

Extension: Revised expiry date	16 February 2018
'Hold Date'	

Bristol City Council Development Management

Delegated Report and Decision

Application No: 17/05223/F **Registered:** 22 September 2017

Type of Application: Full Planning **Expiry Date:** 22 December 2017
Case Officer: Matthew Bunt

Site Address:

Raj Mahal City
Clarence Road
Redcliff
Bristol
BS1 6RP

Ward: Central

Description of Development:

Demolition of existing building and erection of a building containing 73no. student bedspaces, communal space and cycle parking (major application).

Site Visit Date: 2 November 2017

Date Photos Taken: 2 November 2017

Consultation Expiry Dates:

Advert 1 Nov 2017

and/or Site 1 Nov 2017

Notice:

Neighbour: 26 Oct 2017

SITE DESCRIPTION

The application site is the Raj Mahal City restaurant on Clarence Road in Redcliff, the building is predominantly single storey, with a three storey roof extension containing residential accommodation. The site is bound to the north by a rank of garages associated with the adjacent Spencer House to west which has an 11 to 12 storey scale. Mede Close (an adopted but unclassified highway) bounds the site immediately to the west, as does Clarence Road to the south, and the four storey (equivalent) building to the east which is part of the wider St Mary Redcliffe and Temple School site. Further to the south abutting Clarence Road is the River Avon (New Cut), to the south east is the grade II listed Langton Street Bridge. At the midpoint of the River Avon is the Bedminster Conservation Area which extends to the south, and further to the north and north west of the site is the Redcliffe Conservation Area finishing on the western side of the Redcliff Hill and the Ship Inn to the north west. Within Somerset Square to the north there is a grade II listed fountain, and further to the north are a number of grade II listed buildings included the Ship Inn. The site is also within the an air quality management area, as well as Flood Zone 2 and 3, and the River Avon itself is a Site of Nature Conservation.

APPLICATION

The application includes the erection of a 73no. bedroom purpose built student accommodation

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building which forms three attached vertical blocks consisting of an 8 storey block adjacent to Spencer House, that steps down to a setback 7 storeys, with a 5 storey frontage section. The layout and shape of the proposal is angled and progresses from the principal elevation of the adjacent school building toward Spencer House. The development's rear elevation then stops level with the northern section of the adjacent stairwell within Spencer House. The required stores are positioned between the rear elevation and the garage rank that bounds the northern side of the site. The proposal's design is contemporary including a red brick clad 8 storey section, with the set back (7 storey) section finished in a light coloured cladding and the frontage section clad in a blue brick matching the adjacent swimming pool building.

The applicant contends that pre-application advice was sought from the Local Planning Authority, however no formal pre-application enquiry was submitted despite being advised to.

AMENDMENTS AND FURTHER DETAILS ACCEPTED

During the course of the application revised documents/plans were accepted with regard to contamination; transport; residential amenity; and site drainage. These details were accepted given an appropriate extension of the target date for the determination of the application was agreed (until the 16/02/2018). This time extension was also intended to provide the applicant with sufficient time to submit a revised flood risk assessment, however, such a flood risk assessment was only submitted on the 01/02/2018. This flood risk assessment was not accepted by the Local Planning Authority given there was insufficient time to enable consultation with the Environment Agency, a statutory consultee. As well as this, it is understood that the flood risk assessment required the development to materially change to accommodate the required mitigation measures, including a material reduction in the number of student bedrooms and change to the ground floor resulted. Such plans were submitted on the 02/02/2018 and were not accepted given there was insufficient time to consult and notify third parties as to the material change to the planning application. A document including a Sequential Test and Exception Test were however accepted as the tests themselves, excluding the submitted revised flood risk assessment, did not require consultation further than the case officer.

It should be noted that target date for the application was extended on the 19/12/2017, meaning the applicant had in excess of 8 weeks to submit the revised assessments and for such assessment to be suitably consulted on, officers were also informed on the 19/12/2017 that the revised flood risk assessment was expected 'within the next 24 hours or so'. With this in mind, officers find the Local Planning Authority to be within their remit under paragraph 061 of the Planning Practice Guidance to refuse to accept the information referenced above. As well as this, officers find in not accepting the revised details in accordance with paragraph 061, the Local Planning Authority has not acted in an 'unreasonable' fashion as described by paragraph 030 of the Planning Practice Guidance.

RELEVANT PLANNING HISTORY

14/03000/F	Approved subject to Conditions	18/08/2014
Widening of entrance onto Clarence Road, including new pavement crossover and formation of 5 parking spaces.		

COMMUNITY INVOLVEMENT

i. Process:

The application was supported by a statement of community involvement (SCI) prepared by Jenny Gee Communications Ltd. A programme of community consultation was submitted as part of the SCI and is summarised below:

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- An email to councillors;
- Door to door delivery of an invitation to over 600 households;
- Website was live advertising the proposal;
- RRAG meeting;
- Drop in session;
- Meeting with the St Mary Redcliffe and Temple School;
- Ongoing feedback and liaison - website.

The key community involvement opportunity appears to be the drop in session where 6 people attended.

ii. Summarised response to consultation:

- RRAG asked why a residential use with affordable housing was not being sought;
- Cllr Smith suggested he could aid communications regarding the garages to the rear;
- Overlooking of the school and swimming pool;
- Community wants to ensure integration with student and local residents;
- Can CIL money be used to something about the subway where people are sleeping;
- Overseas preference are preferable;
- More ecological information is required;
- St Mary Redcliffe and Temple School raised the following issues:
- Development programme;
- Track record of the developer;
- Safeguarding pupils from overlooking;
- Overshadowing;
- Construction management plan;
- Disruption of the school during assemblies and exams;
- Access to the school via Mede Close;
- Construction parking;
- Residential parking;
- Safeguarding students during construction;
- Antisocial behaviour;
- Drop off and collection days for students;
- Height of the building proposed;
- Flood risk;
- Fire safety;
- Utilities.

iii. Result of community involvement:

A number of the concerns raised have been addressed through the submission of assessments and surveys. It does appear that the key consultees in the nearby area (Spencer House and Patterson House) have not engaged, or have not been engaged; hence the value of the community involvement is limited. Given both of these are Council run housing blocks, it is disappointing to see that the relevant housing officer was not engaged to help facilitate community involvement. With this in mind, the community involvement that has occurred is of limited value.

RESPONSE TO PUBLICITY

Nearby occupiers were notified by letter, and the application was also advertised by press and site notice in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015. In response to such consultation, 7 objections were received from members

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of the public and a ward councillor. A further neutral comment was received from the Bristol Civic Society. These comments are summarised below.

i. Members of the Public

Principle

- The building should be kept as a restaurant or returned to pub;
- Lack of affordable housing;
- Housing would be preferable to student accommodation;
- Adding 73 more residents to the area is not acceptable;
- The loss of the restaurant is not acceptable.

Design and Site Planning

- Proposal would block views out of the site to the river and Victoria Park (from Patterson House);
- A more active frontage would be welcomed.
- Residential Amenity
- The proposal would block views from the walkway, kitchens and bedrooms of the lower floors of Spencer House;
- Scale of the building in close proximity to Spencer House would be intrusive and harmful to levels of light in kitchens and bedrooms;
- Views from Spencer House and Patterson House would be interrupted, for example views of the Totterdown and the River Avon;
- The proposal could result in noise and disturbance;
- More details of student management requested;
- No room for on-site manager regarding managing students;
- The proposal will contribute to anti-social behaviour in the area.

Transport

- The proposal should leave the garages as it does as these are full;
- Parking around the school is problematic;
- Insufficient levels of car parking are proposed;
- Insufficient cycle storage is proposed;
- Refuse and recycling area is insufficient in size;
- Insufficient laundry area;
- Concerns as to staff, delivery and family parking.
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Community Involvement

- More information as to how the garages were decided not to be within the scheme would be helpful.

ii. Bristol Civic Society

Bristol Civic Society has no objection to the residential use of this site if the Council is satisfied that the commercial space on it is no longer viable. The Society considers that the height and massing of the proposal is appropriate for this site. The site would be better used for a conventional residential development, however, rather than intensive student accommodation.

iii. Councillor Paul Smith (comments included verbatim)

This is a high density development neighbouring Spencer house which is a council housing block. I do support development of this site for residential but not for student housing. This is not an area

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which has been historically used for student housing and I don't think it's an appropriate use for this location. A presentation has been made by the developer to the Redcliffe Residents Action Group (RRAG) which represents the local community, the RRAG decided at that meeting to oppose the development.

iv. Adam Phelps - Developments Bristol (applicant)

In response to the Housing Officers comments, Mr Phelps summarised comments as follows (full comments on the website):

- Shadow studies have been submitted to demonstrate no loss of light - empirical data should take precedence;
- Views will not be blocked from Patterson House;
- Student accommodation will be managed appropriately;
- Parking, cycle parking and refuse and recycling stores are acceptable - BCC Transport have confirmed this.

Environment Agency (Sustainable Places) has commented as follows:-

Objection, the submitted flood risk assessment is unacceptable. Full comments are available from the website.

Civil Protection Manager has commented as follows:-

The submission does not include a floor emergency or evacuation plan. Such a document would be required in the event of approval.

Nature Conservation Officer has commented as follows:-

No objection subject to conditions regarding bat roosts, bird box provision and the proposed green/brown roof. Advice notes are also suggested.

Contaminated Land Environmental Protection has commented as follows:-

No objection subject to conditions. Full comments are on the website.

Pollution Control has commented as follows:-

The submitted acoustic report is acceptable. The acoustic report makes recommendations as to the provision of glazing and ventilation and I would therefore ask for the following condition should the application be approved:

1. Sound Insulation

No development shall take place until there has been submitted to and approved in writing by the Local Planning Authority a detailed scheme of noise insulation measures for all residential accommodation, this scheme shall also include details of ventilation.

The scheme of noise insulation measures shall take into account the recommendations detailed in the Noise Assessments submitted with the application and the provisions of BS 8233: 2014 "Guidance on sound insulation and noise reduction for buildings".

The approved details shall be implemented in full prior to the commencement of the use permitted and be permanently maintained.

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Arboricultural Team has commented as follows:-

No objection subject to conditions. Full comments are available on the website.

Crime Reduction Unit has commented as follows:-

A host of crime reduction advice has been issued - see full comments on the website.

Flood Risk Manager has commented as follows:-

It is a requirement of national planning policy that sustainable drainage measures are put in place for the management of surface water runoff from all Major development. It is also a local validation requirement for all Major development proposals to be supported by a sustainable drainage strategy. The application supporting information includes sufficient information and will be subject to a condition to ensure implementation.

Sustainable Cities Team has commented as follows:-

The proposal to provide hot water with a communal gas boiler meets the requirements of policy BCS14. The proposed use of electric panel heaters to provide space heating does not meet the heat hierarchy set out in policy BCS14 and other measures should be specified. These include, site-wide renewable heating (using for example heat pumps), site-wide gas fired heating and individual renewable heating.

The proposed use of PV is noted and welcome.

Additional information is needed to show the assumed annual yield per kWp of installed capacity and to clarify that the projected annual yield takes account of the shading factor (SF), tilt and orientation of the system. The Shading Factor should be calculated using the Standard Estimation Method (as set-out in the MCS Guidance).

Under BCS13 and the need to avoid 'responses to climate impacts which lead to increases in energy use and carbon dioxide emissions' I recommend requesting an assessment of overheating risk.

This should assess the risk in units deemed to be most vulnerable such as those with a southerly aspect. The assessment should be based on a recognised methodology such as TM52 of equivalent, to 2050, based on a mid to high emissions scenario.

A connection to the pre-existing district heating network in the area would be sought, given the proposed ground floor layout this could be secured by condition.

Transport Development Management has commented as follows:-

No objection subject to revised layout for the disabled space, and relevant conditions.

City Design Group has commented as follows:-

The submitted application does not comply with our Core Strategy's BCS21 policy neither with the Design Policies established in our Development Management policies. The intensity of the development is so excessive that the height, scale and bulk of the block are unacceptable. Proposed variation in volumetric receding, setback of upper floor, roof gardens, and different cladding material, will not mitigate the severe impact of the proposed built form to the immediate

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site context and the site constraints. The excessive intensity of development pair with poor design makes the scheme impossible to recommend for approval. Full comments are available from the case file.

Air Quality has commented as follows:-

The applicant is proposing to install a centralised gas boiler in order to provide for on-site demands however no details of the type, size and location of the boiler flues have been provided.

Details of the proposed boiler need to be provided with regards to emissions of pollutants to air. It is possible that an air quality assessment of these emissions will be required, however, the applicant should refer to the IAQM/EPUK Guidance document: Land-Use Planning & Development Control: Planning for Air Quality (2017). Given the proximity of the site to Spencer House the applicant should also demonstrate that the location of the stack has been carefully considered in order to maximise the dispersion of emissions and minimise the potential impact on surrounding residential receptors.

These details can be conditioned if deemed appropriate.

RELEVANT POLICIES

National Planning Policy Framework – March 2012
 Bristol Local Plan comprising Core Strategy (Adopted June 2011), Site Allocation and Development Management Policies (Adopted July 2014) and (as appropriate) the Bristol Central Area Plan (Adopted March 2015) and (as appropriate) the Old Market Quarter Neighbourhood Development Plan 2015.

In determining this application, the Local Planning Authority has had regard to all relevant policies of the Bristol Local Plan and relevant guidance.

KEY ISSUES

For information, any policies containing BCS are from the Core Strategy, DM are from the Site Allocation and Development Management Plan, and BCAP are from the Central Area Plan.

(A) Existing and Proposed Land Uses

i. Existing Land Use

This subsection seeks to assess the principle of the loss of the existing site in land use terms. The existing site is a brownfield site composed of a restaurant with an ancillary maisonette above (1no. residential unit).

The lawful use within the planning register appears to be Use Class A4, however in 2010 the use changed lawfully be nature of the permitted development rights to a restaurant use (Use Class A3). There are no policies within the Development Plan that resist the loss of an A3 use, and given the residential accommodation within the development is associated within the restaurant use, officers find no reason to resist its loss.

ii. Proposed Land Use

This subsection seeks to assess the principle of the proposed land use – purpose built student

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accommodation (PBSA). The site is not subject to any Local Plan designations, meaning the site represents a windfall site situated on previously developed land. However, the area of Redcliffe does have an area-wide specific policy – BCAP47 ‘The Approach to Redcliffe’. In south and west Redcliffe the policy aims to redevelop vacant or derelict sites, seeking design enhancements where possible, seeking renewal or replacement of retail units, public houses and other active ground floor uses. The existing restaurant forms and active use which is not understood to be vacant, and is certainly not derelict, the proposal will result in a degree of loss of an active frontage/ground floor use. Policy BCAP47 makes reference to and supports the Future of Redcliffe SPD (SPD3), this document includes specific guidance for South Redcliffe and importantly does not identify the site as a ‘development opportunity’ on page 55, but does identify the existing restaurant frontage as an existing building frontage.

The development is not for Use Class C3 (dwellinghouse), rather the proposal is for specialist student housing. Both policy DM2 ‘Residential Sub-Division and Specialist Housing’ and policy BCAP4 ‘Specialist Student Housing’ supports the principle of specialist student accommodation in the city centre, recognising the benefits in terms of relieving pressure on local housing stock. Similarly these policies support for specialist student accommodation is subject to the development in question not creating or contributing to amongst other issues, a harmful concentration of specialist student housing within any given area.

In support of this application a Planning Statement was submitted, within this statement the issue of the concentration of PBSA – term to be used interchangeably with specialist student accommodation/housing – was discussed. The Planning Statement referred to a CBRE report submitted in support of planning ref. 16/02994/F which permitted PBSA at Brunel House, St Georges Road. The CBRE report concluded Bristol has a significant undersupply of PBSA, which is exacerbated by the predicted increase in student numbers. As well as this, the Planning Statement interprets the CBRE report with regard to houses in multiple occupation (HMO) suggesting that the proposed 73no. student bedspaces would equate to ‘taking the pressure off 14no. homes in the local housing supply’. Whilst the CBRE report is from 2016, officers accept there is shortfall in the supply of student accommodation in Bristol, and recognise that this development would relieve pressure on family-sized homes within the wider city. As well as this, it is important to recognise the economic benefits which students represent to the city, and also the social benefits associated with students living in Bristol.

The principle of student accommodation in this location is considered by officers to be acceptable as contributing to the housing supply and meeting a clear demand for purpose built student accommodation in the city subject to consideration of detailed policy requirements (see below). Furthermore, beyond their contribution to the city’s higher education establishments, students bring considerable economic benefits to the city through support of existing services. As such the student accommodation is acceptable in principle on the basis of local policy requirements (Policies BCAP4 and DM2) and offers benefits in removing pressure on other housing stock.

iii. Proposed Land Use within Flood Zones 2 and 3

As noted by the Environment Agency’s comments, the application is within Flood Zones 2 and 3. Policy BCS16 ‘Flood Risk and Water Management’ and Section 10 of the NPPF requires development to follow a sequential approach to flood risk management through giving priority to development of sites with the lowest risk of flooding. Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making are required to take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking

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into account the flood risk vulnerability of land uses and applying the Exception Test if required. Paragraph 066 of the PPG categorises student halls (comparable to PBSA) as 'more vulnerable' in terms of flood risk vulnerability, and Table 3: Flood risk vulnerability and flood zone 'compatibility' (paragraph 067 of the PPG), suggests that if more vulnerable uses are sequentially acceptable, such uses must then be subject to the Exception Test. For information, the existing restaurant use is considered to be a 'less vulnerable' in terms of flood risk vulnerability.

Accordingly, the principle of the development in Flood Zone 3 is only acceptable provided no sequentially preferable sites are available in areas at a lower risk from flooding (i.e. sites within Flood Zones 1 or 2).

iv. Summary

The principle of student accommodation in this location is considered to be acceptable, subject to consideration of detailed policy requirements including the proposal's design quality; impact on the area (both in terms of amenity and the accommodation provision/mix); the availability of sequentially performable sites; and highway safety impacts.

(B) Type, Mix and Amount of Housing

i. Type and Mix of Housing

Policy BCAP4 is clear that specialist student housing schemes that contribute to the diversity of uses within the local area will be acceptable in Bristol City Centre unless it would create a harmful concentration of such housing in any given area. Policy DM2 goes on to define, amongst other things, what a 'harmful concentration' might be. It is written out in full below for ease of reference. DM2 states that specialist student accommodation (and other forms of residential sub-divisions/ conversions/ shared/ specialist housing) "will not be permitted where:

I. The development would harm the residential amenity or character of the locality as a result of any of the following:

- Levels of activity that cause excessive noise and disturbance to residents; or
- Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; or
- Cumulative detrimental impact of physical alterations to buildings and structures; or
- Inadequate storage for recycling/refuse and cycles.

II. The development would create or contribute to a harmful concentration of such uses within a locality as a result of any of the following:

- Exacerbating existing harmful conditions including those listed at (i) above; or
- Reducing the choice of homes in the area by changing the housing mix.

Where development is permitted it must provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies.

In terms of the policy context, policy BCS18 expects new development to maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities.

With regard to considering the development's impact on the type and mix of housing in the area, data is available at various geographical levels relevant to the site: the Redcliffe Lower Super Output Area (LSOA); the ward of Lawrence Hill and the city of Bristol. The applicant has submitted limited information with regard to the proposal's impact on the housing stock in the area, stating:

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'The introduction of PBSA into Redcliffe South will marginally alter the term-time population profile within the LSOA, in a progressive manner in terms of mixed and balanced communities. Census 2011 data reported that less than 4% of Redcliffe South residents were full-time (18yrs+) students, which is below the comparable city-wide figure of 8%. These students in the area (at the time of the Census) were, for the most part, living at home or privately renting as the surveyed housing stock and household (compositions) were nearly absent of shared or multi-person households i.e. HMOs, demonstrating that there is certainly no concentration of such uses in the area in accordance with Policy DM2 (ii).' (Page 15 of the submitted Planning Statement).

With regard to the proposal's impact on the choice of homes in the area, officers largely agree the proposal will not contribute harmfully to the type and mix within the area. As of 2016 according to data assembled from both the UWE and UoB, university students formed 5% of the total population of the ward of Lawrence Hill, which was less than the average across the city where the students form 7.2% of the student population. Based on these statistics, were this application to gain permission, the percentage of university students as part of the total population of Lawrence Hill would equate to 5.4%. As such officers find that the proposal would not result in a ward-wide community that was unduly mixed with regard to students. At the geographically more local level of the Redcliffe South LSOA, as of 2016, university students formed 2.4% of the total population of the LSOA, were this application permitted, this would increase to 8.5%, 1.3% more than the average across the city. Given the very narrow geographical area of the LSOA, officers do not find this concentration to be unacceptable, especially as at the time of submission, there appears to be no other planning applications approved or submitted within the LSOA since 2016 with regard to student accommodation.

It also relevant to assess the impact the development would have on the existing housing stock in the locality. According to the 2011 Census data, the ward of Lawrence Hill had 84 multi-person households composed of 'all full-time students' which equates to 1.2% of the households in Lawrence Hill, this figure is less than average across the wider city - 1.9%. Similarly, the LSOA only has 2 (0.3%) multi-person households composed of 'all full-time students' which is less than the average across the city. Accordingly, whilst these statistics do not suggest that the locality is composed disproportionately of multi-person households occupied by students, the proposed development would reduce pressure on households within the locality, and city as a whole, from potential conversion into multi-person households occupied by students.

While the proposal is for student housing only, the evidence above sets out how this would contribute to addressing the demand in the city for this type of accommodation and to a degree freeing up the existing housing stock for family homes within the City Centre to which policy BCAP3 refers. Officers are aware that the proposal would result in the loss of one C3 unit within the local area (the ancillary maisonette), however, given the proposal would likely reduce pressure on the existing housing stock in the city centre, officers find this loss to be likely off-set meaning the relevant policy criteria of policies DM2 and BCS18 are met.

Whilst the location of the site is not within walking distance of any university building, it is within walking distance of Temple Meads and a number of other public transport links, as well as the city centre as a whole.

In light of the above the remaining question is whether or not the proposals would result in a harmful concentration of uses based on demonstrable harm to residential amenity – criteria included within policy DM2 relating to transport issues will be assessed within Key Issue G. Given the close proximity of the development to Spencer House, officers are aware for the potential of activities related to the use of the proposal to disturb the occupiers of Spencer House, especially given Mead Close which provides further opportunity for disturbance. Within the Planning

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Statement it is suggested that the building will be fully managed to avoid undue noise and disturbance. This is a common approach taken with regard to student accommodation; a management plan has been submitted with regard to transport, and a student management plan with regard to disturbance will be subject to a condition in the event of approval given such a plan is not included within the submitted details.

ii. Amount of Housing

Policy BCS20 states that new development will maximise opportunities to re-use previously developed land. Opportunities will be sought to use land more efficiently throughout the city. Imaginative design solutions will be encouraged at all sites to ensure optimum efficiency in the land use is achieved and higher densities of development will be sought in the City Centre. The proposal's contribution to the Council's housing land supply has been discussed, and it is acknowledge that the proposal would contribute toward the provision of 7,400 new homes within the city centre as identified by policy BCS2 'Bristol City Centre' as student accommodation is considered to count toward the Council's supply of deliverable housing land.

The density of housing on the site would be 333.3 dwellings per hectare (capacity divided by hectare – $20/0.06 = 333.3$). This figure was derived from considering each unit/cluster to represent a dwelling, meaning the proposal is considered for the purposes of assessing housing density to have 20 units. 333 dwellings per hectare is relatively high in the context of the city centre, for example recent development in the city have represented a much lower comparative density: approximately 200 dwellings per hectare (Wapping Wharf) and 150 dwellings per hectare (The Zone, St Philips). Similarly, the density of development is comparatively higher than one of the recent developments referenced within the submitted Planning Statement: Brunel House St Georges Street (161 dwellings per hectare). Officers do acknowledge that the remaining recent student development referenced by the Planning Statement no. 13-21 Baldwin Street has a much higher density than the proposal, however this is due to this proposal being solely for studio student apartments meaning a comparison is not overly helpful (1,137.5 dwellings per hectare).

Whilst the high density of the development does represent an efficient use of land which is encouraged by policy BCS20, the policy does state that the appropriate density for any individual site should be informed by amongst other things: the characteristics of the site; the local context; the need to provide an appropriate mix of housing to meet demands; and importantly the need to achieve high quality, well designed environments. Accordingly, the provided the mix of housing is acceptable, this section is satisfied in terms of policy BCS20, however, later sections of this report will consider the proposal's density of development in terms of its resultant design and character impacts with the local environment in mind.

iii. Affordable Housing

Student accommodation is exempt from the local policy seeking affordable housing provision from new residential development as it is recognised that such a requirement may make these schemes unviable and the LPA recognises the strong need for student housing in the City Centre to support Bristol's role as a thriving university city. Purpose built student accommodation provision also alleviates the pressure on the private housing stock elsewhere in the city for conversion to student residences- an issue that the LPA has sought to address through a planning mechanism know as an Article 4 Direction, which requires an application for planning permission for changes of use of homes to houses in multiple occupation (HMOs) in those areas of the city most under pressure.

iv. Summary

Local planning policies BCAP4 and DM2 are clear that specialist student housing schemes will be

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acceptable in the City Centre provided that they wouldn't result in a harmful concentration through harm to residential character or reduction in housing choice through changing the housing mix. There is a clear and serious demand for purpose built student accommodation in the city and policy directs such specialist student housing to the City Centre, which helps to relieve the pressure on the private rental housing stock and offers a sustainable location. Officers are therefore satisfied that the proposals would meet all of the policy tests in this respect.

(C) Flood Risk

As indicated within Key Issue A, the proposed development represents a 'more vulnerable' use within Flood Zone 2 and 3, meaning the development must be subject to the Sequential Test and Exception Test. Specifically, the Flood Zone 3 extends across the front of site level with the adjacent Mede Close that runs parallel to Clarence Road, the Flood Zone continues to then extend level with the section of Mede Close that runs perpendicular to Clarence Road finishing just before the north western edge of site. Flood Zone 2 extends further to the north than Flood Zone 3. Overall, in terms of the site and development proposed, approximately 50% of the site is within Flood Zones 2 and 3.

i. Sequential Test

Policy BCAP5 'Development and flood risk' seeks to minimise the exposure of more vulnerable types of development to flood risks, and endorses the sequential approach included within policy BCS16 and the NPPF. The policy goes on to acknowledge there are a number of areas in need of regeneration in the city centre that coincide with some areas identified to be at a risk from flooding, in such cases the policy encourages a more focused approach to flood risk where some residential development will be accepted. Policy BCS2 outlines a number of areas of focus for development and regeneration, the site is not within one of these areas. The significance of this is that policy BCAP5 narrows the search area for the Sequential Test for regeneration areas identified within Appendix A of the Central Area Plan: Newfoundland Way, Bristol Shopping Quarter, Nelson Street and Lewins Mead, North Redcliffe, Redcliffe Way, Bristol Temple Quarter, Central Harbourside, and Cumberland Basin. With this in mind, the search area for sequentially preferable sites at a lower risk from flooding should be contained to just the city centre as indicated by policy BCAP5.

Further to this, the Council's Flood risk sequential test practice note provides guidance on defining the search area where proposals include the replacement of an existing building as this development does. The guidance states:

'In situations where an existing building has become predominantly vacant because its existing use is no longer viable and a conversion to alternative uses is necessary to bring it back into use, the council will consider the regeneration benefits of its reuse and the implications of its remaining vacant. If the council is satisfied that the benefits that would arise from bringing the building back into use cannot be provided by development on an alternative site, then the search area for the Sequential Test can be the application site alone and the Sequential Test thereby passed.

In some cases, it will not be possible to bring the building back into use without some increase in floorspace, such as through the provision of additional floors or some degree of extension. In such cases the search area for the Sequential Test may still be the site alone, but the proposed additional floorspace should not be significantly more than is required for a deliverable scheme.

The replacement of an existing building with a new, suitably flood-resilient design is likely to be preferable to the conversion of an existing building if the exposure of people and property to flooding is to be minimised. In such cases, subject to the considerations set out above, the search area for the Sequential Test can again be limited to the application site.' (Page 5 and 6).

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The applicant has not demonstrated that the existing building is predominantly vacant as the existing use is no longer viable meaning the search area for the Sequential Test should not just be limited to the application site, rather than the city centre. Notwithstanding this, even if this were demonstrated, the proposed replacement building introduces significantly more floorspace than existing, much more than what would be considered to be required for a deliverable scheme. With this in mind, the search area for the Sequential Test is the city centre, the submitted Sequential Test agrees with this in that the search area is city centre wide.

The Sequential Test requires any alternative sites within the search area that are at lower risk of flooding and would be appropriate for the proposed development to be identified. The guidance states that:

Alternative sites for major proposals of 10 or more dwellings or over 1,000m² of non-residential floorspace can be identified from the council's emerging Local Plan documents and the evidence produced to support them, particularly the Strategic Housing Land Availability Assessment (SHLAA). (Page 6).

Further guidance is included as to whether a site is 'reasonably available', the guidance states that: a site is only considered to be reasonably available if all of the following apply:

- The site is within the agreed area of search.
- The site is of comparable size and can accommodate the requirements of the proposed development.
- The site is either:
 - Owned by the applicant;
 - For sale at a fair market value; or
 - Is publicly owned land that has been formally declared to be surplus and is available for purchase.
- The site is not safeguarded in the Local Plan for another use.

The submitted Sequential Test sets the search area for alternative sites as greater than the city centre which is acceptable. In searching for alternative sites, the applicant has reviewed the list of 'Key Sites' included within the annex to the Central Area Plan. Further to this, the applicant has also used the online property search engine 'Rightmove', this returned 20no. additional sites.

Of the sites reviewed from the 'Key Sites', it is submitted that all have predominantly received planning permission and are outside of the means of ownership to the applicant, or have significant constraints such as heritage and accessibility. No information has however been produced to justify this in any way further than an appendix that includes a list of the 'Key Sites'. Turning to the sites produced on the 'Rightmove' search, it is contended that those that lend themselves to redevelopment face heritage and contextual constraints that would not be conducive to the level of development promoted by the applicant. Once again no information has been provided to justify this claim further than a list of 20 properties with their guide price straight from the Rightmove website.

Whilst the search for alternative sites does not refer to the SHLAA, officers find the search to be acceptable in scope and breadth, given it refers to allocated sites within the search area as well as alternative sites through a search engine. As well as this, officers also realise that the SHLAA refers to housing land only.

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Turning to whether alternative sites are reasonably available, officers are of the opinion that there is a lack of information submitted to adequately establish if the sites referenced are not reasonably available as the submitted information is general in nature and not adequately specific to each site referenced within the search for alternative sites.

There is therefore an insufficient level of information submitted to establish that there are no sequentially preferable sites available in areas at a lower risk from flooding within the city centre. The proposal therefore fails policies BCAP5 and BCS16 as well as the relevant paragraphs of section 10 of the NPPF.

ii. Exception Test

As set out within Table 3 Flood Risk Vulnerability and Flood Zone 'compatibility' within paragraph 067 of the PPG, the development should be subject to the Exception Test. For paragraph 102 of the Exception Test to be passed:

- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by the Strategic Flood Risk Assessment; and
- A site-specific Flood Risk Assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users and the likely effects of climate change, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

The applicant contends that the development includes wider sustainability benefits in that the development created PBSA within the city centre, close to transport interchanges with good accessibility to student campuses. Further to this, the submitted documents assert that the development would be on previously developed land and would be constructed by a local workforce and supplied by local suppliers. It is then concluded by the applicant that the proposal would provide high quality accommodation for students within the city, easing the pressure of conversion on existing family housing.

The NPPF establishes that there are three dimensions to sustainable development: economic, social and environmental. Whilst the development does include economic benefits in the redevelopment of a brownfield site and providing a platform for students to live and contribute to the economy, as well as social benefits in terms of diversity of population, such benefits are not considered to outweigh the associated flood risk. The benefits listed are simply policy-requirements and whilst material, do not outweigh the identified flood risk. Further to this, the proposed accommodation would not be close to a student campus as suggested by the applicant, and the fact that a local workforce and suppliers would be used is not unusual or sufficient to outweigh the identified flood risk. Officers are also mindful of the environmental dimension of sustainable development, as has been discussed the development would pose material harm to the residential amenity of the nearby occupiers, as well as this the development would not provide a high quality environment for future occupiers. On a similar note, the development's design quality is limited and considered harmful to the area. Accordingly, the development fails the first bullet point of paragraph 102 and as such the Exception Test.

A site-specific flood risk assessment has been submitted and found unacceptable by the Environment Agency (EA), hence failing to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users and the likely effects of climate change, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Specifically the EA thoroughly discounted the submitted flood risk assessment (FRA), stating:

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'The FRA submitted with this application does not comply with the requirements set out in the Planning Practice Guidance and the National Planning Policy Framework. The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails:

- 1. Use appropriate/contemporaneous modelled flood data*
- 2. Consider the effect of a range of flooding events including extreme events and demonstrate safe access egress.*
- 3. Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the [sic].*

We advise that the flood levels included within in the FRA are incorrect - they appear to be for a different part of the river/outdated. We have checked our records and can find no flood data requests for this site within the last 12 months, This site is located in an area at high risk of tidal flooding (tidal flood zones 3 and 2), but is at low risk of fluvial flooding. An assessment therefore needs to be made using tidal flood levels only. The proposed mitigation measures are also inadequate for the level of flooding. The proposed finished floor levels specified in the FRA are far too low and no assessment of the likely flood flow routes has been attempted. This proposal includes self-contained living accommodation at a level that could be subject to flood depths of up to 1.96m in an extreme event. This poses a risk to life and is therefore unacceptable.

Furthermore there is no proposal for safe access and egress to the site. This should be possible as there is an area of flood zone 1 within the site boundary. However, the current proposal does not identify how this would be done'.

The second element of the Exception Test is therefore failed, as are polices BCS16 as well as the relevant paragraphs of section 10 of the NPPF.

iii. Summary

The information submitted has failed to demonstrate that the proposal would meet the requirements of both the Sequential Test and Exception Test. The submitted food risk assessment is also insufficient. Cumulatively this will therefore represent a refusal reason.

(D) Design and Character

This section of the report should be read in conjunction with the City Design Group's comments for the proposal which are available on the online casefile. For clarity, the City Design Group objected to the proposal.

i. Policy Context

Paragraph 56 of the NPPF considers good design to be a key aspect of sustainable development that is indivisible from good planning and should contribute positively to making places better for people. The Planning Practice Guidance (PPG) provides further guidance emphasising the wide range of issues that should be considered when assessing design, including: the local character; safe, connected and efficient streets; greenspaces and public places; crime prevention; security measures; access and inclusion; efficient use of natural resources; and cohesive and vibrant neighbourhoods (paragraph 006).

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Material to a number of these design issues is the density of the development and its resultant impact on the character of the area. Given the site the site represents previously developed land, policy BCS20 'Effective and Efficient Use of Land' is material, in that it encourages the redevelopment of sites so development achieves optimum efficiency and higher densities in and around the city centres. Importantly, the policy provides further guidance as to the appropriate density for any individual site, stating that it should be informed by a number of factors, including more design-orientated criteria such as: the characteristics of the site; the local context; and the need to achieve high quality and well-designed environments.

The Development Plan includes further relevant policies, including policy BCS21 'Quality Urban Design' which encourages developments to: contribute positively to an area's character and identity, creating or reinforcing local distinctiveness; promote accessibility and permeability; promote legibility through the provision of recognisable and understandable places, routes, intersections and points of reference; safeguard the amenity of existing development and create a high-quality environment for future occupiers; create buildings that adapt to changing conditions, including environmental conditions.

Similarly, policy DM26 'Local Character and Distinctiveness' requires development harmful to the character of the area to be resisted. The policy goes onto identify specific types of development, including infill which the proposal is considered to be. The guidance for this type of development is that proposals will be expected to have regard to the prevailing character and quality of the surrounding townscape, including the pattern, form and design of existing development. Further to this, the policy expects proposals to: respond appropriately to existing land forms and historic assets; respect the local pattern and grain of development; respond to the scale, character and function of streets and public spaces; retain, enhance and create important views into, out of and through the site; make appropriate use of landmarks and focal features; respond to the height, scale, massing, shape, form and proportion of existing buildings, building lines and set-backs from the street, skylines and roofscapes; and to reflect locally characteristic architectural styles, rhythms, patterns, features and themes.

Policy DM27 'Layout and Form' encourages the successful arrangement and form of buildings, structures and spaces. The policy requires proposal's layout form to: clearly design public and private spaces; utilise active frontages to the public realm; utilise coherent and consistent building line and setback that relate to street alignment; respond to local climatic conditions including solar orientation; and to enable existing and proposed development to achieve appropriate levels of privacy, outlook and daylight. Importantly, the policy identifies the importance of the height, scale and massing of development to appropriately respond the immediate context, site constraints, character of adjoining streets and spaces, the setting, public function and/or importance of the proposed development and the location within the townscape.

Policy DM28 'Public Realm' requires development to create or contribute to a safe, attractive, high quality, inclusive and legible public realm that contributes positively to local character and identity and encourages appropriate levels of activity and social interaction.

Finally with regard to design-related Development Plan policies, policy DM29 'Design of New Buildings' is focussed on securing high standards of design quality for new buildings, and to a degree builds on the design principles set out within the discussed policies. The policy requires new buildings to be well organised with regard to internal layout and circulation, and to respond to the solar orientation of the building to support energy efficient design. As a number of other policies have set out, new development should support a high quality of amenity of existing and future occupiers, the policy also resists single aspect units, especially where they are solely north-facing. Further to this, the proposal reiterates the importance of new buildings engaging positively with the public realm, and for new development to have appropriate scales and proportions. Unlike the

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previously discussed policy, this policy also requires development to incorporate green roofs, green walls and green decks that may be accessed and used where appropriate.

The Central Area Plan regards tall buildings to be those of generally 9 storeys or more, although paragraph 8.24 of the plan does state that those which significantly change the skyline within the city centre would be considered to be a tall building. The proposal is 8 storeys in height, but would significantly change the local skyline. Given the development would not change the skyline of the whole city centre, rather just the local skyline, the proposal will not be assessed against relevant tall building policy such as SPD1. Notwithstanding this, officers do find there to be sufficient policy other to the tall building policy to assess the proposal sufficiently.

ii. Site Context

The site is situated in amongst the Redcliffe Estate in south Redcliffe, which is dominated by the post war development of several high rise residential tower blocks, including Spencer House (adjacent to the site), and Patterson House to the north. The area has been appraised and considered in a number of supplementary planning documents (SPD) that are adopted by the Council; hence to understand the area it is important to reflect on how adopted policy documents have viewed the area. The Future of Redcliffe SPD notes that area is dominated by the radical post-war redevelopment that whilst removed the historic street pattern, did ensure that the remaining quality buildings now stand out as 'precious jewels', and this is certainly true in the case of St Mary Redcliffe Church, given its spire can be seen from Clarence Road despite the estate. This is largely thanks to these high rise blocks being slender, set well back from the street and being isolated in space and low building densities (page 15). Further to this, SPD1: Tall Buildings, identifies that the Redcliffe Estate in South Redcliffe should be seen in distinction to the poor quality post war development in the city, reflecting that the estate has a distinct character and layout which is likely thanks to the estate being designed by the City Architect (see page 13). Further to this, the estate has been recognised as a positive example of post war planning in independent publications to the Council, for example H. Barton et al's 'Shaping Neighbourhoods – For Local Health and Global Sustainability'.

From these appraisals it is clear that there is to a degree a consensus as to the success of the Redcliffe Estate as a high-rise post-war development, and it appears this is largely a result of the slender towers being set in a low density environment, for which the existing site is situated. Officers do admit that the adjacent St Mary Redcliffe and Temple School development does impact on the setting of the estate, especially through the 4 storey building adjacent to the site. However, the estate as a whole retains its character given the intervening features and distance to the nearest tower blocks. Indeed, this is a result of development being avoided in close proximity to the existing high rise blocks, and where development has occurred, for example the existing site itself or the adjacent school, high density proposals are avoided, and appropriately scaled buildings have been built, thereby providing the high rise blocks with breathing space, that both provides a positive urban character and safeguards the amenity of residents.

For clarity offices do find the existing development at the site to respect the existing pattern and grain of development and this is a result of the scale of the building being predominantly single storey with the three storey roof section. This modest scale provides a pleasing 'urban gap' between the high scale of Spencer House and the relatively squat development of the adjacent school. This urban gap does not just provide Spencer House with breathing space, but also the residents of Spencer House and Patterson House with a relief from high rise built form given the site currently allows short and long distance views out to the New Cut (River Avon) and beyond, as identified by multiple members of the public within their comments.

The development should therefore respect this existing pattern and grain of development,

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especially considering its proximity to Spencer House - less than 7 metres (approximation).

iii. The Proposal

It is clear from the submitted information, including the Architect's response to the City Design Group's comments, that there is a different assessment and understanding of the character of the area. Specifically, the architect suggests that as the estate is not within a conservation area or locally listed, that the estate is 'not considered to be of particular importance'. Further to this, the architect goes on to state that apart from Spencer House, the other blocks are far away, and that together the blocks 'do not create any form of united urban character'. However, as is evident from the paragraphs included within this Key Issue, and from visiting the site, the blocks do together form an urban character that has been recognised to be a successful example of post-war planning of high rise residential development, and that this is largely due to the low density for which the blocks occupy. With this in mind, it is clear that the scale, massing, pattern and grain of the existing area has not been accurately assessed meaning the character of the area, and site itself has not been understood in a manner that would conducive to a high quality design that responds sensitively to the character of the area.

Indeed this is clear in the submitted Design and Access Statement (DAS) which sees the challenge of the development to visually link the different volume heights of the adjacent 4 storey school building to the 12 storey Spencer House. The DAS goes on to describe the existing site as a 'visual hole' in the street, rather than recognising the existing building's height, scale and massing provides an important function in allowing Spencer House to remain in a low density environment, and to enable residents to have short and long distance views out of the site to the river and beyond. The proposal forms three attached vertical blocks consisting of an 8 storey block adjacent to Spencer House, that steps down to a setback 7 storeys, with a 5 storey frontage section. The layout and shape of the proposal is angled and progresses from the Close to the principal elevation of the adjacent school building, toward Spencer House. The development's rear elevation then stops level with the northern section of the adjacent stairwell within Spencer House. The required stores are positioned between the rear elevation and the garage rank that bounds the northern side of the site.

iv. Height, Scale, Massing, Layout and Density

The development locates the major bulk and scale of the development closest to Spencer House at an 8 storey scale, and the remaining scale is only a small relief, especially given the development covers the majority of the site in a relentless fashion apart for the section at the front. As a result of this massing, form and scale the existing urban gap which provides relief for the scale of Spencer House, and a gap between the more recent school development is lost impacting on the character of the area negatively, and not recognising the local distinctiveness of the area, or the predominant scale, height, grain and pattern of the existing development in the area (contrary to policies BCS21, DM26 and DM27). Indeed, the development fails to be an appropriate form of infill development, given the scale, height, massing and positioning of the development does not have sufficient regard to the prevailing character and quality of the surrounding townscape as required by policy DM26.

Views in and out of the site, which currently create a sense of openness and legibility amongst the urban form, would also be impacted and much reduced by the built form of the development. For example, from Clarence Road when walking east to west views of the spire of St Mary Redcliffe Church are evident that aids the legibility of the city as a whole given the prominence and importance of this grade I listed building. Further to this, filtered views of the site, Spencer House and St Mary Redcliffe Church are gained from York Road on the southern side of the New Cut which is within the Bedminster Conservation Area; the development would therefore be visible at times from the conservation area. The architect has provided photographic surveys to question the Council's assessment of these views, however counter evidence is available in photographic form

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to demonstrate such views. Further to this, views from Somerset Square to the south would be impacted by the proposal, as would lines of sight from Spencer House and Patterson House. It is clear from the architect's comments that the discussed views have not been considered as an important issue to consider when designing this development, as it is considered by the architect, that such views are not important as they have not been labelled as such by a planning policy or document. However, to those who are affected by the proposal it is likely that such views are considered to be important, especially considering the development would obscure views of the Church, and importantly short and long distance views out of the site. Indeed, policy DM26 requires that important views are respected; this is not evident within this development.

v. Detailed Design

The City Design Team considered the proposal's design to lack elegance and refinement in both architecture and urban form. The proposal's elevations have a simple pallet of materials consisting of red brick within the 8 storey element, a light coloured cladding for the setback element and a blue brick within the 5 storey element. Further to this, the setback and 5 storey elements of the scheme have a fairly uniform fenestration layout, which the 3 storey element does not follow, with a rather unorganised window layout. Apart from the materials, which could be said to interpret the materials used in the adjacent buildings, the proposal does not demonstrate how it has been informed by the local character, or how it creates or reinforces local distinctiveness. Overall, the proposal's architectural detailing lacks refinement, however the scale, massing, layout and form of the development represents the key issue that prevents the development from achieving an acceptable standard of design.

vi. Public Realm and Landscape Design

As indicated within SPD3: Future of Redcliffe, the whole Clarence Road lacks active frontages close to the road, and the site remains to a degree in isolation as such an active frontage. The development would result in the removal of a true active ground floor use, given the proposed ground floor and frontage, whilst including an entrance lobby adjacent to Mede Close, is largely composed of bedrooms, a narrow laundry room and a living room on the corner. The proposal therefore does not meet the requirements of policy BCAP47 which resists the loss of ground floor active frontages and the policy guidance of DM27.

The proposal's scale, position and mass would have a negative impact on the public realm associated with Mede Close which provides an access route for the occupiers of the estate from Clarence Road, as well as a parking area for staff of the adjacent school. This negative impact would be as a result of the proposal's bulk and overbearing impact which would arise from the 8 storey blanket elevation that together with the adjacent stair block of Spencer House would enclose Mede Close with overbearing built form. This demonstrates that the scale of the development is not responsive to the scale, character and function of this street and element of the public realm which is contrary to the requirements of policy DM26.

On a positive note the proposal does retain the street tree at the front, and does provide sufficient protection measures. The development also includes landscaping at the front. Whilst the retention of the street tree and the landscaping proposed would represent positive elements to the public realm, cumulatively this would not be sufficient to outweigh the harm to the public realm posed by the development.

vii. Internal Layout

Policy DM29 requires that all new residential development should provide dual aspect where possible, particularly where one of the aspects of north-facing. Unfortunately, officers do not find

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that the proposal has responded to this policy-requirement effectively. The development has a similar layout throughout the first, second, third and fourth floors being composed of three 4-bed cluster flats (type A, B and C). Within the type B flats all rooms are single aspect and north-facing, similarly within the type A flats, all the bedrooms labelled bedroom 1 are single aspect and north-facing. All the flats on the first, second, third and fourth floor, are accessed by an internal corridor with no access to natural light meaning it will likely be a dark environment. Moving to the fifth floor, the floor contains a near identical type A flat on the same side of the building as on the first to fourth floor, but with a type E flat now included in the same position as the type B flat on the lower floors. Once again the type E flat is predominantly single aspect; however this flat does have a kitchen/dining living room area with both north and south facing windows. The corridor within the fifth floor will however benefit from a good quality south-facing outlook, unlike the majority of the bedrooms, which is evidence that the proposal does not respond sufficiently to the constraints and opportunities of the site. The sixth floor includes a type E flat once again in the same position and identical to the fifth floor. The western side of the floor contains two 4 bedroom cluster duplex flats that would be over the sixth and seventh floor, type D1 (north and westerly facing) and type D2 (south and westerly facing).

Four of the flats proposed will be single aspect and north-facing (Type A – first to fourth floor), a further two flats will have solely north-facing single aspects bedrooms with a deep kitchen/dining/lounge which has a dual aspect. The development also includes a single aspect north-facing windows within the flats on the western side of the development. As stated above officers do find that the development fails to respond appropriately to policy DM29's requirement for development to provide a dual aspect where possible, especially where north-facing. The architect contends that this incorrect as only 31 out of 73 bedrooms face north, and that of these 31 rooms, 13 are within cluster flats with a south facing living room. The architect also states that north-facing bedrooms would have large windows to maximise levels of light. Whilst officers appreciate that larger windows maximise levels of light, the rooms would still be north-facing thereby limiting levels of sunlight and not maximising opportunities to provide a high quality environment. Further to this, whilst the number of north-facing rooms may not form a majority they do form over 42% of the total rooms which officers do find to be a significant proportion of the rooms offered by this development, and as such is unacceptable and poor design. This is especially pertinent given the nature of the proposal being student accommodation where occupiers will likely spend a larger proportion of time in bedrooms when compared to typical residential accommodation.

viii. Prejudicing Future Development

Policy DM27 requires that new development should not prejudice future development. Further to this, policy BCAP34 requires major development in the city centre to demonstrate that opportunities have been sought to progress a more comprehensive or co-ordinated form of development with other sites in the locality where they are adjacent to other vacant or underused sites and a buildings. Immediately to the north of the site are two ranks of garages/lock-ups, a parking area for the school and landscaping. It is understood that the developer has sought to understand if these areas would be open to development associated with a co-ordinated scheme, but has found the respective owners to not wish to currently be part of a development. For example, it is understood that the majority of the garages are leased to occupiers of Spencer House, and the car parking area appears to be well-used. With this in mind, it does not appear that the area to the north is currently underused in the purest sense. However, this is not to say that the area will not be prejudiced by the development in terms of its future use.

Even if the area was not developed in the sense of built-form containing residential development etc., it could provide a future amenity space for the nearby flats including Spencer House, or the nearby school; especially if future lifestyles change as expected for example less reliance on the car and thereby less need for car parking areas. The development would prejudice this area, mainly

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through the development's scale overshadowing the site and through the number of bedrooms overlooking the site. Based on the submitted details the development would result in the area being materially more overshadowed in a prejudicial manner throughout the morning and early midday when compared to the existing impact, this would be true of both summer and winter months. With regard to overlooking, if the area became available for residential development it would be materially overlooked given the proliferation of north-facing windows proposed.

ix. Solar Gain/Orientation

No information has been submitted as to assess the proposal's overheating risk, indeed an assessment has been requested by the Council's Sustainability Team, but one has not been submitted despite the agent for the application reviewing the corresponding comments. It is also evident that the architect considers there is chance of south facing rooms overheating given on page 4 of the submitted 'Architects response to Development Management' the architect comments that 'south facing rooms can overheat from solar gain'. As the Council's suite of design policies make clear, buildings should be able to adapt to the environment and should be influenced by solar orientation (policies BCS21, DM27 and DM29). Further to this, policy BCS13 requires development to respond to climate impacts.

x. Summary

As discussed within Key Issue B, the proposal has a high density, and whilst optimal densities are encouraged on brownfield sites, such densities must be shaped and informed by the characteristics of the area, the local context and the resultant development's ability to represent a high quality of design and a well-designed environment (as required by Policy BCS20). Unfortunately the development fails to achieve these requirements, and in doing so fails a number of development plan policies including: BSC13, BCS21, DM26, DM27, DM29, and BCAP47.

Firstly, the development fails to recognise the local context or respond to the existing pattern and grain of development in the area. This is evident through the development situating such an excessively tall and bulky block adjacent in such close proximity to Spencer House thereby removing the existing urban gap which provides Spencer House with a low density setting and a sense of relief from large-scale built form. As a consequence the proposal would appear uncomfortable and the local distinctiveness of Spencer House, and the wider Redcliffe Estate would be eroded, rather than reinforced. The proposal also fails to recognise a number short and long distance views that are currently possible due to the scale, height and massing of existing building. These views are considered to be important, not just to the occupiers and residents of Spencer House, Patterson House and Somerset Square, but also to the urban character of the immediate area in that such views provide a sense of openness in the context of the high rise block of the Redcliffe Estate. Further to this, the development would obstruct views of the spire of St Mary Redcliffe Church, one of the most prominent and celebrated buildings within the city centre, thereby impacting on the legibility of the city. The proposal's scale, height, position and layout would also prejudice development to the north. From Clarence Road and Mede Close, the development would also harm the public realm through the removal of an active frontage and the enclosure of Mede Close as a result of the proposal's scale not adequately responding to the scale of the street. Internally the proposal will also be insufficient in that in terms of achieving a high quality of design and residential amenity as a result of a significant number of bedrooms and flats being single aspect and north-facing. Given there the front elevation is south-facing, officers would expect an assessment of solar gain in order understand if overheating would be a risk, this has not been submitted.

Officers are mindful of the design-approach and rationale of the applicant, and have given consideration to the submitted justification, but unfortunately cannot agree with this assessment. As

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this section demonstrates, the proposal fails to respond to the pattern, layout, scale and massing of existing development in the area, and as result materially harms the character of the area having an unacceptable quality of design. This will therefore constitute a refusal reason.

(E) Residential Amenity – Existing Occupiers

The development would have the greatest impact on the occupiers of Spencer House given its proximity to the application site combined with the scale of the proposed development. As well as this, Spencer House has a decked access on the eastern side that provides access for all the flats, the relevance of this is that when entering and exiting the flats within Spencer House, the development proposed would be very apparent. The internal layout of Spencer House is also relevant in that it has balconies orientated toward the east, as well as bedrooms and kitchens. Spencer House has a lower ground floor including no residential accommodation; a ground floor including flats; and the rest of the accommodation are maisonettes over two floors including decked access on the ground floor of the flat, with a balcony on the same side (eastern) on the first floor of the flat. As well as Spencer House, the occupiers of Patterson House to the north of the site will also be impacted by the development, given a number of these flats currently have views of the river and beyond to the south. The proposal's impact on the amenity of the adjacent school must also be considered.

Policy DM29 requires new development to ensure that existing and proposed development achieves appropriate levels of privacy, outlook and daylight. In a similar vein, policy DM27 requires proposal to not prejudice existing and future development. Unfortunately officers find that the development would directly prejudice the amenity of the occupiers of Spencer House through overshadowing a number of flats within the morning and through overbearing on the eastern side of Spencer House creating an enclosing affect.

In support of the application a number of shadow assessments were submitted, as well as animations to supplement the stills submitted. The existing building for which this development seeks to replace has a rather neutral impact on Spencer House with regard to overshadowing. However, the submitted shadow study demonstrates that the proposal would overshadow a section of Spencer House adjacent to the stairwell within the morning hours of both the summer and winter. Approximately 30 flats would be impacted to differing degrees by this overshadowing within the morning of both summer and winter which is significant, and contrary to policies DM27 and DM29. Officers do note that the architect contends that such overshadowing is caused by the existing building, but as the submitted information demonstrates this is an incorrect assertion, given Spencer House shadows itself from midday onwards.

When visiting Spencer House and observing the development site from the decked access and a number of flats it is clear how when entering and exiting Spencer House views of the New Cut, Totterdown, York Road and beyond provide a sense of openness and outlook for the residents of Spencer House. The proposal would obstruct these views by nature of the scale, mass and position of the development that has not been designed to respect existing views through the site. Whilst views of neighbours are often not considered to be material considerations, where buildings would result in a feeling of enclosure and an overbearing impact detrimental to residential amenity, such as they do in this case, officers find that the development should be resisted in accordance with the requirements of policies DM27 and DM29. Similarly, views from Patterson House would also be materially obstructed contributing to a sense of enclosure and overbearing feeling.

Due to the position of windows within both the proposal and Spencer House, the development would result in a loss of privacy. Officers note comments expressing concerns as to the proposed use resulting in disturbance to nearby residents. The proposed student accommodation will be managed, and a student management plan has been submitted, meaning officers do not find this to

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be a sufficient reason to resist the scheme.

In summary, the proposal would have a prejudicial impact on the residential amenity of neighbouring occupiers through its overbearing presence and overshadowing impact. The development is therefore contrary to policies: DM29 and DM27.

(F) Residential Amenity – Future Occupiers

As has been identified within Key Issue D, the proposal offers a poor standard of outlook and natural light for a significant number of bedrooms/flats given they are predominantly single aspect and north-facing. This would not be conducive to a high standard of residential amenity, and will be included within a design-based refusal reason.

The site is adjacent to a busy road and other nearby noise generating uses. An acoustic report has been submitted which recommends the provision of glazing and ventilation. The Council's Noise Pollution Team have reviewed the report and agree with the recommendations included within the report. As such, in the event of approval a condition is therefore suggested that requires a detailed scheme of noise insulation, as well as ventilation details, to ensure the future residents of the proposal are not prejudiced by nearby sources of noise.

(G) Transport and Highway Safety

The Transport Statement submitted sets out that the site is in a highly sustainable location due to its proximity to the city centre, Temple Meads Station and several principle bus routes including Metrobus on Redcliffe Hill as well as two routes on Clarence Road itself. TRICs data submitted sets out that the development will likely generate significantly less vehicle trips than as at present. Further to this, an analysis of accident data concludes that there are no safety reasons preventing the development from going ahead should planning permission be granted. Transport Development Management has reviewed the Transport Statement and largely agree with these conclusions. To manage the arrival and departure of students at the start/end of each semester/academic year a moving in/out strategy has been produced and submitted. Initially students will be directed to park in a private carpark owned by the applicant at 5 Victoria Grove where they must telephone the site manager to check in. When given permission they will then drive to the site and unload in the proposed layby after which they will be able to return to the carpark or seek parking nearby. In terms of moving out the strategy contends that students will move out over a much longer period of time, therefore a formalised approach is not required, although this will be kept under review. This approach is acceptable.

The proposal seeks to increase the layby at the front of the site in order to establish a larger loading bay for three vehicles. A section 278 agreement will be required to ensure the layby is constructed to Council standards, and this will be ensured separate to the planning application. Further to this, a Traffic Regulation Order is required given the layby would necessitate designation as well as restrictions within Mede Close itself, the cost of this would be £5,395 and will need to be met by the applicant, this would need to be secured by a legal agreement in the event of approval. It should be noted that the applicant has not objected to this contribution.

The site plan submitted proposes an area of interlocking paving slabs in front of the main entrance to the building. This is acceptable providing the paving is permeable and appropriate drainage is provided to prevent the discharge of any surface water onto the adopted highway. A series of bollards will be provided to protect the area from incursion by any vehicles, which is acceptable. A 0.5 metre wide buffer has been provided to protect the leading edge of the building which is acceptable.

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To the rear of the building a secondary entrance is proposed to enable students to be able to access the cycle store. A 2.4m wide x 4.8m long disabled parking space is also proposed, with a 1.2m wide hatched area. This however, is on the wrong side and needs to be on the driver's side. If the hatching were to be repositioned the sightline of any motorist pulling out would be blocked by the building. A condition would be sufficient to ensure a satisfactory arrangement.

The applicant proposes that the site would be car free. Given the sites proximity to the city centre, Temple Meads Station, key bus links on Redcliffe Hill including two of the proposed Metrobus routes, this is acceptable. One disabled space is proposed, and as discussed needs reconfiguring. As the site is within Redcliffe Residents Parking Scheme the site must be designated as low or no ca, and advisory note would be needed as it is unlikely that a permit would be available for future occupiers. In respect of cycle storage the site plan proposes three external Sheffield Stands for the use of visitors as well an internal store that will feature 10 Sheffield Stands and be able to accommodate 20 cycles. Whilst the amount of storage for students is acceptable Transport Development Management has suggested that additional storage should be provided to promote sustainable travel. However, given the standards are met, officers cannot resist the scheme on this basis.

Whilst the Construction Management Plan submitted covers most of the key elements, it is unclear if there will be sufficient room within the existing carpark at the front of the site to accommodate and un/load vehicles delivering/collecting construction materials and waste and how the plan will be communicated to local residents and businesses. Both of these points must be clarified, and will be via condition in the event of approval.

The submitted refuse store is acceptable. Subject to the conditions discussed, the development is considered acceptable in highway safety.

(H) Sustainability and Climate Change

The proposal includes information as to where the materials have been sourced from and the development proposes a brown/green roof in combination with PV panels which is encouraged. As indicated by the submitted Sustainability Statement, the development is suggested to make a 20.56% saving on residual emissions, meaning the 20% for renewable energy generation is met. The Council's Sustainability Team have requested that further information is submitted with regard to shading and the impact on the photovoltaic system; this will be required by condition. The Council's Sustainability Team have advised that the proposed use of electric panel heaters to provide space heating does not meet the heat hierarchy set out in policy BCS14 and other measures should be specified. A condition will be included in the event of approval to include investigation of potential alternative methods of heating in the event of approval. Policy BCAP20 requires residential development consisting of 10+ dwellings to meet Code for Sustainable Home level 5; residential development consisting of 100+ dwellings to meet Code for Sustainable Homes level 5 and BREEAM for Communities 'Excellent'; and non-residential development consisting of 1,000sq.m or more to meet BREEAM 'Excellent'. However, as this policy refers to residential dwellings (Use Class C3) and non-residential uses, officers find that policy is not strictly applicable to purpose built student accommodation which is residential character, but does result in 'dwellings'. With this in mind, officers turn to the remaining relevant aspects of the Development Plan referring to sustainability measures. Officers are also aware that the Code for Sustainable Homes has been abolished, but a number measures and tests included within this document are still relevant and applicable.

Policy BCS15 'Sustainable Design and Construction' states that major development should include a BREEAM and/or Code for Sustainable Homes assessment. The policy also includes the same BREEAM requirements as policy BCAP20. With this in mind, it is clear that student accommodation

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falls between these requirements, meaning officers find in this case that BREEAM 'Excellent' cannot be insisted upon. However, considering the policy requirement and the general approach to student accommodation, a condition will be imposed requiring the submission of a BREEAM 'Very Good' assessment in the event of approval.

Policy BCS14 states that the use of combined heat and power (CHP), combined cooling, heat and power (CCHP) and district heating will be encouraged. Within Heat Priority Areas, major development will be expected to incorporate, where feasible, infrastructure for district heating, and will be expected to connect to existing systems where available. The Council's Energy Services Team have commented on the application stating that the development would be expected to connect to the existing heat network in the area – there is already a connection to Spencer House. This has not been proposed, but officers recognise that there is a willingness from the developer to possibly connect in future. Given the ground floor includes a plant room more than sufficient in size to accommodate the required equipment, it can be conditioned that the development includes facilities to enable connection, and does so prior to the first use of the development. Such a condition would be included in the event of approval.

(I) Air Quality

The site is within an Air Quality Management Area as most of the city centre is. The Council's air quality officer only raised one issue with regard to the development's impact on air quality in the area, and this regarded the proposed boiler, and its emissions. Within the IAQM/EPUK Guidance document: Land-Use Planning & Development Control: Planning for Air Quality (2017), certain boilers require assessment when in proximity to residential occupiers. This application includes a boiler, a condition will be applied in the event of approval to require such an assessment, along with any mitigation required.

(J) Site Drainage

The revised drainage report proposes to limit storm water discharge off site to the existing public sewer to 5l/s for all events up to the 1 in 100 annual chance rainfall event including allowance for climate change. It is proposed to achieve this through a reduction in existing impermeable area combined with cellular storage crates. This approach is acceptable, and would be conditioned in the event of approval.

(K) Land Contamination

The Council's Land Contamination officer has reviewed the submitted desk-based land contamination report, and has recommended that based on this report, a site specific risk assessment and intrusive investigation shall be carried out to assess the nature and extent of the site contamination and whether or not it originates from the site. Further to this, it is recommended that a number of conditions regarding remediation (if required) and any unexpected contamination found at the site are imposed in the event of approval.

(L) Arboricultural Concerns

The supplied arboricultural impact assessment and arboricultural method statement produced by Silverback Arboricultural Consultancy Ltd identifies and appropriately addresses the arboricultural impacts on trees on and adjacent to the site, there are therefore no objections to the proposals on arboricultural grounds subject to relevant conditions.

(M) Nature Conservation

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There are no nature conservation concerns subject to a condition regarding bat roosts and bird nesting opportunities. Advisory note(s) are also recommended.

(N) Equalities Assessment

During the determination of this application due regard has been given to the impact of this scheme in relation to the Equalities Act 2010 in terms of its impact upon key equalities protected characteristics. These characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. There is no indication or evidence (including from consultation with relevant groups) that different groups have or would have different needs, experiences, issues and priorities in relation this particular proposed development. Overall, it is considered that neither the approval nor refusal of this application would have any significant adverse impact upon different groups or implications for the Equalities Act 2010.

PLANNING BALANCE

When determining planning applications the NPPF and policy DM1 requires a positive approach to be taken that reflects the presumption in favour of sustainable development. The Local Planning Authority is also required to work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the city. Officers have worked proactively with the applicant and their team in order to seek solutions to issues, and although transport issues for example have been overcome through positive discussions, the proposal's design quality; impact on neighbours and future occupiers; and failure to demonstrate the acceptability of the proposed 'more vulnerable' use in an area of flood risk, individually and cumulatively act to significantly and demonstrably outweigh the benefits associated with the development. The proposal therefore has not been found to represent sustainable development and is recommended to be refused.

COMMUNITY INFRASTRUCTURE LEVY

How much Community Infrastructure Levy (CIL) will this development be required to pay?
 £167,563.39

RECOMMENDED REFUSED

The following reason(s) for refusal are associated with this decision:

Reason(s)

1. Urban Design

The proposed development, by reason of its siting, scale, massing, urban form and architectural detailing fails to contribute positively to the urban character and identity of the area and as such fails to create or reinforce local distinctiveness. The proposed development is therefore contrary to policies BCS13, BCS20 and BCS21 of the Bristol Development Plan: Core Strategy (adopted) June 2011, policies DM26, DM27 and DM29 of the Bristol Development Plan: Site Allocations and Development Management Policies (adopted) July 2014; policy BCAP47 of the Bristol Development Plan: Central Area Plan (adopted) March 2015; and the provisions of the National Planning Policy Framework.

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2. Residential Amenity

The proposed development, by reason of its siting, scale, massing and urban form would prejudice the levels of daylight currently experienced by the existing occupiers of Spencer House and the outlook and sense of openness currently experienced by the occupiers of both Spencer House and Patterson House. In addition, the proposed development would prejudice the existing and future potential use of the adjoining land to the north which itself contributes to the success of the local urban environment by reason of overshadowing. In terms of the future occupiers the internal layout of the development would also give rise to a significant number of single aspect north-facing bedrooms and cluster flats which would not enable appropriate levels of outlook and daylight. As such the proposals would materially harm the amenities of both existing and future occupiers, contrary to policies BCS21 of the Bristol Development Plan: Core Strategy (adopted) June 2011; policies DM27 and DM29 of the Bristol Development Plan: Site Allocations and Development Management Policies (adopted) July 2014; and the provisions of the National Planning Policy Framework.

3. Flood Risk

The development has failed to demonstrate that there are no sequentially preferable sites available on sites of a lower risk of flooding within the city centre (Sequential Test). The development also fails to provide wider sustainability benefits to the community that outweigh flood risk, and the submitted Flood Risk Assessment fails to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users and the likely effects of climate change, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall (Exception Test). Therefore the scheme is contrary to policy BCS16 of the Bristol Development Plan: Core Strategy (adopted) June 2011, policy BCAP5 of the Bristol Development Plan: Central Area Plan (adopted) March 2015, and the provisions of the National Planning Policy Framework.

Advice(s)

1. Refused Applications Deposited Plans/Documents

The plans that were formally considered as part of the above application are as follows:-
 CTP-12-581 Student Moving In/Moving Out Strategy, Cotswolds Transport Planning, December 2017, received 20 December 2017

CTP-17-581 Transport Statement, Cotswolds Transport Planning, December 2017, received 20 December 2017

3178_PA 062 , received 1 December 2017

3178_PA 100 existing shadow study - summer solstice, received 1 December 2017

3178_PA 101 Existing shadow study - September equinox, received 1 December 2017

3178_PA 102 Existing shadow study - winter solstice, received 1 December 2017

3178_PA 103 Existing and proposed summer solstice 1 of 2, received 1 December 2017

3178_PA 104 Existing and proposed summer solstice 2 of 2, received 1 December 2017

3178_PA 105 Existing and proposed september equinox 1 of 2, received 1 December 2017

3178_PA 106 Existing and Proposed September Equinox 2 of 2, received 1 December 2017

3178_PA 107 Existing and proposed winter solstice 1 of 2, received 1 December 2017

3178_PA 108 Existing and proposed winter solstice 2 of 2, received 1 December 2017

3178_PA 078 Proposed roof plan, received 22 September 2017

3178_PA 080 Proposed south elevation, received 22 September 2017

3178_PA 081 Proposed north elevation, received 22 September 2017

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3178_PA 082 Proposed east elevation, received 22 September 2017
3178_PA 083 Proposed west elevation, received 22 September 2017
3178_PA 085 Existing basement floor plan, received 22 September 2017
3178_PA 086 Existing ground floor plan, received 22 September 2017
3178_PA 087 Existing ground floor plan, received 22 September 2017
3178_PA 088 Existing elevations 1 of 2, received 22 September 2017
3178_PA 089 Existing elevation 2 of 2, received 22 September 2017
3178_PA 091 Proposed photomontage 01, received 22 September 2017
3178_PA 092 Proposed shadow studies summer solstice, received 22 September 2017
3178_PA 093 Proposed shadow studies september equinox, received 22 September 2017
3178_PA 094 Shadow studies winter solstice, received 22 September 2017
3178_PA 095 Proposed external view 01, received 22 September 2017
3178_PA 096 Proposed external view 02, received 22 September 2017
3178_PA 097 Proposed external view 03, received 22 September 2017
3178_PA 098 Proposed external view 04, received 22 September 2017
Arboricultural report, received 1 December 2017
Draft heads of terms for S016 planning agreement, received 22 September 2017
Flood risk assessment, Stokes Morgan, Not Dated, received 22 September 2017
Planning supporting statement, received 22 September 2017
Residential planning noise assessment, received 22 September 2017
Statement of community involvement, Prepared by Jenny Gee Communications Ltd, Dated September 2017, received 3 October 2017
Sustainability statement, received 22 September 2017
Design and access statement, received 22 September 2017
3178_PA 060 Site location plan, received 22 September 2017
3178_PA 061A Proposed block plan, received 1 December 2017
3178_PA 070A Proposed ground floor plan, received 1 December 2017
3178_PA 071 Proposed 1st floor plan, received 22 September 2017
3178_PA 072 Proposed 2nd floor plan, received 22 September 2017
3178_PA 073 Proposed 3rd floor plan, received 22 September 2017
3178_PA 074 Proposed 4th floor plan, received 22 September 2017
3178_PA 075 Proposed 5th floor plan, received 22 September 2017
3178_PA 076 Proposed 6th floor plan, received 22 September 2017
3178_PA 077 Proposed 7th floor plan, received 22 September 2017
O'Leary Goss Clarence Road Photographic Study November 2017, received 1 December 2017
Student Management Plan by Stokes Morgan Planning,, received 1 December 2017
Drainage Strategy Report by S. Cridland,, received 1 December 2017
Phase 1 Contaminated Land Report prepared by CJ Associates,, received 1 December 2017
Demolition & Construction Management Plan by Stokes Morgan Planning, received 1 December 2017
Letter from Stokes Morgan, dated 01/12/2017, received 1 December 2017
Sequential Test, Stokes Morgan, January 2018, received 2 February 2018

Case Officer: Matthew Bunt

Authorisation: Alison Straw

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