

Amendment Sheet

9 August 2023

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

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

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262-273	<p>The applicant has provided an updated Thermal Comfort Overheating Analysis (Waterman, July 2023) which identifies a high risk of overheating in the 2050 weather scenarios based on the current design. The Analysis includes several ways that this risk can be addressed through in-built design measures, as well as some less preferable measures such as internal cooling.</p> <p>The Analysis sets out that the consultant considers that measures such as having openable windows and improved g-values would likely address this overheating risk and as such, these measures are incorporated into the proposed development before Committee.</p> <p>Whilst the success of these measures hasn't been confirmed, officers are willing to rely upon the professional judgment of the applicant's consultant that the measures would be sufficient. In the interests of minimising the reasons for refusal, it is suggested that a revised Analysis with this updated modelling, inclusive of the in-built measures, could be secured via condition if Members are minded to approve the application.</p> <p>Suggested wording is available below, however any condition would need to be agreed with the Applicant.</p> <p>Prior to the commencement of the development hereby approved, an updated Overheating Assessment / Thermal Comfort Analysis (based on a recognised methodology and criteria such as C.I.B.S.E TM52/ TM59, or equivalent, and a medium emissions 50th percentile scenario) shall be submitted and approved in writing to the Local Planning Authority.</p> <p>The updated Assessment shall include the in-built measures set out in the Thermal Comfort Overheating Analysis (Waterman, July 2023) that demonstrate the development would pass the 2050 weather file and therefore is adapted to the effects of climate change.</p> <p>Reason: To ensure the development incorporates measures to minimise the effects of and can adapt to a changing climate.</p> <p>Based on the above, it is considered that the proposed development would reduce carbon dioxide emissions from energy use through the use of a sustainable heating system. Subject to the implementation of the measures in the Thermal Comfort Overheating Analysis and confirmation that these measures would address overheating risk, it is considered that the proposed development would be sufficiently adapted to climate change.</p>
277-282	<p>Following receipt of the comments from the Flood Risk officer set out above, it is concluded that the proposed development would be acceptable in terms of the impact upon flood risk and drainage, subject to a condition(s) being added to any decision for approval to secure the following:</p> <ul style="list-style-type: none"> - Detailed design of SuDS features. - A maintenance plan for SuDS. - Outcomes of infiltration testing and confirmation whether this is a suitable strategy. - Agreement with Wessex Water that the proposed connection to a surface water sewer is accepted.
304	<p>[For clarity, para. 304 is updated to confirm that there is a loss of existing green infrastructure assets.]</p> <p>It is considered that the adverse impacts arising from the overdevelopment of the site, the less-than-substantial harm to heritage assets, the existing loss of green infrastructure assets and the lack of resilience to climate change demonstrably outweigh the benefits of the scheme. Officers therefore consider full planning permission should be refused, even</p>

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