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reply to: [redacted]
telephone: [redacted]
E-mail: development.management@bristol.gov.uk
our ref: 24/00631/PREAPP
your ref: -
date: 17 June 2023

Dear [redacted],

Pre application response letter

Pre application no: 24/00631/PREAPP

Site address: The Bull Inn, 333 Crew's Hole Road, Bristol. BS5 8BQ

Proposal: Demolition of existing building and erection of a single building containing 10 apartments.

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

Please find below the Local Planning Authority's (LPA's) response to the pre-application proposals set out below. Apologies for the long delay in responding to this enquiry, which is a consequence of severe local and national LPA resource shortages.

Headline Issues:

- The loss of the public house will need to be justified through robust viability assessments as it is not considered that there are any alternative public houses within a reasonable walking distance of the application site.
- The demolition of the existing building would be harmful to the Avon Valley Conservation Area and would not be supported.

Site Description

The site is located at the junction of Crew's Hole Road and Niblett's Hill and is not allocated for any particular use, however, the surrounding areas form established residential development.

The site currently contains the Bull Inn, a public house, which was constructed in the late 19th century.

The site is located within the Avon Valley Conservation Area and is bounded by the Conham Vale and Dundridge Farm Woodland Site of Nature Conservation Interest (SNCI) to the south. The site is also located within the Coal Authority Development High Risk Area.

Community consultation

The Bristol Planning Protocol sets out that 'an important ingredient of the modern planning system is involvement with the local community. In order for all parties to gain maximum benefit from the Protocol, it is essential that there is meaningful engagement between developers, the council, and relevant stakeholders. An initial focus will be to 'front load' the involvement of local communities, probably through the Neighbourhood Planning Network (NPN) and Neighbourhood Partnerships'.

Public consultation is not carried out as part of the pre-application enquiry process; however, the Bristol Neighbourhood Planning Network (BNPN) was consulted and has advised on the proposal. The Bristol Neighbourhood Planning Network is a network of voluntary groups working towards better involvement in the development of their neighbourhoods.

The BNPN (St George's Community Planning Group) has advised that '*any planning application based on the outline proposals shown in this pre-application should be refused.*

Development of proposals for this site should consider the following:

i. *Retain the existing building as a public house as a first preference*
ii. *If (i) is demonstrated to not be economically viable, then the viability of alternative uses for the building of benefit to the community, should be considered.*
iii. *If (i) and (ii) are demonstrated to not be economically viable, then designs that convert the 1904 building to residential use should be considered.*
iv. *In the event of the existing building being retained (options (i), (ii) or (iii)) then additional sympathetic development in the car park area should be considered.*
v. *In the event that it is demonstrated that no viable design that incorporates the existing building can be produced, then the design should not be constrained to the existing building footprint with adjacent car park. A design should be developed that makes best use of the whole site, includes the provision of affordable housing and protects the appearance of the Conservation Area. Quoting our leading member, the proposal is for the poorest option of possibilities – that is; the demolition of a significant local building, the retention of a dreary car park and the construction of a small group of apartments that appear out of place in that they are too timid a response to the context and make an unacceptably underwhelming contribution to the whole site.'*

The full comments of the St George's Community Planning Group are available online.

If you have any further queries regarding contacting these groups, then it is recommended that you contact the Bristol Neighbourhood Planning Network, at the following email address: webmaster@bristolnpn.net

A Community Involvement Statement (CIS) would be a submission requirement of any future application

given that the proposal would be classified as ‘major’ development.

Given that the current proposals have not been the subject of substantial previous community involvement, the views of which are required to be taken into consideration in the determination of any application; the advice given in this response may therefore be subject to revision.

Land use considerations

Loss of the Public House and the Principle of Residential Development

Policy DM6: Public Houses states that proposals involving the loss of established public houses will not be permitted unless it is demonstrated that:

i. The public house is no longer economically viable; or
ii. A diverse range of public house provision exists within the locality.

The Policy goes on to state that where development is permitted any extensions or alterations should not harm the identity or architectural character of the public house.

The application submission states that the intention is to comply with part ii of DM6. In order to do this, the applicant will need to provide evidence of a range of pubs in the locality that can collectively continue to meet the needs and expectations of the whole community. This will include a good choice of pub environments offering a diverse range of services and community and leisure activities. As a guide the locality should include all other surrounding public houses within a reasonable walking distance (800m).

The Council has produced a practice note (Public Houses Practice Note - October 2022) which provides further guidance on the implementation of Policy DM6. This guidance clarifies what development proposals are expected to provide to demonstrate compliance with Policy DM6 and includes further detail to aid in the assessment of applications for the loss of public houses.

The pre-application enquiry states that an 800m walking distance would not account for hard boundaries such as the River Avon that would apply to this particular site. The submission acknowledges that the ability to travel to the public house from areas west of the river is limited as a result of pedestrian footbridges which would be unsuitable for evening and night time use.

The Practice Note sets out that ‘regard should be had to factors such as barriers to movement such as parks and undeveloped areas, rivers, canals, large roads and railway lines, underpasses or pedestrian overpasses and particularly steep gradients. Alternative provision that is beyond barriers like this may not be considered to be within a reasonable walking distance’.

As a result, the LPA agrees that public houses west of the river should not be considered as suitable alternative provision as they are not within a reasonable walking distance. The LPA does not agree, however, that this would justify a wider definition of ‘locality’ (1,600m). Instead, this would suggest that the applicant would need to comply with part i. of the policy in order to meet the requirements of DM6.

It is noted that the site is surrounded by steep topography but is situated at the lowest point as it is located close to the River Avon. Therefore, public houses identified as being within a 1,600m distance are not considered to be suitable alternative provision on the basis that they are outside

of the area defined as the ‘locality’ and they would not be considered a ‘reasonable walking distance’ as patrons would be required to walk up ‘particularly steep gradients’ (Practice Note, outlined above) in order to reach the other pubs.

Therefore, the LPA does not consider that there would be a diverse range of public house provision within the locality which could justify the loss of the public house on this site.

The applicant’s comments with regard to the closure of the existing public house because of the loss of the license are noted, however, it has not been demonstrated that the public house could not continue in operation under new management.

BCS12 (Community Facilities) and DM5 (Protection of Community Facilities) outline that public houses can be considered to be community facilities. DM5 requires applicants to demonstrate that the proposed loss would not lead to a shortfall of community facilities in an area or, where the use has ceased, that there is no demand for any other suitable community facility that would be willing to make use of the building or land. Applicants should consider adaptive re-use or retention of community facilities and will be required to demonstrate why neither of these options would be possible. If the loss cannot be avoided, appropriate replacement community facilities will need to be provided. Any future full application will need to address BCS12 and DM5 to demonstrate that the loss of the public house would be acceptable.

Local Housing Need

NPPF (2023) reflects the need to significantly boost the supply of housing and to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive communities. Policy BCS18 of the Core Strategy states that ‘all new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation mixed, balanced and inclusive communities’. Development should aim to contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists.

Analysis of the city's general housing needs and demands has identified indicative requirements for each of 6 city zones. The zones reflect sub-market areas used in the Strategic Housing Market Assessment (SHMA). The intention is to provide a strategic steer for all sizes of residential scheme within each zone. A local area-based assessment is required to assess the development's contribution to housing mix as a smaller scale will not provide a proper understanding of the mix of that area; a larger scale may conceal localised housing imbalances. As a guide the neighbourhood is defined as an area equivalent to the size of a Census Lower Level Super Output Area (LSOA) (average of 1,500 residents).

The site falls within the Crews Hole LSOA. Census data (2021) shows that a significant majority of residences (70.5%) are houses as opposed to flats, maisonettes, or apartments (29.3%). The prevailing accommodation size is 3 bedrooms (44.4%). Smaller proportions of dwelling size include 1 bedroom (13.2%), 2 bedroom (30.4%), and 4 or more bedrooms (12.0%).

The above Census data would lead to the conclusion that in this instance, there is an imbalance between flats and houses within the local area and that there may be a need for smaller dwellings in the area. Notwithstanding this, there would continue to be a need for family-sized, affordable dwellings in the area.

The proposed scheme would provide 8no. 1 bed 2 bed 4 person flats and 2no. 1 bed 2 person flats, which would help to redress the imbalance of houses to flats. The proposal would add to the

concentration of 2 bedroom dwellings in the area, however, 2 bedroom dwellings are considered to offer a greater degree of flexibility when compared with 1 bed dwellings and would therefore be in accordance with BCS18.

Affordable Housing

The Housing Strategy and Enabling Team has commented on the proposals – please see full comment attached. Headline points from their comments are as follows:

The site falls within St George Troopers Hill ward, which is in East Bristol. In accordance with policy DM3 the site is required to deliver 10% affordable housing, which is 1 unit out of the 10 homes being delivered.

The following tenure proportions will be sought on the affordable housing contribution: Strategy & Enabling Planning Consultation Response:

- 75% Social Rent;
- 25% Affordable Home Ownership

Within the 25% Affordable Home Ownership, the Council will accept applications bringing forward Shared Ownership or First Homes and it will be for applicants to identify which product they wish to develop. Based on current evidence the Council's preferred route to Affordable Home Ownership is Shared Ownership.

As this scheme will deliver 1 unit this should be a 2 bedroom flat available for Social Rent.

Please refer to the attached comments for further details.

Design and Heritage Considerations

As outlined above, there are principle concerns about the scheme detailed in the pre-application enquiry, but if these were addressed then any scheme would need to consider the following in determining whether the design is acceptable.

Impact to Avon Valley Conservation Area

The site is located within the Avon Valley Conservation Area and the building itself is identified as a monument on the City's Historic Environment Record (HER) and therefore constitutes a non-designated heritage asset in its own right.

The pre-application proposes the demolition of the public house and the construction of a new block of 10 flats.

The Conservation Officer was consulted and made the following comments:

‘The Bull Inn is an historic foundation, a pub already built by 1803. As noted in the application, there is significant early industrial interest in the area, and the settlement of Crews Hole developed to serve mining and copper works in the vicinity. As part of this industrial community the pub would have been a central focus and important local asset. As such, the former pub building contributes to the historic character of the area, and the archaeological potential for remains of its earlier manifestations is identified in the HER entry.

The present building was erected for Georges brewery in 1900...[Paul & James Architects] produced a significant number of Bristol pubs for Georges in the first decade of the 20th century, creating a distinctive house-style...Particular features that contribute to its character are the deep modillion courses at the eaves, double-projecting bay window of two storeys with an embellished pediment, and the single-storey gable-fronted club room with its bay and pagoda roof. The tall chimneys are embellished with arched recesses, and the overall profile is intentionally varied with deliberately picturesque asymmetry. The use of a mixed palette of contrasting and rich natural materials adds to the visual appeal of the main facade of the road, whilst cheaper rubble stone taken from near the site is used to the rear. The original free-standing pub sign is a rare and attractive survival and an excellent example of Fin de Siècle ironmongery. The pub is notable for its very large size. It is a good example of an improved pub in the Edwardian period.

The Bull has clear architectural and historic character, contributing positively to the Avon Valley Conservation Area both aesthetically and through its historical associations with the lost industrial community. It is considered as a landmark building in the area for its distinctive architecture and design quality...The demolition and loss of the landmark building and the pub sign from the conservation area would have a significantly negative and damaging impact on significance [of the Avon Valley Conservation Area] and architectural and historic character. Permanent and irreversible loss is not considered justified, and consequently demolition of the Bull Inn and its sign would not be supported.

The Policy requirement of DM31 is that the special character of designated Conservation Areas should be preserved or enhanced. The former pub offers excellent opportunities for conversion, extension and adaptive reuse. The existing building should form the focus of a heritage-led development that contributes to the local character and distinctiveness. The Bull Inn is unlikely to be suitable for any additional height, however, new-build elements would be welcome elsewhere on the site where they responded positively to the existing context and materials; these should avoid dominating the existing building in scale or massing.

As part of any full planning application a detailed heritage statement should be provided that explains the historic context of the site and its development within the Conservation Area, existing materials, structures, buildings and other features that contribute positively to the historic and architectural character of the Conservation Area, and detailed discussion of the architectural development and significance of the landmark Inn building and its freestanding pub sign. As a minimum, the NPPF requires the relevant Historic Environment Record to have been consulted, however, local archival sources will also be important in providing relevant and appropriate detail. We recommend that this assessment is undertaken as a next stage, so that it might inform an appropriate direction for further design development.’

As outlined above, the loss of the public house would not be supported, and any future scheme should prioritise adaptive reuse of the existing building.

General Design Considerations

Policy DM29 expects that proposals for new buildings will incorporate active frontages and clearly defined main entrances facing the public realm that emphasise corners and reinforce the most prominent frontages. Developments will be expected to provide appropriate natural surveillance of all external spaces; and incorporate high quality detail of an appropriate scale and proportion, arranged in a coherent way that contributes positively to the overall design approach of the building. Opportunities for green infrastructure such as green roofs, green walls and green decks should be incorporated where appropriate.

Policy DM30 expects that extensions and alterations to existing buildings will respect the siting, scale, form, proportions, materials, details and the overall design and character of the host building, its curtilage and the broader street scene; and retain and/or reinstate traditional or distinctive architectural features and fabric. The Policy states that extensions should be physically and visually subservient to the host building, including its roof form, and not dominate it by virtue of their siting and scale. Proposals to sensitively adapt existing buildings to alternative uses as an alternative to demolition will be supported.

There are opportunities to increase density of the site by developing along Crews Hole Road and reducing the quantity of car parking. The parking area itself does not contribute positively to the character and appearance of the Conservation Area and therefore there are opportunities to improve the appearance of this portion of the site by providing gentle density of development and provision of a meaningful landscaping scheme.

Existing development on this portion of Crews Hole Road is lacking in natural surveillance and interest at ground floor level. Any future scheme should aim to improve this by providing active frontages at ground level and a high degree of visual interest which would seek to enhance the appearance of the Conservation Area.

Living Conditions

Neighbouring Occupants

Policy DM29 states that proposals for new buildings will be expected to ensure that existing and proposed development achieves appropriate levels of privacy, outlook and daylight.

Policy DM30 states that extensions and alterations to existing buildings will be expected to safeguard the amenity of the host premises and neighbouring occupiers.

The site is set significantly lower than existing development on Bull Lane, which is located to the east. As such, it is unlikely that any proposed development would result in overbearing or overshadowing of neighbouring occupants of Bull Lane.

There are no existing windows to habitable rooms on the side elevations of dwellings addressing Crews Hole Road. Therefore, proposals on the application site would be unlikely to result in harmful impacts to privacy, overshadowing or overbearing. However, development proposals should retain a gap of 12 metres between habitable rooms face existing walls, and 21 metres where habitable rooms face each other in order to ensure that privacy for existing occupants is preserved.

Future Occupants

Policy DM29 'Design of New Buildings' states; 'New residential development should provide dual aspect where possible, particularly where one of the aspects is north-facing'.

Policy DM30 states that extensions and alterations should leave sufficient usable external private space for occupiers of the building.

No elevation details or floor plans are provided at this stage, however, any future development should seek opportunities to provide dual aspect development in order to ensure sufficient light levels and outlook. This is particularly pertinent given that the eastern portion of the site is bounded by a steep slope which would reduce outlook at the rear.

The Urban Living SPD recommends the following:

- 'Maximising opportunities to provide dual aspect units, which improve access to natural light, choice of views and cross ventilation through units providing greater capacity to address overheating'
- 'Considering the risk of overheating when designing for sunlight, together with the need to ensure appropriate levels of privacy'
- 'Creating living rooms that are fully 'openable' with a full height glazed balconette if no balcony or direct access to other private open space is provided'
- 'If single aspect dwellings are unavoidable, the design will need to demonstrate that all habitable rooms and the kitchen are provided with adequate ventilation, privacy and daylight and the orientation enhances amenity, including views'

The SPD recommends that the following are avoided:

- North facing single aspect dwellings
- Single aspect dwellings exposed to noise levels above which significant adverse effects on health and quality of life
- Single aspect dwellings that contain three or more bedrooms

For full guidance, please see Q2.8, page 46 – 47 of The SPD.

The plans submitted as part of the pre-application enquiry do not show any meaningful private amenity space for the use of future occupants. Private amenity space should be provided given the amount of site area available and the proposed level of density.

Trees, Nature Conservation & Biodiversity Net Gain

There are slopes along the eastern boundary of the site with a high degree of existing, mature vegetation.

Please see Nature Conservation comments attached – key points from the full comments are summarised below:

The site is located in a suburban area and the southern boundary of the site is connected to the 'Conham Vale and Dundridge Farm Woodland' Site of Nature Conservation Interest (SNCI). The site is within the West of England Nature Partnership (WENP) Nature Recovery Network, with the woodland network.

The site comprises a building, garden, hardstanding and well-established scrub and trees. Any future application on this site will be subject to mandatory 10% uplift in Biodiversity Net Gain. Additional green infrastructure will be required, and this should be biodiverse, majority native planting which is accessible for long term management. The existing building may require bat surveys, which should be carried out prior to submission of a full application.

Any future application should include an Ecological Impact Assessment (EcIA) in accordance with published (CIEEM) guidelines. The EcIA cannot be conditioned because the presence, or potential presence, of a protected habitat, feature or species is a material planning consideration.

Any future application should include a 'Biodiversity Net Gain Assessment (BNGA). It is recommended that the proposal employs the Defra / Natural England Biodiversity Metric 3.1 to demonstrate a positive biodiversity net gain. All BNG submissions should be accompanied by a 30-year Habitat Monitoring and Management Plan (HMMP) for all habitats created or enhanced on site must also be submitted.

Transport

Full comments from the Transport Development Management (TDM) Team are yet to be provided but will be forwarded at the earliest available opportunity.

The site includes 13no. car parking spaces as existing. A total of 10 dwellings would be provided with a maximum level of parking set at 12 car parking spaces by limits outlined in Appendix 2 of the Site Allocations and Development Management Policies Local Plan. Opportunities to improve active transport through walking and cycling will be encouraged and prioritised over car parking. It is noted that no cycle parking has been shown on the site plan as provided. Any future development would be required to provide 18 long stay cycle parking space with one additional visitor parking space.

Bristol Waste

Please refer to full comments available online.

Sustainability

Core strategy policies relating to sustainability include BCS13-16. In addition, BCS10 (Transport and Access) also has relevance to sustainability. The relevant Site allocations and development management policies supporting the core strategy policies in relation to sustainability are: DM15, DM17, DM19, DM29.

**The Council is currently midway through the process of adopting a Local Plan Review. The emerging revised local plan policies have been through two rounds of public consultation and therefore can be afforded increasing weight and should be carefully considered as they represent the intended direction of travel in light of the ecological and climate emergency. Directly relevant emerging policies that need to be considered in terms of sustainability are as follows:

- Draft policy NZC1 Climate change, sustainable design and construction
- Draft policy NZC2 Net zero carbon development – operational carbon
- Draft policy NZC3 Embodied carbon, materials and waste
- Draft policy NZC4 Adaptation to a changing climate
- Draft policy NZC5 Renewable energy development

The comments below relate to key considerations at this stage of the development. Full technical guidance on how to implement the above policies can be found within Bristol City Council's Climate Change and Sustainability Practice note.

BCS 13 Climate change

All new development should be designed with the future climate in mind through climate change mitigation & adaptation techniques. Mitigation and adaptation measures must be integrated into the design.

Mitigation

Development should seek to minimise embodied carbon through re-use of existing buildings and energy efficient refurbishment wherever possible. (Please see draft policy NZC3) Measures for all buildings should include high energy efficiency (thermal insulation, passive ventilation & cooling, passive solar design & use of natural resources). The applicant should consider the feasibility of decentralised, renewable & low carbon energy, and where feasible include in the proposals. (Note draft policies NZC1, NZC2 and NZC5)

Additionally, all developments should encourage walking, cycling & public transport.

For developments in central areas, a level of car parking that reflects location, access to public transport (including metro bus), and location in the AQMA is strongly encouraged. As such, provision that exceeds the minimum standard for cycle parking and sets car parking levels below the maximum established in the Site Allocations Local Plan Document is strongly encouraged. The design should demonstrate that permeability and connectivity has been maximised to strengthen routes for walking and cycling and improve access to public transport.

Given the expected increase in the uptake of electric vehicles following the announcement that the sale of new petrol and diesel vehicles will be banned from 2030, we recommend that this scheme should adopt the emerging policy (Draft Policy T5) on electric vehicle charging, with a charge point provided in 20% of the parking spaces with suitable provision for charge points to be added in the remaining 80% of spaces as demand increases. Charge points should have a minimum power output of 7kW and the power supply to the site should have the capacity to deal with future demand. (Contact should be made with National Grid)

As a minimum, the development should meet the minimum requirements with respect to electric vehicle charging points set out in the Site Allocations Local Plan Document. The designation of space for car club parking within the design is also encouraged.

Adaptation

Any new development should clearly address how the development will meet the following points:

- The layout of the site should be designed to mitigate extreme temperatures brought about by climate change. Orientation, form, massing and planting for shade should be carefully considered so that both internal and external spaces are comfortable in hot weather. (See Draft Policies NZC1 and NZC4)
- The building design should mitigate extreme temperatures and risk of overheating brought about by climate change. This should include good thermal mass, living walls and roofs, open able windows, canopies, and external shading, and avoiding single aspect units. This is particularly important for rooms on S and SW sides of the building. South facing elevations will receive more direct solar radiation around midday when the sun is high in the sky. South-west facing elevations will receive solar gains when ambient external temperature is at its highest, making the rooms on both South and South West elevations more prone to overheating. The extent of glazing to the W facing rooms should be carefully considered as these may receive unwanted solar gains from low level sun in the evenings. Overheating risk analysis (e.g. following CIBSE TM59/TM52 guidance/other as appropriate) should be carried out based on dynamic thermal modelling in order to understand the implications of future projected temperatures (e.g. in 2020, 2050 and 2080) on the development in order to mitigate the risks appropriately and ensure a comfortable internal environment is provided without the need for energy consuming cooling equipment. (See Draft Policies NZC1 and NZC4). Further guidance produced by the NHBC foundation/zero carbon hub on understanding overheating and design options for mitigation can be found here. Assessments using the steady state conditions SAP compliance tool are not appropriate for the purpose of demonstrating compliance with the policy requirement (i.e. for site layouts and approaches to design and construction which provide resilience to climate change) because this tool does not factor in future climate impacts.

Development should conserve water through water efficiency measures.

Development should minimise flooding through the use of sustainable drainage systems.

Development should include blue & green infrastructure to both mitigate the urban heat island and reduce surface water runoff. (See draft policies BG1-5 for emerging requirements for Biodiversity Net Gain and Green Infrastructure). DM15 requires that new GI assets are designed to be multifunctional and expects the provision of additional and/or improved management of existing trees as part of new development.

Development should avoid responses to future climate impacts leading to increases in energy use (e.g. air conditioning systems).

BCS14 Sustainable energy

All new development is required to follow the energy hierarchy, prioritising energy efficiency measures to minimise energy demand. At this early stage in design, it's important that the development's orientation, fenestration and built form is carefully considered to optimise solar gain to minimise space heating demands whilst avoiding overheating risk during hotter weather. The built form and internal layout should also maximise the use of natural ventilation and lighting to reduce energy demand.

Heating systems should be fully assessed for feasibility and selected in accordance with the heat hierarchy stipulated in policy BCS14 and being mindful of the emerging Heat Hierarchy within Draft Policy NZC2. Where systems are discounted full justification will be required.

The BCS14 heat hierarchy prioritises connection to a heat network where available. Major development should connect to existing district heating networks where available. Please note that renewables within the District Heat Network (DHN) will count towards the site's renewable energy provision (the 20% on existing policy)

The heat network operator, Vattenfall Heat UK, should be consulted (BristolBusDev@Vattenfall.com) to confirm whether a connection to the network is available and establish an agreed approach to connecting the development to the network. Evidence of the agreed approach should be provided in writing as part of the energy strategy submitted with the full application.

Where the heat network provider confirms a connection cannot be made and the development is within the heat priority area (BCS14 Diagram 4.14.1), particularly in areas where the heat network is likely to be established, major developments should incorporate infrastructure to enable connection to forthcoming networks in the future. This should include:

- Provision of a single plant room, located adjacent to the planned/most likely heat network route, producing all hot water, including engineering measures to facilitate the connection of an interfacing heat exchanger
- Space identified for the heat exchanger
- Provisions made in the building fabric such as soft-points in the building walls to allow pipes to be routed through from the outside to a later date
- External pipework routes identified and safeguarded.

- Heat delivery, distribution and control systems that are designed to achieve low return temperatures, and that these services are designed in accordance with current CIBSE guidance on connection to district heating (please refer to Heat networks: Code of Practice for the UK, CP1, 2015, CIBSE).

Developments should secure at least a 20% reduction in CO2 emissions from residual energy use in new development through on-site generation of renewable energy. (See Draft Policy NZC2 for emerging policy requirement). At this stage, the site layout and orientation should be enhanced to maximise the potential for renewable technologies. This could include the incorporation of south-facing, unshaded roof slopes, and allowing sufficient space and appropriate locations within the design for technologies such as heat pumps. The impact that adjacent built (or approved but currently unbuilt) developments will have on the feasibility and effectiveness of renewable technologies should be carefully considered. Similarly, the impact of this development on adjacent developments (built or unbuilt) solar gain and renewable energy strategies should be factored into the design. Feasibility of all available renewable technologies should be tested at this stage and reported within the energy statement.

To demonstrate that the current adopted policy has been met, calculations should follow SAP/NCM methodology for the most up to date building regulations Part L version and should be carried out using appropriate software. Note the recently published Climate Change and sustainability practice Note Addendum setting out guidance on how to demonstrate compliance with BCS14 using Part L 2021 calculations. The impact of shading of roof mounted PV should be factored into the calculations using the current MCS guidance for shade evaluation (Standard Estimation Method), which can be downloaded in two parts from this webpage.

It's important that key figures are presented within the energy statement as per the table provided in the Climate Change and sustainability practice Note Addendum. Applications cannot be assessed without this information in this format.

Where the full requirements of Policy BCS14 cannot feasibly be delivered onsite, an alternative allowable solution will be considered, such as providing the residual emission reduction through a contribution to a relevant citywide low-carbon energy initiative or by agreeing acceptable directly linked or near-site provision. This would be secured by S106.

Full guidance can be found in the Climate Change and Sustainability Practice Note and accompanying Addendum.

BCS 15 Sustainable construction

Waste & recycling

The management of waste during demolition, construction and operation should be considered. Opportunities to re-use or recycle demolition waste should be identified. Appropriate storage for bins and recycling should be provided in line with Bristol Waste's recycling planning guidance.

Water

Development should conserve water through rain/ greywater harvesting and the adoption of water efficient appliances. At this stage, the technical feasibility and financial viability of rain/grey water harvesting over the lifetime of the development should be considered. Where found to be feasible for the development, the required space should be allocated within the design for inclusion of the tanks and infrastructure.

Other water efficiency measures could include: flow restrictors, spray taps, percussion or sensor taps, dual flush WC, Eco showerheads, Low water use washing machines and dish washers, leak detection methods. Note Draft Policy NZC1.

Materials

Development should use consider the type, lifecycle and source of construction materials.
The use of A-rated BRE Guide materials should be prioritised.

Flexibility & adaptability

Development should be flexible and adaptable to future changes of occupancy, should incorporate good internal dimensions and allow for any future change of use through access and circulation. The development should consider the buildings lifetime, not just the foreseeable future and should incorporate live / work units to enable home working where possible. The design and specification should consider reconfiguration of the building.

Biodiversity

Development should enhance biodiversity and green infrastructure onsite.

In addition to BCS15 requirements about enhancing biodiversity, the Site Allocations and Development Management Plan also links to biodiversity (some policies are outlined below).

Policy DM15 Green Infrastructure Provision requires new residential development to be designed and located to facilitate opportunities for local food growing.

Policy DM29 Design of New Buildings requires development to incorporate opportunities for green infrastructure such as green roofs, green walls and green decks.

Policy DM33 Pollution Control, Air Quality and Water Quality requires new development adjacent to underground or surface water bodies covered by the Water Framework Directive should contribute towards those water bodies maintaining or achieving Good Ecological Status. This may take the improving the condition of onsite measures or a financial contribution to off-site measures.

Biodiversity enhancement options could include; allotments (proven to enhance biodiversity), sustainable drainage systems such as green roofs, brown roofs, living walls, tree pits, swales, attenuation ponds to reduce surface run off and improve water quality, wildlife areas, balcony

planting, the inclusion of bird and bat boxes and the planting of fruit/ nut bearing trees. Green roofs should be specified with deep substrate depths to support a greater variety of species, hold significantly more rainfall, have a greater thermal mass and have greater evapotranspiration properties.

Please note draft policies BG1-5 for emerging requirements.

Information & communications technology

In relation to BCS 15 new homes and workplaces should include the provision of high-speed broadband access and enable provision of 'Next Generation' broadband. Evidence that this will be done should be included within the sustainability statement. Further guidance on demonstrating this policy requirement has been met can be found in the broadband connectivity practice note March 2018

Development should include smart metering and sub metering to enable good energy management.

Land Contamination

The applicants are referred to the following:

- Bristol Core Strategy - BCS23 Pollution
- Local Plan DM34 Contaminated Land
- National Planning Policy Framework (NPPF, 2023) Paragraphs 124(c), 180(e&f), 189, 190
- Planning Practice Guidance Note https://www.gov.uk/guidance/land-affected-by-contamination
- https://www.bristol.gov.uk/planning-and-building-regulations-for-business/land-contamination-for-developers

The proposed development is sensitive to contamination and is situated on or adjacent to land which has been subject to land uses which could be a potential source of contamination. The surrounding area was historically an area of heavy industry and mineral extraction the proposed end use is sensitive to contamination.

A minimum of a Preliminary Risk Assessment (also known as a desk study) looking into contamination shall be submitted with any future planning application, if the report identifies a requirement for a Generic Quantitative Risk Assessment submission of this information with the planning application is encouraged to reduce the burden of pre-commencement conditions and save time later in the development process.

Coal Mining

The Coal Authority records indicate that the site is likely to have been subject to historic unrecorded underground mining at shallow depth.

In accordance with the approach agreed with the Local Planning Authority, any planning application for development of this site therefore needs to be accompanied by a Coal Mining Risk Assessment Report. It is a requirement of the National Planning Policy Framework, paragraphs 189-190 that the applicant demonstrates to the satisfaction of the LPA that the application site is safe, stable and suitable for development. Further information on how to prepare Coal Mining Risk Assessments can be found at: https://www.gov.uk/planning-applications-coal-mining-risk-assessments

Flood Risk

Please refer to full comments available online.

Building Bristol

Please refer to full comments available online.

Procedural Matters

It is advised that applications are submitted electronically via the Planning Portal: https://www.planningportal.co.uk/

The following Council webpage contains details of both the national and local List of planning application validation requirements:

https://www.bristol.gov.uk/planning-and-building-regulations/make-a-planning-application

If you do decide to proceed with a planning application, the following documents are specifically required for assessment of a full application:

- Application form – signed and dated, including the relevant ownership certificate
- Site Location Plan
- Existing and Proposed Planning Drawings (block, site and floor plans, sections and elevations)
- Planning Application Fee
- Air Quality Assessment
- CIL Questions Form
- Community Involvement Statement
- Viability Assessment for the Public House
- Sustainable Drainage Strategy
- Broadband Connectivity Assessment
- Planning Obligations Statement
- Sustainability Statement and Energy Strategy

- Overheating Risk Assessment
- Transport Statement / Assessment
- Travel Plan
- Residential Accommodation Management Plan
- Waste Management Plan
- Construction Management Plan
- Arboricultural Impact Assessment
- Site Safety / Security Management Plan
- Delivery and Servicing Plans
- Phase 1 Desk Study – Ground Investigation
- Phase 2 Exploratory Investigation – Ground Investigation (as necessary)
- Ground Investigation Remediation Strategy (as necessary)
- Landscape and Ecological Management Plan
- Employment and Skills Plan (visit www.buildingbristol.com for details)
- Coal Mining Risk Assessment
- Visual Impact Scoping Exercise
- Daylight and Sunlight Assessment
- Lighting Assessment – providing baseline and post-construction lighting impacts on the habitats in the SNCI
- Preliminary Bat Roost Assessment
- Ecological Impact Assessment (EcIA)
- Biodiversity Net Gain Assessment
- Landscape and Ecological Management Plan
- Design & Access Statement

Summary and Conclusion

In summary, there are principle concerns regarding the acceptability of residential development in place of the existing public house. Any future full application would need to provide robust justification to demonstrate that the site is not economically viable for use as a public house or another community facility.

The demolition of the existing public house will not be supported and adaptive reuse should be prioritised.

If this can be addressed, the proposal will need to take account of local context and the recommendations of the Urban Living SPD when considering the appropriate scale and massing for the

site. Single aspect units should be avoided, and any future application should seek to provide a high standard of accommodation for future occupants.

It is recognised that the scheme would provide much needed housing which would contribute positively to the mix and balance of housing types and sizes and within the local area. However, if the above issues cannot be adequately addressed, any future application on this site is unlikely to be acceptable.

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

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

Yours sincerely,

Development Management