate change is therefore an overarching principle of the Core Strategy.

Current Bristol Planning Policy BCS13 says that:

Development should avoid adapting to the impacts of climate change in ways that would increase the city's CO₂ emissions, such as by the widespread use of mechanical ventilation.

This design contravenes this because 2 of the 3 blocks will have mechanical ventilation in every bedroom (paragraph 8.3 of the overheating study), this does not seem compliant.

The scheme proposes to use gas and biomass for 60% of the heating for its development both produce CO₂ from combustion, and should not be used lightly in a city with a plan to become net zero by 2050, or more locally in an Air Quality Management Area. Lower energy design solutions are possible which would not require such a large amount of on-site fossil fuel consumption.

If this scheme is approved it sets a precedent that says local policy guidance, context and climate change concerns can be ignored.

Andrew Kemp, St John's Lane, Bristol.

C14

Height and Density Statement,

I object to this proposal on the basis that the height and massing are unacceptable; two previous appeals have been refused for this site, which were 10 and 8 stories, and 9 and 7 stories tall, with a similar massing. The height and density of this design has not improved from the original that has already been refused. Hence this is clearly a waste of our time, when the Inspector refused the appeal it would have been reasonable to expect much lower buildings, but because of the need to design in a second staircase due to the change in legislation, there has actually been an increase in height to mitigate against the loss of space.

It is unbelievable to see this new design bought back to the planning committee with no nothing other than a token effort to address the reasons for refusal and unsuccessful appeal of the original . And I quote from the inspectorate, "This unbearable height and density will achieve an oppressive wall of development". There will be cumulative impact as well, due to the intensity of development along this corridor.

I would like to invite the committee to at least defer this application so they can come on a site visit to see for themselves the emerging look and feel of this neighbourhood now we have a number of developments being constructed. It would be interesting for the committee to hear first-hand from a Council Urban Design officer, rather than comments that will no doubt have been filtered through the system.

The design is in contravention with policies in DM26-29 which states that developments should contribute to the character and form of the neighbourhood; these buildings do not achieve this and the Inspector's findings of the height and massing being out of character remain pertinent to this application. The report seems to be carefully worded to state that the bulk will appear reduced from a particular viewpoint only. I do not agree that the layout and form will successfully be integrated in their urban context.

Not only is this design physically appalling, so is the purpose. Building yet again for student accommodation will meet the maximum allowed student units in this small area. When the Local Plan makes provision for them, surely this is on the basis that they should be dispersed across more sites in Bedminster/Southville. This in itself should cause this committee to refuse the applications and send it back to the planning officers with a list of achievable commitments the developer can and should apply.

I am pleased to see the commitment to managing parking through a S106 and would like to see this carried forward into new more acceptable proposals.

Councillor Ed Plowden

Councillor for Windmill Hill

This Message Is from an External Sender

This message came from outside Bristol City Council, think before opening attachments or clicking links

I am writing to voice my concerns about the above application.

My concerns are:

- 1) The size of the blocks with only narrow gaps between them.
- 2) Only 3 parking spaces for nearly 500 students
- 3) The impact of artificial light on the Malago at night
- 4) Lack of active frontage along Malago Road
- 5) Overshadows the flats opposite

My biggest concern however is that I've heard that the NHS is looking to register all the new students at local practices initially until better longer term options are found.

Lucy Sansom Piano Teacher

C16

Hello,

As per my previous comments, I would like to share several concerns relating to this planning application.

Bedminster Green is a very important green space for local residents and others walking from further out into town. This has both physical and mental benefits. It is an important green corridor for wildlife which should be maintained, following Bristol's nature ambitions. It is also Important Open Space protected from development by DM17.

Major concerns include:

Biodiversity loss - tree loss, other flora and fauna loss, pollution (soil, air, water)

Density of population - infrastructure strain (eg NHS services, parking)

Height of buildings - blocking light, vista

Moreover, this is in the context of large amount of new housing development taking place in this area which will already be putting strains on resources (such as those indicated above).

At the very least, this proposal should be delayed so impact of developments can be seen allowing consideration of future context. Please restore faith in the Bristol political context and planning process by acting upon the concerns of residents.

If you have any questions please let me know.

Best wishes,

Tilia Astell

I am strongly object to the proposed development Application No. 22/06085/F as detailed below:

Purpose Built Student Accommodation is a new phenomenon in South Bristol, and residents are finding it hard to understand how it contributes to the city, and the housing supply?

We estimate that there are 1393 student beds in three different blocks within a mile of each other. I am concerned that 65% of the students will leave halls in their second year, and outbid local families for private accommodation. We received this data from Watkins Jones, the developer that only 35% of students stay in halls for Year 2.

I am shocked that an application originally turned down by council planners, and the national inspectorate who described the design as over bearing, effectively dominating the Malago Road has come back with similar height, increased accommodation and the layering of the blocks does nothing to reduce a heavily dominant design and has reduced the space between each block reducing views into and out of Windmill Hill.

This design will badly impact on the Malago Road Apartments opposite effecting their sun light and privacy.

In concluetion I consider that the scheme as designed does not balance the increased density for the area, with the requirements for liveability as outlined in the Urban Living SPD. The development will create an almost solid wall and mask views to and from Windmill Hill.

Councillor Tessa Fitzjohn Bedminster

Please note I will be attending the meeting and I wish to speak at the meeting.

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Statement re planning application 22/06085/F (Malago Rd)

- This is not part of a masterplan for regeneration, as it is purely high rise, high density, homogenous students digs; adding to the 100's of flats built and due to be built.
- It is not in keeping with other low-rise, mixed-use regeneration schemes – e.g. Whapping Wharf, which considers streetscape, people and their quality of life.
- The developments are unnecessarily high with narrow gaps between blocks. So, overshadowing nearby residents.
- It will add to significant congestion, pollution, and parking difficulties in the area.
- It will add significant disruption and light pollution to the Malago wildlife corridor.
- This is not mixed-use development and there will be no active street frontage.
- There is no regard for increased pressure on local services.
- A true masterplan should be more imaginative, inspired and would listen to the local community.

Tom Brynolf

C19

Statement for Plot 1 Ref 22/06085/F

I object to the current planning proposal for Pring and St Hill Street site. Here are a few of my reasons.

a. The River Malago walk and St John's Churchyard and the Bedminster Green are all currently Important Open Spaces within the existing Local Plan 2014 and acknowledged to be important for local wildlife and together with the railway embankment they provide a dark and safe corridor for bats to travel. The height and light emissions and the noise from these proposed buildings will have an adverse impact on wildlife in the Malago and related areas. The buildings are too dense and too high. The applicants' own ecological survey says at one point:

Increased lighting levels associated with the development threaten the site's value for foraging bats and could sever potential flight lines

If there are outdoor roof space gardens with light and noise at night these will surely threaten bat flight lines.

b. I am not aware there has been a recent detailed riverine survey by the developer to consider as a baseline what wildlife and riverine species there are currently in the Malago and how it may be impacted by this or other developments – there is not only the issue of noise and light but also sewage outflow and contamination from the metals etc remaining in the ground from past use. A recent standard riverfly survey of the river in February 2024 undertaken by experienced volunteers revealed levels of fish currently sufficient to sustain kingfishers but a need to clean the river carefully. You cannot know what biodiversity loss or gain there will be without accurate measurements of existing species before development.

c. From a human perspective, at a time of increasingly uncertain weather and high temperatures the proposed development seems too dense and too high. South Bristol needs good quality, truly affordable, housing for a diverse group of people including families to form a community and so this does not appear to be a solution to the housing problems so many people are facing.

d. It is not clear there is a sufficient community infrastructure to support the influx of so many people including GPs etc.

Angela Truell

Five reasons for councillors to approve our plans for Malago Road

1. Strategic Contribution to Local Infrastructure

- The proposed development on Malago Road includes the gift of 25% of the land to enable crucial strategic highway works. This contribution is vital for completing the transportation infrastructure in the area and addressing long-standing connectivity and traffic flow issues.
- The development's integration with the proposed river restoration scheme and public realm enhancements will significantly improve local environmental and recreational assets.

2. Regeneration of Underutilised Brownfield Site

- The development transforms a long-vacant brownfield site, previously an engineering works foundry, into a vibrant community space.
- This regeneration brings back to use a site that has been idle since 2003, revitalising an area needing investment and development. Thus, an urban eyesore is eliminated, and the site becomes a beneficial asset.

3. High-Quality, Managed Student Housing

- Offering 484 high-quality, purpose-built student homes, the project addresses Bristol's critical need for student accommodation.
- This development helps meet the University of Bristol's housing demands and alleviates pressure on local housing. The project helps preserve the existing residential stock for local families and professionals by providing dedicated student housing.

4. Enhancement of Local Economy and Biodiversity

- The project is expected to boost the local economy by increasing footfall and supporting local businesses, particularly in the East Street area. Furthermore, the design includes substantial green spaces, tree planting, and a bat corridor, promoting biodiversity.
- These elements contribute to the area's ecological health and provide residents and visitors with attractive natural spaces.

5. Shovel-Ready Project with Extensive Planning Engagement

- The development is 'shovel-ready,' with the potential for quick commencement upon planning approval.
- Extensive collaboration with city design teams, planning officers, and statutory consultees has effectively refined the proposals to address previous concerns. The project's readiness and detailed planning show a commitment to timely and efficient development, minimising potential disruption.



Conclusion

- This development on Malago Road offers a well-considered, beneficial addition to the Bedminster Green area, bringing substantial community, economic, and environmental benefits.
- With the planning officer's recommendation for approval and the proposal's alignment with local planning strategies, granting consent is not only appropriate but advantageous for Bristol's continued growth and development.

Ben Wrighton, Head of Planning, Watkin Jones Group.

About Watkin Jones

We are an experienced developer and manager of student accommodation. We have completed six other projects in the City in recent years, with Plot 3 in Bedminster opening in September 2024 , and our scheme at Wilder Street being awarded a Bristol Civic Society Design Award.

Bristol City Council Development Control Committee A – 24th April 2024

Public Forum Statement – Sally Davis, Avison Young

Good Afternoon Members,

The proposals before you today amount to appropriate, sustainable development. The application site comprises previously developed (brownfield) land in a sustainable location within the city centre of Bristol, where land to meet the city's development needs is a finite resource.

As part of the Bedminster Green Framework, this site benefits from policy framework support for mixed-use high density development.

We have worked closely with Officers to carefully address the concerns raised within the previous appeal decisions and engaged with members of the community, and this has resulted in proposals that more closely reflect the aspirations of the Council and the Bedminster community for Bedminster Green. During the course of the application process, we have addressed all technical matters raised through consultation and urge committee members to recognise this work that has resulted in an Officer recommendation to approve.

There are very clear and distinct benefits of the proposals:

- Investment and a coordinated approach to help realise the opportunity to renaturalise the River Malago, to improve flood resilience, manage drainage and flood risk, increase vegetation planting, promote green infrastructure and deliver biodiversity net gain within the area, further helping to achieving long-standing strategic planning aims for the area. We have worked closely with BCC's Regeneration Team to ensure the proposals align with the planned river restoration works and, as part of any planning agreement, the applicant commits to transfer land to BCC to help facilitate the delivery of this strategic green infrastructure.
- Significant investment and improvements to the public realm and streetscape surrounding the application site, promoting a pedestrian and cyclist priority urban environment within this part of the city, and connecting into the Bristol Heat Network, helping to achieving long-standing strategic planning aims for the area as set out in the Bedminster Green Framework;
- We will make important transport contributions towards the provision of Electric Car Club facilities in Bedminster Green, together with cycle lane improvements within the area and in excess of £2 million in contributions to the city's strategic infrastructure via the Community Infrastructure Levy;
- The redevelopment of a prominent site comprising previously developed land within an extremely accessible location in the City which has long been vacant and underutilised; the proposals would realise a high quality redevelopment scheme meeting development needs of the city;
- The delivery of student accommodation will contribute to the City's housing land supply delivering economic and social benefits for the city (based on national planning guidance, the current proposals would make a contribution equivalent to 194 homes towards BCC's housing land supply).

Taking into account the considerable benefits that the scheme would deliver, it is considered that these public benefits significantly and demonstrably outweigh any harm identified with the proposals. All key planning constraints and planning policy considerations have been taken into account in the development of the current scheme. This is an well-considered, policy-compliant scheme. I urge Members to agree with the Officer's recommendation and approve this application.

Planning application no. 22/06085/F

Written statement for committee meeting Wednesday 24th April 2024

The main question is does this development an improvement on the two previous refusals that were also dismissed on appeal? The answer from the local community is a resounding No! The total number of comments is 175, of which nearly all are objections, not 137 as stated in the planning officer's report. About 100 objections have been made in response to this application.

The previous applications were refused because of the width, height and massing of the buildings. The inspector draws attention to the failure of the applicant to take account of the 'low rise domestic character of the area'. It is therefore surprising that the applicant has ignored this by going one storey higher. The report makes several rather disingenuous attempts to gloss over this. For example, they suggest that the detail and architecture would somehow magically mitigate the height, presumably by some form of optical illusion. The report correctly states that the ten-storey Blocks B and C exceed the indicative parameters of the Bedminster Green Framework, but these are then brushed off by the planning officer as of 'limited relevance'. The report goes on to suggest that 'only a modest part of the tenth storey...would project above the horizon'. Again, this is misleading as Block A and B are around 7 metres higher than the Hill itself. The applicant's whole site elevations are also inaccurate and misleading. The Framework was agreed by Bedminster Green developers and the council in response to the serious concerns raised by the local community. It should therefore be upheld by all and not trashed when the parameters don't suit a particular party.

The Sustainable Cities Team draws attention to the problem that up to half the rooms, which are single aspect with unopenable windows, will be subject to overheating (see the overheating study, with rooms listed as FAIL in red). Furthermore, two of the three blocks will have mechanical ventilation. This contravenes Bristol City Council's climate change policy. The building also fails against 2050 and 2080 projections, meaning it is not future proofed. The report then states that 'the development may well be facing these excess temperatures by 2041'. However, climate change is happening so rapidly that it is highly likely that excess temperatures will be experienced much sooner than that. Clearly, we must prepare now for 40C temperatures. The applicants have provided no solution to this problem, probably because they don't have one. With acute climate change already upon us, it is utterly irresponsible to allow this application to go through.

Both the applicant and planning officers fail to make the case that this application is any better than previous ones. Worst of all, they are happy to ride roughshod over

rules and regulations designed to protect all of us. This application should be refused.

Nick Townsend

Good Morning,

I live two streets away and look down not this area and it will be massively impacted by these further tower block. My details are:

Leigh Archer

I wish to make a statement against this planning application.

I strongly object to this proposed development. We already have four 'tower blocks' now up as we speak in a very tight small area of a few hundred metres and surrounding a rare piece of remaining green land. The height, scale and design is just not in any way acceptable to such a small and already massively over developed plot. The original idea for 'The Plan' was 8 storeys max. It's starting to look like the City Of London square mile in Bedminster of all places. The height of all these buildings is horrendous, one is now 16 storeys plus. Combined, they are literally creating a wall and barrier from Windmill Hill, screening Bedminster off from us and not integrating into us at all. It's incredibly ugly and of such a height that the impact on noise and light pollution is too much. Has anyone from the planning committee actually visited Windmill Hill and taken a glance down the hill at the eyesore of 4 tower blocks and how these four new would sit? Bristol and the view into the city is now a distant memory. You may feel differently if you visited and saw the actual impact in real life now and avoid just ticking a box of yet further 'university need', however far away it is from the study area. Bristol used to be a city of worldwide respect and creativity, it's pandering to the greed of the university, which is now a huge business and 60K students, more than 1 in 10 of the population here.

The whole neighbourhood is supportive of the need for new homes (and affordable at that) but why has this tiny plot of land in Bedminster now becoming a 'University Campus' and 'dumping ground' for the university based in another part of this fine city? There is no education facilities anywhere near here and even the Temple Meads new buildings are still years away and not even commenced. 'The Plan' for Bedminster Green in reality and post previous questionable and poor planning decisions, is a barrier of tower blocks and no new homes at all, only one London level priced rental block, how are locals or modest income people and families to stay or even move here to live and work? Lets place very high rental and 2000+ students (paying a premium I'm sure) in less than a 400m sq area, oh and in one of Bristol's poorest postcodes without upscaling any of the local facilities. In fact the application you agreed for the 16 storey block included a 3 storey car park which they cannot afford to build, but they miraculously can fund another block of flats only metres away opposite? Will you hold them to account and force this to be built? Especially given they bought the only existing car park to put one block on!

It really feels like our small area of this neighbourhood has become the only plot for the university's ever growing (business) needs. The irony that it 'meets their requirement of being two miles or less' is questionable and laughable let's be honest. Thanks very much Uni people who don't live here, it's very kind of them to allow 2000+ students to appear here overnight with zero improvement in infrastructure and help at all. There is zero planning for doctors expansion, health support and especially the parking hell these current developments has caused. For 2 years now the main road through Bedminster 'Malago Road' has become a one way only zone and a succession of red-light moving road blocks and pollution, before we even start on the traffic jams and rat-runs through our streets it's created. There is zero measures in place for the parking issues this development would bring and others have brought, the existing car park was sold to allow one block to go on and just where are 2000+ students and another 1000 tenants in the other black parking? It's very very naive to think they will all walk and ride bikes. There is no RPZ as it is, and none planned, and the by product of recent developments has meant our streets are a rally driving

course all day and a parking hell, cars are damaged daily, arguments are frequent, GPS sends all into our streets due to the red light mayhem on Malago Road, hundreds of builders poorly parking to work on these sites and then no new parking at all for any of the existing and now proposed blocks? The developer 'Danadra' has backtracked on building a replacement post planning approval and the existing car park was sold. Our streets will be an evermore squeezed and used as a free car park, if you can even get a space that is. How can 3000+ people be proposed and no parking measures introduced? Crazy...

We need affordable housing and not London level rents and what will now be 2000+ students in such is not how locals hoped this plan would pan out, we all want affordable housing and a buoyant community, several thousand transient students is not it. If I recall correctly this one small plot of over developed student accommodation has exceeded the target for new student digs already city wide has it not? So why does another 1000 need to be added at the bottom of our hill?

Approve affordable housing soon happily and plenty of it at lower height level, homes people can afford and please offer a parking solution, instead of selling off existing ones and letting developers lie to get a application through and then backtrack on their agreed promises. The maths doesn't work, remove car parks and added 4000+ people in a 400m sq area?

We want housing and the area to move forward but this is not the way to do it, nor as the plan agreed, developers exploring and planning team pandering to the university's ever demanding 'need' and how far away from the uni? Come and look at the 'actual' effect these blocks and others have and will have in such a densely built plot. You may feel very differently.

The possibility of Malago Road being one way and a constantly moving red light mayhem for 2 more years at least is just intolerable. Come and see what it's really like.

Regards

Leigh Archer

C24

PRING and St Hill

As a young man I toured Pring & St Hill the local steel frame fabricators on this site checking the framework for a Bristol Supermarket my employers were building.

It had at least one fine old historic building on the plot which would have been a great feature today had it achieved a listing status but it was lost in the general clearance of the site.

We then accepted a proper housing use would be the way forward before Bedminster Green was conceived .

That we are faced with this bland trio of tall buildings with tiny student rooms is however unacceptable

C25

Hello

I am a neighbour to the planned development site. Please see my statement below for the Development Control Committee A meeting on the 24th April 2024, regarding application - 22/06085/F Redevelopment of the site comprising the erection of three buildings to provide purpose built student accommodation (sui generis) with new vehicular access, disabled parking and servicing arrangements, public realm works and landscaping. (Major) | Former Pring & St Hill (Plot 1) Malago Road Bristol BS3 4JQ.

STATEMENT FOLLOWS -

This application should be immediately turned down by the committee. There is massive public opposition to the development, and the public have again voiced their views in large numbers despite only being given a few weeks to do so before the development is reviewed by committee.

Furthermore, in respect to loss of daylight and sunlight, although the Planning Officer advises that there will not be a harmful effect on the flats on the opposite side of Malago Road, it is clear that 42 windows on the Malago Road Apartments will experience reductions of sunlight to their windows, between 20% and 36%, well in excess of the BRE Guideline of 20%. Although the report claims these guidelines don't need to be followed due to recesses in the building, etc.

*“Paragraph 123 (c) of the National Planning Policy Framework requires local planning authorities to take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site **(as long as the resulting scheme would provide acceptable living standards).**”*

I argue that by clearly exceeding the BRE guidelines and causing a “moderate” impact on the daylight and sunlight of the Malago Road Apartments opposite, the resulting scheme would not provide acceptable living standards and therefore this does not meet the NPPF requirement.

When the Malago Road flats were built in the early 1980s there was a three storey steel fabrication plant opposite. The arrangement of the Malago Road Flats were clearly built with this in mind, and not the possibility of having an 8-10 storey block directly opposite. “Plot 1” simply isn't the right location for a huge block of flats which will tower over the other properties and block out sunlight.

Points 3.16 and Point 3.17 of the report suggest that 8 spaces (4 temporary lay-by suspension and 4 on the site) would be sufficient to move 484 students in and out of the development over the course of a weekend, with no knock on effect to the local community. This clearly cannot be possible and will lead to massive congestion in the local area many times throughout the year. This is not to mention the students who will park cars on the surrounding streets due to lack of parking throughout the year.

In regards to the report the planning officer statement claims that -

“A total of 137 comments were received in response to the application; 76 during the first round of public consultation and 62 during the second round. Of these, 1 response was in support of the scheme, from the University of Bristol. A total of 136 comments were in objection to the scheme and raised the following concerns...”

This is incorrect, from the comments visible on the Bristol City Council planning portal -

76 Public Comments were made on the first application between 27 January 2023 and 1 March 2024. All 76 of these comments objected to the application. Two additional objections were made by local councillors. On the second application after the first was withdrawn, 96 comments were made between the dates of 7 March 2024 and 2 April 2024. Of these, 95 objected to the application, and only 1 was in support, from the University of Bristol. One further objection was given by a local councillor.

In total, these makes 170 public objections and only 1 in support, from the University of Bristol. This demonstrates that the public reaction to these applications has included many more objections than the report mentions and is massively in opposition to this plan.

Additionally since the planning officer returned their statement on the 16th April 2024, a further 11 public objections have been made.

STATEMENT ENDS

Thank you for your help and best wishes

James

Amendment Sheet 24 April 2024

Item 1: - Caravan Club Cumberland Road Bristol BS1 6XG

Page no.	Amendment/additional information
	Please see attached Addendum sheet.

Item 2: - (Former Debenhams & Building To West) 33-47 (odds) The Horsefair, 6-10 (consec) The Haymarket, St James Barton & 29 - 31 (odds) The Horsefair Bristol BS1 3JE

Page no.	Amendment/additional information
118	<p>Significance of Heritage Assets</p> <p>For clarity, the reference to views and figures listed under this key issue are taken from the applicant's visual impact assessment. This includes verified views, which aim to give an accurate representation of the impact of the development in the relevant views.</p>
119	<p>Paragraph 3 amended as follows:</p> <p>The applicant has submitted a heritage assessment which assesses the impact on a large number of heritage assets in the area. It is noted that Historic England have stated that they are content with this assessment, and officers also consider that this is in large part an appropriate assessment. This includes an assessment of the heritage assets impacted, the significance of those assets and the impact of the proposals, including level of harm where appropriate.</p> <p>Officers have reviewed that assessment, taken into account the comments from consultees, including the comments from the Conservation Officer and Historic England. It is accepted that the Heritage Assessment is appropriate and fit for purposes. The table, provided in annex 1 (Annex 1: Tabular assessment of Harm to Heritage Assets) of the original report is the officer assessment of the level of harm specifically in response to the concerns raised through consultation, and in large part concurs with the assessment submitted by the applicant. Officers are satisfied that in all other matters the assessment submitted by the applicant is satisfactory, and properly assesses the impact on the identified assets affected by the proposal. It is considered that the individual harm to the identified assets varies, and ranges from minor to moderate. Importantly, substantial harm has not been identified to any of the individual Heritage Assets.</p> <p>Paragraph 6 amended to the following:</p> <p>It is noted that some representations have suggested that this would constitute substantial harm, the test in relation to substantial harm is whether or not it would severely damage the assets significance.</p> <p>Significant weight should be applied to evaluation of impact on the affected Heritage</p>

Page no.	Amendment/additional information
120	<p>Assets in assessing this proposal, in this case Historic England do not claim substantial harm. Case officers are satisfied that given the analysis of the impact of the proposal would therefore result in less than substantial harm to the Heritage Assets above identified by Historic England.</p> <p>Paragraph 3 to include:</p> <p>In this context the loss of eight storeys would have a significant impact on the contribution that the scheme would make to the delivery of desperately needed market and affordable housing (irrespective of viability). It would make it harder to justify the public benefits outweighing the harm.</p> <p>Special regard' and 'great weight' to be afforded to the preservation and conservation of heritage assets, the cumulative effect of the public benefits clearly outweighs the less than substantial harm to heritage assets which would arise as a consequence of the development. Thus the heritage balance of paragraph 208 of NPPF is passed and the outcome of this balancing exercise provides the 'clear and convincing justification' as required by paragraph 206 of the NPPF.</p> <p>End of paragraph 2 to change to: "The Cumulative Impact of both proposals is not considered to be detrimental to amenity or create additional cumulative harm to the wider heritage assets considered in this report and listed at Annex 1, such that it would make the proposals unacceptable."</p>
122	<p>Paragraph 7 to include: The proposal however exceeds the Urban Living SPD standards for overall amenity space provided. This includes private open space and communal roof terraces.</p>
130	<p>Paragraphs to be added:</p> <p>Section 5 (Delivering a sufficient supply of homes) of the NPPF outlines that "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay". In relation to maintaining sufficient supply and delivery of homes, paragraph 75 of the NPPF outlines: "Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites."</p> <p>Bristol has a positive approach to boosting the supply of homes. Policy H1 of the emerging Bristol Local Plan (Publication Version November 2023) proposes an ambitious housing requirement of 1,925 homes per year, substantially higher than that of the current Core Strategy (June 2011). The emerging plan offers a large range of potential development sites, areas of growth and regeneration and a variety of policy interventions that will help to ensure that the housing requirement is delivered and preferably exceeded. In doing so the emerging plan seeks to meet as much of the identified housing need as possible, consistent with paragraph 60 of the National Planning Policy Framework (NPPF).</p> <p>Until the new local plan is adopted, the council is expected to identify and update annually a supply of specific deliverable sites to meet its local housing need for the next few years. If it cannot do this, the presumption in favour of sustainable</p>

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121	<p>development applies. For Bristol, only a four year supply (rather than 5 ears listed in the original report) must be demonstrated, as the emerging local plan has reached the Publication (Regulation 19) stage (NPPF paragraph 226).</p> <p>The Government's standard method sets Bristol's local housing need at a very high level due to the inclusion of an additional 35% uplift for the largest cities and urban centres. Consequently, despite a substantial stock of planning permissions and a positive approach, Bristol is currently unable to demonstrate a four year supply of housing land. As a result paragraph 11(d) of the NPPF is engaged and the tilted balance applies.</p> <p>As such officers must consider proposals pass the two-limbed test contained in paragraphs 11(d)(i) and 11(d)(ii) of the Framework. The first limb – “the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed. In this respect, the development proposed does not fall within any of the protected policy designations referenced in Footnote 7 of the Framework. Whilst it is acknowledged that the development would result in less than substantial harm to the significance of designated heritage assets, this is at the lower end of the spectrum of harm and the substantial public benefits arising from the Proposed Development significantly outweigh the harm. The impact upon heritage assets does not therefore provide “a clear reason for refusing the development proposed”. The first limb of the test in paragraph 11(d)(i) is therefore passed.</p> <p>In respect of the second limb – “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”</p> <p>Other than the less than substantial harm to heritage assets, considered above, no other adverse impacts have from the proposal have been identified that could significantly and demonstrably outweigh the benefits.</p> <p>Officers consider the proposed development is in accordance with the development plan and is supported by NPPF para. 11 as set out above. Material considerations do not indicate a recommendation other than in accordance with the development plan.</p> <p>List of errata</p> <p>Paragraph 1 change figure to the following: 1,410sqm of Public Realm as set out in the DAS Addendum.</p> <p>Paragraph 2 change figure to the following Bed 1 Person x 75; 1 Bed 2 Person x229; 2 Bed 3 Person x 28; 2 Bed 4 Person x 170: Total 502.</p> <p>Paragraph 1 updated policy to: Affordable Housing Practice Note published in July 2022, and the Delivery of Affordable Build to Rent Homes in Bristol supporting note to the AHPN which was published in July 2022 and updated in June 2023.</p> <p>Paragraph 2 quantity should be: 13 M4(3) units</p>
114	<p>Paragraph 2 repeat of text: Paragraph 206 is repeated twice.</p>

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115	Should also include subparagraph 206b which regards scheduled monuments, Grade I and Grade II* listed buildings and registered parks and gardens.
116	Paragraph 1
117	This section recognises that the possible adaptation of the former department store has been fully explored. While the report notes that the potential for residential conversion was assessed, robust assessments were also undertaken of the alterations needed to convert the building to office or hotel use, and that this is evidenced in the application's supporting documentation.
118	<p>References to 'English Heritage' are made throughout the report. These should be amended to 'Historic England'. This section should also note that Historic England recently considered an application which sought the listing of the former Debenhams building. HE determined that the building does not demonstrate sufficient architectural or historic interest to warrant a statutory listing.</p> <p>Paragraph 8 word "yet" removed, with regard to Debenhams being on the local list.</p> <p>It is also recognised that the existing building is identified as a non-designated heritage asset (though not on the Local List).</p>
119	<p>Paragraph 2 to be added: The whole life carbon impacts summary should be amended to confirm that the new build option has a marginally higher whole life carbon estimate by approximately 2% on a per m2 basis.</p> <p>Paragraph 7 to be added: Confirmation that funding request has come from the NHS.</p>
129	<p>Paragraph 2 corrections: The report erroneously states that the Council's Housing Delivery Test for 2022 was 74%. This should state 88%. This paragraph also states that the Council cannot demonstrate a Five Year Housing Land Supply. The report should recognise that the Council may only be required to demonstrate a Four Year Housing Land Supply in accordance with the amendments made to the National Planning Policy Framework in December 2023, then also acknowledge that the Council can also not demonstrate a Four Year Housing Land Supply. Regardless of the housing land supply position, the policies of the development plan are out of date.</p>
130	<p>Further clarification of affordable housing: Provision of 20% Affordable Housing including social rent and shared ownership.</p> <p>Conditions</p> <p>Replace Condition 9 with following:</p> <p>Contaminated land.</p> <p>No development hereby permitted (except demolition and site clearance) within any approved phase shall take place until the works relating to land contamination detailed below are fully completed: With consideration to human health, controlled waters and the wider environment,</p>

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	<p>the following documents shall be completed to characterise potential risk to sensitive receptors and submitted to the LPA for approval:</p> <p>I. Generic Quantitative Risk Assessment (GQRA) - Submission of this document is the minimum requirement. II. Detailed Quantitative Risk Assessment (DQRA) - Submission of this document if GQRA requires it.</p> <p>The actions required above shall be completed in full accordance with the following guidance: Land Contamination Risk Management (Environment Agency, 2023).</p> <p>Reason: To ensure that risks from land contamination is understood prior to works on site both during the construction phase to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors</p> <p>Replace Condition 10 with the following:</p> <p>Remediation Strategy and Verification Plan</p> <p>No development hereby permitted (except demolition and site clearance) within any approved phase shall take place until the works relating to land contamination detailed below are fully completed:</p> <p>In accordance with the findings of site characterisation and risk assessment, documents from the following shall be submitted to the LPA for approval:</p> <p>I. Remedial Options Appraisal. II. Remediation Strategy III. Verification Plan.</p> <p>The actions required above shall be completed in full accordance with the following guidance: Land Contamination Risk Management (Environment Agency, 2023).</p> <p>Reason: To ensure that risks from land contamination is understood prior to works on site both during the construction phase to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors</p> <p>Additional conditions to be added, condition numbers to be updated to reflect changes:</p> <p>Remediation and Verification The development hereby permitted within any approved phase shall not be brought into use until the works relating to land contamination detailed below are fully completed:</p> <p>Remediation (if required), it shall be carried out in full accordance with the approved Remediation Strategy.</p> <p>A Verification Report must be submitted to the LPA for approval upon completion of remediation works. The Verification Report must include information validating all remediation works carried out; details of imported materials</p>

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	<p>(source/quantity/suitability); details of exported materials; and details of any unexpected contamination.</p> <p>The actions required above shall be completed in accordance with the following guidance: Land Contamination Risk Management (Environment Agency, 2023).</p> <p>Reason: To prevent further contamination risks.</p> <p>Unexpected Contamination</p> <p>The development hereby approved within any approved phase shall not be brought into use until written confirmation is provided to the LPA that unexpected or previously unidentified contamination was not encountered during the course of development works.</p> <p>If, during development, unexpected contamination is found to be present on the site, no further works shall be carried out at the affected location until the following are submitted to the LPA for approval:</p> <ul style="list-style-type: none"> I. Risk Assessment (GQRA or DQRA); II. Remediation Strategy & Verification Plan; <p>If remediation is required, it shall be carried out in accordance with the approved Remediation Strategy. Upon completion of remediation works, a Verification Report shall be submitted for approval.</p> <p>The actions required above shall be completed in full accordance with the following guidance: Land Contamination Risk Management (Environment Agency, 2023).</p> <p>Reason for all conditions: To prevent unacceptable risk to Human Health and Controlled Waters and to prevent pollution of the environment in accordance with the aims of 124 (c), 180 (e & f), 189 & 190 of the National Planning Policy Framework (2024).</p> <p>Unexploded Ordnance Risk Assessment</p> <p>Prior to commencement of development a detailed unexploded ordnance survey shall be carried out at the site to establish whether there is any unexploded ordnance, the details of which shall include any necessary mitigation measures and shall be submitted to the local planning authority for approval. The development shall be undertaken in full accordance with any approved mitigation measures.</p> <p>Reason: To ensure that development can take place without unacceptable risk to workers and neighbours including any unacceptable major disruption to the wider public on and off site that may arise as a result of evacuation/s associated with the mitigation of UXO</p> <p>TDM update response on S106 contributions (The agent has responded to confirm acceptance of the contributions set out below by TDM):</p> <p>Having revised our ask, again, we consider the below mitigation to fully meet the tests as set out within the NPPF and consider them to be very fair and reasonable given the scale of the development.</p> <p>We consider the £110,440 travel plan fee to be standalone given this is a service offered by the council. The developer, without this £110k contribution, would still be obliged to develop and implement a travel plan themselves and would therefore still be spending the equivalent amount outside of this contribution (should they have chosen to implement the travel plan themselves). We offer this as a paid service</p>

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	<p>given our teams expertise in the travel planning field and this allows for a holistic approach across numerous developments within the same areas, which only BCC can provide.</p> <p>Our asks remain.</p> <ul style="list-style-type: none"> • £376,130 towards the upgrade of local cycle infrastructure in the vicinity of the development. • £175k contribution towards the provision of a surface level crossing point linking the site to the North of Bond Street. <p>I believe a strong case could be made for asking for the £71,465 towards the provision of a coach stand outside of the Hampton by Hilton however noting the need to negotiate and reach agreement have removed this ask.</p> <p>We consider these to fully meet the tests and deliver on the aims of the City Centre DDP. It should be noted, specifically in relation to the cycle and walking contribution this is in line (on a per-head basis) with numerous other developments within the area.</p> <p>It should be noted the above ask is only £5k more than the entire Premier Inn development which has half the number of people resident and is also delivering extensive public realm thoroughfare and given land for a future highways project.</p> <p>TDM have also acted reasonably within these negotiations with the following asks being removed:</p> <ul style="list-style-type: none"> • £199,529 towards the upgrade of the local bus stops along the Haymarket. • £71,465 towards the provision of a coach stand outside of the Hampton by Hilton. • Improvements to the Horsefair. • Contribution towards the provision of an off-site EV Car Club car. • Contribution to Freight Consolidation centre <p>It should be noted given the preliminary nature of their servicing designs should a bus stop need to be relocated etc the cost of this would be met the applicant however this could be secured outside of s106 at the more technical detailed stage.</p>

Item 3: - Former Pring & St Hill (Plot 1) Malago Road Bristol BS3 4JQ

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9	<p>Eleven further letters of objection received from members of the public, raising concerns regarding:</p> <ul style="list-style-type: none"> • Overshadowing to nearby residents. • Ecological impacts to the Malago and harm to the environment. • Excessive density. • Design and architecture of the buildings.

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9	<ul style="list-style-type: none"> • Presence of student accommodation instead of family homes. Concern that the accommodation could not be re-used for an alternative use in the future. • Lack of infrastructure for new and existing residents. • Concern about fire safety. • Concern about well-being of students. • Concerns regarding traffic generated. • Concern about light pollution. <p>As a point of clarification, Bristol Civic Society submitted objections to the scheme in March 2024 and February 2023. These have been summarised within Section 5.4.1 of the Officer Report – ‘Public Responses’.</p>
18	<p>With regard to the principle of development discussed in Section 8 of the report, Members are to note the following point which must be considered in coming to a conclusion on the planning balance:</p> <ul style="list-style-type: none"> • The Government's standard method sets Bristol's local housing need at a very high level due to the inclusion of an additional 35% uplift for the largest cities and urban centres. Consequently, despite a substantial stock of planning permissions and a positive approach, Bristol is currently unable to demonstrate a four-year supply of housing land. As a result, paragraph 11(d) of the NPPF is engaged and the tilted balance applies. • There are two aspects to understanding whether planning permission as prescribed by Paragraph 11(d) should be granted and whether policies which are most important to determining the application are out of date: <ol style="list-style-type: none"> 1. The first is where the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed. 2. Or the second, where any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
17	<p>In Section 6 of the report, the correct reference to the National Planning Policy Framework is December 2023.</p>
22	<p>In paragraph 9.20 and 21.4 – correction – the site owner has already transferred land to BCC to facilitate highways works along Malago Road. Land will be transferred to facilitate the river restoration.</p>
26	<p>In light of the comments from the Sustainable Cities team and to consider how the development would adapt to climate change (in line with BCS13), the applicant has undertaken further testing to consider additional measures that would assist with mitigating the risk of overheating. The further testing includes passive measures together with MVHR (50 l/s) as per the current strategy with the addition of:</p> <ul style="list-style-type: none"> • Use of internal blinds: we have considered the use of blinds as a measure for adaptation. • G-value: we have tested with a lower g-value for glazing of 0.30. <p>The results are as follows:</p>

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	<ul style="list-style-type: none"> • Current weather file - all assessed habitable rooms achieve compliance against the criteria of CIBSE TM59. • Future Weather File 2050 – spot testing with the inclusion of blinds and a g-value of 0.30 shows an improvement with an increased number of units that comply in this scenario. On average, reduction of 43% in overheating hours from the previous strategy. • Future Weather File 2080 - hours for failing units drop by an average of 29.6% from the previous strategy. <p>Having reviewed this additional information, Sustainable Cities Team maintain an objection due to failures remaining. Sustainable Cities request the removal of glazing below desk level where this has no daylight benefit, and the consideration of active cooling measures where failures remain from 2050.</p> <p>Officers comment that: Policy BCS13 requires development to contribute to both mitigating and adapting to climate change, and to meeting targets to reduce carbon dioxide emissions. The supporting text for Draft policy NZC4 of the Publication Version Local Plan states that the risk of overheating should be assessed using Part O of the Building Regs and CIBSE TM59 guidance. In the CIBSE guidance, the minimum requirement in order to demonstrate compliance with the TM59 methodology is modelling the weather file up to 2040. Modelling using additional future weather files (2050s and 2080s), are <u>recommended</u> to explore performance where there is particular concern, for example presence of vulnerable occupants or for testing the performance of mitigation options under more extreme events.</p> <p>Following the further testing undertaken to consider additional mitigation for future weather files and considering the constraints of the site which largely guide the overall layout of the site, along with the requirements from student housing, Officers consider that the applicant has demonstrated adequate consideration of the risk of overheating in the future, although a moderate residual risk of overheating remains for the future. The overall quality of the accommodation is therefore afforded moderate weight in the planning balance.</p>

Addendum Sheet – Baltic Wharf 21/01131/F

Ecology

An updated BNG metric and report has been submitted following the Ecologists previous comments that the Tree canopy data had been incorrectly calculated. Amended planting plans and planting schedules were also submitted to accompany the BNG report. These are all published onto the website.

The revised Ecologist comments are as follows:

“The site is located in an urbanised/rural area and is 12m away from the Floating Harbour Wildlife Corridor to the north, and 25m away from the River Avon Site of Nature Conservation Interest (SNCI) to the south. The site is within the West of England Nature Partnership (WENP) Nature Recovery Network, within the watercourse network. This site is unlikely to impact the watercourse network, or the aquatic/riparian habitats nearby as long as appropriate pollution prevention measures are in place during construction.

The Biodiversity Net Gain assessment has been updated with the latest version of the metric (the statutory metric) following revisions with updated guidance and landscaping proposals. The BNG metric calculates a -38.74 loss in area habitat units, and a 27.20% gain in hedgerow habitat units on site. Through offsite habitat creation (tree planting via the BTRS requirements for this site) the summary of biodiversity loss for this planning proposal is - 7.86% loss in area habitat units, and a 27.20% gain in hedgerow habitat units on site.

An overall 10% net gain and compliance with the trading rules is not mandatory as this application was submitted before the 10% BNG policy became mandatory on February 12th. Nonetheless, this application is not achieving an overall net gain in biodiversity in line with the revised National Planning Policy Framework (NPPF, 2023) which requires a “measurable net gain” to be achieved. If this application is deemed approved, a two-phase Biodiversity Net Gain condition is set out below, in which the applicant must provide a biodiversity net gain plan outlining how a biodiversity net gain will be achieved by meeting the biodiversity unit requirement (at least 0.45 units), and evidence that the biodiversity unit fulfilment has been met before works commence.

To offset biodiversity loss following the BNG hierarchy development applicants must prioritise: onsite (no longer an option if deemed approved), offsite on own landholdings, offsite via purchase of biodiversity units, offsite via purchase of biodiversity credits. Every effort should be made to deliver biodiversity offsetting for this development within Bristol. It must be demonstrated that all opportunities to do this have been explored before the option of purchasing units from a provider outside of Bristol will be considered.

When an offsetting option is confirmed, the metric must be amended to reflect the offsetting and demonstrate that a net gain in area habitat units can be achieved. The ‘delay in starting habitat creation (years)’ column needs to be completed for all proposed habitats on and off site, and a Habitat Monitoring and Management Plan (HMMP) must be provided. This is conditioned below.

The updated ecology note also recommended that a single nocturnal roost survey will be required on buildings B1 and B2 which were classified as having low bat roost suitability. It was agreed in a meeting with the applicant’s ecologist (The Environment Partnership) on 20th February that, if this application is granted prior to the bat survey season commencing (May) further survey work and application for the relevant license (if required) will be carried

out and that this can be conditioned (requiring the applicant to produce a Favourable Conservation Method Statement (FCMS). If, however this application is not granted prior to the bat survey season commencing, the additional surveys required for bats on this site must be completed if the applicant wishes to pursue developing the site.

The following conditions should be applied if this application is deemed approved:

Favourable Conservation Method Statement (FCMS)

Prior to the commencement of the development hereby approved, the applicant shall submit a Favourable Conservation Method Statement (FCMS) with the results of a single nocturnal bat roost survey on buildings B1 and B2, completed by a suitably qualified ecologist. If a Natural England protected species license is required following the results of this survey, this must be obtained, and evidence provided to the Local Planning Authority. If a license is not required details of how the potential presence of bats will be treated with precaution during building B1 and B2's demolition shall be included in the FCMS.

Reason: in the interest of protecting bat species, legally protected under the Conservation of Habitats and Species Regulations 2010 and the Wildlife and Countryside Act 1981.

Precautionary Method of Working (PMW)

Prior to the commencement of development hereby approved, including all site clearance and vegetation removal, a method statement for a Precautionary Method of Working (PMW) with respect to the potential presence of bats in tree T2 as described in the Preliminary Ecological Appraisal (The Environment Partnership) shall be prepared by a suitably qualified ecological consultant and submitted to and approved in writing by the Local Planning Authority.

The development shall be carried out in full accordance with the approved method statement.

Reason: To ensure the protection of legally protected and priority (Section 41) species which are a material planning consideration. And to demonstrate compliance with the 1981 Wildlife & Countryside Act (as amended) and the 2017 Habitats Regulations.

Guidance: According to paragraph 180 (page 52) of the National Planning Policy Framework (2019), 'Planning policies and decisions should... limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.' Reason: To conserve legally protected bats and other nocturnal wildlife.

Ecological Mitigation & Enhancement Strategy (EMES)

Prior to the commencement of the development hereby approved the applicant shall submit an Ecological Mitigation & Enhancement Strategy (EMES). This shall include details of the provision of bird, bat and insect boxes. The bird boxes must include bricks or tiles for swift and house sparrow. The location, specification, height and orientation of these features shall be shown on a site plan.

The development shall be carried out in full accordance with the approved details or any amendments agreed in writing by Bristol City Council.

Reason: (1) The Natural Environment and Rural Communities (NERC) Act 2006 (Section 40) obliges the LPA '*... in exercising its functions, [to] have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*'. In order to discharge its biodiversity duty, the LPA must satisfy itself that all developments

deliver ecological enhancement wherever reasonably possible; (2) Ecological enhancement is a requirement of the revised National Planning Policy Framework (2021) which states (in paragraph 174) that '*Planning policies and decisions should contribute to and enhance the natural and local environment...*'.

Green Roof Method Statement and Plan

Prior to commencement of the development hereby approved the applicant shall submit a Method Statement prepared by a suitably qualified ecological consultant or landscape architect shall be submitted to and approved in writing by Bristol City Council for the creation of living roofs and/or walls. This shall include management details e.g watering/care schedule, species/seed mix avoiding the sole use of sedum, provision of features for invertebrates, and details of the provision of new plants should the originals fail. All details shall be shown on a scale plan of the site.

The development shall be carried out in full accordance with the details submitted or any amendments approved in writing by the Council.

Reason: To conform with Policy DM29 in the Site Allocations and Development Management Policies Local Plan, which states that: '*Proposals for new buildings will be expected to incorporate opportunities for green infrastructure such as green roofs, green walls and green decks*'.

Guidance: Please see: <https://www.greenroofers.co.uk/> and <https://livingroofs.org/> for further information and the following reference: English Nature (2006). Living roofs. ISBN 1 85716 934.4 Internet address: <https://documents.net/document/english-nature-triton-full-living-roof-the-structure-may-need-to-be-assessed.html>

Please note that a living roof can be integrated with photovoltaic panels.

The living roof should include calcareous wildflowers and should not employ significant areas of *Sedum* (Stonecrop), as the latter has limited value for wildlife. The Method Statement should include details of the layout (measurements should be provided), construction and design of the living roof. Design elements should include the following: stones, shingle and gravel with troughs and mounds; log piles; mounds of pure sand 20 to 30 cm deep; coils of rope and areas of bare ground. The use of egg-sized pebbles should be avoided because gulls and crows may pick these up and drop them. An overall substrate depth of at least 10 cm comprising crushed demolition aggregate or pure crushed brick is desirable. Deeper areas of substrate which are at least 20 cm deep are also valuable as they provide refuges for animals during dry spells. An area of wildflower meadow should also be seeded on the roof for pollinating insects. Details of the seed mix and planting proposed should also be submitted, together with a maintenance/management schedule.

Nesting Birds

If works are proposed within the nesting bird period (March to August inclusive), nesting bird checks shall be completed by a suitably qualified ecological consultant to ensure that no breeding birds would be adversely affected including by disturbance by the works. Where checks for nesting birds are required, they shall be undertaken no more than 48 hours prior to the removal of vegetation. If nesting birds are found, a 5m buffer zone shall be implemented and works shall not be carried out in that area until the chicks have fledged.

Reason: To ensure that wild birds, building or using their nests are protected, to demonstrate compliance with the 1981 Wildlife & Countryside Act (as amended).

Soft Landscape Plan

Prior to the commencement of the development hereby approved, a finalised soft Landscape Plan including a planting schedule, shall be submitted to and approved in writing by Bristol City Council.

The development shall be carried out in full accordance with the details submitted or any amendments approved in writing by the Council.

Reason: To conform with Policy DM29 in the Site Allocations and Development Management Policies Local Plan, which states that: '*Proposals for new buildings will be expected to incorporate opportunities for green infrastructure*'. And to comply with the revised National Planning Policy Framework (NPPF, 2023), which states in paragraph 174 (d) on page 50 that '*Planning policies and decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity...*',

Habitat Management and Monitoring Plan (HMMP)

Prior to commencement of the development hereby approved, the applicant shall submit a 30-year Habitat Management and Monitoring Plan (HMMP). This should address retained features of ecological interest, together with mitigation and enhancements to be provided. The HMMP should set out management compartments, objectives, and prescriptions for all new proposed soft landscaping/planting to demonstrate how all habitats will be managed to their target condition (as specified in the BNG assessment). It should also show how management of the site will be resourced and monitored.

Reason: (a) Ecological enhancement is needed to meet the requirements of the revised National Planning Policy Framework (NPPF, 2023). (b) The Environment Act (2021) requires habitats to be maintained for 30 years after development is completed (schedule 7A, Part 1, paragraph 9) to secure net gains for biodiversity.

Biodiversity Net Gain

The applicant shall not commence any site clearance or demolition works until a biodiversity net gain plan containing details of how the full habitat unit requirement will be met, has been submitted to and approved in writing by the Local Planning Authority. No above ground development will be carried out until evidence that the full habitat unit requirement has been secured (in accordance with the approved biodiversity net gain plan), and an updated copy of the statutory biodiversity metric has been submitted to and approved in writing by the Local Planning Authority.

Reason: To secure the delivery of measures to ensure that biodiversity net gain is achieved in accordance with policy DM19 of the Site Allocations and Development Management Policies and paragraphs 185 and 186 of the National Planning Policy Framework (2023)."

TRANSPORT

Further comments have been received from TDM 17/4/24 to provide updated conditions and informatives' from when they were originally submitted in 2021, Officers request that these conditions and alterations form part of the Officers recommendation and recommended conditions.

The conditions are as follows:

Delete condition 2 (standard CMP)	Replace with - B38 Construction Management Plan – Major Developments
New conditions:	<p>“Highway works – General Arrangement Plan</p> <p>No development shall take place until General Arrangement plan(s) to a scale of 1:200 showing the following works to the adopted highway has been submitted to and approved in writing by the Local Planning Authority.</p> <ul style="list-style-type: none"> - Widening of the vehicular crossover, resurface and where required reconstruct the footway; - Wayfinding signage to clearly sign the pedestrian route through the site from Cumberland Road; - Warning signage at the top and bottom of the ramp to Harbourside Walk - Resiting of streetlighting column adjacent to the vehicular access point and upgrading of streetlighting adjacent to the site. - Car club bay on Sydney Row <p>Indicating proposals for:</p> <ul style="list-style-type: none"> - Existing levels of the finished highway tying into building threshold levels - Structures on or adjacent to the highway - Alterations to waiting restrictions or other Traffic Regulation Orders to enable the works <p>Prior to occupation these works shall be completed to the satisfaction of the Highway Authority and approved in writing by the Local Planning Authority.</p> <p>Reason: In the interests of public safety, to promote sustainable travel and aid wayfinding and to ensure that all road works associated with the proposed development are: planned; approved in good time (including any statutory processes); undertaken to a standard approved by the Local Planning Authority and are completed before occupation.”</p>
	<p>“Structure Adjacent To/Within 6m of the Highway</p> <p>No development shall take place until Highway Structures Technical Approval (TA) has been granted by the technical approval authority (TAA) based on submission(s) setting out how any structures within 6 metres of the edge of the adopted highway (and outside of this limit where the failure of any structures would affect the safety of highway users) will be assessed, excavated, constructed, strengthened or demolished. Technical Approval submissions shall be submitted in writing, and TAA approval, if granted, shall be in the form of a signed Design and Check Certificate.</p> <p>Reason: To ensure the works safeguard the structural integrity of the adopted highway during the demolition and construction phase of the development.”</p>
	B39 Highway Condition Survey
	C5A Implementation/Installation of Refuse Storage and Recycling Facilities – Shown on approved plans
	C7 Completion of Vehicular Access – Shown on approved plans
	C8 Completion of Pedestrians/Cyclists Access – Shown
	C12A Completion and Maintenance of Car/Vehicle Parking – Shown
	C29 Management and Maintenance of Private Streets
	C30 Permissive Routes
	<p>Provision of Vehicular Visibility Splays</p> <p>No building or use hereby permitted shall be occupied or use commenced until visibility splays 2.4 metres back from the centre line of the access and extending 25 metres on the nearside carriageway edge shall be provided at all accesses/junctions, as shown on the approved plans.</p>

	<p>Nothing shall be erected, retained, planted and/or allowed to grow at or above a height of 0.6 metres above the nearside carriageway level which would obstruct the visibility splay. The visibility splays shall be maintained free of obstruction at all times thereafter for the lifetime of the development.</p> <p>Reason: To ensure motorists have clear and unrestricted views of approaching cyclists/vehicles in the interest of highway safety.</p>
	<p>Car Club</p> <p>No building or use hereby permitted shall be occupied or use commenced until details of a car club scheme, in accordance with a contract to be entered into by the developer and an approved car club provider, shall be submitted to and approved in writing by the Local Planning Authority. The car club scheme shall comprise (where applicable):</p> <ul style="list-style-type: none"> • The allocation of one car club parking space provisionally in Sydney Row • The provision of one car club car • Provision of car club membership for all eligible residents of the development for a minimum of three years • Promotion of the scheme • The phasing at which the scheme will be introduced <p>Reason: In order to reduce the need for excessive car ownership</p>
	C39 Delivery & Servicing Plan
	C41 Waste Management Plan
	C42 Car Park Management Plan
	<p>Traffic Control System/Pedestrian Access</p> <p>No building or use hereby permitted shall be commenced until details of the proposed traffic management/control system for vehicles accessing the ramp within the eastern car park and a delineated walking route to the buildings stair and life cores, cycle stores and bin rooms has been prepared, submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: In the interest of highway safety</p>
	<p>Maintenance Plan</p> <p>No building or use hereby permitted shall be occupied or use commenced until a maintenance plan has been prepared, submitted to and approved in writing by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved maintenance plan for the lifetime of the development. The maintenance plan shall include:</p> <ul style="list-style-type: none"> -The contact details of a suitably qualified member of staff who will be responsible for overseeing all maintenance; -Details of how often and by whom the platform lift, car park and external lighting, CCTV, security roller shutters, pedestrian/vehicular entrance management/control systems will be serviced/maintained; <p>Reason: In the interests of highway safety</p>
Delete EV Condition (25)	Now Superseded by Building Regulations
Proposed advices:	I021A) Alterations to Vehicular Access
	I024A) Works on the Public Highway
	I043A) Impact on the highway network during construction
	I044A) Restriction of Parking Permits – Existing Controlled Parking Zone/Residents Parking Scheme
	I052) Highway Condition Survey

	I053) Excavation Works on the Adopted Highway
	I054) Private Road
	I055) Street Name and Numbering
	I059) Structure Adjacent To/Within 6m of the Highway
	<p>Access to Private Roads for the Collection of Domestic Waste</p> <p>The development hereby approved includes private road(s). You are advised that you will need to provide an indemnity to Bristol City Council before waste can be collected from households served by these road(s). As the collection of domestic waste is a statutory requirement, the use of private waste contractors is not permitted. Contact Bristol Waste at BWCPlanning@bristolwastecompany.co.uk</p>

4 further objections received since the submission of the officers' report, raising the following points:

- Cumberland road is a 30mph road not 20mph as detailed in the TDM comments, therefore a larger visibility splay will be required. *[TDM Manager response: It is acknowledged that the developments' access on Cumberland road would need to reflect the active traffic regulations and TDM Officers confirm that it would be standard practice for the detailed design of any access to be safety audited at the technical approval stage of the S278.]*
- If the project runs at a loss to provide affordable housing then the developer may wish to reduce the affordable housing provision in the future
- Existing infrastructure and road network are insufficient for anticipated increase in population
- Loss of mature trees
- Similar units cannot be sold nearby – will these also stand empty
- A number of factual errors occur in the officers' report. Including that the site is fully in flood zone 3, not 2 and 3; the site should not be considered brownfield; no site notice has been erected on the site; the site is not mainly hardstanding, but only the roads around the site the rest is grass and gravel; the site is not tenure blind; unnecessary use of the term 'much needed housing'; the site will have an impact upon the homes along the eastern boundary; and 82 out of 102 trees will be lost the report stated 'a number of trees'.

The **Bristol Tree Forum** have also provided further comments:

Notwithstanding our request for the consideration of this matter by DCC A next week to be adjourned, I have reworked the applicant's revised Statutory Metric calculation - 21_01331_FREVISED_STATUTORY_BNG_METRIC-3665394 - to reflect what we say is the correct approach to the mitigation that will be required should this application be approved.

This is premised on the following assumptions:

1. That all Urban Individual trees habitats have High Strategic significance - we have already made representations as to why this is the correct allocation to make.
2. That there will be a delay of two years in the creation of all new habitats.
3. That the Statutory Metric trading rules are complied with so that there is zero net loss of Urban Individual trees habitat, which is a Medium Distinctiveness habitat.

No other changes have been made to the applicant's calculations.

Please note that, whilst we do not agree that the condition of the offsite Urban Individual trees habitat should be set to Poor (we say it ought to be Medium), we have retained the applicant's designation for the sake of this exercise.

On the basis of the above, we calculate that an additional 0.4682 hectares of Urban Individual trees habitat will need to be created offsite. This will require a further 115 'small' SMC category trees to be planted in addition to the 162 proposed by the applicant.

I also invite the NCO to give consideration to the planning conditions we agreed during the Brislington Meadows Appeal as being, perhaps, a possible model for what is required in this application. I attach a copy of that decision and ask the NCO to give consideration to Annex C, conditions 8, 19 & 25. Whilst the context is different, I suggest that these conditions could serve as a model for the conditions which will be required here, in particular to the offsite mitigations required.

[Officer note: The Nature Conservation Officer has reviewed these comments and the requested conditions and can confirm that the conditions already form part of the recommended conditions, apart from condition 25 as that was part of a reserve matters application and this proposal is not a phased development so would not be relevant in this case.]

Officer Recommendation: No change to the Officers' Recommendation, subject to the inclusion of the above recommended conditions.