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date 21 January 2020

Dear Caroline

Pre application response letter

Pre application no: 19/05220/PREAPP

Site address: Land At Broom Hill Broomhill Road Bristol BS4 4UD

Proposal: Provision of up to 300 residential units with infrastructure.

I refer to your pre-application enquiry regarding the above proposal.

SUMMARY

The principle of residential development in this location is supported in accordance with allocation BSA1201 in the Bristol Local Plan- Site Allocations and Development Management Policies.

The single vehicle access from Broomhill Road is acknowledged as being the most likely option when considering the various constraints of the proposal site limiting other potential routes including an access from School Road through the existing allotments.

However, it is recognised by the Council's Transport Development Management Team (TDM) that this access will serve almost double the amount of dwellings that would ordinarily be considered acceptable from a single access point. In order for this arrangement to be acceptable it will be necessary to amend the existing layout in order to improve vehicle circulation routes around the site and to maximise cycle and pedestrian linkages with the Dixon Road, Broomhill Road and School Road.

In order to alleviate the concerns of CDG and TDM in relation to this single access from a Placemaking perspective, it will be necessary to provide an in depth analysis as to why another secondary point of access from School road is not a feasible option.

The current proposal involves a significant loss of hedgerows including species-rich and ancient hedgerows and a number of TPO trees. It is advised that the layout is amended in order to retain and incorporate these features. Further Ecological, Arboricultural and Archaeological surveys will be required in order to inform the layout and design of the scheme.

RELEVANT POLICIES

Applications for planning permission are assessed against relevant national and local planning policy and adopted planning guidance documents. In this case, these include:

- National Planning Policy Framework (2019)
- Bristol Core Strategy (2011)
- Bristol Site Allocations & Development Management Policies Local Plan (2014)
- Bristol City Council Climate Change and Sustainability Practice Note (2012)
- Department for Communities and Local Government Technical Housing Standards – National
- Described Space Standard (2015)
- Urban Living SPD (2018)
- Planning Obligations SPD (2013)

KEY ISSUES

Principle of Development

The principle of residential development in this location is supported in accordance with allocation BSA1201 in the Bristol Local Plan- Site Allocations and Development Management Policies. However this needs to be considered against other local and national planning policy requirements and material considerations as set out below.

Highways and Access

The proposed single access point located at the north eastern corner of the site will serve double the amount of dwellings that would normally be considered acceptable. It is acknowledged that an access from School Road was previously considered but raised safety concerns and resulted in considerable earthworks to just achieve a 1:12 gradient, rendering much of the west of the site undevelopable.

The Council's City Design Group (CDG) have commented that this single access point is not acceptable from a Placemaking perspective as it would engender a sense of living in an enclave resulting in poor legibility, difficult circulation and increased vehicular trip lengths due to the separation of the proposed scheme from the surrounding development.

In order to alleviate the concerns of CDG it will be necessary to provide an in depth analysis as to why another secondary point of access from school road is not a feasible option. Further to this requirement, in order to justify the single access point it will be necessary to further maximise pedestrian and cycle linkages with the surrounding area, most notably Dixon Road, Broomhill Road

and School Road as per the allocation considerations and comments above provided by the Council Transport Development Management Team. In addition, as per the TDM consultee comment, it will be necessary to schedule a meeting at an appropriate time prior to submission in order to discuss the suitability of the site entrance to Broomhill Road. A Two-Stage Transport Assessment (TA) prior to any submission will also be necessary.

Design and Layout

Whilst the proposed layout plan is only indicative it appears that the internal road network is not acceptable. As per the CDG comments, the illustrative sketch masterplan proposes an internal road layout structured using a single main route running through the site with roads leading away, many of which culminate in a dead end. This goes against best practice, secure by design principles and planning policy which requires a connected network of streets to increase legibility and prevent segregation. Further to this, the layout creates few straight avenues culminating unceremoniously into parking bays which also needs to be reviewed. Further details on the layout and design will need to be considered at a detailed stage once some of the fundamental issues relating to designing the site are resolved. Please refer to the Urban Living SPD for further guidance

A key consideration in any amendment to the current layout will be the comments of the Council's Ecologist, Arboricultural Officer and Archaeologist as detailed in the appendices below. The existing site layout as proposed has not adequately considered the site history, current green infrastructure, the ancient hedgerow network or the ancient and veteran trees on site. Most notably, the southern most emergency vehicle access from Bonville Road will have significant impact on a number of ancient trees that are of potential TPO status.

It is also understood that the dwellings set in a linear formation adjacent to the site entrance are not considered to provide an adequate green infrastructure linkage with Eastwood Farm Open Space to the north east of the site as specified in the Site Allocation designation.

The scheme will therefore require a significant redesign in order to incorporate the ancient trees and ancient hedgerow structure. Prior to this the applicant is advised to carry out the required further Ecological, Arboricultural and Archaeology surveys as specified in the consultee comments.

Residential Amenity

Considering the required redesign of the overall layout as specified above, it is not possible to comment in any detail at this stage on the level of residential amenity awarded to any future occupants or residents of the surrounding properties. However, careful consideration should be given to the proximity, orientation and distances between the proposed and existing dwellings in order to limit the potential for an unacceptable level of overlooking or overbearing impact.

Community Infrastructure Levy

Any development would be liable under the Community Infrastructure Levy a rate of £50/m2 for residential development in this part of the city based on net new floorspace.

Community Involvement

The proposal would represent a major development and hence a statement of community involvement would be required at application stage as a validation requirement. Guidance on community involvement is available from the following link:

<https://www.bristol.gov.uk/planning-and-building-regulations/community-involvement-for-major-planning-developments>

Validation Requirements

Notwithstanding the advice given in this latter, if you do decide to proceed with submitting an application, please refer to the following webpage for details of both the National List and Local List of planning application validation requirements:

<https://www.bristol.gov.uk/documents/20182/33956/Planning+applications+local+list+of+requirements/cb90237a-1980-4d7a-b1c3-88fa56326e3b>

In specific reference to this proposal it is advised that the following information will be required for the validation of the application:

- Application Form
- CIL form
- Transport Statement and Travel Plan
- Construction Management Plan
- Construction Environmental Management Plan
- Design and Access Statement
- Planning Statement
- Scaled Site Plan, Block Plan, Elevations and Floor Plans
- Landscape Plan
- Drainage Plan
- SuDS strategy in line with the West of England Sustainable Drainage Developers Guide
- Context elevations and sections showing heights and relationship with neighbouring dwellings including shadow survey where necessary
- Archaeological Survey Report
- Aboricultural Survey report
- Ecological Survey report
- Phase 1 desk study looking into land contamination
- Noise risk assessment

- Sustainability and Energy Statement
- Thermal modelling assessment (CIBSE or equivalent)

The views given are current at the time of giving the advice, but changes in the planning circumstances can change, and will need to be taken into account when any subsequent application is determined.

Please note that the above advice represents an informal opinion of an officer of the council who has no power to bind the council by the views expressed.

Yours sincerely

Development Management

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Appendix A: Transport Development Management.

Principle

This site comprises an allocated housing site within the adopted planning policy. Therefore the principle of residential use on this site is established by planning policy. Whether the correct level of technical scrutiny was undertaken at the time when the site was allocated for housing is a matter for question. However, TDM is grateful for being consulted on this by property and other technical specialises in the intervening period and at an early enough stage in the interests of establishing some workable parameters that will assist in bringing forward housing in this location.

Strategic Context

The site is located on a current open space within a short distance of a number of key trip attractors and transport linkages on all sides. Whilst this is beneficial, the walking and cycling links to these destinations is currently either non-existent or poor and in its current state will do very little to encourage active and sustainable travel and therefore enhance the health and wellbeing of the future population in line with planning policies and our corporate objectives.

TDM will be seeking improvements to local infrastructure from this development to maximise the level of active and sustainable travel associated with this site and connect it to the surrounding area.

For these discussions to realise an appropriate package of measures underpinned by a robust evidence base, a Transport Assessment will be required, which should ideally submitted in draft form for discussion / agreement prior to any formal application for these proposals. Likewise, the more work that can be undertaken to establish and agree the detail of the on-site layout in advance, the faster that housing can be delivered in line with our housing programme.

Masterplan

With all major proposals for housing, masterplanning is critical. First and foremost the site needs to be permeable and from as many directions as possible. Due to the location of the site in between a number of employment, retail and education uses, opportunities for permeability need to be maximised from all directions, subject to the correct infrastructure being delivered, and at the correct time. We would therefore strongly advise the applicant to adopt the recommendations of the following document: <http://www.transportfornewhomes.org.uk/wpcontent/uploads/2018/07/transport-for-new-homes-summary-web.pdf> to deliver successful development and avoid missed opportunities.

Two-Stage Transport Assessment (TA)

TDM looks forward to being fully involved in the scoping and preparation of a TA for this development. Experience has shown that a two-stage TA provides the most value, as it allows for informed discussions to take place at the correct time, resulting the submission of a document at the planning stage that carries sufficient transport officer

support, given our early involvement in its scoping. The two stages we would apply to this process should ideally be carried out prior to planning submission by the appointed transport consulting engineers as follows:

Stage 1 TA:

- A qualitative audit of the surrounding walking and cycling linkages between the site and the following key trip attractors:
 - o Broomhill Infant and Junior Schools & Nursey, Fermaine Avenue
 - o Broom Hill local shops and bus stops (both directions), Broom Hill Road
 - o St Brendan's Sixth Form College, Broom Hill Road
 - o Brislington Enterprise College, Hungerford Road
 - o Brislington Retail Park, Bath Road
 - o Industrial Estate, between Bonville Road, Broom Hill Road and Bath Road
 - o Local Shopping Centre, Sandy Park Road

It is important that the above assessment does not merely describe these linkages, but provides an analysis of their quality, safety, width, surfacing and lighting, particularly in view of several of the destinations being educational facilities that are reached along routes for which this development will increase footfall during peak periods, particularly by young and therefore vulnerable users.

Where no safe or direct links exist, we will seek that the development delivers them. The obvious candidate would be a pedestrian / cycle link between the development and Fermaine Avenue, which if not provided would be a serious oversight and create a circuitous and unnecessarily long route to local facilities that would segregate this development from its community. TDM recognises that this involves land outside of the red line boundary. However, it is BCC land and therefore this should not preclude this 5m link being delivered as part of the development. Careful treatment is however required to avoid this causing the development to become impacted by school pick-up / drop-off traffic at 8:30 and 3pm

It is also of note that a significant area to the south of this development (south east of Bonville Road) is entirely industrial and therefore characterised by HGV movements, poorly parked vehicles, considerably wide accesses and crossing points and other barriers to safe and active movement including congested peak hour traffic (Bath Road). Active travel from this development is unlikely to be encouraged if the current infrastructure remains unaltered or unenhanced.

Confirmation of the number of morning peak, evening peak and daily weekday person arrivals and departures generated by the development, deriving a trip rate from the TRICS database, selecting only the TRICS reference sites that are relevant.

- Interrogating the 2011 census ward 'journeys to work' dataset to calculate / derive the modal share of movements generated by the development.

- Using the location of work dataset from the same ward, formulating a geographical distribution of trips to forecast the levels of walking, cycling, public transport and vehicular trips and along each sections of the surrounding highway network, taking into account reasonable walking (2km), cycling (5km) and public transport (10km) distances.
- The collection and presentation of 12-hour weekday school term-time junction turning counts and queue length surveys at the following locations (avoiding Monday and Friday):
 - Broom Hill Road / Whitmore Avenue – to include two-way speed surveys
 - Broom Hill Road / Birchwood Road / School Road mini-roundabout
 - School Road / Allison Road Priority T-junction
 - Broom Hill Road / Emery Road / 'McDonalds' roundabout

The above pieces of work will set a credible baseline upon which to discuss the above findings and formulate and agree a scope of the stage 2 TA to support the development proposals. The above traffic survey locations are suggested as an absolute minimum, but the scope may however need to expand as part of Stage 2, depending upon the outcome of the traffic generation and distribution analysis. However, by undertaking the above and avoiding a more comprehensive scope, it is considered that potentially abortive survey work is avoided.

The undertaking of queue length surveys is however critical given that any junction modelling necessary to support the proposals cannot be validated unless the outputs of the model are compared against the operation of the junctions as observed. To not do so invalidates the baseline models and therefore removes credibility and therefore weight from any future forecasts.

Stage 2 TA:

The stage 2 TA scope can be confirmed once the findings of the Stage 1 TA are known, discussed and agreed. However, we would expect it to progress the above findings further in the interests of establishing and confirming the following:

- Junction Capacity Assessments as agreed following the Stage 1 TA, confirming the impact of the development, utilising PICADY / ARCADY / LINSIG models, as appropriate.
- A package of transport improvement measures to support the development.
- General Arrangement designs for the site access and layout that can be referenced and secured through planning conditions for the developer to deliver under section 278 of the Highways Act.

- A Stage 1 / 2 Road Safety Audit to accompany any highway interventions put forward by the applicant, including the site access.
- Where financial contributions to BCC Transport & Highways are required, an agreed section 106 Heads of Terms with appropriate triggers for where BCC is expected to deliver works / travel planning. Where the applicant is BCC this will need to comprise a signed Memorandum of Understanding by the relevant chief officer.
- Confirmation of an agreed and adoptable on-site layout that conforms to BCC's design standards, in terms of width, turning and maintenance requirements that is suitable in order to progress a section 38 agreement under the Highways Act.
- A draft Construction Management Plan (CMP) that takes account of the challenging access constraints and confirms how impacts on the surrounding highway network and local community will be minimised.

At this stage, the above is not intended to be exhaustive, but cannot predict all outcomes of the Stage 1 TA and therefore, this is provided only as guidance at this stage.

On site Layout – Barton Willmore plan 30867 SK01 Revision A

The level of housing proposed on site dictates that the internal layout will be adopted by Bristol City Council under a section 38 agreement. Initial considerations from Transport DM Engineering team, who would be responsible for the technical approval and inspection of new street construction advises as follows:

Number of units

Firstly, 300 is a considerable number of homes off a single point of access and around double the figure we would normally permit. An access from School Road was previously considered but raised safety concerns and resulted in considerable earthworks to just achieve a 1:12 gradient, rendering much of the west of the site undevelopable.

Permeability

The layout indicates the need for strong East-West continuous linkage through the site for pedestrians and cyclists between School Road and Bonville Road. This route should fulfil a minimum width requirement of 5m and be lit as it will provide a valuable walking and cycling link between new residents and areas to the west including the city centre.

Access from Broomhill Road

As a result of topographical constraints, only Broomhill Road provides a potentially acceptable access, but this requires further investigation in terms of recording the speed of vehicles along Broom Hill Road, the requisite visibility and an accompanying Road safety audit as detailed above.

The entrance to site will need to undergo swept path analysis to ensure that a refuse vehicle can exit the site at the same time as a medium size car can enter it, and vice versa (from each direction). Whether or not a right turn lane is required can be defined by junction capacity assessment as it is important that public transport is not delayed in this location.

Emergency Access

A second (emergency) point of access is necessary, and the only suitable location for this is Bonville Road. This is provided on the submitted plan and is likely to require works to Bonville Road and adequate natural surveillance to avoid its abuse. From the layout proposed, the latter appears to have been considered and is welcomed, but we would require to see new footway provision along Bonville Road to connect this development better with its surroundings. This issue is also covered elsewhere.

Gradients

As raised above, gradients are the most fundamental on-site matter associated with this site. BCC has a statutory requirement to consider accessibility by all members of the community in accordance with the Equalities Act. Therefore, and to fulfil BCC's adoption requirements, all carriageways, footways and footpaths are required to be designed to a maximum 1:20 gradient (5%) to meet accessibility requirements and avoid future liabilities on the public purse.

In the event that in doing the above, significant land is lost, or results in tortuous bends or overprovision of hard surfacing or loss of considerable numbers of units, we may consider departures from this standard to aid design, but initial drawings must be designed to fulfil 1:20 in order to commence the conversation.

In dealing with gradients, retaining walls and structures are often necessary. TDM needs an early heads up on these matters and the full involvement of our Bridges and Structures team as part of an AiP given that an unadoptable structure will result in an unadoptable highway, as we cannot rely on poorly constructed infrastructure which some developers have found to their considerable cost and future liability.

Forward Visibility

All carriageways are required to benefit from adequate forward visibility in alignment with a design speed of 20mph, which must be demonstrated where there are internal bends and junctions. Only low-level planting on corners or bends within the splay is therefore permissible.

Servicing / Refuse Vehicles

Every house / property will require to be accessed by refuse vehicles. The entirety of the carriageway layout is therefore required to be subject to a swept path analysis by no shorter than an 11.4m-long refuse vehicle, passing a medium-sized car, including on corners.

Carriageway widths

All internal carriageways require must be a minimum of 5.5m in width for this level of housing. The 4.8m width indicated by Manual for Streets has proven to be inadequate elsewhere in Bristol as it does not allow for a car to pass a van or other goods or service vehicle without the footway being mounted, causing damage to the highway asset and endangering pedestrians or causing wing-mirror damage where neither gives way. It is understood why straight sections are necessary, but these will need to adopt traffic calming measures to ensure vehicles keep within the design speed and we would need clarification on traffic calming measures.

Parking and Traffic Management

The 6m carriageways that are proposed within this development will encourage parking onstreet, but this must only occur in marked bays and on one side of the road, where parking is prohibited (through double yellow line TROs) on the opposite side of the road. To not do this encourages footway parking on both sides of the road and a poor environment that obstructs pedestrians.

Regulation of parking within the development is likely to be necessary, if the internal highway layout is to be offered up for adoption. A Restricted Parking Zone (upright signs only) might be more appropriate than conventional yellow lines, if the carriageways are not standard blacktop tarmac construction. The development should be required to fund the traffic orders necessary to give effect to the above measures and should also be required to fund or provided the associated physical works.

Car parking that is proposed on-street (in front of the footway) must be adopted and therefore cannot be allocated to individual properties. We do not accept 'strips' of unadopted allocated parking sandwiched between two adoptable areas as this has caused considerable problems elsewhere associated with drainage, silting, poor construction and other maintenance problems.

It also severely limits BCC's ability in the future to repurpose this area for alternative infrastructure – ie: planting, cycle parking, benches, play equipment etc and therefore will result in poor environment.

I have not counted the number of car parking spaces provided but would need to see some justification of numbers and alignment with the local plan. It is important to ensure that overspill parking does not occur within the site or surrounding areas, but also be of a suitable number.

Additional waiting restrictions will also be required in and around the proposed entrances to the development on Broom Hill Road, Bonville Road and potentially on School Road if it is considered that overspill parking will be generated.

Electric Vehicle Charging

The increase in the popularity and purchase of Electric Vehicles requires EV charging to be designed-in to this development. Emerging West of England policy is for 20% active

provision and 80% passive provision. It is far easier to retrospectively install EV charging on-street where the ducting and design has been future-proofed and the space made available for transformers / substations necessary to enable standard, rapid and fast charging.

TDM urges the applicant to work with Bristol Energy and submit designs at the application stage which allow for Electric Vehicle charging throughout the site and avoids the future problems of cables across the highway, the re-excavation (and weakening) of newly constructed footways and roads, and the removal of trees to deliver EV charging points.

This needs to be considered at the planning stage for it to be properly incorporated into the future section 38 agreement for this development.

Private / Shared Surfaces

Where accessing 5 or less houses, we will accept some areas of non-adopted shared surface, but they must be suitable for refuse vehicles and avoid blind corners and other hazards that negatively affect vulnerable users.

Where shared surfaces are being offered for adoption, they must conform to the minimum width of 7.5 metres (between buildings) and be design so as to eradicate obstructive and dangerous parking.

SUDS

The developer will be required to follow the West of England SuDS Guide and determine its masterplan using a proof of concept approach. There are flooding issues downstream of the site (a small watercourse in Victory Park at School Rd) and therefore, the applicant needs to ensure a SuDS approach and no increase in flows and volumes. SuDS within the highway will need to include rain gardens etc but not permeable paving. Whilst BCC welcomes the use of SuDS in the open space but SuDS features needed throughout the development

Off Site Connectivity and impacts

Traffic Management & Road Safety

It is likely that s278 conditions and / or s106 obligation will be sought for BCC to deliver the a number of improvements in the surrounding area, but this requires further assessment following the Stage 1 TA referenced above. The following are therefore provided to inform the applicant of the likely concerns / considerations associated with this development.

School Road

- There are existing speeding issues along School Road so it is advised that traffic

calming, centre line removal and advisory cycle lanes with light segregation may be required, depending upon the demonstrated impacts

- Within the local shopping area on Broom Hill Road, improvements shall be considered along active frontage such as continuous footway treatments and public realm improvements.
- Improve Allison Rd/School Rd junction, including widening of footways and improving pedestrian / cycling facilities.
- School Rd north of junction with Allison road is part of LCWIP advisory cycle lanes + light segregation at key points A TRO is required, parking restrictions + junction protection and speed limit.

Industrial Estate

- Historic parking issues at Broomhill Rd Industrial Estate, due to parking from businesses and also overspill from St Brendan's sixth form college
- Concern that physical features will be required in addition to TRO, in order to prevent footway parking. It is not clear from the plan how this issue will be mitigated.
- Upgrade any existing Vehicle Activated Signs (VAS) in the area

Public Transport

- Concerns are raised by public transport colleagues about the effect that the new access road would have on the Terminus and commencement point of the number 1 service on Whitmore Avenue.
- The generated traffic from the development may cause problems on the network at the Broomhill Rd junction – particularly right turners (in and out) – which could affect bus journey times, particularly during the peak periods.
- Funding will be sought for the upgrading of those bus stops closest to the development that serve either the 1 or 96 route: Wyndham Crescent NW-bound; Longwood Road N-bound Shelter site, Broomhill Rd N-bound and Fermaine Avenue SE-bound and the Whitmore Avenue drop-off stop. The level of financial contribution sought will be confirmed at the planning stage.

Public Rights of Way

Our PROW team comments as follows:

PROW/478 which runs across the eastern section of the development site is recorded on the illustrative sketch as 'Public Right of Way retained'. However, the alignment of the path on the sketch differs from the PROW line on the Definitive Map. This path will either need to retain the Definitive Map alignment or a public path diversion order will be required. This PROW would also benefit from surface improvement either as part of the development itself or via the provision of S106 funding.

PROW/482 which runs across the development site from east to west is also recorded as 'public Right of Way retained'. This PROW is not currently aligned with the desire path on the ground, which is closer to the 'potential pedestrian/ cycle and emergency access link' indicated by the pink hashed line in the illustrative sketch. It is therefore advised that this PROW should be diverted onto the alignment of this proposed new access link as part of the planning process.

Both the above PROW realignments will require a public path diversion order under the Town & Country Planning Act 1990 to accompany the planning application. New routes will be subject to a detailed equality impact assessment. Please note in particular:

- a. Proposals for new development will be expected to incorporate existing rights of way for the most part along their existing routes and/or reflect pedestrian desire lines. Early consultation with the PROW Team is advised.
- b. New routes should be of an appropriate gradient for wheelchair use, preferably using areas of landscaping and amenity open space.
- c. Routes should be signed to enable users to follow the public paths.

No development should take place over the route of the path prior to the confirmation of a T&CPA path diversion order.

Please also note that a Highways Act Public Path Order is currently being advertised to divert PROW/477 onto the line of a desire path through the southern-most tip of the development area. However, the illustrative sketch provided does not show any new build in this section.

Consideration would also need to be given to public access and safety for users of the PROW during construction work. If construction works are likely to require the temporary closure or diversion of the PROW, a Temporary Traffic Regulation Order (TTRO) will be required for the duration of the works on the grounds of safety of the public.

Travel Planning and Promotion of Sustainable Travel

In line with BCC Travel Plan Guidance www.bristol.gov.uk/travelplans a Travel Plan Management and Audit Fee in the sum of £5,165 is required. The fees are to be secured through a S106 agreement or Unilateral Undertaking payable on commencement of the development.

The developer is required to implement, deliver and monitor their own agreed Travel Plan over the 5-year period, reporting biennial progress to the Council.

This fee does not cover the surveys, data inputting or analysis, which are the responsibility of the developer and their Travel Plan Co-ordinator. All monitoring reports and survey output data must be submitted to BCC.

Alternatively, Bristol City Council will undertake the implementation of the Travel Plan on the applicant's behalf for an Implementation Fee of £41,700 (£139 per dwelling). By paying the Travel Plan Implementation Fee the developer will be released from travel planning obligations over a 5-year period. A further contribution of £8,000 would also be requested for Road Safety education.

The applicant is required to advise which of the above options they wish to take prior to the decision being made on the planning application

Car Club provision would be expected and one that is accessible to wider community and suitably location.

Construction

A meeting will be required at the appropriate time to discuss TM for site entrance. We would also need to look at the routes in as these are not at present suitable for large numbers of construction vehicles. A construction access from Bonville Road may therefore make more sense and avoid impacts in the residential area.

Bristol Waste

Following a review of the documentation, Bristol Waste has considered the waste and recycling provision for the development at Broom Hill Broomhill Road Bristol BS4 4UD.

For 300 individual houses and flats we would provide the standard kerbside collection service. This would consist of the following containers for each house:

Container	Volume (litres)	Width (mm)	Depth (mm)	Height (mm)
Refuse bin	180	465	740	1070
Blue bag	90	450	450	450
Green recycling box	55	585	390	350
Black recycling box	45	585	390	285
Food waste bin	23	320	400	405
Kitchen caddy*	5	250	205	205
Garden waste bin**	240	570	740	1070

*to be kept inside property **optional, paid for service

For blocks of flats with shared communal bin stores with a combined number of apartments exceeding 15 units we would provide communal 1100 litre refuse bins and Mini Recycling Centre containers.

For smaller blocks we would provide communal refuse bins and shared recycling boxes marked up with a range of recycling materials. We would request further consultation with the developer as the siting and layout of communal storage areas.

Each property should have adequate storage space to accommodate at least a refuse bin, green recycling box, black recycling box and food waste bin. Whilst it is not a statutory service it would be advisable to also allow space for a garden waste bin or sacks as these properties do have gardens. Containers from all individual properties should be presented at the kerbside on the relevant collection day. Bristol Waste would enter communal stores for flatted blocks provided they are within a reasonable distance from where the refuse and recycling vehicles can safely stop while not obstructing the highway.

It is noted that there are concerns about the single point of access from Broomhill Road. We would urge the developers to ensure there is enough road width to not only safely enter and exit the site but to serve households near the entrance and at other pinch points without our lorries blocking residents' vehicles as this has resulted in conflict between drivers and our workers at other similar sites.

Bristol Waste would insist the highway is adopted by Bristol City Council (not just built to an adoptable standard) as our insurance does not cover the servicing of residential properties off the highway.

We would urge at this stage of the planning process that the developers refer to the Planning Guidance for Waste and Recycling produced by Bristol Waste Company. When considering the layout, access and the design of the bins stores, this guide contains a wealth of information regarding the bin volumes, requirements etc. <http://www.bristolwastecompany.co.uk/resources/>

Appendix B: City Design Group

Context

The Brislington Meadows site is allocated site BSA 1201. The Site Allocations development considerations include the following key considerations to inform design and development on the site:

- 'provide suitable access, which may include access off School Road through the existing allotments and ensure that any allotments affected are re-provided on the site or on nearby land'
- 'informed by an ecological survey of the site and make provision for mitigation and compensation measure, including enhancement to the grazing land adjacent to Victory Park and compensation for the loss of semi-improved neutral grassland and damp grassland. It was a site of Nature conservation Interest before it became an allocated site'.
- 'retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey'.
- 'retain and where appropriate improve the public rights of way on the site and provide pedestrian /cycle links with Brislington Trading Estate'
- seek to provide pedestrian / cycle links with Eastwood Farm Open Space to the north-east via the site of Sinnott House Police Station;

Any development on the site needs to demonstrate compliance with the considerations laid out at the time of site allocation. The current layout does not address the considerations which raises fundamental concerns about the proposal and its acceptability from design perspective.

Site Assessment

The Archaeological Officer considers that some pre-history remains could be present on this site.

This pre-application has not included a full Ecological survey, Arboricultural survey or Archaeology survey to demonstrate justification for the proposed layout in compliance with the 'site considerations' stated in the Local Plan. Please note that without further archaeological work such as a geophysical survey and/or trial trenches it will not be possible to comment on the potential archaeological impacts of any development on this site.

Without the above information the site constraints cannot be considered a reliable reflection of the site's assets. Accordingly, the proposed masterplan cannot be considered to have responded appropriately to the existing green infrastructure, arboriculture, ecological or potential historic assets.

The current layout proposes the removal all of the internal hedgerows with trees and

potential ecological features without any assessment. This is not acceptable approach and landscape/ecology lead design approach is needed for the site.

Layout and Form

The Illustrative Sketch Layout for Brislington Meadows shows a single access point to the north of the site. While it is acknowledged that this approach has been accepted by Transport Department, this is not acceptable from a Placemaking perspective. The site allocation seeks suitable access through the allotment which needs be explored. The key points to note are;

- A single vehicular access and cul-de-sac arrangement serving 300+ units is not going to work in this location, and goes against our adopted Local Plan Policies and recognised best practice.
- BLP Policies BCS21 (Quality Urban Design), DM27 (Layout and Form) and DM28 (Public Realm) all support the creation of an inter-connected and legible public realm and development that integrates spatially with the existing neighbourhood. The aim being to create a seamless transition between existing and proposed street space in order to successfully assimilate new residents into the locality. Creating a series of vehicular no-through routes would restrict this degree of integration, however, and engender a sense of living in an enclave. This could consequently result in poor legibility, difficult circulation and increased vehicular trip lengths (including servicing vehicles); making vehicular access more difficult physically won't necessarily result in a more sustainable transport choice, particularly in a suburban context.
- In addition to our adopted Local Plan Policies, Manual for Streets also supports an integrated, inter-connected approach towards public realm design in new housing development (see attached extract). As the extract points out, multiple vehicular access points lead to a more even spread of motor traffic throughout the area. In relation to Brislington Meadows site, Broomhill Road already represents a heavily trafficked street accommodating a significant volume of through-traffic. The wisdom of directing all traffic from the new development on to this already busy street is therefore questioned.

The above concerns regarding permeability and creation of a large cul-de-sac were raised previously by Mark Luck at an initial meeting between Homes England and BCC last October.

Footpath Network

A firm commitment for pedestrian cycle access from Dixon Road, Broomhill Road and School Road is needed as per the allocation considerations. The importance of the footpath and cycle connections to the surrounding townscape has increased importance for this scheme due to the single access point to service the 300+ residential units to limit trip generation. Connections should be shown to the school north of the site and

the local centre along Broomhill Road.

The provision of pedestrian/cycle route which runs parallel to the brook halfway in the middle of green spaces appears arbitrary. There is already a green option available along the brook and an alternative route along the edge of development is considered to be appropriate alternate option. This will be more efficient in its land take, construction, use and management.

While factoring variation for topographic, arboriculture and ecological factors, a similar approach is recommended for other pedestrian cycle routes along the edges of the site.

The footpath shown entering the site opposite Dixon Road will need to demonstrate it is achievable both in terms of the levels and the existing trees.

As noted above a multimodal route to Broomhill Road and School Road with generous provision for pedestrian and cycle users need to be provided.

Internal road network

The illustrative sketch masterplan proposes an internal road layout structured using a single main route running through the site with roads leading away, many of which culminate in a dead end. This goes against best practice, secure by design principles and planning policy which requires a connected network of streets to increase legibility and prevent segregation.

Further the layout creates few straight avenues culminating unceremoniously into parking bays etc. this needs to be reviewed.

Further details on the layout and design will need to be considered at a detailed stage once some of the fundamental issues relating to designing the site are resolved.

Summary

City Design Group objects to the scheme as currently proposed.

The submission of this pre-application should have included an Ecological, Arboriculture and Archaeology survey to ensure the design considerations set out in the Site Allocation were considered.

Additionally multimodal access from School Lane through the allotments, option for make the access Broomhill Road a multimodal one and confirmation of pedestrian cycle access from Bonville Road should have been tested and confirmed with a Transport consultant.

There is opportunity to rationalise the routes within the site, but these aspects need to

be discussed once the fundamental concerns noted above are addressed.

Appendix C: Ecology

The Site Allocations development considerations for this site, BSA1201 in the Local Plan, states that “development should:

- be informed by an ecological survey of the site and make provision for mitigation and compensation measures, including enhancement to the grazing land adjacent to Victory Park and compensation for the loss of semi-improved neutral grassland and damp grassland (the site currently has city-wide importance for nature conservation due to the presence and condition of particular species, habitats and / or features);
- retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey;
- provide a green infrastructure link with Eastwood Farm Open Space to the north-east.”

In addition, ecological mitigation is required to meet the requirements of the National Planning Policy Framework (NPPF). The National Planning Policy Framework (2019) states in paragraph 170(d) on page 49 that planning decisions should minimise impacts on and provide net gains for biodiversity.

The submission refers to ecological surveys but these have not been provided. It is difficult to comment without the findings of these surveys. Because of the potential for legally protected and priority species to be present, a Preliminary Ecological Appraisal (PEA) (extended phase one habitat survey) is recommended, which should include a detailed botanical assessment of the grassland and hedgerows on site because the site was formerly designated as a Site of Nature Conservation Interest (SNCI) and be carried out by a suitably qualified ecological consultant prior to the validation of a future planning application and not conditioned. This should include legally protected and priority species and habitats - Species and Habitats of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act [2006]) are a material planning consideration.

The current proposal involves a significant loss of hedgerows including species-rich hedgerows shown on the constraints and opportunities plan and is not considered ideal from an ecological perspective. The findings of the ecological surveys should be used to inform the layout and design of the scheme.

The layout and design of the scheme fails to take ecological considerations into account and is not supported in its current iteration.

If this proposed development proceeds an ecological mitigation and enhancement strategy to include a Precautionary Method Of Working method statement, bird, insect, hedgehog and bat boxes, Japanese knotweed control (please see below) and

landscaping details are likely to be recommended as a planning condition and a Section 106 financial contribution for off-site mitigation recommended.

Having consulted with Parks, a Section 106 financial contribution of £36,000 for off-site mitigation through the restoration and enhancement of species-rich grassland in the vicinity is now considered likely to be more deliverable than enhancement to the grazing land adjacent to Victory Park.

If this proposed development proceeds then the Japanese knotweed on site near Bonville Road will need to be controlled under a method statement.

Four storey apartment blocks are proposed. There may be an opportunity to provide living roofs as ecological mitigation if these have flat roofs, or on cycle shelters and bin stores. Living roofs should provide features for invertebrates, areas of bare ground and wildflowers to maximise their value for wildlife, and avoid the use of Sedum. Further technical guidance is available on request.

SSSI Impact Risk Zone

This site lies within the SSSI Impact Risk Zone and so Natural England should be consulted at the full application stage because this application proposes more than 100 dwellings.

Please note that the Preliminary Ecological Appraisal (PEA) report indicates that further ecological surveys are required on site prior to the validation of a future planning application (in accordance with central government guidance these should not be conditioned) as set out in Table 7 on page 25 of the report. Some of these surveys are seasonally constrained.

Ecological mitigation is required to meet the requirements of the National Planning Policy Framework (NPPF). The National Planning Policy Framework (2019) states in paragraph 170(d) on page 49 that planning decisions should minimise impacts on and provide net gains for biodiversity.

A biodiversity net gain assessment is recommended within the report. This should employ the Biodiversity Metric 2.0.

An ecological mitigation and enhancement strategy produced by an ecological consultant will be required if a future planning application is approved. This should include a precautionary Method of Working with respect to legally protected and priority species, mitigation for the loss of priority (Section 41 Habitats of Principal Importance) habitats as informed by a biodiversity net gain assessment, the provision of bird, bat, insect and hedgehog boxes and habitat log piles and method statements for the control of the invasive species Wall cotoneaster and Japanese knotweed.

It is noted that the report recommends that: “the woodland and hedgerow habitats within the Site are retained as much as possible, as well as the potential badger sett and the

retention and/or creation of suitable reptile habitat.” The Council’s Ecologist considers that the existing proposed site layout does not really meet these objectives, particularly with respect to hedgerows and therefore needs substantial design improvements.

Appendix D: Arboricultural Officer

Site Description

Brislington Meadows is an area of land located in Broomhill with pedestrian links from Broomhill Road, School Road and Bonville Road. The site topography consists of seven arable fields that slope from the north down to the southeast where it meets Victory Park and a number of tenanted grazing fields. The fields are divided by ancient hedgerows that contain ancient oak, holly and hawthorn trees.

The field system and hedgerows have not changed significantly since before the 1844-1888 Ordinance Surveys 1st Edition. A number of the ancient oak and holly trees plotted during the mapping of the area are still in existence today.

The 1840 Tithe maps also clearly identify the field system but does not contain any tree related data. The early layout of Broomhill Road and School Road are present.

Species Distribution

The most predominate species on site is Hawthorn (*Crataegus monogyna*) which forms the major species within the hedgerows. Mature oak (*Quercus robur*) and Holly (*Ilex aquifolium*) form the majority of the climax species with ash, field maple, elder, blackthorn and Hazel present to a lesser degree.

Age Classification

During my site visit I have measured the girth of a number of trees of varying species to demonstrate their age. Broadleaf trees such as Oak, Ash, Beech and Sycamore add, on average, between 1.5 & 2.5cm of circumference/ girth per annum (Royal Forestry Society – Tree Age). This average was created into a methodology by Alan Mitchell to estimate the age of trees. The methodology states that one inch of girth measured equates to a year of life. This is an estimate of age with some variability dependant on the speed of growth within differing species and site conditions.

Due to the significant amount of blackthorn sucker growth it has been impossible to measure the girth of many of the largest Hawthorn and holly, many of which have a multi stem form with large root bases.

Figure 1: An estimate of age from a sample of trees at Brislington Meadows.

Species	Stem Girth (M)	Stem Diameter (cm)	Estimate of age
Oak	2.1-4.7m	67 – 150	82 – 185
Holly	1.7	54	66
Ash	2.8-3.6	89 – 115	110 – 141
Hawthorn	1.5-1.9	48 – 61	59 – 74
Hazel	2.3-2.6	73 - 83	90 - 102

Ancient and Veteran trees

An ancient or veteran tree is a tree that is old for its species, or due to the conditions it has endured, presents a number of characteristics such as cavities, water pockets, hollows, fungal fruit bodies. These characteristics are often high quality niche habitats for bats, birds, mammals and invertebrates, some of which can only exist in these species specific niche habitats. Different species become ancient at different ages; a 100 year old oak can be considered mature whilst a 100 year old hawthorn is very ancient due to the shorter life expectancy of the species.

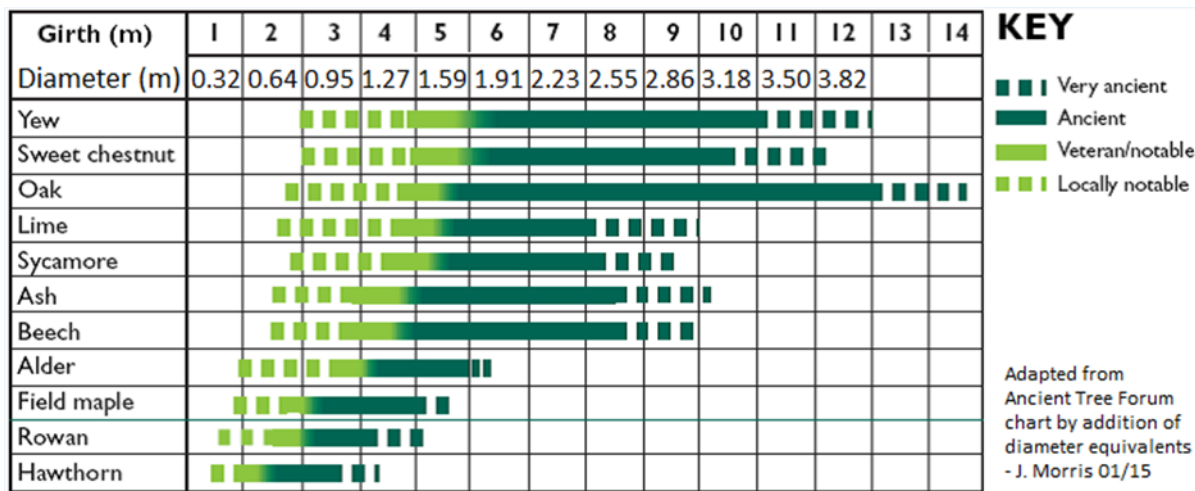


Figure 3: Age classification of the largest

Species	Stem Diameter	Age classification
Oak	150	Veteran/ Ancient
Holly	54	No data available
Ash	115	Veteran/ Ancient
Hawthorn	61	Ancient
Hazel	83	No data available

Ancient Hedgerow

Definitions (Defra: Habitat Action Plans – Ancient and Species Rich Hedgerows)

Ancient hedgerows

An Ancient hedgerow (which tend to be the most biologically diverse in terms of both plants and animals) are defined as those that were in existence before the Enclosures Acts (Mainly passed between 1720 and 1840)

Species-rich hedgerow

Species-rich hedgerows are defined as those containing an average of 5 or more native woody species per 30m length (4 species in northern England, upland Wales and Scotland). Additionally, hedges containing fewer woody species, but with a rich basal

flora of herbaceous plants are included, although there is no specific definition for identifying them.

Neglected Hedgerow

Neglected hedgerows gradually turn into rows of trees and develop gaps, impacting on their ecological status. This has become more of a problem in recent years in response to increasing labour costs, and the loss of traditional skills.

The hedgerows within Brislington meadows were in existence before the end of the Enclosures Act period and are therefore defined as Ancient Hedgerows. The hedgerows have not been managed for a significant period and have therefore become neglected reducing the species diversity due to the encroachment of blackthorn sucker growth. The dominant species within a majority of the hedgerows is Hawthorn in the main with sideways colonisation of blackthorn. Gaps have begun to form and trees such as field maple, hazel, holly and elder become scares where they would have once grown well evident by the small numbers remaining within the hedgerows.

There is still good evidence of age succession of hawthorn with the age diversity from very ancient too young.

Some sections of hedgerow also have more than 5 native species with a 30m length, however, the previously managed hedgerow species have become individual trees. During my site visit I have taken photographic evidence of a number of trees that have almost horizontal sections of stem close to ground level, this demonstrates the hedgerows were once managed by laying. This is a traditional form of hedgerow management that is seldom used since the mechanisation of farming practises.

The hedgerows on site are neglected ancient hedgerows that have been in existence since before 1840. The ancient/ veteran oaks, ash and Holly within the hedgerows provide a significant historical and cultural heritage locally and must therefore be retained during any development process

National Planning policy Frame Work (NPPF)

Glossary of terms

Irreplaceable Habitats: Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

15. Conserving and enhancing the natural environment.

175. When determining planning applications, local planning authorities should apply the following principles:

- Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are

wholly exceptional reasons and a suitable compensation strategy exists

Development management policies DM15 & DM17

DM15: Green infrastructure provision

“Green infrastructure provision facilitates a positive effect on people’s health by providing.....Improves the quality of visual and natural environments...”

Trees

The provision of additional and/ or improved management of existing trees will be expected as part of the landscape treatment of new development.

DM17: Development Involving Existing Green Infrastructure

Trees

- All new development should integrate important existing trees
- Development which would result in the loss of ancient woodland, aged trees or veteran trees will not be permitted.
- Where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided, in accordance with the tree compensation standard.

Pre-application proposal

Considering the guidance set out in the National planning policy framework, BCS9, DM15 & DM17 the current site layout, if brought to full planning would have to be refused due to the removal/ deterioration of ancient trees.

The site layout has not considered the site history, current green infrastructure, the ancient hedgerow network or the ancient and veteran trees on site.

The scheme requires major re-design to incorporate the ancient trees and ancient hedgerow structure. This will require investment to improve the green infrastructure assets in accordance with DM15; improved management to ensure a sustainable hedgerow system into the future must include:

- Management of the invasive blackthorn that has swapped the ancient hawthorn.
- Remedial tree pruning where necessary.
- Re-stocking with traditional native hedgerow species to increase species diversity and renovate the neglected structure.

Full planning application.

If a development is proposed for this site the following information will be required to support a re-design of the site layout to ensure the retention of the ancient trees and hedgerow network:

- A design that retains the important ancient trees and hedgerow structure
- An arboricultural report in accordance with BS5837: 2012 (This is a validation requirement)
- A scheme of improvements and enhancements to restore the neglected hedgerow system.
- Mitigation for tree loss in accordance with Bristol’s planning obligations SPD tree

replacement standard.

- Landscape/ tree planting plan.

Appendix E: Sustainability

It appears little on sustainability has been supplied as part of the pre-application enquiry, and headline views have not been requested within the wording of the enquiry. However it may be worth highlighting the key policies at this early stage.

Policy BCS13

Development should adapt to climate change through measures including: Site layouts and approaches to design and construction which provide resilience to climate change; The use of green infrastructure to minimise and mitigate the heating of the urban environment; and Avoiding responses to climate impacts which lead to increases in energy use and carbon dioxide emissions.

In order to avoid carbon intensive measures such as installation of air conditioning in future warming climates, resilience to spells of higher temperatures should be designed into the buildings at this early stage.

It is noted that apartments are proposed as part of the overall development. These should be dual aspect and consideration should be given to providing shading particularly to south elevations. Consideration could be given to balconies which allow for private space as well as some shading to be given to living areas below.

It would be expected as part of the full planning assessment that a thermal modelling assessment (CIBSE or equivalent) is submitted, for the proposed lifetime of the development (BCC will accept 60years); selecting 2050 and 2080 medium emissions scenario. A justified selection of units can be submitted. Any 'failures' should be addressed, starting with passive measures, including prevention of solar gain on southern and western elevations.

The use of green infrastructure is strongly encouraged as per Policy BCS13 on account of the multiple co-benefits. The use of planted brown/green roofs is also encouraged particularly in combination with roof-mounted solar PV as it enables the PVs to work more efficiently.

Policy BCS14 states: Development in Bristol should include measures to reduce carbon dioxide emissions from energy use in accordance with the following energy hierarchy:

1. Minimising energy requirements;
2. Incorporating renewable energy sources;
3. Incorporating low-carbon energy sources.

With regard to point 1; any proposed fabric improvements above existing Building Regulations would be welcomed.

Information as to the proposed air tightness should be submitted, (which is a welcomed method of ensuring the building envelope performs well thermally), and the opportunity

for natural cross ventilation should be taken where possible. However, BCC also accept the use of Mechanical Ventilation with Heat Recovery, which may further reduce the heating load, and also ensure that the internal air quality is sufficient if windows are shut in winter. This should include a summer bypass mode to allow for the heat recovery aspect to be turned off in the summer months.

Energy strategy

Contact has been made with the Heat Network team and no response has been received as of date of writing, when their response is received it will be forwarded across.

As such, it is advised that prior to submission of outline or full planning you contact the Heat Network team on heat.network@bristol.gov.uk to clarify if they would expect a connection to the network in the future.

Heating systems should be fully assessed for feasibility and selected in accordance with the heat hierarchy stipulated in policy BCS14. Where systems are discounted full justification will be required.

Major development should connect to existing district heating networks where available.

If the proposal is required to be District Heat ready, it should incorporate a wet heating system, and infrastructure to enable connection to forthcoming networks in the future. This should include:

- Provision of a single plant room, located adjacent to the planned/most likely heat network route, producing all hot water, including engineering measures to facilitate the connection of an interfacing heat exchanger; (It is noted at present there is a plant room specified within the ground floor of Block C – discussion with the Energy Service should be carried out prior to the submission of any full application to clarify the best location for the plant room and ensure the correct size)
- Space identified for the heat exchanger;
- Provisions made in the building fabric such as soft-points in the building walls to allow pipes to be routed through from the outside to a later date; and
- External pipework routes identified and safeguarded.
- Heat delivery, distribution and control systems that are designed to achieve low return temperatures, and that these services are designed in accordance with current CIBSE guidance on connection to district heating (please refer to Heat networks: Code of Practice for the UK, CP1, 2015, CIBSE).'

If no connection to the heat network is required, then the heat hierarchy found under BCS14 should be considered and an appropriate heating strategy selected. Please note that electric resistive heating is not found within the adopted heating hierarchy.

Please note that the use of heat pumps may enable the development to benefit from

renewable cooling if required in summer, if provision is made for cooling loops, etc.

Renewable energy technologies

The policy minimum requirement is for a 20% saving on residual emissions to be achieved via the use of renewable energy sources such as solar PV, solar thermal or other technologies such as heat pumps. Although not a policy requirement, it must be noted that whilst the minimum requirement is for a 20% reduction, if more than one technology could be combined, such as heat pumps and PV, the development could far exceed this, which would contribute towards the City's aspiration to be net-zero by 2030.

Policy BCS15 requests details of sustainable design and construction –including details of type, life cycle and source of materials to be used, (BRE B rated is noted); details of flexibility and adaptability of units and requests opportunities to provide net biodiversity gain as a result of development of the site such as brown/green roofs. Please note the National Planning Policy Framework (2019) states in paragraph 170(d) on page 49 that planning decisions should minimise impacts on and provide net gains for biodiversity.

The policy also requires high speed broadband to be supplied. Additional information is required to show how the scheme will meet the policy requirements – as per the Connectivity Practice Note.

Meaningful information in relation to provision of biodiversity opportunities does not appear to have been supplied at this stage. We would welcome provision of green infrastructure to assist with future cooling of the development in a hotter climate (such as tree planting for shade, or brown green walls /roofs to assist with increased thermal mass and cooling).

EV provision

There is a policy requirement of 1 EV space for every 5 parking spaces., although with this type of development and the current drive toward electrification of vehicles It is strongly encouraged the applicant to provided more EV spaces than the minimum, or at least provide the infrastructure to allow further spaces to be provided in the future. EV charge points should be 7kw to allow fast charging, or for two vehicles to be charged overnight.

Appendix F: Affordable Housing

Bristol City Council's Core Strategy Policy BCS17 and Site Allocations and Development Management Policies DM3 seek to secure affordable homes without any public subsidy. The 'Offer' of 30% Affordable Housing is accepted and without prejudice, this summary of requirement reflects the Illustrative Layout submitted with the Outline Planning Application.'

Tenure

- 77% Social Rented
- 23% Intermediate (which may include shared ownership on 40% equity at no more than 1.5% rental on the retained equity or other tenures where it can be demonstrated as affordable in perpetuity and meet needs of households identified in the West of England SHMA.)

Percentage of total units:

30% of the total residential component (C3) will be sought for Affordable Housing. Please also refer to Core Strategy BCS17. The following forms of housing are not considered appropriate for Affordable Housing:

- Micro-flats
- Live/work units
- Student accommodation where the accommodation is provided in the form of no self-contained/cluster units
- Key worker-units where the accommodation is provided in the form of non-self-contained/cluster units.

Unit & type

The following units are sought that should meet the national space standards and will apply for the 'affordable housing' contribution:

Social Rented Units				
Type/bedroom	Minimum Size (m2)	No of Units	% of Total Units	
1 bedroom flat	50	21	N/a	
2 bedroom flat	61	18	N/a	
2 bedroom house	70	14	N/a	
3 bedroom house	84	14	N/a	
4 bedroom house	97	3	N/a	

Shared Ownership Units				
Type/bedroom	Minimum Size (m2)	No of Units	% of Total Units	
1 bedroom flat	50	6	N/a	
2 bedroom flat	61	6	N/a	
2 bedroom house	70	4	N/a	
3 bedroom house	84	4	N/a	
4 bedroom house	97	1	N/a	

Distribution and location of units

The council seeks fully integrated mixed housing but will support a reasonable clustering, particularly for any proposed flatted units, to enable small self-contained blocks. In support of this, affordable housing must be integrated amongst market sale housing, and be indistinguishable in external appearance from market sale homes. The S106 agreement will be subject to an agreed location of the units between Bristol City Council, an approved Homes Bristol Registered Provider and the Developer.

RSL payment

Bristol City Council's Core Strategy Policy BCS17 seeks to secure affordable homes without any public subsidy. Our Matrix is out-of-date, we therefore advise developers to assume 50% of market value across all units when assessing the level of affordable housing they can provide. Registered Partners (Housing Association) might offer more than this percentage.

Service charges

Service charges (including all site charges for un-adopted public space) payable by the occupant on all affordable houses transferred will not exceed £250 per annum and £650 per annum in respect of flats. These Service Charges will be linked to the Consumer Price Index. Any ground rent or estate charges shall be at a peppercorn.

Enabling Fees

An Enabling Fee of £550 per affordable homes index linked from 1st October 2017 will be payable to Council by the Registered Provider when each affordable home is substantially completed.

Specification

The council expect all Affordable Housing units to achieve Design and Quality Standards that is specified in the Homes and Communities Agency's "Design and Quality Standards" (published by the former Housing Corporation in April 2007) but without the code levels.

Approved housing provider

The Council's preferred approved Registered Provider for this scheme will be a 'Homes

West' Bristol Partner.

Wheelchair Accessible units

The Council would like to seek 2% of the affordable housing units provided to be fully wheelchair accessible.

Appendix G: Public Protection Team (Land Contamination)

The pre-application has been reviewed in relation to land contamination. The applicants are referred to the following:

Bristol Core Strategy - BCS23 Pollution

Local Plan DM34 Contaminated Land

National Planning Policy Framework (2019) Paragraphs 118, 170, 178, 179, 180

Planning Practice Guidance Note:

<https://www.gov.uk/guidance/land-affected-by-contamination>

<https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>

<https://www.bristol.gov.uk/planning-and-building-regulations-for-business/land-contamination-for-developers>

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

As this is a major application a minimum of a phase 1 desk study looking into contamination must be submitted with any future planning application, if the desk study identifies a requirement for a phase 2 intrusive assessment submission of this information with the planning application it is encouraged to reduce the burden of pre-commencement conditions.

More details regarding the team and services are available on the website listed above.

Appendix H: Pollution Control

Parts of the middle of the site are adjacent to the play areas at Broomhill Junior School and part of the south east of the site are near to commercial premises at Brislington Trading Estate. The Pollution Control Officer therefore has some concerns regarding the potential for noise from these sources affecting future occupiers of the development. It is therefore expected that any full application would be accompanied by a noise risk assessment in accordance with ProPG: Planning & Noise Professional Practice Guidance on Planning & Noise New Residential Development (May 2017).

Due to the size of the site and the close proximity of the school and residential properties the Pollution Control Officer would also like a Construction Environmental Management Plan or Statement to be provided as part of the application. The Plan would need to detail the following:

- Proposed working hours - We would usually require that any works or ancillary operations which are audible at any residential property only be carried out between 08 00 Hours and 18 00 Hours on Mondays to Fridays and 08 00 and 13 00 Hours on Saturdays and at no time on Sundays and Bank Holidays. Any procedures for any deviation of the agreed working hours would need to be included in the plan.
- Noise mitigation measures
- Dust mitigation measures
- Measures to prevent nuisance from site lighting
- Public relations and complaint management

Appendix I: Flood Risk

These comments are provided by the Lead Local Flood Authority. The flood risk to the site appears low, but this needs to be confirmed by a reasonable flood risk assessment. Given this is a greenfield site, we would expect a SuDS strategy in line with the West of England Sustainable Drainage Developers Guide.

In particular, the Flood Risk Team would expect the site masterplan process to follow the Proof of Concept approach advocated by the Guide, specifically the identification of potential flow paths across the site, informed by the BCC Surface Water Management Plan modelling (which is available via <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>), as well analysis of the site's own topographic survey.

The flow paths (blue corridors) must form the basis of the proposed SuDS strategy as well as positioning of houses to ensure no dwellings interrupt the flow path and that linear SuDS features (e.g. swales, rain gardens etc.) are positioned in natural flow paths.

The site masterplan and associated SuDS strategy must also be informed by infiltration testing (conducted to BRE365 standards) and clearly identify the drainage hierarchy being proposed, as well as discharge location. No evidence has been submitted that the existing Masterplan has taken a SuDS proof of concept approach. However, the Flood Risk Team welcome the consideration of SuDS/drainage features in the proposed open space.

The proposed site must manage surface water runoff very carefully, ensuring volumes and rates of runoff are no more than existing as we are aware of historic flooding problems associated with the small ordinary watercourse that flows through Victory Park and underneath School Road. The Flood Risk Team completed a scheme here to realign the trash screen to help mitigate flood risk but it remains a high risk site. The proposed development must ensure it has only a positive impact on this flood risk.

Whilst the Highway Authority will not adopt permeable paving, permeable paving can be utilised for privately maintained areas, subject to reasonable maintenance responsibility and ownership. Permeable paving (or any SuDS feature) doesn't necessarily need to be an infiltrating system, they can be lined and served with an outflow device restricting flows. The highways serving the development can be drained using rain gardens or similar above ground source control SuDS.

Flood Risk Officers would welcome an early discussion with the applicant during the development of the Masterplan.

Appendix J: Avon Fire & Rescue

Further to the planning application reference 19/05220/PREAPP – Land at Broom Hill, Broomhill, Bristol. Avon Fire & Rescue Service will have additional Hydrant requirements associated with this application, please see attached plan as to our hydrant requirements.

The costs will need to be borne by developers through developer contributions. I have set out below the calculated costs per Hydrant.

Avon Fire & Rescue Service aim is ensuring members of the community are safe from fire and feel safe within their own homes by taking a risk assessed approach. We work with partner agencies developing strategies to help reduce the risk of fire within the community, and also assisting our partners in achieving their targets.

Our current strategy to reduce risk is simple: prevention, protection, response. Where efficiencies can be made we will work in partnerships to achieve these strategies. For example, we can bring positive change through effective education, influencing safer design of products, buildings and many other fire prevention activities. In the event of a fire occurring we want to ensure that people are protected, remain safe and can escape unharmed.

We can achieve this by enforcing fire safety regulations in buildings and undertaking home fire safety checks, including the fitting of smoke alarms. It is important that our communities know that if they need our help, we can respond to a range of emergencies, including fires and rescues.

Central Government does not provide any funding to Avon Fire & Rescue Service for the capital cost of growth related infrastructure. Where possible Avon Fire & Rescue Service will need seek and explore opportunities in relation to funding from other sources to meet the changing demands within its operational area.

Therefore Avon Fire & Rescue Service may need to become reliant on local support funding through either developer contributions, Section 106 of the Town and Country Planning Act 1990, through the Community Infrastructure Levy (CIL).

These developments will contribute to a significant increase in demand for Avon Fire & Rescue Service. As the population increases, so does the demand. This has an added impact upon the current resources therefore stretching our assets to meet this demand.

Fire Hydrants

The additional residential and commercial developments will require additional hydrants to be installed and appropriately-sized water mains to be provided for fire-fighting purposes. This additional infrastructure is required as a direct result of the developments and so the costs will need to be borne by developers either through them fitting suitable mains and fire hydrants themselves and at their cost or through

developer contributions.

Avon Fire & Rescue Service has calculated the cost of installation and five years maintenance of a Fire Hydrant to be £1,500 + vat per hydrant. Again this cost should be borne by the developer.

Importantly, these fire-fighting water supplies must be installed at the same time as each phase of the developments is built so that they are immediately available should an incident occur and the Fire & Rescue Service be called.