

**Mr P. Chick**  
**Development Management**  
**Bristol City Council**  
**City Hall**  
**PO BOX 3399**  
**Bristol**  
**BS3 9FS**

Our reference: MO.5930  
Your reference: 22/01221/FUL  
Date: 6<sup>th</sup> May 2022

Dear Mr Chick,

## **PLANNING APPLICATION REF. 22/01221/F AT ST. CHRISTOPHERS SCHOOL, WESTBURY PARK, BS6 7JE**

This letter has been prepared by CSJ Planning on behalf of SCAN Action Group (St. Christopher's Action Network), a local group set up to help achieve the appropriate development of the St. Christopher's School site. In summary, the group object to the above planning application which seeks consent for, inter alia:

- 122 self-contained extra care residential units.
- A wide range of wellbeing facilities, amenity facilities and flexibility services.
- Landscaping and active outdoor space & extensive shared and private gardens.
- 65 car parking spaces.
- 940sq.m new Community Hub within Grace House.
- Urban Village Hall within North Lodge.

Many of the local residents have objections to the proposal in relation to the overdevelopment of the site, highway impacts, environmental impacts and lack of affordable housing. The Action Group therefore wish to register an objection to the proposed development on the following grounds:

### **IMPACT ON HERITAGE ASSETS**

S66 of Planning (Listed Buildings and Conservation Areas) Act 1990 prescribes a general duty on Local Planning Authorities in the exercise of their planning functions regarding listed buildings. 'Special regard' must be paid to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.

Similarly, S72 prescribes a general duty in respect of Conservation Areas, which are also designated heritage assets. In this instance, legislation requires that 'special attention' shall be paid to desirability of preserving or enhancing the character or appearance of that area.

These legislative requirements are mandatory, not discretionary. It is incumbent upon the Local Planning Authority to pay special attention and regard to preserving or enhancing heritage assets within an application for development.

The application site at St. Christopher's contains a Grade II Listed building, Grace House, and lies within The Downs Conservation Area. Case Law is relevant in identifying the importance of heritage considerations as it has provided interpretation of how the duties should be applied. In particular:

Barnwell Manor Wind Energy Ltd v E.Northants DC, English Heritage, National Trust & SCLG [2014] EWCA Civ 137

*The judgment in Barnwell Manor emphasised that "there is a need to give considerable importance and weight to any harm...when carrying out the planning balance".*

R (on the application of) Forge Field Society & Others v Sevenoaks DC & Interested Parties [2014] EWHC 1895 (Admin)

*Forge Fields* reiterated Barnwell Manor's approach, finding that the statutory duty imposed under section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings and their settings requires that 'considerable weight' must be accorded to any harm to listed buildings or their settings. The judgment concluded:

*'The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the right balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation...'*

Therefore, it is incumbent upon the Local Planning Authority to afford considerable importance and weight to heritage impacts when considering the applications at St. Christopher's.

In this regard, para 7.156 page 76 of the submitted Built Heritage Statement is relevant. It asserts:-

*When considering all elements of the development proposals and of The Downs Conservation Area as a whole, it is not considered that the change will impact upon the overall character and appearance of heritage significance of the asset."*

This statement is alarming. It is somehow intended to justify the proposed new build elements. Whilst the articulation and design of facades may indeed have some ingredients that respect some local character, there is no assessment of the sheer amount, height, mass, and bulk of the proposed new-build built form.

The proposal is a considerable over-development and effective cramming of as much accommodation on the site in buildings far too tall for their context. The 6-storey block in particular will dominate the Listed Building of St. Christopher's and cause harm to the building itself, its significance and its setting.

The Built Heritage Statement also appears to provide extensive analysis of the changes to the listed building internally, but no satisfactory assessment of the impact of a multitude of new buildings set in close proximity to the listed building, some of which are very tall and will undoubtedly dominate the listed building itself. Accordingly, SCAN consider that the proposals will cause 'less than substantial harm', towards the upper end of the spectrum of this classification.

The term 'less than substantial harm', derives from the NPPF and does not indicate that such harm is of low importance. Quite the reverse is true, as explained in case law identified above, which is reflected within NPPF para 199. In short, the proposals will be most damaging to the listed building and its setting.

The Built Heritage Assessment also seeks to identify harm to The Downs Conservation Area. The commentary describes views of the site from the wider conservation area in an attempt to justify the proposals. It does not satisfactorily address the proposed density of built form in this locality, or whether this respects the local spacious character. Neither does it provide a meaningful quantum analysis of the increase in floor space proposed and the impacts that this will have on the designated heritage assets.

The conclusions of the Heritage Statement, particularly paragraph 8.1, outlines the following in respect of the overall heritage impact *"when taking into account all aspects of the scheme, it is concluded that the proposed development would result in less than substantial harm, at the lower end of the spectrum, to the overall architectural and historic interest of the Grade II Listed Grace House"*.

Notwithstanding that it is SCAN's contention that the extent of the harm caused is at the higher end of the less than substantial scale, the extent of harm caused by the proposals, as evidenced by the Heritage Statement and Planning Statement has neither been afforded 'great weight' or been justified.

NPPF paras 199 and 200 between them requires that *any harm*, in accordance with the pertinent Case Law, is afforded great weight. It further sets out that any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification.

Within the suite of documentations submitted for consideration, there is neither any recognition that the extent of harm caused requires the application of '*great weight in decision making*', nor any express reference to justifying the harm caused. On this basis alone, the application is incomplete in heritage terms.

The Planning Balance exercise undertaken within the Planning Statement makes no reference whatsoever to the starting point of 'great weight' being afforded to the recognised heritage harm. Instead, it simply seeks to apply the test of whether there are public benefits that

outweigh the acknowledged harm, to allow for a determination that the titled balance within 11d of the NPPF is applied. This approach is flawed, as there is no prior acknowledgement of the requirement to apply great weight to the harm caused, and the requirement to provide clear and convincing justification for such harm. In the absence of such assessments, the starting points for the balancing exercises required by the NPPF is inappropriate and does not adequately apply the conclusions from *Barnwell Manor* or *Forge Fields*.

Again, and notwithstanding the above position, SCAN consider that 'less than substantial harm' is at a higher degree than as stated within the submission, principally due to the quantity, height, mass, and bulk of new buildings proposed in the Conservation Area, which will be an intrusive and unwelcome addition to the built fabric within The Downs Conservation Area. On this basis, the level of justification required, in accordance with NPPF 200, is at an even higher scale than what is already absent from the application.

In conclusion, the proposals are clearly contrary to Policies BCS22 and DM31. The proposal will result in an unacceptable level of heritage harm to designated heritage assets, which have not been justified, which do not conserve or enhance the assets themselves nor their settings.

## LAND USE PRINCIPLES

The application seeks to articulate an overwhelming need for extra care accommodation whilst also suggesting that the current lawful use of the site for SEND facilities has been adequately provided elsewhere and is not suited to this site in any event.

Paragraph 6.27 of the Planning Supporting Statement, notes that the applicant has considered the issue of SEND education provision and commissioned a report by EFM to provide an assessment for such educational facilities. Section 8 of the EFM report assesses a suitability of existing buildings, noting their shortcomings for SEND accommodation in the modern era.

In particular, paragraph 8.9 notes that the site layout has grown up in an unplanned, organic way, which is not ideal for children with special educational needs of any type. It also highlights maintenance and servicing arrangements that are not cost effective. It concludes that a new SEND School would require a good deal of rationalisation and rebuilding necessary to make the school efficient and meet DFE requirements.

Whilst such EFM conclusions may be understandable, that does not necessarily lead to a conclusion that Policy BCS12 & DM5, regarding the protection of community facilities, have been satisfied. The application has not demonstrated that there is no longer a need to retain the SEND use, and in this instance no alternative provision has been made.

In paragraph 6.26 of the Planning Supporting Statement, it notes that the Council strategy includes 'finding smaller pockets of provision' for SEND accommodation across the city. The Bristol Schools Forum agenda meeting of 29th March 2022 (enclosed at Appendix A), notes, amongst other things, budget constraints and the impacts of long tail Covid resulting in higher numbers of children joining education from a 'lower baseline'.

At paragraph 3.4, page 15, it is noted:-

*"Although good progress has been made, providing suitable and sufficient Special Educational Needs and Disability places remains a major challenge."*

Paragraph 4.23 states:-

*"There has also been a rise in demand for specialist provision with a large increase in a number of educational health care plans. The rise is significantly above that which would be expected from the rise in the general school population. Existing specialist provision across the city is at, or very close to capacity and will require substantial capital investment."*

Paragraph 4.24 notes:-

*"In October 2020 census there was 1,211 pupils in Bristol special schools compared to 1,119 in October 2021."*

Accordingly, it is evident that SEND requirements are increasing in Bristol and therefore not catered for. Past statements of sufficient capacity may now be outdated. In this context, it is evident the SEND need is still evident and therefore the Local Planning Authority should safeguard such places for suitable accommodation. The opportunity to re-use the existing premises or re-building should be afforded substantial weight.

In conclusion, the applicant has failed to satisfy the requirements of Development Plan Policies BCS12 & DM5 regarding the protection of community facilities and therefore there is an in-principle policy conflict.

## OVERDEVELOPMENT OF SITE & TOWNSCAPE IMPACT

The appeal site is within the Downs Conservation Area. This is notable for the consistency of the stone buildings with rich detailing, the formality of the layout of the streets and the abundant street trees. Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

The proposed development is considered to represent overdevelopment which responds poorly to the site. It would be entirely out-of-keeping with the scale and form of nearby development and would consequently be harmful to the local townscape character.

Although an update to date Conservation Area Appraisal has not been prepared to-date, the Conservation Area Enhancement Statement issued as part of the Local Development Framework identifies that its character is derived from *"for its small buildings and street furniture, trees, quality and consistency of limestone building materials and traditional boundary walls. The buildings are well proportioned so that they harmonise with the street as a whole"*. This character will be markedly eroded by the proposed development.

The scale, massing and height of the proposed development would unacceptably alter the existing character and street scene along Westbury Park, Royal Albert Road, Etloe Road, The Glen, Bayswater Avenue and Belvedere Road, where the scale of existing development is

predominantly 2/3 storeys. The scale and bulk of the proposal sits uncomfortably within the plot and would constitute a cramped form of development. The plot coverage is significant and out-of-keeping with the more well-balanced existing plot arrangement.

At 6 storeys in height, elements of the proposed development are up to 4 storeys taller than many surrounding buildings in the area. This is considered to be inappropriate in design terms, failing to respect the rich and historic character of the existing townscape. The proposed development itself will result in a substantial degree of change which will have a notable impact on the street scene and will sit at odds with the important elements of the character and appearance of the Conservation Area, thus impacting upon its overall heritage significance.

The proposed development is considered to be harmful to the existing townscape character by virtue of the increased height and stark uninteresting residential form of the scheme will mean the development will be visible from, and within the context and setting of designated heritage assets and key views through the city. Furthermore, the removal of existing trees which currently provide screening to the site would cause further harm to the visual impact of the development on the surrounding landscape.

The Townscape & Visual Impact Assessment (TVIA) outlines that there are 4 No. key townscape receptors of medium and medium-high sensitivity and 5 No. key visual receptors, also of medium and medium-high sensitivity. As the TVIA notes, higher levels of sensitivity are associated with a higher receptor susceptibility to change. On the basis of the identified receptors, they are all at the medium to higher end of the scale, which indicates that they are subject to greater impacts arising from changes to the townscape.

The TVIA concludes:

- *Overall levels of effects for townscape receptors range from moderate (for the character of the site), through slight-moderate (for Local character area – Westbury Park Frontage Villas), to slight (for Local character areas – Cottages and Houses and St Alban's and Redland Garden Estates). Adverse effects are associated with the change to the height, scale and mass of the buildings within the site.*
- *Adverse visual effects are associated with the addition of new buildings of increased height and mass within the site, and in certain locations, tree removals, which open up views into the site. Overall levels of effects are judged as varying slight to moderate-substantial adverse (for receptor groups B, C and D) and slight adverse (for receptor groups A and E)*

The stated conclusions are clear in that the 'effects' on the townscape revolve principally around the scale, height and mass of the proposed buildings and the loss of existing tree cover. This is endemic of a proposal that is out of character with its locality and is reliant on tree removal that is a valuable existing townscape feature and is a key component of the character and appearance of the Downs Conservation Area.

Ultimately, the conclusions arising from within the Townscape & Visual Impact Assessment, do not correlate with the conclusions within the Planning Statement, whereby it asserts that the

proposal is neutral in design terms within the wider balancing exercise. This inconsistency is alarming.

## AFFORDABLE HOUSING PROVISION

The proposal is deficient in respect of the provision of on-site affordable housing. As such it fails to accord with the Development Plan. Affordable housing is probably the single most important strategy of Bristol City Council, evidenced by the recent publication of Strategy 1000, which is in effect the City's most recent corporate strategy for housing, including affordable housing, delivery through to 2025.

A failure to propose a suitable on-site response is worthy of refusal. The application site is within the Inner West area of the City where 40% affordable housing is sought by adopted policy BCS17.

In the absence of a Viability Assessment to justify the proposed affordable housing 'offer', in accordance with the adopted Validation Checklist, SCAN consider that the application should not have been validated by the Local Planning Authority. The adopted Validation Checklist confirms that where below policy-compliant affordable housing is proposed, the Affordable Housing Statement (or Heads of Terms, as submitted) must be accompanied by a full un-redacted Viability Appraisal. No such information is forthcoming and the extent of the detail in respect of affordable housing is set out within the Planning Statement.

Paragraph 5.9 identifies Policy BCS 17 and the 40% target delivery for affordable housing in the Inner West wards. In the absence of such provision, a full development viability appraisal is required. No such appraisal has been submitted. The proposal therefore evidently falls short of policy requirements.

Paragraph 5.26 acknowledges the Affordable Housing Practice note, presumably the 2018 edition. It does not specifically reference the policy guidance within 3.3 namely that "*The developer is expected to provide affordable homes on site without any public subsidy in line with the Council's affordable housing policy*".

Paragraphs 6.83 – 6.85 provide the applicants response to affordable housing within this proposal. It states "*the particular model of care to be provided at the site means that, in principle, the scheme is unable to provide on-site affordable housing. This is because residents will be required to pay a service charge toward communal facilities, wellness services and the general management and upkeep of the extra care Integrated Retirement Community*"

The Affordable Housing Practice Note 2018 spells out the Council's approach to service charges at paragraph 3.6, page 10. This states "*The service charge is the amount payable on an affordable home in addition to rent/mortgage which includes all estate management charges, ground rents, services, repairs, maintenance and improvements of a communal nature and the insurance of the building. The level of service charge can be a material planning consideration as this affects the relative affordability of the unit. The Council will seek to ensure via the s106 agreement that the total occupation costs to affordable housing occupiers remain affordable in the long term. The Council would not expect a service charge to exceed £250 per annum in*

*respect of a house and £650 per annum in respect of a flat (Index linked (CPI) respectively). Early consultation is recommended as good design can overcome the need for high service charges.”*

The application is clearly at odds with the Practice Note guidance and contrary to policy with no on site affordable housing provision. There is no good explanation on why the model of care proposed cannot cap the service charge for affordable units and any deficit effectively cross subsidised by private owned units. Such an approach is commonplace in Bristol.

It is not explicit in the application why the applicant’s consider that Extra Care proposal should be excluded from policy requirements. They should not. Nor should the Local Planning Authority enter into negotiations with an applicant to search for an off-site or financial solution that is contrary to the Practice Note and adopted policy requirements.

Accordingly, the proposal should be refused on a failure to comply with policy BCS17 and its accompanying supplementary guidance.

## ROAD SAFETY AND TRAFFIC / PARKING

Section 4 of the NPPF outlines that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives.

Policy DM23 (Transport Development Management) of the Local Plan outlines that new development should not give rise to unacceptable traffic conditions and will be expected to provide safe access to the highway network. The policy also outlines that new development should be accessible by sustainable transport methods such as walking, cycling and public transport. Furthermore, the policy sets standards for parking provision.

A full Transport Objection Statement has been produced by SCAN Group, provided as Appendix B. A summary of the detail within the accompanying Statement is provided below:

Firstly, the applicant does not provide any estimates of the actual expected parking needs of the residents, staff and visitors for a new Extra Care scheme, and does not claim to be able to meet these without any overspill on to surrounding roads. Instead, the proposed number of parking spaces is based on:

- an interpretation of the parking standards for C2 (residential care homes where residents don't have cars);
- comparison with parking provided at a small number of non-similar schemes; and
- a comparison with the number of cars parked in a small non-comparable (social rent) sheltered housing scheme, in a small town in Northern Ireland, on one day in early 2019.

The proposal is for 122 units comprising 111 two-bed and 11 one-bed dwellings. The Transport Statement estimates approximately 15-20 staff on-site at any time. The applicant has only included 65 spaces for a site of 122 primarily 2-bed apartments, which could accommodate up to 244 residents. None of the supporting information provided within the transport Statement



suggests that this will be enough to accommodate for all residents, staff and visitors. Section 1.2 of the accompanying statement explains why the information in their Transport Statement does not demonstrate that the parking provided will be sufficient to avoid overspill.

The applicant justifies their plans with numerous subjective assertions, but these are not evidenced by any quantified assumptions, data or research to show the actual likely parking requirements of the residents, staff and visitors. Section 1.3 uses reliable data sources to indicate that a reasonable estimate of parking requirements for the development would be 116 spaces, made up of:

- 76 spaces for residents' cars
- 2 car club and 1 mini-bus space
- 37 spaces reserved for staff and visitors.

It is well known that the residential roads surrounding the site already face issues with over-demand of parking, and the associated road safety issues. Section 1.4 of the accompanying document provides further detail in this respect. These roads have no spare capacity to accommodate the likely over-spill from the new development, and the extra volume of cars looking for spaces will exacerbate the current safety concerns.

Obviously, the ultimate parking needs will be based on a number of factors and cannot be predicted with 100% accuracy. However, it should be recognised that the nature of the location – closely surrounded by residential roads – means that if the estimates lead to insufficient parking on-site, residents, staff and visitors will seek to park on the neighbouring roads, and this impact cannot be managed by the developers (or BCC) once the site is occupied.

There must therefore be a clear onus on the applicant to provide sufficient parking, based on realistic estimates, to reduce, as far as reasonably possible, the risk of this occurring. Instead, their provisions are, at best, based on unenforceable best case wishful thinking. The estimates provided within the accompanying statement are based on defined and reasonable (not worst case) assumptions, as detailed further in Section 1.3.

Most of the applicant's case seems to rely on a suggestion (Transport Statement 6.21) that "parking provision is in line with other similar schemes". However, the amount of parking provided on these other sites is not relevant in determining the actual parking needs of this site.

Appendix E to the Transport Statement indicates that the comparison site is TRICS ref TY-03-P-01. The referenced site is a small retirement housing scheme in a small town in Northern Ireland, providing socially rented housing. No care is provided, solely an (off-site) alarm service, and there are no community facilities. Units are primarily single occupancy, distorting the pro rata calculation.

This site is clearly not sufficiently similar to St Christophers Square to provide any meaningful comparison data. The context of the site has not been remotely taken into consideration within the assessment, with no regard for existing environmental factors such as the presence of a

Primary School (Westbury Park) & Nursery (Daisychain) and existing parking conditions & traffic movement.

Finally, it should be noted that the applicants themselves do not claim that there will be no overspill on to surrounding roads – their plans appear to be justified primarily by a highly tenuous and limited comparison with 1 day of trip analysis at a completely non-comparable site. For a development of this size and complexity, this cannot be seen as anything approaching a reliable basis for the limited parking provision. The plans presented in the first pre-app included 120 spaces, and even then, they referred to the potential need for a residents parking scheme to avoid over-spill into the surrounding streets. This suggests that the applicant is in fact aware of the likely number of parking spaces required to avoid overspill, but has reduced the planned provision from 120 to 65 for their own undefined reasons.

The road safety issues within the vicinity of the site have been acknowledged by Bristol City Council, who rejected two recent planning applications – 19/93194/F and 20/06030/F – due to the additional parking demands they would place on these roads, and the impact on road safety. Additionally, the report from the Planning Inspectorate in response to an appeal on 19/93194/F upheld the Council's decision, summarising that "I found that parking is at a premium, which is currently causing significant hazards for all users of the highway<sup>1</sup>."

The parking issues on these roads are even acknowledged by the applicant, who states (Transport Statement 6.7) that "Roads to the south such as The Glen and Belvedere Road are on the edge of the residents parking zone and have issues with lack of on-street parking for residents". A recent poll of local residents found that 81% of the 298 respondents see issues with parking in Westbury Park having a dangerous impact on road safety, with 67% having witnessed accidents, incidents or near misses in this area (44% more than once). This can only increase with a further 50+ cars circling the roads competing for rare spaces. "

The parking survey undertaken by local residents indicates a significant existing shortfall in existing parking, with the parking pressures most severe during the working week, principally owing to commuters who seek to avoid the restrictions imposed by the Residents Parking Zone within the locality. The parking situation often results in vehicles having to park in the middle of the road, causing congestion and conflict which is exacerbated by the two-way carriageway which creates a hazard for all road users and residents. This issue is particularly pertinent as the peak parking pressures will coincide with the working hours for staff at the redeveloped St Christophers – where the proposed level of provision will not cater for staff demand.

The proposed scheme does provide some negligible mitigation in the form of a raised speed table, implementation of double-yellow areas and dropped kerbs to assist pedestrian crossings, however, these limited benefits are not considered sufficient to justify the significant impact on the operation of the local highway network, or indeed the resulting further reduction in the availability of on-road parking.

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<sup>1</sup> Application 17/06914/F on the Bristol City Council Planning Portal: "Costs Decision"

Overall, it is clear that there is simply no basis for assuming that the planned parking provision is sufficient for the parking needs at this location. There will be a significant overspill, which will increase risks to road safety in the surrounding residential streets. The applicant has not provided any reliable information to support that 65 spaces will be sufficient for the needs of all residents, staff and visitors to the site and the transport submission fails to identify the full range of impacts. In consequence, its assessment of the impact upon the local road network is both incomplete and unreliable, with no evidence that the proposal is acceptable. Consequently, it is recommended the LPA take a precautionary approach when assessing highway impacts.

It is also evident that the formal submission has not taken into account the advice from Transport Development Management (TDM) in respect of the ongoing operation of the access from Etloe Road. The formal advice issued at the Pre-Application stage was clear in that this must be addressed, owing to the proximity to the existing Nursery and the St Helena Junction, which would give rise to highway safety concerns for vehicles leaving the site. Residents are also concerned that the proposed pedestrian access to The Glen would increase the risk of it being used for overflow parking.

Overall, it is therefore concluded that the proposal, as submitted, would harm highway safety. Policies BCS10, DM2 and DM23 of the Development Plan require safe streets integrated with the development, the regulation of parking impacts from shared housing and the avoidance of unacceptable traffic conditions.

Paragraph 109 of the NPPF states that "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." It is clear that the developers are not producing sufficient parking to avoid an unacceptable impact, and the application should therefore be refused on these grounds.

## IMPACT ON THE ENVIRONMENT

Section 11 of the NPPF (Conserving and enhancing the natural environment) states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy BCS9 (Green Infrastructure) of the Bristol Core Strategy outlines that the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced. Opportunities to extend the coverage and connectivity of the existing strategic green infrastructure network should be taken.

Policy DM17 (Development Involving Existing Green Infrastructure) outlines that development should integrate important existing trees. It is suggested that where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided in accordance with the standard set out within Policy DM17.

The proposed scheme is considered to be in conflict with the above policies for the following reasons owing to an extensive loss of trees, including high quality individual specimens, which has not been adequately justified

The Development Plan requires appropriate mitigation for any lost green infrastructure assets will be required. Development should incorporate new and/or enhanced green infrastructure of an appropriate type, standard and size. Where on-site provision of green infrastructure is not possible, contributions will be sought to make appropriate provision for green infrastructure off site.

The development has been supported by an Arboricultural Report tree survey and Impact Assessment undertaken by Barton Hyett, which has informed the design of the Proposed Development.

Paragraph 6.94 of the Planning Statement notes that design rationale has been to identify and retain the best quality trees wherever possible, replacing those of low quality. A total of 82 individual trees were surveyed on site and summarised in terms of their quality in accordance with the recommendations of the BS5837 quality category. The development proposes to retain 43 urban street trees, with 39 individual trees, plus 3 groups of trees and four hedges being proposed for removal, equating to approximately 50% of the existing trees on site.

The tree survey states that 18 of the 39 trees proposed for removal are of moderate to high-quality (4 high-quality, 14 moderate quality) with their retention therefore desirable in accordance with the BS5837 guidance. This clearly conflicts with paragraph 6.94 and the stated intention to retain trees of quality, with over half of those proposed for removal mature trees of good condition and desirable for retention.

Whilst it is acknowledged that the removal of trees is an inevitable consequence of development, the loss of so many high-quality trees is not deemed to be essential to the redevelopment and has not been appropriately justified. It is considered that such an extent of loss is again indicative of a design proposal that constitutes overdevelopment of the site.

In light of the above, the proposal is considered to cause significant damage to the local green infrastructure network and environment, with the quantum of tree removal not deemed necessary for the redevelopment of the site. The proposal would therefore conflict with Policies BCS9 of the Core Strategy and DM17 of the Site Allocations and Development Management Local Plan.

## SUMMARY & CONCLUSION

This formal representation has been prepared by CSJ Planning for and on behalf of St Christophers Action Network (SCAN) and has been provided in response to the formal submission of planning application ref: 22/01221/F. The application seeks planning permission for 122 self-contained extra care residential units with associated works, including car parking and landscaping

SCAN's stated purpose is to seek the appropriate redevelopment of St Christophers, however, in summary, they consider that the submitted application is not appropriate for the following reasons:

- The proposed scale, mass and bulk of the proposals is inappropriate within this sensitive heritage context and will give rise to unacceptable impacts on heritage assets and townscape;
- In the context of an increasing need for SEND accommodation in Bristol, the applicant has failed to satisfy the requirements of BCS12 and DM5 which seek to safeguard community facilities;
- The extent of tree loss proposed is inappropriate, particularly so in terms of high quality individual specimens which make a valued contribution to the character and appearance of the Conservation Area;
- The proposal is not appropriate in transport and highway terms, owing to insufficient on-site parking provision and inappropriate access/egress arrangements, which will increase the road safety risks in an area where there is already a significant concern;
- The proposal includes no affordable housing and is not supported by an unredacted Viability Appraisal to justify such lack of provision, which is contrary to the adopted Development Plan. The stated reasoning for the lack of provision is not consistent with adopted policies or adopted supplementary planning guidance.

For these reasons, it is considered that the submitted application should be refused by the Local Planning Authority.

I would appreciate if you are able to confirm receipt of this submission and I would be grateful to be kept informed of the progression of the application in due course.

Yours sincerely,



**Michael Orr** BA (Hons), BPL, Dip UD, MRTPI  
Director  
[mo@csj-planning.co.uk](mailto:mo@csj-planning.co.uk)



**APPENDIX A – BRISTOL SCHOOLS FORUM AGENDA MEETING OF  
29.03.22**

***Bristol Schools Forum***

Agenda Tuesday, 29th March, 2022 at 5.00 pm

**Virtual Meeting via Zoom**

	<b>Start</b>	<b>Item</b>	<b>Action</b>	<b>Owner</b>	<b>Paper</b>
1.	17:00	Welcome	A	Chair	
2.	17:05	Election of Vice-Chair	De	Chair	
3.	17:10	Forum Standing Business (a) Apologies for Absence (b) Confirmation meeting is quorate (c) Appointment of new members/Resignations: New members – to be updated at the meeting Resignation – Rob Davies, Nursery Governor Representative (d) Notification of Vacancies: To be updated at the meeting (e) Declarations of Interest	A	Clerk	
4.	17:15	Minutes of the Previous Meeting (a) To confirm as a correct record  (b) Matters arising not covered on agenda – to include an update on de-delegated insurance services	A	Chair	3 - 9
5.	17:20	Presentation by Director of Education and Skills	Di	AH	
6.	17:40	DSG Management Plan Update	Di	AL	10 - 14
7.	18:00	Place Planning	Di	IB	15 - 40
8.	18:20	DSG Budget Monitor P10	I	AL	41 - 44
9.	18:30	Any Other Business		Chair	

(\*) A = Admin, I = Information, De = Decision required, C = Consultation, Di = Discussion

**Clerk:** Corrina Haskins email: corrina.haskins@bristol.gov.uk**Chair:** Sarah Lovell (contact via clerk)



## FUTURE MEETINGS

Date	Items
24 May 2022	
12 July 2022	

## *Bristol Schools Forum*

**Minutes of the meeting held on Thursday, 13th January, 2022  
at 5.00 pm at Virtual Meeting via Zoom**

**Present:**

Melanie Bunce	Maintained Primary Headteacher Rep, St Barnabas
Simon Eakins	Academy Primary Head Rep, Cathedral Primary
Simon Holmes	Nursery Head Rep, St Phillips Marsh Nursery
Tracy Jones	Academy Primary Headteacher Rep, Merchants Academy
Sarah Lovell (Vice-Chair)	Academy Secondary Headteacher Rep, Bristol Brunel Academy
Kate Matheson	Maintained Primary Governor Rep, St Barnabas
Steve Mills	Non School Member, UNISON
Aileen Morrison	Pupil Referral Unit Rep, St Matthias Park
Chris Pring	Maintained Primary Headteacher Rep, Cabot Primary
Emma Richards	Maintained Special School Headteacher Rep, Claremont
Cedric Sanguignol	Maintained Primary Governor Rep, Bishop Road Primary
Cameron Shaw	Academy Secondary Head Rep, Bristol Metropolitan
Simon Shaw	Maintained Secondary Head Rep, St Mary Redcliffe & Temple
Liz Townend	Diocese of Bristol Board of Education
Stephanie Williams	Academy Primary Head Rep, Bannerman Road Community Academy

**In attendance from Bristol City Council:**

Abioye Asimolowo (AA)	Finance Manager
Councillor Asher Craig	Cabinet Member for Children Services, Education and Equalities
Paul Dury (PD)	Risk and Insurance Officer
Corrina Haskins (CH)	Clerk to Schools Forum
Alison Hurley (AH)	Director of Education and Skills
Denise Murray (DM)	Director of Finance
Angel Lai (AL)	Finance Manager (Children's and Education)
Travis Young (TY)	Principal Accountant

	Action
<b>1. Welcome</b>	
SL (Vice-Chair) welcomed everyone to the meeting.	
<b>2. Election of Chair and Vice-Chair</b>	
The Clerk reported that 1 nomination had been received for the position of Chair, Sarah Lovell, and that, if appointed, the position would be for a two-year period, as set out in the constitution.	
<b>AGREED – that Sarah Lovell be appointed as Chair of Bristol Schools Forum.</b>	
SL took the chair and asked for nominations for Vice-Chair, preferably from the maintained	

<p>primary sector to balance her position as a secondary academy representative. There were no nominations, and it was agreed to defer this to the next meeting. Simon Eakins indicated that he would be willing to take on the role in the absence of any nominations from the maintained sector.</p>	
<p><b>3. Forum Standing Business</b></p>	
<p><b>a. Apologies for absence</b>  Apologies for absence were received from:  Rob Davies, Nursery Governor Rep, Speedwell and Little Hayes Nursery Federation  Trish Dodds, Academy Primary Governor Rep, Fishponds Academy  David Otlet, Recognised Teaching Professional Association (NEU)  Rebecca Watkin, Academy Special School Headteacher Rep, LearnMAT</p> <p><b>b. Quorate</b>  The Clerk confirmed the meeting was quorate.</p> <p><b>c. Resignations</b>  There were no resignations to report.</p> <p><b>d. Appointment of New Members</b>  There were no new Members to report.</p> <p><b>e. Notification of Vacancies</b>  The following vacancies were noted:  2 x Academy Secondary Governor Rep  Academy Primary Governor Rep  PRU Governor Rep  Clifton Diocese Rep</p> <p><b>f. Declarations of Interest</b>  There were no declarations of interest.</p>	
<p><b>4. Minutes of the Previous Meeting</b></p>	
<p><b>RESOLVED</b> - that the minutes be confirmed as a correct record</p> <p><b>Matters Arising</b></p> <p><b>Free School Meals Eligibility Checks</b>  In response to a query raised at the previous meeting, AH confirmed that Free School Meal eligibility was not collected on a weekly basis but 3 times a year as part of the census, and that the 2018 changes to Universal Credit had protected children who were eligible before and during the roll out of Universal Credit until the end of the roll out period.</p> <p>In response to further queries from CP about a software which enabled schools to check eligibility on a regular basis, AH undertook to look into this and provide CP with a response.</p> <p><b>Written Statement of Action RAG Rating</b></p>	<p>AH</p>

AH undertook to send Schools Forum Members a link to this information.	AH
<b>5. Verbal update from the Director of Education and Skills</b>	
<p>AH referred to the proposal for phase 3 of the Education Transformation Programme that was discussed at the previous meeting and updated as follows:</p> <ol style="list-style-type: none"> <li>1. Following the in-principle decision to transfer 0.5% from the Schools Block to the High Needs Block at the last meeting, further work was being undertaken to develop the school based element of the proposal.</li> <li>2. This included scoping work to look at the wide range of school-based programmes and interventions across the education system in Bristol to identify how to improve the effectiveness of education for children with SEND and how best to meet needs.</li> <li>3. There was a recognition that there was a lot of good work going on in mainstream schools, Alternative Provision and special schools and a wealth of knowledge and expertise in the sector.</li> <li>4. School leaders were looking at ways to meet needs within a community/locality to work across schools in a collaborative way.</li> <li>5. Bids would be invited from schools for projects that would reflect the priority themes: <ol style="list-style-type: none"> <li>a) early intervention and support.</li> <li>b) emerging needs across the system e.g. social and emotional health and speech and language.</li> <li>c) building on workforce development and capability and how to expand on that and share expertise across the system.</li> <li>d) reducing exclusions and improving attendance of children with SEND.</li> </ol> </li> <li>6. The proposals would need to demonstrate value for money and be sustainable.</li> <li>7. In terms of timelines: <ol style="list-style-type: none"> <li>a) Between now and April a panel would be set up with Local Authority officers, parents and carers, school leaders and Schools Forum members.</li> <li>b) A further update would be provided at the March meeting.</li> <li>c) The details would be circulated to Forum Members prior to the March meeting with a request for feedback.</li> <li>d) From April onwards there would be a move into the cycle of monitoring and quality assurance.</li> </ol> </li> </ol> <p>In response to questioning, AH confirmed:</p> <ol style="list-style-type: none"> <li>1. The information would be circulated through the weekly Heads' Bulletin, and through networks such as Heads' briefing and the Excellence of Schools group.</li> <li>2. In terms of whether nursery providers would be involved, there was a need to check parameters in terms of the funding requirements, but the preference would be that this sector should be involved, along with the Health sector due the key work on early identification and intervention.</li> </ol> <p><b>AGREED – information be circulated to Schools Forum in advance of the next meeting for first comment prior to wider circulation.</b></p>	AH
<b>6. Dedicated School Grant (DSG) 2022-23</b>	
<p>TY introduced the report and drew attention to the following:</p> <ol style="list-style-type: none"> <li>1. The allocations were announced by ESFA on 16 December as set out in table 1 of the</li> </ol>	

report.

2. Subsequent to this, the ESFA announced an additional £325m for High Needs including £2.651m for Bristol.
3. This changed the figures in tables set out in the report with £78.2m for High Needs (rather than £75.52m), an increase of 13% from the previous year.
4. Central School Services Block: This block was funded in two parts, for ongoing and
5. historic responsibilities. The funding for historic commitments had been reduced again by 20%.
6. Early years: The 3- and 4-year-olds funding rates were unchanged, 2-year-olds increased by 21p and this would be passed on directly to providers as requested during the consultation process.

In taking a decision, Forum Members noted the feedback from schools as part of consultation process. In relation to comments to Cabinet and Council, Forum noted the additional funding for High Needs and awaited proposals from the Council as to how this funding would be utilised going forward as part of the Education Transformation Programme or to support the cost pressures in the High Needs Block.

#### **AGREED –**

1. **That the 2022/23 funding levels be noted.**
2. **That the final transfers between blocks be approved.**
3. **That the EYNFF be approved.**
4. **That the Central School Services Block allocations be approved:**
  - a. **LA Core Functions £1.139m (as per Appendix 1).**
  - b. **School Admissions £0.557m.**
  - c. **Schools Forum £0.023m.**
  - d. **Combined Services £0.596m (as per Appendix 2).**
5. **That the following feedback be given to Cabinet and Council, for their consideration in making final decisions on the Schools Budget for 2022/23:**  
**The Bristol's Schools Forum noted the additional funding for High Needs and awaited proposals from the Council as to how this funding would be utilised going forward as part of the Education Transformation Programme or to support the cost pressures in the High Needs Block.**

#### **7. School Block Funding Formula**

TY introduced the report which asked Forum to approve the funding formula for submission to the ESFA.

LA officers answered the following questions raised by Forum Members:

*Is there any further information on whether there would be a hard NFF next year?*

There was no further update, but the indications were that there would be a move towards a hard NFF

*What would happen over the next few years in relation to the Growth Fund especially in view of the difficulty in finding places in Bristol, especially secondary places in the East/Central area?*

The 70 places mentioned in the report was the current situation with 1 new and growing school and going forward, growth funding was also under review. The LA would look at how to apply growth funding under any new requirements of ESFA.

From a strategic perspective, it was challenging to find out about the Growth Fund on an annual basis, but the LA was creating a Place Planning Strategy to look at next 5-10 years (under the Belonging Strategy). In the short term, the LA was responding to a capacity issue with the delay in the building of a new free school in East Central. The new South Bristol secondary school was on track to open in September 2023 albeit in temporary accommodation. There was a report to Cabinet on 18 January to approve spend of a capital grant from DFE to deliver additional school capacity in order for the council to continue to meet its statutory obligations.

It was agreed that Place planning for Secondary/Primary places in the City was an important issue and a progress update in this regard would be brought to the Schools Forum meeting in March.

*Why was there a delay in the opening of the school in East Bristol?*

The school was part of the Silverthorne Lane development which had been called in by the Secretary of State following an objection on the planning application from the Environment Agency due to flood risk concerns about flood risk.

#### **AGREED**

- 1. That the proposed arrangements for the 2022/23 mainstream funding formula, including the amount set aside for the Growth Fund be approved.**
- 2. That the following feedback be given to Cabinet and Council, for their consideration in making final decisions on the Schools Budget for 2022/23:  
Place planning for Secondary/Primary places in the City is an important issue to look at and a progress update in this regard needs to be brought to the Schools Forum meeting in March.**

#### **8. De-delegation - outstanding items**

The Chair asked Maintained Primary Representatives to consider the following outstanding items which had not been agreed at the previous meeting:

##### **a) Employee and Premises Insurance**

It was noted that there was a request for further information at the previous meeting about why joining a separate scheme such as the RPA was cheaper and how cover compared between that and the option proposed by Council. The Council's Risk and Insurance Officer confirmed that the RPA cover did not include engineering inspection services/motor insurance and would also mean an additional administrative burden of schools dealing directly with insurers rather than through the Council's Insurance and Risk Team. In response to a question about whether Bristol City Council had considered taking up RPA as an authority-wide scheme like some other LAs, he confirmed that this wasn't the recommended option at the current time.

It was agreed that if Forum was minded to support de-delegation, the Council would seek the most value for money option and explore RPA as part of that process before committing to a 3 year contract.

**AGREED that Employee and Premises Insurance be de-delegated and that the Council would seek the most value for money option and explore RPA as part of that process before committing to a 3 year contract.**

<p><b>b) Education Psychologist</b></p> <p>On voting on whether this service should be de-delegated, there were 2 in favour and 2 against. The Chair used her casting vote to support the proposal following feedback that the service was valued by SENCOs but asked that further information be provided on the details of the service provided to schools to ensure that the service was value for money.</p> <p><b>AGREED (3 in favour and 2 against) – that the Education Psychologist service be de-delegated.</b></p> <p>In response to a question from CP about how schools could access the TU fund, AH undertook to report back with details.</p>	<p>AH</p> <p>AH</p>
<p><b>9. Dedicated School Grant (DSG) Budget Monitor (P8)</b></p>	
<p>AL introduced the report and drew attention to the following:</p> <ol style="list-style-type: none"> <li>1. The report summarised the DSG budget position as of November 2021.</li> <li>2. There was a £10m deficit from previous year as of November, this had risen to £16.7m.</li> <li>3. The reason for the increasing deficit was the demand in the High Needs Block, in particular top-up funding and placements and there was also some pressure on Early Years SEN.</li> <li>4. A cumulative forecast of £26.7m was predicted by the end of the financial year.</li> </ol> <p>It was noted that the deficit was an ongoing concern and the next iteration of the DSG Management Plan would be discussed at the next meeting. Councillor Craig confirmed that the growing deficit was an issue of urgency for the Council and asked Forum to have a robust discussion at the next meeting.</p> <p>AH confirmed that the High Needs and Early Years Task and Finish Groups would be meeting in advance of the next meeting to look at the DSG Management Plan in detail. She asked other members to consider joining these groups and further details would be circulated to all members.</p> <p>In response to a concern raised about information in the press relating to local authority powers to recoup money from maintained schools, it was noted that this may either refer to the recent consultation to withdraw funding to Local Authorities (Brokering Grant) for school improvement or the balance control mechanism to control surplus balances. SS undertook to forward the news articles to AH for clarification at the next meeting.</p> <p>In response to a question about the reason for the variance in relation to the closure of 3 schools and opening of a new school, TY confirmed that the 3 schools had been fully funded for 12 months but closed at the end of August and the new school was opened without any funding and so a new allocation was worked out using the unspent money from the closed schools and the variance was the net result.</p> <p>Further questions were asked in relation to the increase in top-up funding to Resource Bases, whether spaces were filled and also the reason for the difference in terms of funding and outturn for special schools. AH confirmed that in relation to both Resource Bases and Special Schools, the increase was needs led and the Council was not funding empty spaces as had happened previously. She advised that there had been a significant increase in requests and</p>	

<p>the complexity of needs had also driven costs up.</p> <p>In response to further questions about whether this increase would be built into next years' budget, AH responded that some of the forecasting had been worked into the budget and there was ongoing work about mitigations and the assumptions around the mitigations. She confirmed that the increase associated with the Covid pandemic and associated lockdowns would slow down as children returned to education settings.</p> <p><b>AGREED</b>  <b>That the in-year 2021/22 position for the overall DSG be noted.</b></p>	
<b>10. Financial Regulation for Schools with Delegated Budget</b>	
<p>AA introduced the report containing the revised financial regulations for maintained schools and asked Forum Members to share the information and respond to the Clerk with any comments. It was agreed that the deadline for comments be extended to 3 February.</p> <p>It was noted that the document would also be available on the Council's website and advertised through the Heads' Bulletin and circulated to business managers.</p> <p><b>AGREED - that the draft regulations be noted, and comments from maintained schools be welcomed up to 3 February 2022 with the final regulations coming into effect from 01/04/2022.</b></p>	

The meeting closed at 6.23pm.



## **Bristol Schools Forum** **DSG Management plan updates**

<b>Date of meeting:</b>	29 March 2022
<b>Time of meeting:</b>	5.00 pm
<b>Venue:</b>	Virtual meeting

### **1. Purpose of report**

The purpose of this report is to present latest DSG Management Plan (“the Plan”) to the Schools’ Forum for information. Updates within this report is subsequent to the Plan presented in November 2021 Schools Forum’s meeting.

### **2. Recommendation(s)**

Schools Forum is invited to note the following:

- the latest updates in the Plan
- feedback and comments on proposed mitigations
- the next update will be provided to the Schools Forum in May 2022.

### **3. Background**

Local Authorities with an overall deficit on their DSG account at the end of a financial year must be able to present a plan to the DfE for managing their future DSG spend. The ESFA have designed a template to help local authorities manage their DSG and Bristol is using the template.

The Plan is intended to help LAs to develop evidence-based and strategic plans covering the provision available for children and young people with special educational needs and disabilities. Completion of the Plan will enable us to:

- comply with paragraph 5.2 of the DSG: conditions of grant 2020 to 2021
- monitor how DSG funding is being spent
- compare data on high needs spend between LAs
- highlight areas that may require a ‘deep dive’ to ensure resources are being used efficiently and best value is secured

### **4. Developments since November 2021 Schools Forum meeting**

Subsequent to November 2021 Schools Forum meeting, ESFA announced 2022/23 DSG allocations in December 2021 and additional funding to High Needs block in January 2022, along with suggested income growth projections for High Needs block (2023-24: 5% uplift and 3% uplift for subsequent years).

DSG management plan was updated to reflect these changes. The unmitigated deficit forecast was reduced to £85.5m from £89.1m for year 2025-26 in the version reported to the Forum in November 2021. This is primarily due to £9.8m increase in High Needs block funding in 2022-23, offset by reductions in High Needs funding growth assumptions beyond 2023-24.

As illustrated in Table 1, ESFA confirmed 2022-23 DSG funding allocation, which is an uplift of £17.847m or 4.4% from 2021-22 allocation. However, as additional £8.928m is for Schools Block where majority of the funding is passported to schools and will be fully spent. £78.214m for High Needs Block representing £9.848m, including additional £2.69m for High Needs block announced in January 2022 representing 14.4% uplift from 2021-22, this is not sufficient to cover current forecasted annual need or contribute to the accumulated historic deficits. The DSG deficit forecast is anticipated to rise further until mitigations plans can be fully developed, consulted on, and begin to take effect in the coming years. As a result, this additional £2.69m allocation cannot be re-directed to other use.

Table 1 - ESFA DSG funding allocation by block analysis	2021-22 DSG allocation	2022/23 DSG allocation as at Dec2021	Increase	Increase	notes on changes:
	£m	£m	£m	%	
Schools block (£s)	297.264	306.192	8.928	+2.9%	unit funding has gone up by 2.5% & 2.8% plus secondary numbers increased by 3.2%; offset by slight primary number reduction.
Central school services block (£s)	2.774	2.742	-0.031	-1.1%	historic responsibilities was 599k & 147k in 2020/21, but £147k element no longer exist (Prudential borrowing)
High needs block (£s)	68.366	78.214	9.848	+14.4%	mainly driven by increase in numbers.
Early years block (£s)	35.286	34.388	-0.898	-7.5%	Based on participation, numbers participating is reducing.
<b>Total DSG allocation (-ve: reduction) as at January 2022</b>	<b>403.690</b>	<b>421.537</b>	<b>17.847</b>	<b>+4.4%</b>	overall 3.3% increase in funding allocation

DSG Management Plan deficit is forecasted to increase further due to an increase in current year deficit forecast. Without mitigations and increased government funding the current trends indicate that this would result in an unmitigated cumulative DSG deficit of £26.792m for 2021-22.

In order to deliver service needs on a sustainable footing, work and collaboration continue with Transformation Programme working groups to finalise mitigation proposals for consideration by the Schools Forum in 2022-23, and further work and engagement thereafter and where appropriate consultation on the co-design of these potential mitigations for development and implementation in subsequent years. Further details on mitigation proposals and developments on potential opportunities to expand further outside Transformation Project Programmes such as engaging with the

Education and Skills Funding Agency (ESFA) on Delivering Better Value (DBV) for SEND programme is covered in the Education Director's report.

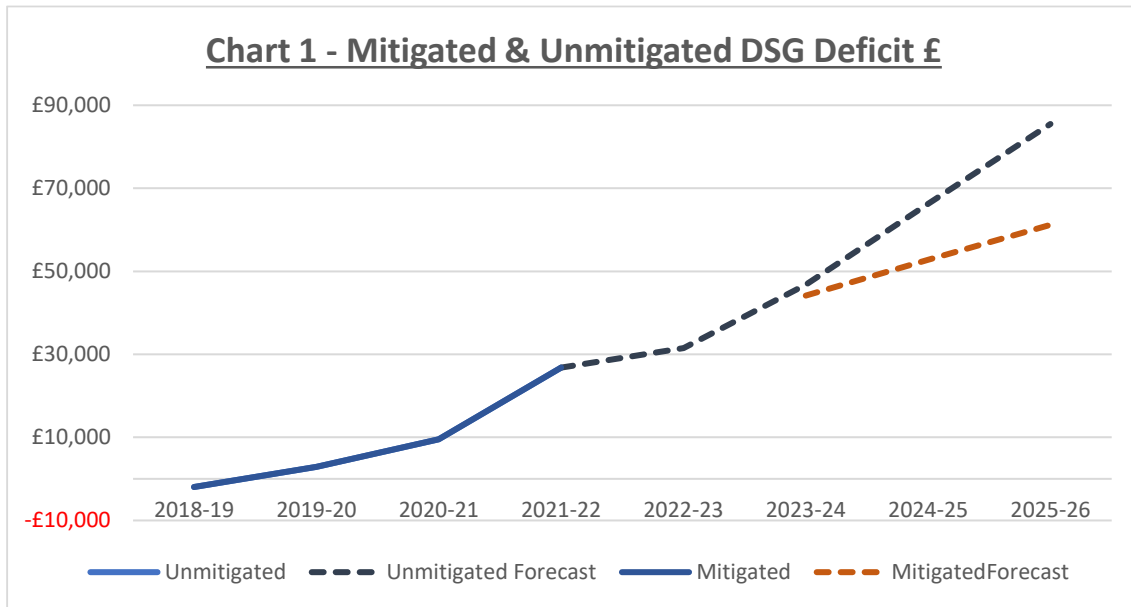
Table 2 below provide high level calculations, for illustration purposes only of the potential variation in the financial position if the hypothesis being considered and including additional government funding where implemented.

Table 2	2021/22	2022/23	2023/24	2024/25	2025/26	TOTAL
Demand management			-£910,748	-£9,571,059	-£19,171,074	-£29,652,881
Supply of provisions			-£2,680,259	-£3,908,224	-£4,140,912	-£10,729,395
<b>Total</b>			<b>-£3,591,007</b>	<b>-£13,479,283</b>	<b>-£23,311,986</b>	<b>-£40,382,276</b>

Based on the work completed to date mitigations of £0.871m originally outlined in the 2022-23 financial year has been removed to enable further work. This has been offset by increased funding in HNB confirmed by ESFA in December 2021 and in subsequent announcement in January 2022, resulting in an indicative total mitigation of £40.382m as summarised in Table 2.

The projected DSG deficit position after factor in changes described above, is illustrated in Table 3 and graph below.

DSG Summary of end of year positions as at March 2022									
Table 3	2018-19 £,000s	2019-20 £,000s	2020-21 £,000s	2021-22 £,000s	2022-23 £,000s	2023-24 £,000s	2024-25 £,000s	2025-26 £,000s	
Mitigated DSG position (surplus)/deficit reported in March 2022	-£1,962	£2,893	£10,004	£26,792	£31,528	£43,162	£52,811	£62,187	
Unmitigated DSG position (surplus)/deficit	-£1,962	£2,893	£10,004	£26,792	£31,528	£46,753	£66,290	£85,499	
<b>Total mitigations:</b>						<b>-£3,591</b>	<b>-£13,479</b>	<b>-£23,312</b>	<b>-£40,382</b>



## 5. Risks and Challenges

The forecast presented above is laden with some risks and challenges. Some of these are presented in bullet points below

- Long awaited national SEND Review may be of little consequence or positive impact
- Ofsted re-inspection may highlight new areas to address (as inspection framework is tightened and strengthened)
- Some of the thinking on mitigations may not deliver or may deliver at amount lower than originally anticipated.
- Introduction of National Hard Funding Formula
- Long tail of Covid – high numbers of young children joining education from lower baseline

## 6. Opportunities

The opportunities within the current system are summarized below:

- ESFA Delivering Best Value for SEND initiative will offer long term solution to manage existing cost pressures and enhance financial sustainability.
- Launch of Belonging Strategy (Belonging in Education)
- Impact of the announcement of £2.6 billion over the SR21 period for new school places for children with special educational needs and disabilities (SEND) in England.
- Impact of additional possible yield from SR21 on revenue funding for High Needs Block has not been factored in.

- Schools Forum choose to invest in 2022/23 Phase 3 (focusing on sector-led innovation and commissioning)
- Proactive Schools Forum engagement via Early Years and High Needs Task & Finish Groups
- Phase 1 and Phase 2 interventions land and mature
- SEND Reviews delivers policy reform with positive impact

## **7. High Needs & Early Years Funding Task & Finish Groups**

Two Task & Finish Groups continued to meet throughout the summer has provided invaluable support, challenge, and input into shaping the latest forecast.

Schools Forum members are asked to join the T&F group to provide necessary stakeholders engagement to this work.

## **8. Equalities Impact Assessment**

Equalities Impact Assessments have been produced, or are underway, for the planned interventions and initiatives that may contribute to the management of the deficit position. A cumulative EquiA will be produced as part of HN recovery plan.

## **9. Financial Implications**

No financial implications arise from completing the DSG Management Plan template. It is, however, expected to be a valuable tool in developing an effective response to the DSG deficit recovery requirements. The road to financial recovery will become clearer and more specific as the Plan evolves and becomes fully populated.

The Schools Forum has invested in the Education Transformation Programme by using 0.5% top-slice of the Schools block in 2021/22 and 2022/23 (£1.4m and £1.531m) to fund initiatives and activities that will ensure cost drivers are better understood and outcomes contained in the SEND Written Statement of Actions (WSoA) and wider Education Transformation programmes are delivered. Although no explicit savings are attributed to this programme of work, it is expected to deliver improved outcomes throughout the SEND system, achieve value for money and set the course towards financial sustainability over the medium to longer-term.

## Bristol Schools Forum School Places

<b>Date of meeting:</b>	Tuesday 29 <sup>th</sup> March 2022
<b>Time of meeting:</b>	5.00 pm
<b>Venue:</b>	Virtual Meeting

### 1. Purpose of report

1.1 To update Schools Forum on school place planning across Bristol.

### 2. Recommendation

2.1 That Schools Forum note the contents of this report.

### 3. Summary

3.1 The city continues to experience rising in demand for secondary school places. A significant amount of work has already been undertaken to ensure all pupils continue to be offered a school place. Delays to the delivery of a new free school means further temporary places are required for September 2022 and possibly 2023.

3.2 Offers of places at secondary schools were made on 1st March 2022. 4,549 places were offered in Bristol schools, with 93% receiving an offer of a school named as a preference and 77% receiving an offer for their 1<sup>st</sup> preference school.

3.3 Numbers of pupils requiring a place in Reception continues to fall, offers of places for Reception in September will be made on 19<sup>th</sup> April.

3.4 **Although good progress is being made, providing suitable and sufficient Special Educational Needs and Disability (SEND) places remains a major challenge.**

3.5 The increased numbers of pupils entering secondary schools will begin to impact on demand for post-16 places.

3.6 A 10 Year Strategy is currently being developed to cover all areas of provision though the continuing uncertainty around secondary places makes this aspect more complicated.

### 4. Context

4.1 Bristol has previously seen a dramatic rise in primary school pupil numbers. Reception admissions peaked in 2016 and since then numbers have continued to fall, mainly due to falling birth rates.

4.2 These higher primary school numbers have been impacting on secondary schools for a number of years. Many schools have already been expanded and other schools are taking more pupils than their Published Admission Number (PAN). Taking more pupils than the

capacity is not sustainable in the longer term, without significant capital investment.

- 4.3 The planned development of a secondary free school at Temple Quarter continues to experience serious delays and will not be opening in temporary accommodation for September 2022. The school is part of a wider planning application which was subject to a Public Inquiry. A decision from the Secretary of State is expected in early May and there remains a possibility that the application may not achieve consent.
- 4.4 The DfE has previously confirmed that it can only pursue opening the new school in temporary accommodation once there is certainty of delivery for the permanent scheme and planning permission has been secured. If planning is granted soon, the earliest any temporary accommodation could be available is September 2023, this would slip to 2024 with any further delays.
- 4.5 The Oasis Academy South Bristol is planned to open on a temporary site in September 2023, with the new build school on Daventry Road due for completion the following year. This will provide up to 6 additional forms of entry (180 places per year).
- 4.6 It should be noted that the current economic conditions around the construction industry generally mean that project costs and timescales are being significantly affected. Prices have risen considerably and many projects are experiencing delays due to the impacts of COVID and Brexit. The current rise in energy prices and war in Ukraine will have an additional impact.
- 4.7 Although BCC is not the responsible body for the development or opening of new free schools, it does retain the statutory duty to provide sufficient school places and continuing to offer all pupils places has been very challenging. Academy Trusts and individual schools have played a major role in supporting the LA by agreeing to admit additional pupils to meet the shortfall caused by delays to the free school projects.
- 4.8 Having already admitted over PAN for a number of years and/or already being at capacity there has been a need to make capital investments in a number of schools. These projects have focussed on ensuring there is sufficient space for both learning, particularly specialist spaces such as science, and other activities such as dining to minimise the impact on the pupils' experience.
- 4.9 In January, Cabinet approved £6m for capital projects to support admissions in September 2022. It should be noted that the price rises and workforce availability issues mentioned above will also have an impact on these projects.
- 4.10 A number of the schools where additional places are required to meet the shortfall caused by delays to the Temple Quarter project are PFI schools. The financial model is complex and there are significant revenue costs as well as legal processes to complete for these schools to accommodate pupils in excess of the PFI contract figure. These factors are already affecting the timescales for delivery of the planned capital projects.
- 4.11 Although sufficient spaces have been created to offer all pupils a place at secondary school transfer there is very little space within secondary schools across the city. There are whole areas of the city without places in some year groups. This has impacted on the in-year admissions with an increase in school appeals and placements through 'Fair Access' arrangements, putting these systems under increasing strain. There will be very few available places in any year groups for pupils moving into the city or requiring a change of school.

Where pupils are offered places in schools that are not preferences and/or are some distance from home can affect behaviour and attendance. This can then result in increasing demand for SEND and Alternative Learning Provision.

- 4.12 Following a peak in 2016, numbers requiring places at primary schools continue to fall and places will need to be managed to avoid large numbers of empty places. Willow Park School was opened in September 2021 to replace St Michael's and St George C of E Primary Schools, reducing excess capacity in the city centre. St Pius X Schools was closed in August 2021, reducing places in the south of the city.
- 4.13 Additionally, a number of schools have already reduced their PAN and others are considering this. Officers continue to work with schools to manage the places. The places are not removed permanently but makes it easier for the schools to plan staffing levels with more certainty. Alternative uses of any empty space needs to be considered, including for SEND provision, id appropriate.
- 4.14 There are no indications that the falling birth rate will rise in the foreseeable future and the delivery of new homes, particularly in south Bristol, has been slower than anticipated and is not yet impacting on demand for primary school places.
- 4.15 Pupil projections are prepared annually for the DFE School Capacity Survey. These projections are used to allocate capital funding ('Basic Need') and also contribute towards decisions to approve the opening of new 'Free Schools'. Basic Need allocations are likely to remain for single years, making long term capital finance planning very difficult. The allocations relate purely to mainstream places and there is no direct equivalent source of capital funding for SEND provision.
- 4.16 Birth rates are the main factor used in the pupil projection, with factors such as the effect of new housing and historical trends of gain/loss as pupils move through the school years being incorporated. The projections also take account of net 'loss' of pupils to schools in neighbouring local authority areas and the numbers of pupils opting for independent schools.
- 4.17 Year 7 pupil projections and capacities within PANs are shown in Table 1 below.

**Table 1: Year 7 pupil forecasts and capacity 2021 - 2025**

<b>Year</b>	<b>2021 Oct Census and Projections</b>	<b>Year 7 Capacity</b>
2021/22	4,421	4,269
2022/23	4,612	4,276
2023/24	4,672	4,276
2024/25	4,684	4,276
2025/26	4,527	4,276

Oasis Temple Quarter and South Bristol not included.

- 4.18 Actual numbers in Year 7 in October were lower than those previously forecast. This is at least partly due to the availability of places restricting the numbers starting at schools. This will also mean that when projections are revised in the summer, they are likely to be slightly lower than those shown above.
- 4.19 Demand for secondary places is projected to start to fall after 2024, in line with primary school numbers. Demand in north continues to be in excess of places for some time. If both new free



schools (Oasis Academy Temple Quarter and Oasis Academy South Bristol) are opened it is unlikely that further additional secondary places will be required in east and south in the medium to longer term.

4.20 Planning for secondary school place requirements is carried out using 3 geographical Planning Areas. Primary forecasts use 14 areas, each made up of a number of council wards. To ensure comparability with other LAs these areas comply with DfE guidance and can only be changed with the Department's permission. Pupil projections for each area are included in **Appendices 1 and 2**.

4.21 Reception pupil projections and capacities within PANs are shown in Table 2 below.

**Table 2: Reception Year pupil forecasts and capacity 2021 - 2025**

Year	2021 Oct Census and Projections	Reception Capacity
2021/22	4,943	5,746
2022/23	4,989	5,596
2023/24	4,798	5,536
2024/25	4,612	5,536
2024/25	4,480	5,536

4.22 Reception admissions peaked in 2016 when 5,581 children started school. Although there is variation some years (there was a small increase in applications for 2020 for instance) the long term forecasts indicate that, without a change to birth rates, demand will continue to fall.

4.23 There has also been a rise in demand for specialist provision with a large increase in the number of Education and Health Care Plans. The rise is significantly above that which would be expected from the rise in the general school population. Existing specialist provision across the city is at or very close to capacity and will require substantial capital investment.

4.24 In the October 2022 Census there were 1,211 pupils in Bristol special schools, compared to 1,119 in October 2021.

4.25 Significant progress has been made to increase SEND provision. The majority of these new places will be available from September 2022 onwards.

4.26 There is no direct 'Basic Need' capital grant funding for SEND places. The DfE have announced further capital for SEND places. It is not yet known how this will be distributed. Previous funding has been allocated based on overall pupil numbers with every LA receiving a relatively small amount rather than a bidding system to target funding.

4.27 Demand for places post-16 is forecast to rise in line with secondary school numbers. The current Year 11 has approximately 3,666 pupils, compared to around 4,421 for Year 7. The current projection only takes account of pupils registered in school sixth forms in Bristol and does not include pupils attending CLF post-16 provision, City of Bristol College or St Brendan's College. The projections below may be higher than actual numbers as place availability in the more popular provisions is restricted and students unable to gain a place choose to attend a college provision rather than smaller school sixth forms.

4.28 Projections for School Post-16 are shown in Table 3 below.

**Table 2: School Sixth Form pupil forecasts and capacity 2021 - 2025**

<b>Year</b>	<b>2021 Oct Census and Projections</b>	<b>Year 12 &amp; 13 Capacity</b>
2021/22	2,876	2,700
2022/23	3,048	2,700
2023/24	3,302	2,700
2024/25	3,381	2,700
2024/25	3,430	2,700

4.29 Post-16 numbers vary considerably with many sixth forms operating well above the notional capacity, with more flexibility of timetabling and others well below capacity.

4.30 Trinity Academy will have a sixth form in future and plans for Oasis Academy Temple Quarter also include sixth form provision. Although there is more flexibility with accommodating post-16 pupils, some additional capacity will eventually be needed.

## **5. Financial Implications**

5.1 There will continue to be a requirement for the Growth Fund for the foreseeable future. Most primary schools have now completed their growth and do not require further funding but the funding requirement for additional secondary school places is rising. Delays or variations to actual pupil demand will affect the funding required.

### **Appendices:**

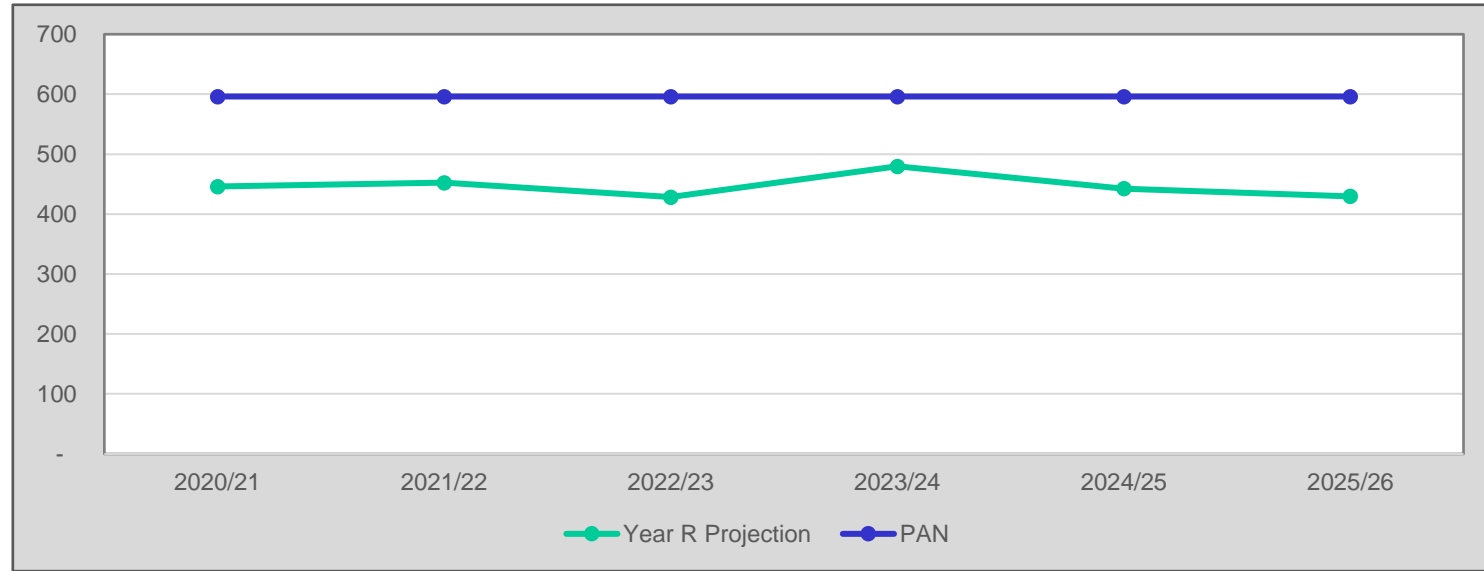
Appendix 1: Primary School Pupil Forecasts

Appendix 2: Secondary School Pupil Forecasts

# Primary School Projection 2021

# 1. Ashley & Lawrence Hill

Academic Year	Year R Projection
2020/21	446
2021/22	452
2022/23	428
2023/24	480
2024/25	443
2025/26	430



Page 21



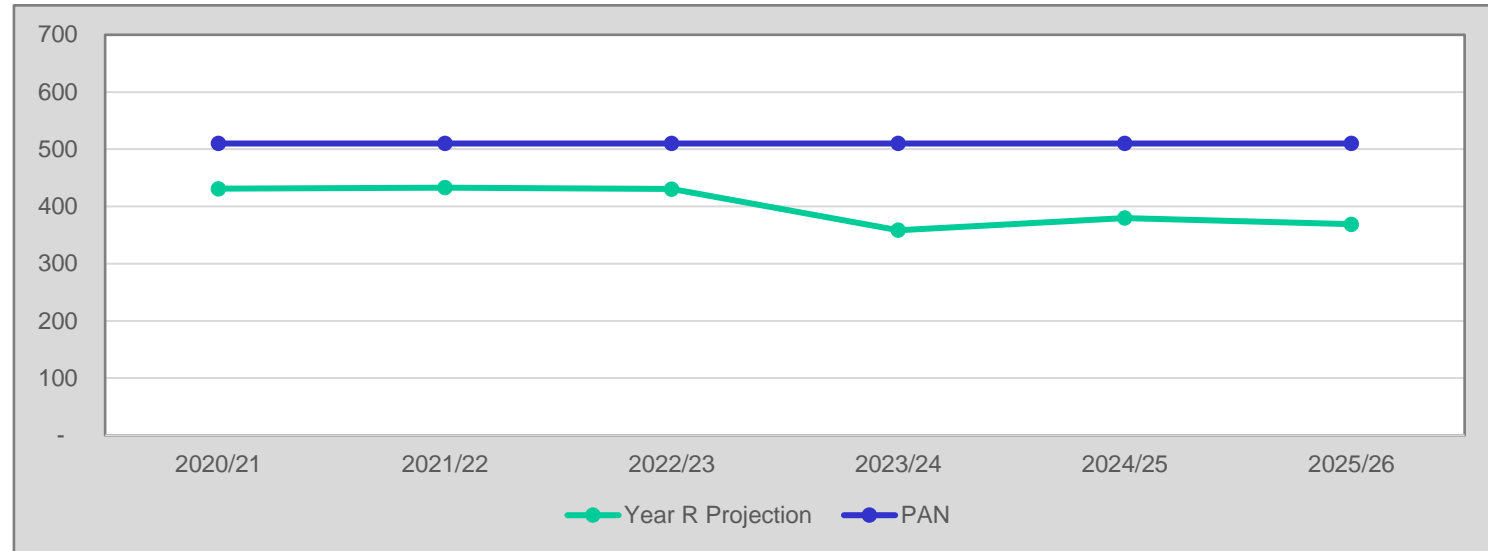
Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Bannerman Road Community Academy	60	60	60	57
Barton Hill Academy	90	90	90	49
Cabot Primary School	30	30	30	22
Easton C of E Academy	60	60	60	59
Evergreen Primary Academy	30	30	30	13
Fairlawn Primary School	60	60	60	38
Hannah More Primary School	30	30	30	30
Sefton Park Infant School	60	60	60	59
St Barnabas C of E VC Primary School	30	30	30	10
St Nicholas of Tolentine Catholic Primary School	30	30	30	20
St Werburgh's Primary School	56	56	56	55
The Dolphin School	60	60	60	34
Sefton Park Junior School**	0	0	0	0
<b>Total</b>	<b>596</b>	<b>596</b>	<b>596</b>	<b>446</b>

\*\*Junior School. Intake from Year 3



## 2. Eastville, Frome Vale & Hillfields

Academic Year	Year R Projection
2020/21	431
2021/22	433
2022/23	430
2023/24	359
2024/25	380
2025/26	369



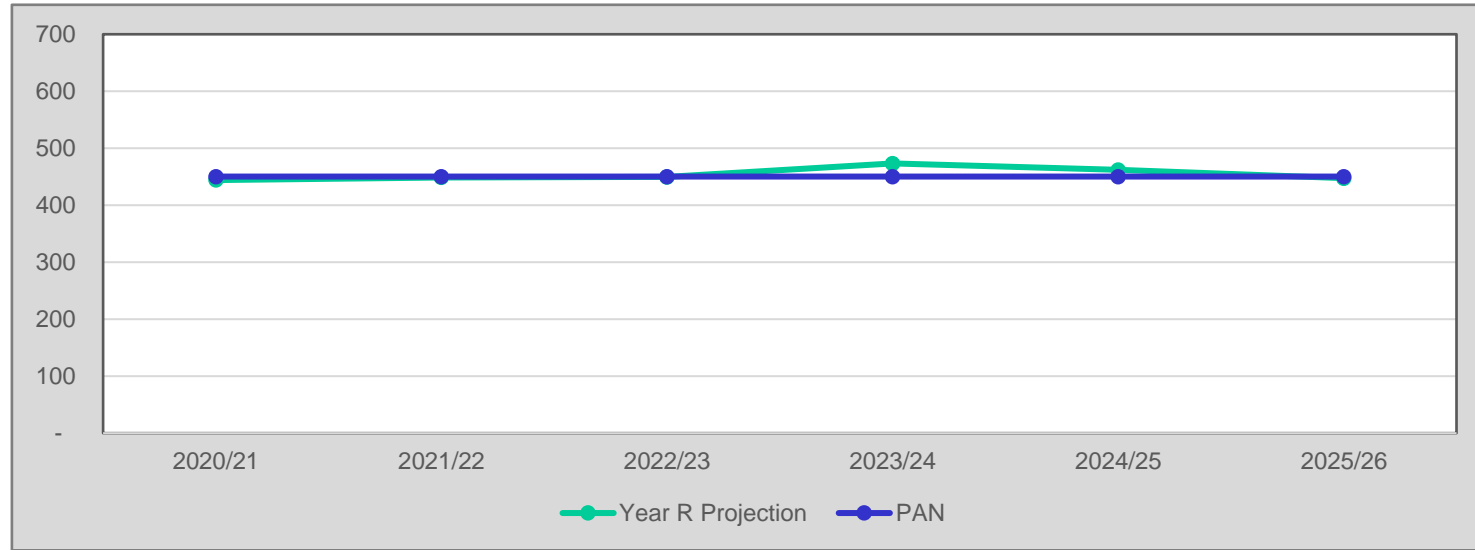
Page 22



Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Begbrook Primary Academy	90	90	90	89
Chester Park Infant School	90	90	90	87
Fishponds C of E Academy	60	60	60	49
Frome Vale Academy	30	30	30	25
May Park Primary School	90	90	90	72
Minerva Primary Academy	60	60	60	56
St Joseph's Catholic Primary School	30	30	30	31
Avanti Gardens Primary	60	60	60	22
Chester Park Junior School**	0	0	0	0
<b>Total</b>	<b>510</b>	<b>510</b>	<b>510</b>	<b>431</b>

# 3. St George & Easton

Academic Year	Year R Projection
2020/21	444
2021/22	449
2022/23	449
2023/24	473
2024/25	462
2025/26	447



Page 23



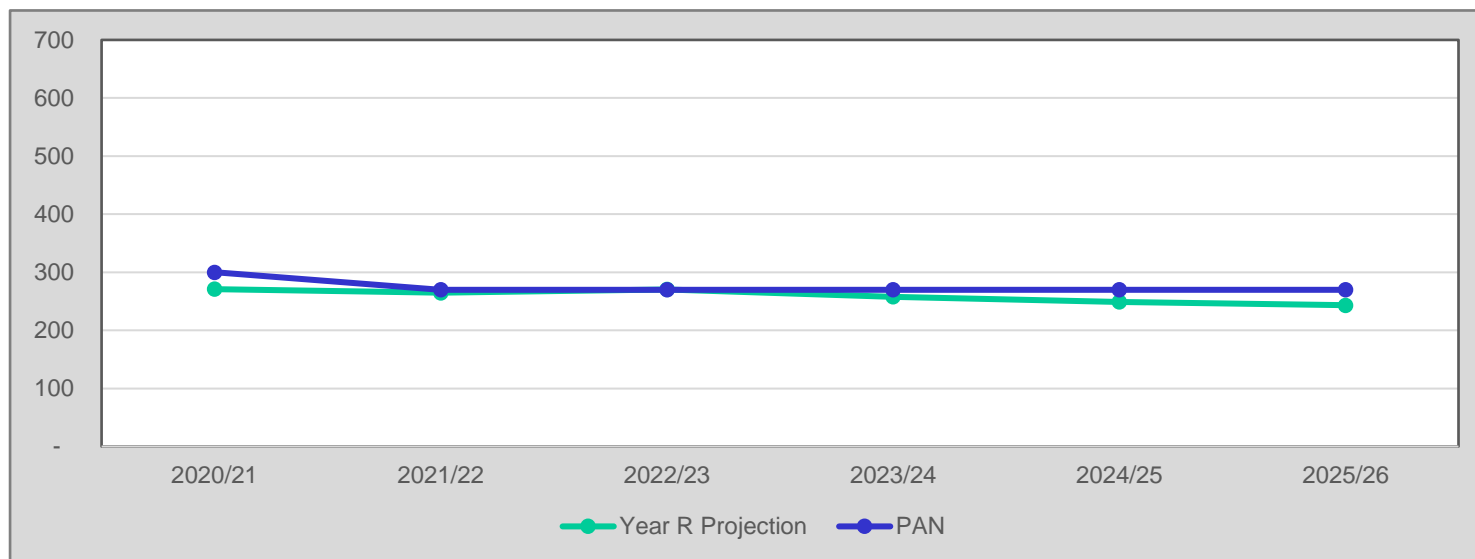
Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Air Balloon Hill Primary School	120	120	120	118
Redfield Educate Together Primary Academy	60	60	60	60
St Patrick's Catholic Primary School	30	30	30	30
Summerhill Infant School	60	60	60	58
Two Mile Hill Primary School	90	90	90	89
Whitehall Primary School	90	90	90	89
Summerhill Academy**	0	0	0	0
<b>Total</b>	<b>450</b>	<b>450</b>	<b>450</b>	<b>444</b>

\*\*Junior School. Intake from Year 3



# 4. Avonmouth & Lawrence Weston

Academic Year	Year R Projection
2020/21	271
2021/22	265
2022/23	270
2023/24	258
2024/25	249
2025/26	243



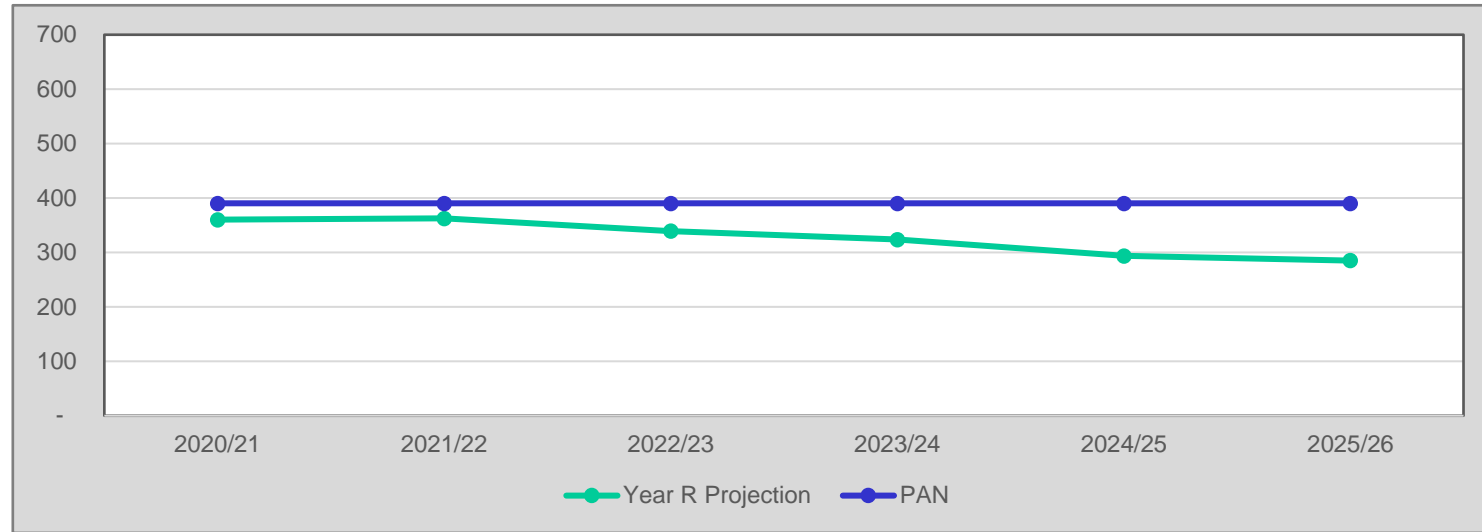
Page 24



Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Avonmouth C of E Primary School	30	30	30	27
Nova Primary School	60	30	30	46
Oasis Academy Bank Leaze	30	30	30	28
Oasis Academy Long Cross	60	60	60	53
Our Lady of the Rosary Catholic Primary School, Bristol	30	30	30	30
Shirehampton Primary School	60	60	60	59
St Bernard's Catholic Primary School	30	30	30	28
<b>Total</b>	<b>300</b>	<b>270</b>	<b>270</b>	<b>271</b>

# 5. Bishopston & Ashley Down, Cotham & Redland

Academic Year	Year R Projection
2020/21	360
2021/22	362
2022/23	339
2023/24	323
2024/25	294
2025/26	285



Page 25



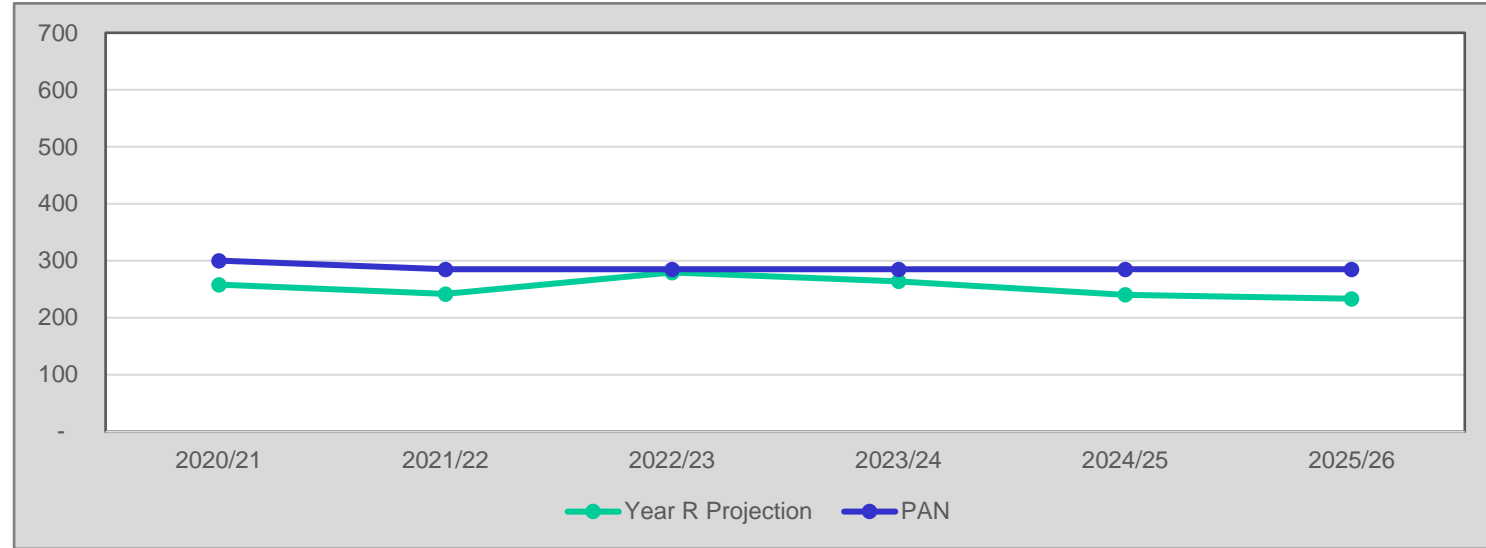
Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Ashley Down Primary School	60	60	60	59
Bishop Road Primary School	120	120	120	113
Brunel Field Primary School	60	60	60	59
Cotham Gardens Primary School	90	90	90	69
St Bonaventure's Catholic Primary School	60	60	60	60
<b>Total</b>	<b>390</b>	<b>390</b>	<b>390</b>	<b>360</b>





# 6. Central, Clifton & Ashley Down & Hotwells & Harbourside

Academic Year	Year R Projection
2020/21	258
2021/22	242
2022/23	279
2023/24	264
2024/25	240
2025/26	233



Page 26



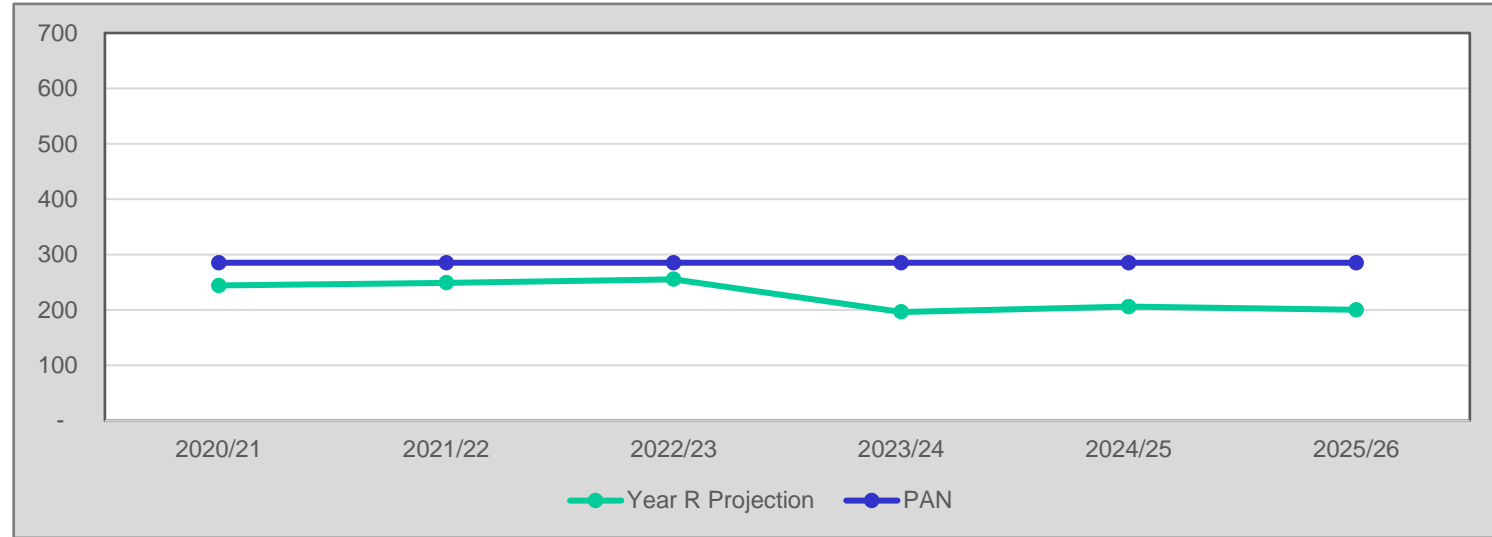
Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Cathedral Primary School	60	60	60	60
Christ Church C of E Primary School	60	60	60	56
Hotwells Primary School	30	30	30	23
Ss Peter and Paul RC Primary School	30	30	30	24
St George C of E Primary School*	15	0	0	7
St Johns C of E Primary School, Clifton	75	75	75	73
St Michael's on the Mount C of E Primary School*	30	30	0	15
Willow Park Primary School*	0	0	30	0
<b>Total</b>	<b>300</b>	<b>285</b>	<b>285</b>	<b>258</b>

\*St George C of E & St Michael's on the Mount C of E Primary Schools closed in 2021 and amalgamated to create Willow Park with a total PAN of 30



# 7. Henbury & Brentry & Southmead

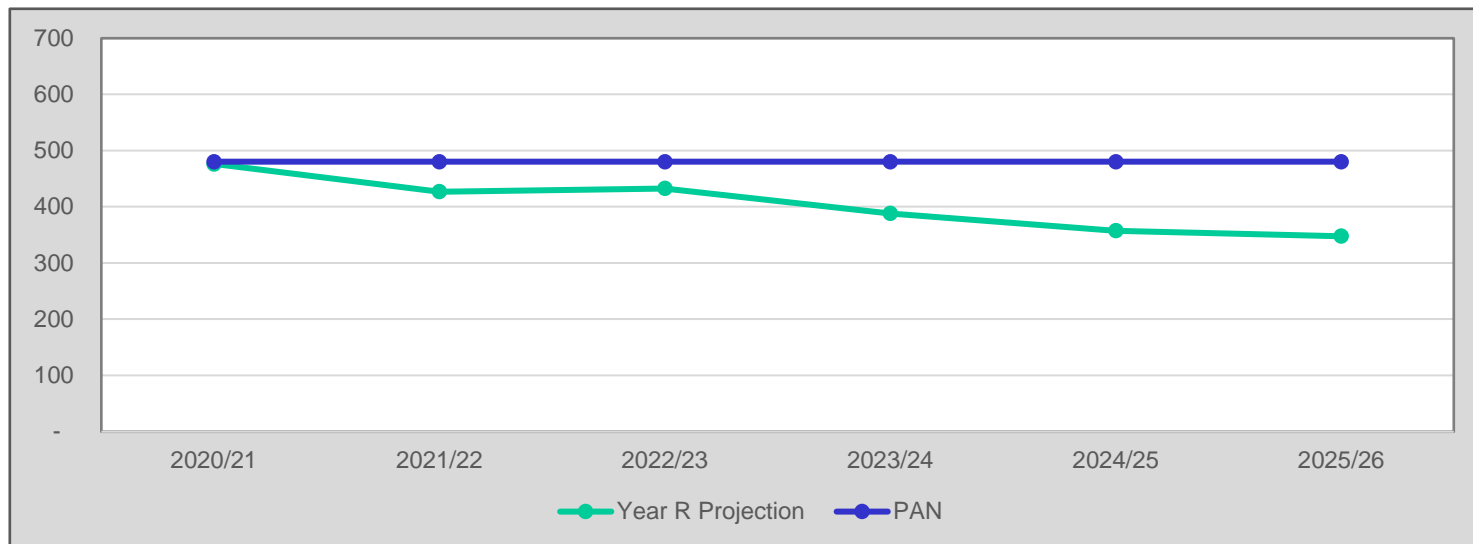
Academic Year	Year R Projection
2020/21	244
2021/22	249
2022/23	255
2023/24	196
2024/25	206
2025/26	200



Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Badocks Wood Primary School & Children's Centre	45	45	45	23
Blaise Primary and Nursery School	60	60	60	60
Brentry Primary School	30	30	30	30
Fonthill Primary School	30	30	30	30
Henbury Court Primary Academy	60	60	60	41
Little Mead Primary Academy	60	60	60	60
<b>Total</b>	<b>285</b>	<b>285</b>	<b>285</b>	<b>244</b>

# 8. Stoke Bishop & Westbury-on-Trym & Henleaze

Academic Year	Year R Projection
2020/21	476
2021/22	427
2022/23	432
2023/24	388
2024/25	357
2025/26	348



Page 28



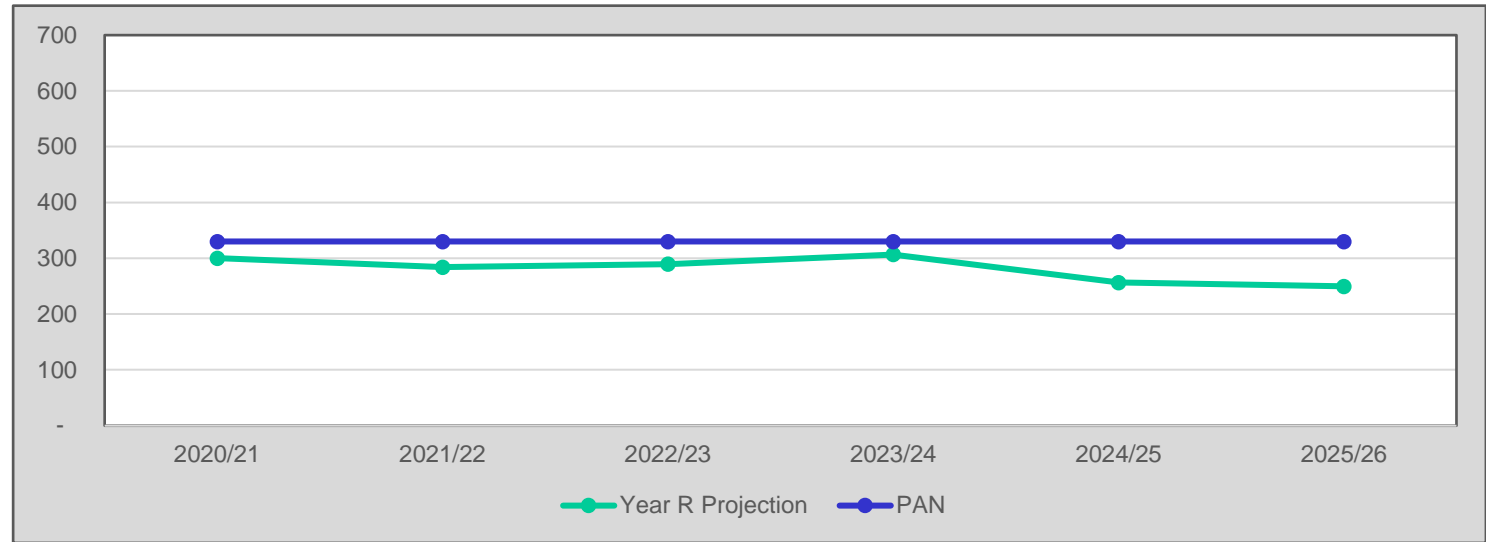
Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Elmlea Infant School	90	90	90	90
Henleaze Infant School	90	90	90	87
Sea Mills Primary School	30	30	30	28
St Ursula's E-ACT Academy	90	90	90	90
Stoke Bishop C of E Primary School	60	60	60	60
Westbury Park Primary School	60	60	60	60
Westbury-On-Trym C of E Academy	60	60	60	61
Henleaze Junior School**	0	0	0	0
Elmlea Junior School**	0	0	0	0
<b>Total</b>	<b>480</b>	<b>480</b>	<b>480</b>	<b>476</b>

\*\*Junior School. Intake from Year 3



# 9. Horfield & Lockleaze

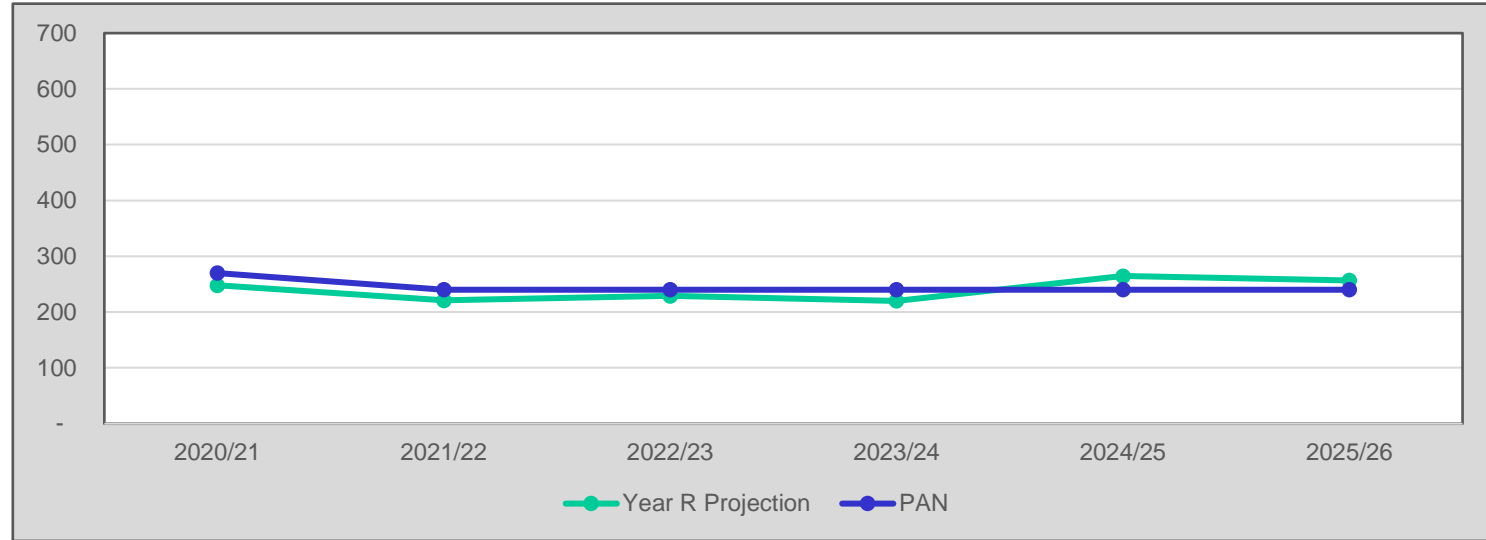
Academic Year	Year R Projection
2020/21	300
2021/22	284
2022/23	290
2023/24	307
2024/25	257
2025/26	249



Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Filton Avenue Primary School	120	120	120	93
Glenfrone Primary School	60	60	60	59
Horfield C of E Primary School	60	60	60	60
St Teresa's Catholic Primary School	30	30	30	30
Stoke Park Primary School	30	30	30	30
Upper Horfield Primary School	30	30	30	28
<b>Total</b>	<b>330</b>	<b>330</b>	<b>330</b>	<b>300</b>

# 10. Brislington

Academic Year	Year R Projection
2020/21	248
2021/22	221
2022/23	229
2023/24	220
2024/25	264
2025/26	257



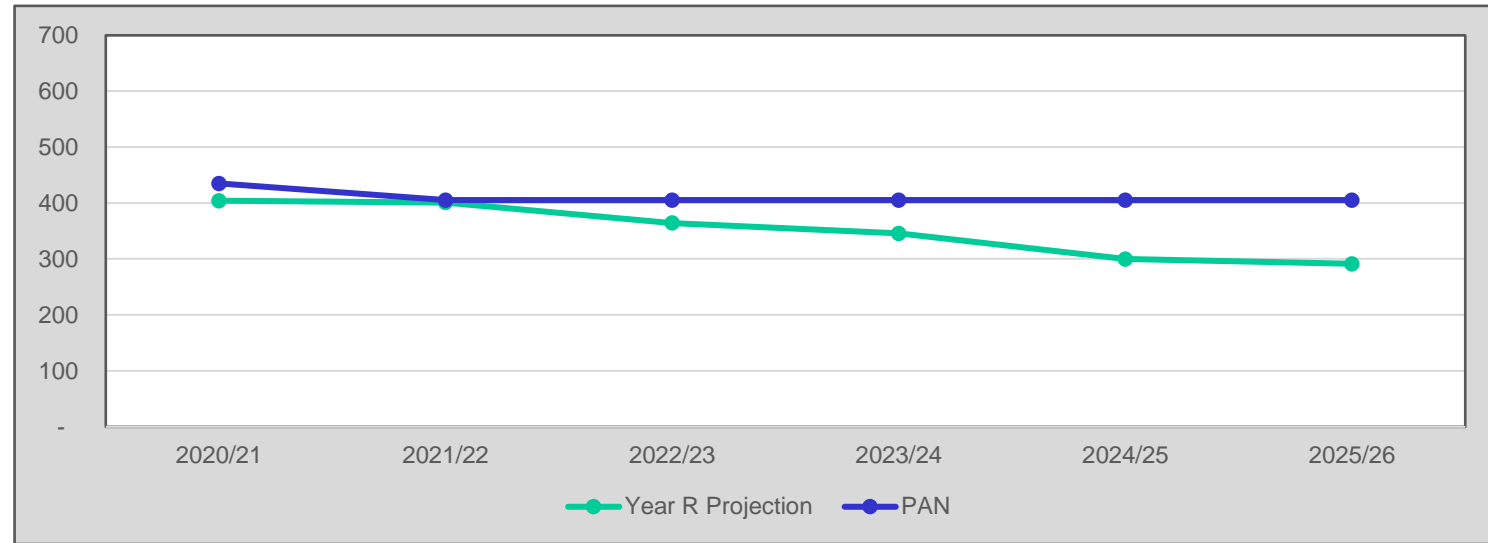
Page 30



Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Broomhill Infant School & Children's Centre	60	60	60	53
Holymead Primary School	90	90	90	90
St Anne's Infant School	90	60	60	81
The Kingfisher School	30	30	30	24
Broomhill Junior School**	0	0	0	0
Wicklea Academy**	0	0	0	0
<b>Total</b>	<b>270</b>	<b>240</b>	<b>240</b>	<b>248</b>

# 11. Bishopsworth & Hartcliffe & Withywood

Academic Year	Year R Projection
2020/21	404
2021/22	401
2022/23	364
2023/24	346
2024/25	300
2025/26	291



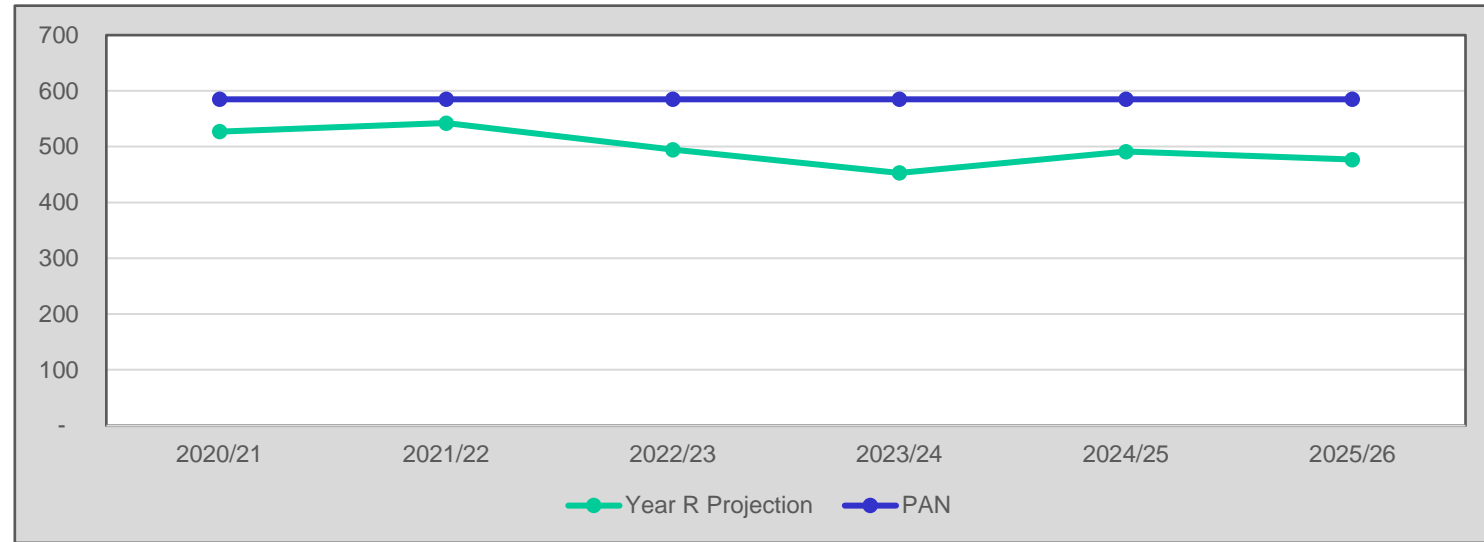
Page 31



Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Cheddar Grove Primary School	60	60	60	60
Fair Furlong Primary School	60	60	60	60
Four Acres Academy	45	60	60	59
Hareclive E-ACT Academy	60	60	60	58
Headley Park Primary School	60	60	60	60
Merchants' Academy	60	60	60	36
St Peter's C of E Primary School (VC)	60	60	60	60
St Pius X RC Primary School*	30	0	0	11
<b>Total</b>	<b>435</b>	<b>405</b>	<b>405</b>	<b>404</b>

# 12. Filwood, Knowle & Windmill Hill

Academic Year	Year R Projection
2020/21	527
2021/22	542
2022/23	495
2023/24	453
2024/25	491
2025/26	477



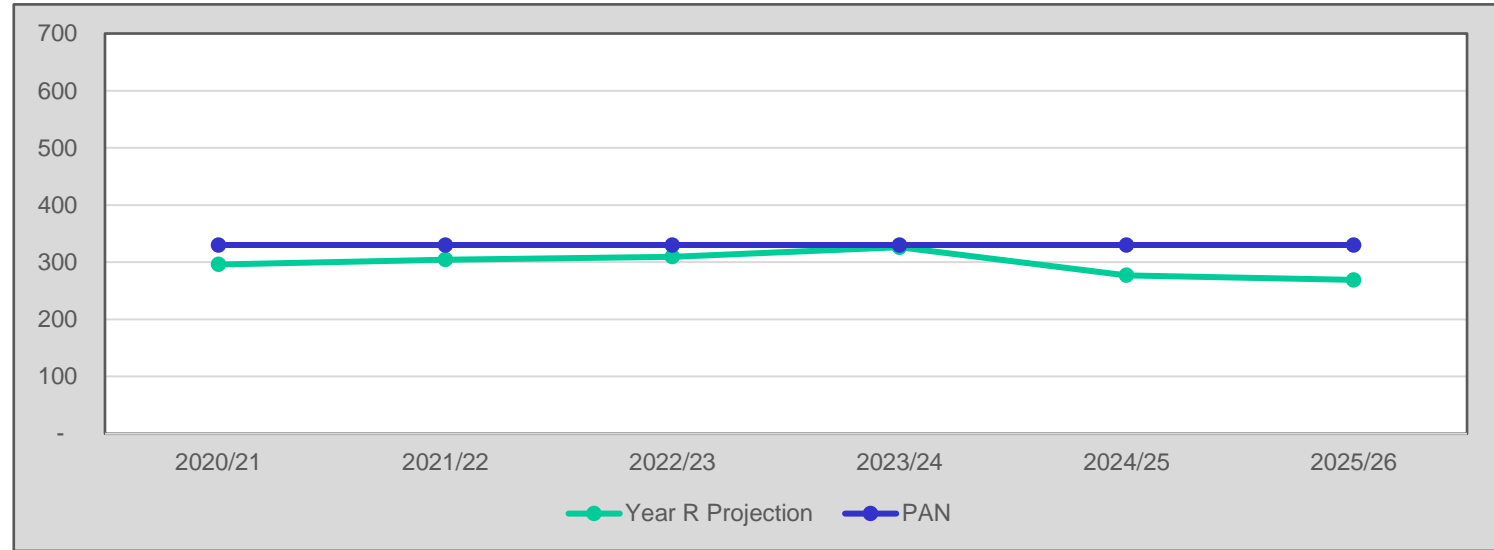
Page 32

Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Greenfield E-Act Primary Academy	60	60	60	43
Hillcrest Primary School	60	60	60	60
Ilminster Avenue E-ACT Academy	45	45	45	48
Knowle Park Primary School	90	90	90	89
Oasis Academy Connaught	60	60	60	41
Oasis Academy Marksbury Road	60	60	60	60
Parson Street Primary School	60	60	60	41
School of Christ The King Catholic Primary	30	30	30	26
St Mary Redcliffe C of E Primary School	60	60	60	60
Victoria Park Primary School	60	60	60	59
<b>Total</b>	<b>585</b>	<b>585</b>	<b>585</b>	<b>527</b>



# 13. Bedminster & Southville

Academic Year	Year R Projection
2020/21	296
2021/22	305
2022/23	310
2023/24	326
2024/25	277
2025/26	269



Page 33

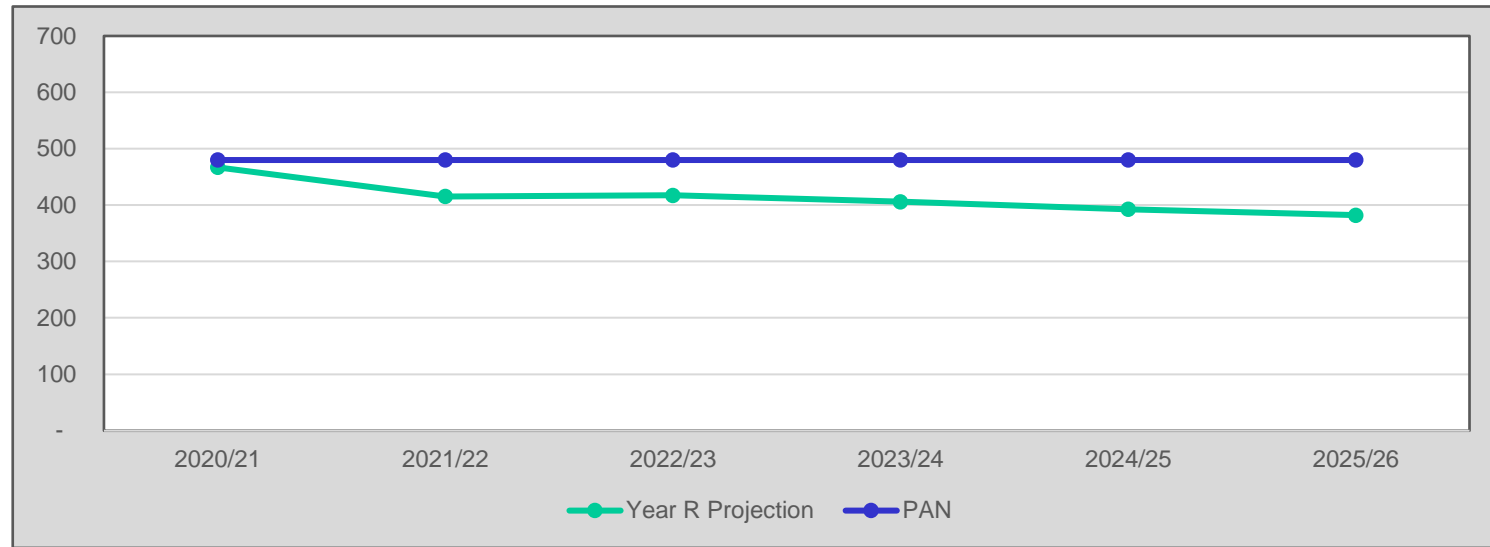


Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Ashton Gate Primary School	120	120	120	116
Ashton Vale Primary School	30	30	30	30
Compass Point: South Street School and Children's Centre	30	30	30	21
Holy Cross RC Primary School	30	30	30	25
Luckwell Primary School	30	30	30	18
Southville Primary School	90	90	90	86
<b>Total</b>	<b>330</b>	<b>330</b>	<b>330</b>	<b>296</b>



# 14. Hengrove & Whitchurch Park & Stockwood

Academic Year	Year R Projection
2020/21	467
2021/22	415
2022/23	417
2023/24	406
2024/25	393
2025/26	382



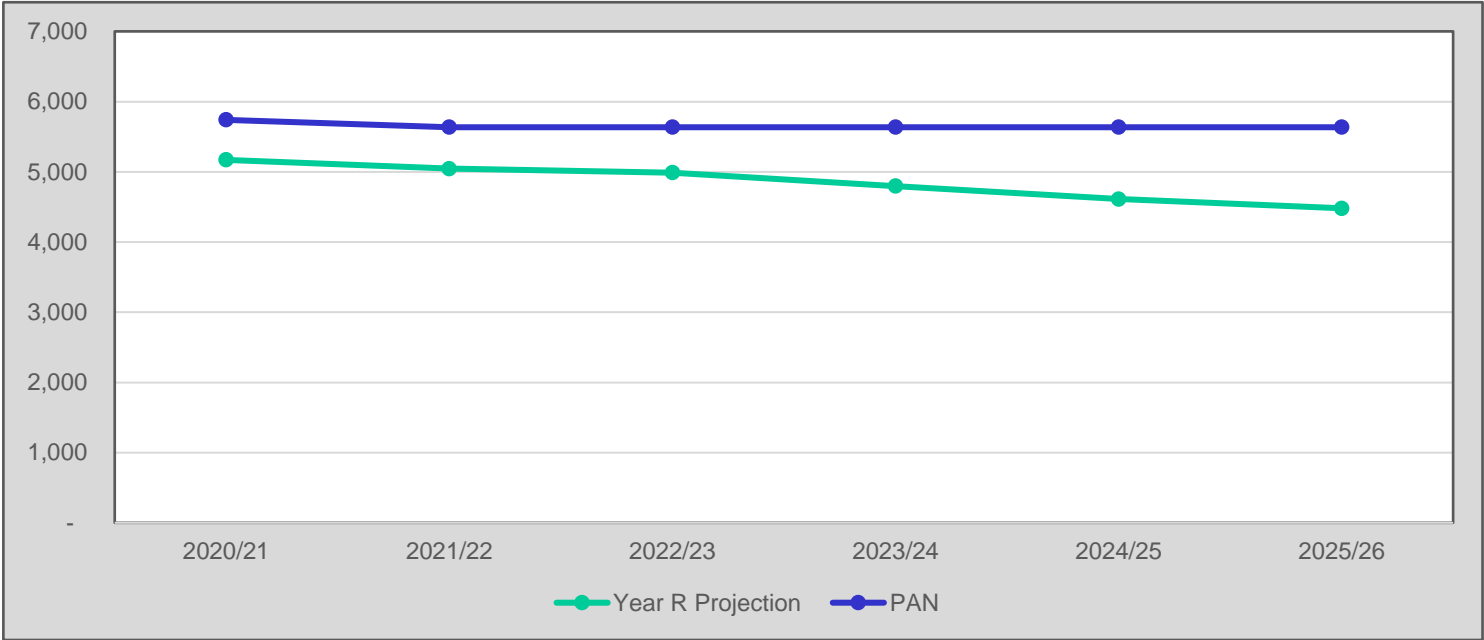
Page 34



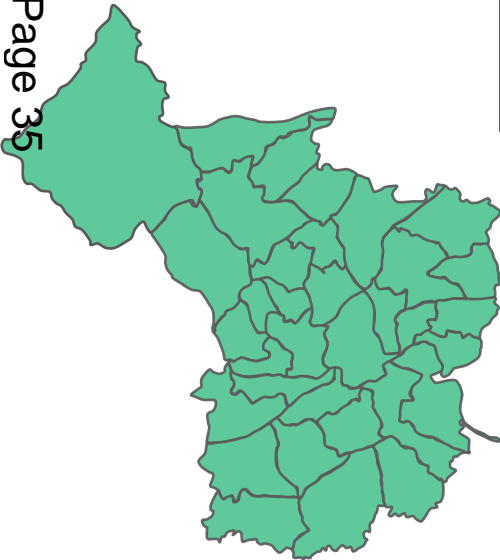
Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Bridge Farm Primary School	90	90	90	90
Bridge Learning Campus	60	60	60	55
Oasis Academy New Oak	30	30	30	30
Perry Court E-Act Academy	60	60	60	60
St Bernadette Catholic Voluntary Aided Primary School	30	30	30	30
Wansdyke Primary School	30	30	30	30
Waycroft Academy	60	60	60	60
West Town Lane Academy	90	90	90	90
Woodlands Academy	30	30	30	22
<b>Total</b>	<b>480</b>	<b>480</b>	<b>480</b>	<b>467</b>

# Primary Projection Citywide

Academic Year	Year R Projection
2020/21	5,172
2021/22	5,046
2022/23	4,989
2023/24	4,798
2024/25	4,612
2025/26	4,480



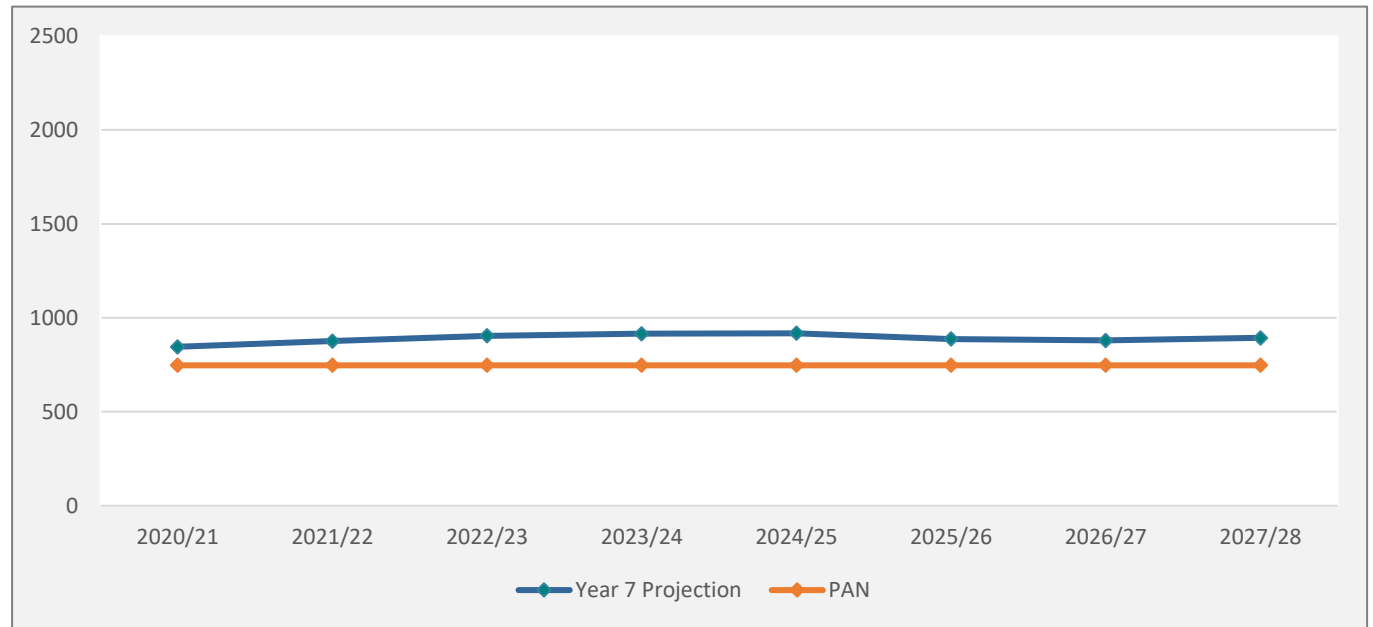
Page 35



# Secondary School Projection 2021

# Secondary Projection East Central

Academic Year	Year 7 Projection
2020/21	845
2021/22	876
2022/23	904
2023/24	916
2024/25	918
2025/26	887
2026/27	880
2027/28	893



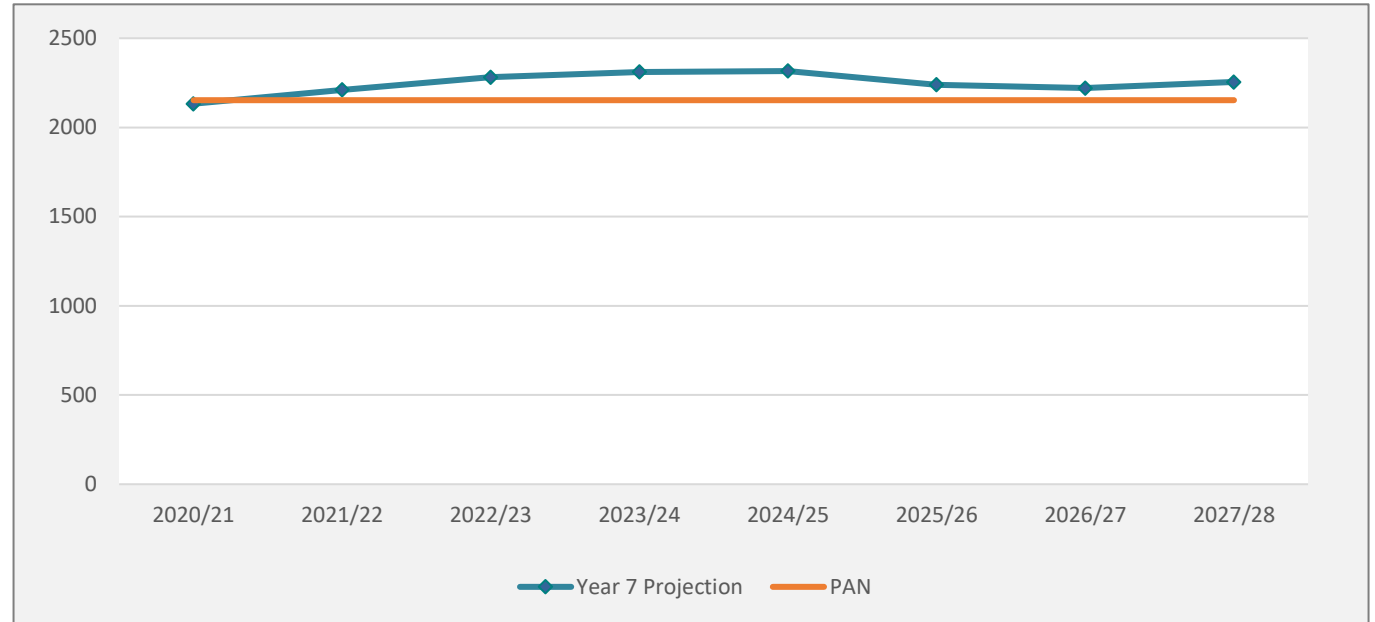
Page 37



Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
The City Academy Bristol	195	195	195	222
Bristol Brunel Academy	232	232	232	262
Montpellier High School	140	140	140	140
Bristol Metropolitan Academy	180	180	180	221
Total	747	747	747	845

# Secondary Projection North

Academic Year	Year 7 Projection
2020/21	2133
2021/22	2211
2022/23	2281
2023/24	2311
2024/25	2317
2025/26	2239
2026/27	2221
2027/28	2255



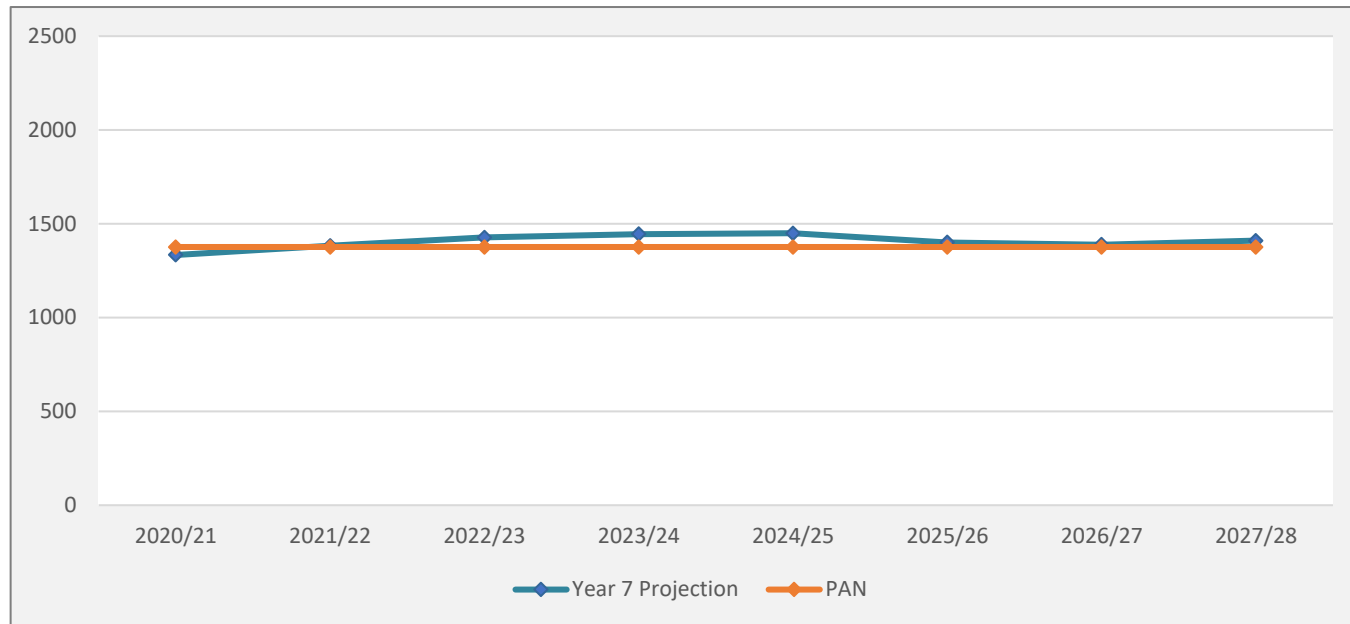
Page 38



Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Bristol Free School	200	200	200	202
Orchard School Bristol	185	185	185	204
Blaise High School	189	180	180	176
Cotham School	243	243	243	241
Fairfield High School	216	216	216	216
St Bede's Catholic College	207	207	207	208
Redland Green School	216	216	216	235
Bristol Cathedral Choir School	150	150	150	153
Oasis Academy Brightstowe	160	160	160	159
St Mary Redcliffe and Temple School	216	216	216	218
CST Trinity	120	180	180	121
<b>Total</b>	<b>2102</b>	<b>2153</b>	<b>2153</b>	<b>2133</b>

# Secondary Projection South

Academic Year	Year 7 Projection
2020/21	1334
2021/22	1383
2022/23	1427
2023/24	1445
2024/25	1449
2025/26	1401
2026/27	1389
2027/28	1410



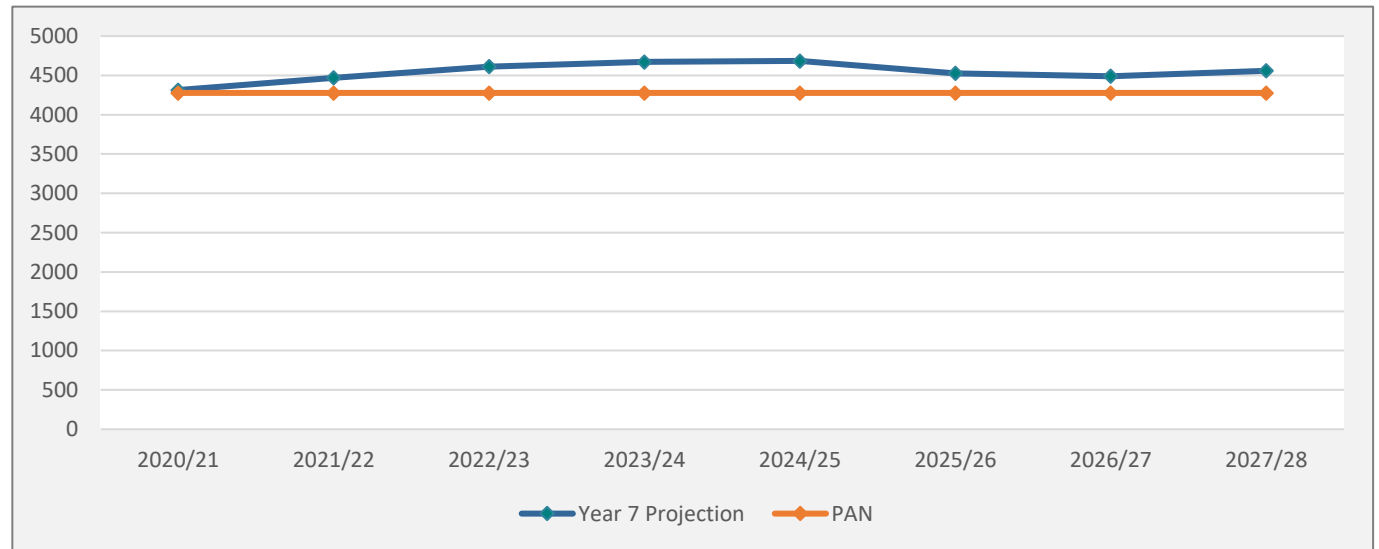
Page 39



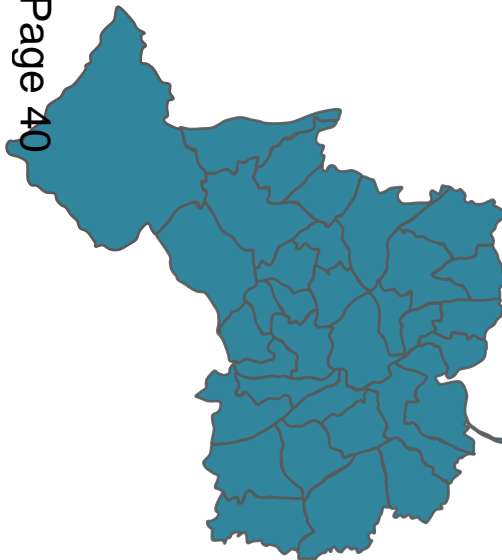
Establishment	PAN 2020/21	PAN 2021/22	PAN 2022/23	NOR Jan 2021
Bridge Learning Campus	180	180	180	123
Oasis Academy Brislington	270	270	270	270
Ashton Park School	216	216	216	219
Bedminster Down School	216	216	216	215
St Bernadette Catholic Secondary School	150	150	150	150
Merchants' Academy	182	182	182	169
Oasis Academy John Williams	162	162	162	188
<b>Total</b>	<b>1376</b>	<b>1376</b>	<b>1376</b>	<b>1334</b>

# Secondary Projection Citywide

Academic Year	Year 7 Projection
2020/21	4312
2021/22	4469
2022/23	4612
2023/24	4672
2024/25	4684
2025/26	4527
2026/27	4489
2027/28	4559



Page 40



## **Bristol Schools Forum** **DSG Budget Monitor 2021/22 P10**

<b>Date of meeting:</b>	29 March 2022
<b>Time of meeting:</b>	5.00 pm
<b>Venue:</b>	Virtual meeting

### **1 Purpose of report**

- 1.1 This report provides information of the forecast financial position for the DSG overall as at Period 10 (to end of January 2022).

### **2 Recommendation**

#### **2.1 Schools Forum is invited to:**

- a) Note the in-year 2021/22 position for the overall DSG.

### **3 Background**

- 3.1 The report updates Schools Forum on the financial position at Period 10 (end of January 2022).

### **4 Budget monitoring 2021/22**

- 4.1 The DSG ended the 2020/21 financial year with an overall deficit of £10.004m.
- 4.2 This period 10 monitor is showing that the in-year forecast net deficit is £16.788m, which when added to the brought forward balance will give a total net deficit to carry forward at the end of the 2021/22 financial year of £26.792m. The variation is predominantly attributed to the High Needs block which is forecasting an in-year overspend of £17.653m and £0.614m in Early Years' SEN; offset slightly by Schools' Block underspend of £0.96m.

The Period 10 position is set out in **Table 1** with more detail set out in **Appendix 2**.



**Table 1: Forecast position on overall DSG for 2021/22 at Period 10 (as at January 2022)**

<i>All figures £'000</i>	<i>b/f Deficit</i>	<i>DSG Funding 2021/22</i>	<i>Forecast Outturn Period 10 2021/22</i>	<i>In-year variance</i>	<i>Forecast Carry- forward Period 10 2021/22</i>
Schools Block	(619)	295,864	294,903	(960)	(1,579)
De-delegation	(553)	0	66	66	(487)
Schools Central Block		2,627	2,627	0	0
Early Years	(621)	35,286	35,316	30	(591)
High Needs Block	12,609	68,513	85,953	17,440	30,049
Education	(812)	1,400			
Transformation			1,613	213	(599)
Funding		(403,690)	(403,690)	0	0
<b>Total</b>	<b>10,004</b>	<b>0</b>	<b>16,788</b>	<b>16,788</b>	<b>26,792</b>

**4.3 Schools Block (-£0.960m underspend).** The formula funding for maintained mainstream schools and academies has been fully allocated. Scope for variation is in the growth fund, or if schools close during the year. Three schools (St Pius X, St George and St Michael on the Mount) have closed at the end of August 2021, and one new school (Willow Park) opened on 1<sup>st</sup> September. These movements accounts for £0.454m forecast variance on Schools Block. Growth commitments are expected at £2.5m against funding of £2.861m, an underspend of £0.507m.

Underspends at year end are not designated by block but treated as a whole for the DSG, and therefore will be utilised to partially offset the DSG deficit.

**4.4 De-delegated resources (£66k overspend).** This is the cost incurred for Trade Union facilities time which will be offset by the reserves brought forward as no funding was collected from schools in the current year.

**4.5 School Central Services Block (£nil variance)** Current forecasting indicates that all of the services in this block will spend to budget.

**4.6 Early Years Block (£30k forecast overspend).** Early Years income and expenditure is based on participation throughout the academic year, and as such the reported position was updated based on ESFA January 27<sup>th</sup> 2022 funding announcement where total allocation was reduced by £1.899m due to low participation in 3-4 years' old (£1.394m), 2 years' old (£0.137m) and early years' pupil premium (£0.259m). **Early Years is experiencing significant pressure in emerging SEN;** the current overspend in this area is forecasted to reach £0.613m at the end of this financial year.

- 4.7 **High Needs Block (£17.653m forecast overspend).** The High Needs block is currently forecasting an in-year overspend of £17.653m for the 2021/22 financial year including £0.213m on Transformation Project.
- 4.8 Top-up funding remains the single greatest pressure, with a significant forecast overspend of £12.342m, followed by forecasted overspend in Placements totalling £3.712m and Commissioned Services of £0.927m; offset slightly by underspends in Core Place funding -£0.688m.

Detailed breakdown of HNB Top Up overspend is summarised in Appendix 1.

- 4.9 The Education Transformation Programme commenced in 2020-21 and is primarily concerned with consequently the High Needs Block, the programme aims to improve outcomes and achieve long term sustainability. Nationally High Needs funding continues to be challenging and in Bristol this has been exacerbated by work to clear the backlog of EHCP and complexity of need.
- 4.10 Following agreement of Forum, the amount transferred from the Schools Block in 2021/22 is being earmarked to the Education Transformation Programme and we are currently forecasting that this funding of £1.4m will be fully utilised in 2021/22.
- 4.11 **Funding (Nil Variance).** £403.690m is the latest DSG amount notified by the ESFA as at 27<sup>th</sup> January 2022.

Appendix 1 - High Needs Block top up funding breakdowns by settings:	Funding 2021/22	Outturn Period 08 2021/22	In-year movement
	£'000	£'000	£'000
HNB: Special Schools	15,823	21,726	5,903
HNB: OLA	1,648	2,800	1,152
HNB: GFE	2,213	3,632	1,419
HNB: Top Up - Resource Bases	1,885	2,154	269
HNB: Top Up - Mainstream Schools	9,134	12,505	3,371
HNB: Top Up - PRUs	1,334	1,562	228
<b>HNB: Top Up</b>	<b>32,037</b>	<b>44,378</b>	<b>12,342</b>

## Appendix 2 - Forecast position for Overall DSG 2021/22 as at Period 10 (Block financing position)

Appendix 2 City of Bristol DSG Financial Position:	Brought forward 1.4.21	Funding 2021/22	Outturn Period 10 2021/22	In-year movement	Carry forward 31.3.22
	£'000	£'000	£'000	£'000	£'000
Maintained Schools		84,395	83,941	(454)	
Academy Recoupment		208,608	208,608	0	
Growth Fund		2,861	2,355	(507)	
<b>Schools Block</b>	<b>(619)</b>	<b>295,864</b>	<b>294,903</b>	<b>(960)</b>	<b>(1,579)</b>
<b>De-delegation Services</b>	<b>(553)</b>	<b>0</b>	<b>66</b>	<b>66</b>	<b>(487)</b>
Admissions		526	526	0	0
Centrally Retained		2,101	2,101	0	0
<b>Schools Central Services</b>	<b>0</b>	<b>2,627</b>	<b>2,627</b>	<b>0</b>	<b>0</b>
National Formula		27,766	27,249	(517)	
2 Year Old Funding		3,360	3,356	(4)	
Pupil Premium (EYPP)		279	279	0	
Additional Support Services		500	476	(24)	
SEN Top up		1,275	1,888	614	
Staffing		1,986	2,016	30	
Disability Access Fund		121	52	(69)	
<b>Early Years Block</b>	<b>(621)</b>	<b>35,286</b>	<b>35,316</b>	<b>30</b>	<b>(591)</b>
Commissioned Services		2,301	3,228	927	
Core Place Funding		9,507	8,819	(688)	
Staffing		1,160	1,563	403	
Top Up		32,037	44,378	12,342	
Placements		9,044	12,756	3,712	
Pupil Support		814	1,558	744	
HOPE Virtual School		236	235	(0)	
Academy Recoupment		13,415	13,415	0	
Education Transformation		1,400	1,613	213	
<b>High Needs Block</b>	<b>11,797</b>	<b>69,913</b>	<b>87,566</b>	<b>17,653</b>	<b>29,450</b>
<b>Funding</b>		<b>(403,690)</b>	<b>(403,690)</b>		
<b>Total</b>	<b>10,004</b>	<b>0</b>	<b>16,788</b>	<b>16,788</b>	<b>26,792</b>

**APPENDIX B – SCAN OBJECTION ON HIGHWAY/TRANSPORT GROUNDS**

## Application 22/01221/F – Objection from SCAN on Highway Grounds

### Summary

This document provides the basis for SCAN's objections on the following grounds:

1. There will be insufficient on-site parking to avoid the risk of overspill on to surrounding roads, which have no spare capacity to accommodate this, and which will therefore increase current road safety concerns.
2. The proposed new accesses at Etloe Road and The Glen will increase road safety issues and exacerbate existing parking stresses. The applicant has not defined under what circumstances they would be used for emergency access, whether this is feasible, or how this will be limited and controlled.

### 1 There is insufficient on-site parking to avoid overspill and associated adverse impact and road safety concerns on neighbouring roads

#### 1.1 Summary

The applicant does not provide any evidence or estimates of the actual expected parking needs of the residents, staff and visitors for a new Extra Care scheme, and does not claim to be able to meet these without any overspill on to surrounding roads. Instead, the proposed number of parking spaces is based on:

- an interpretation of the parking standards for C2 (residential care homes where residents don't have cars);
- comparison with parking provided at a small number of non-similar schemes; and
- a comparison with the number of cars parked in a small non-comparable (social rent) sheltered housing scheme, in a small town in Northern Ireland, on one day in early 2019.

We are sure BCC will not see this as sufficient evidence on which to base such a decision, where if the on-site parking proves insufficient, it will have a major impact on road safety in a residential area.

The applicant has only included 65 spaces for a site of 122 primarily 2-bedroom apartments (which could accommodate up to 244 residents). Section 1.2 explains why the information in their Transport Statement does not demonstrate that the parking provided will be sufficient to avoid overspill.

The applicant justifies their plans with numerous subjective assertions, but these are not evidenced by any quantified assumptions, data or research to show the actual likely parking requirements of the residents, staff and visitors. Section 1.3 uses reliable data sources to indicate **that a reasonable estimate of parking requirements for the development would be 116 spaces**, made up of:

- 76 spaces for residents' cars
- 2 car club and 1 mini-bus space
- 37 spaces reserved for staff and visitors.

It is well known that the residential roads surrounding the site already face issues with over-demand of parking, and the associated road safety issues. Section 1.4 provides further detail and evidence. These roads have no spare capacity to accommodate the likely overspill from the new development, **and the extra volume of cars looking for spaces will exacerbate the current safety concerns.**

Obviously, the ultimate parking needs will be based on a number of factors and cannot be predicted with 100% accuracy. However, it should be recognised that the nature of the location – closely surrounded by residential roads – means that if the estimates lead to insufficient parking on-site, residents, staff and visitors will seek to park on the neighbouring roads, and this impact cannot be managed by the developers (or BCC) once the site is occupied. There must therefore be a clear onus on the applicant to provide sufficient parking, based on realistic estimates, to reduce, as far as reasonably possible, the risk of this occurring. Instead, their provisions are, at best, based on unenforceable best case wishful thinking. The estimates we have provided above are based on defined and reasonable (not worst case) assumptions, as detailed further in Section 1.3.

Finally, it should be noted that the applicants themselves do not claim that there will be no overspill on to surrounding roads – their plans appear to be justified primarily by a highly tenuous and limited comparison with 1 day of trip analysis at a completely non-comparable site. For a development of this size and complexity, this cannot be seen as anything approaching a reliable basis for the limited parking provision. The plans presented in the first pre-app included 120 spaces, and even then, they referred to the potential need for a residents parking scheme to avoid overspill into the surrounding streets. This suggests that the applicant is in fact aware of the likely number of parking spaces required to avoid overspill, but has reduced the planned provision from 120 to 65 for their own reasons.

**Overall, it is clear that there is simply no basis for assuming that the planned parking provision is sufficient for the parking needs at this location. It is very likely there will be a significant overspill, which will increase risks to road safety in the surrounding residential streets.**

Paragraph 109 of the NPPF states that “Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.” It is clear that the developers are not producing sufficient parking to avoid an unacceptable impact, and the application should therefore be rejected.

## **1.2 Issues with applicant’s justification for provision of 65 spaces**

This section details why there is no reliable evidence to suggest that 65 spaces will be sufficient to avoid parking overspill on to surrounding roads.

### **1.2.1 Inappropriate reliance on Bristol City Council Parking Standards**

During the consultation process, the applicant referred to the on-site parking capacity being restricted by BCC parking standards. In this application (eg Transport Statement 6.7 and 6.20) they have repeatedly stated that they are providing more spaces than would be allowed by the BCC parking standards. This is misleading, due to their use of C2 parking standards, which relate to residential care homes, and have significantly different needs to an Extra Care scheme.

Transport Statement 6.5 states “Car parking is set as the following for ‘Hospitals/Nursing Homes and Residential Care Homes’, with ‘Convalescent and residential care homes’ having the following standard.

*C2      1 space per 2 Full time staff  
          1 space per 6 bed space”*

This paragraph omits to mention that the allowance of “1 space per 6 bed space” is set for visitors, not for residents, who presumably are assumed (in a care home) not to be able to drive. The C2 parking standards are clearly therefore not appropriate for a scheme in which many residents will be capable of driving, and which will be marketed as having rentable on-site parking spaces.

We are not clear why the scheme should be defined as C2 rather than C3. The proposals do not even comply with Bristol City Council's definition of Extra Care, which is "to be eligible you should have care and support needs of at least five hours a week.<sup>1</sup>" as St Christophers Square would have a minimum requirement of just two hours a week.

It should be noted that the C3 parking standards allow for the following:

One bed house/flat: one space per dwelling

Two bed house/flat: 1.25 spaces per dwelling

Section 1.2.2 of the Travel Plan states that "In total there will be 111 two-bed apartments/cottages and 11 one-bed apartments", so C3 planning standards would allow for 150 car parking spaces.

It may be seen that the Extra Care development does not easily fit into either a C2 or C3 category – in particular, there will be a need for residents' parking spaces, which are not allowed under C2, while there will be an additional need for staff parking, which is not recognised under C3. We hope that even if BCC agree to the C2 classification, they will consider this challenge when determining how much parking they expect and allow.

### **1.2.2 Comparison with highly limited trip analysis data at one dissimilar scheme**

The applicant states (Transport Statement 6.21) that "a parking accumulation calculation shows that based on surveys of existing sites, the development has sufficient parking".

They are basing this statement – which is the entirety of their case that there is sufficient parking – on one day of data from one retirement scheme, which is in no way similar to the proposed St Christophers Square Extra Care scheme.

Their Appendix E indicates that the comparison site is TRICS ref TY-03-P-01. Further details of this site are provided in 1.2.4 below, showing that this is a small retirement housing scheme in a small town in Northern Ireland, providing socially rented housing. No care is provided, solely an (off-site) alarm service, and there are no community facilities. Units are primarily single occupancy, distorting the pro rata calculation.

This site is clearly not sufficiently similar to St Christophers Square to provide any meaningful comparison data. Even if it were, we cannot imagine that 1 day of data from 1 scheme, 3 years ago, would be considered a sufficient basis for estimating the entire parking needs of a scheme of this magnitude and significance.

(NB Transport Statement 6.16 refers to a comparison with site ref CH-03-P-01, despite Appendix E showing data for TY-03-P-01. In fact, CH-03-P-01 is a care home, further details below.)

To summarise, the applicant has not provided any reliable information to support that 65 spaces will be sufficient for the needs of all residents, staff and visitors to the site.

### **1.2.3 Meaningless comparison with provision at dissimilar schemes**

Most of the applicant's case seems to rely on a suggestion (Transport Statement 6.21) that "parking provision is in line with other similar schemes". However, the amount of parking provided on these other sites is not relevant in determining the actual parking needs of this site.

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<sup>1</sup> <https://www.bristol.gov.uk/social-care-health/extra-care-housing> - section "How to get a place"

- Firstly, the amount of parking provided at any other site does not indicate this is sufficient to meet the actual demand; it is quite possible that there may be overspill at these other sites, or other usable parking close-by. Alternatively, it may be that the location of the site (eg out of town) actually prohibits overspill – which is not the case at the St Christophers Square location, being surrounded by residential streets with unrestricted parking.
- Secondly, the limited number of sites referred to are not sufficiently similar in nature, location or demographics, to be comparable to St Christophers Square (as elaborated further in 1.2.4 and 1.2.5 below).

#### 1.2.4 Reference to non-similar TRICS comparison sites

Transport Statement 6.10 refers to the use of comparison data from TRICS, which is said to contain six schemes for “assisted living”. Transport Statement 6.11 suggests that the range of spaces for these was from 0.375 to 0.545 per dwelling, which they have used to justify a provision of 65 spaces.

The sites which the applicant has quoted are in no way comparable to the proposed Extra Care Scheme. Three of the sites are identified on Page 67 of Transport Statement and the following table provides further details of each:

TRICS ID	TRICS Stated Location	Full name of Scheme and website	Description of Scheme
CH-03-P-01	Chester Way, Northwich, Cheshire	Daneside Court Care Home, Chester Way, Northwich CW9 5JA  <a href="https://www.carehome.co.uk/carehome.cfm/searchazref/20003518D">https://www.carehome.co.uk/carehome.cfm/searchazref/20003518D</a> ANA	Care Home with nursing, providing single rooms for 64 people.
DV-03-P-01	Garfield Road, Paignton, Devon	Abbeyfield Park House, 13 – 15 Garfield Road, Paignton, Devon, TQ4 6AX  <a href="https://www.abbeyfield.com/supported-housing/abbeyfield-park-house-in-paignton-at-tq4-6ax/">https://www.abbeyfield.com/supported-housing/abbeyfield-park-house-in-paignton-at-tq4-6ax/</a>	11 en-suite single rooms with meals provided. No provision of care, solely alarm calls to off-site Careline service. No additional facilities.
TY-03-P-01	Limekiln Lane, Cookstown, Tyrone	Sperrin Court, Limekiln Lane, Cookstown, County Tyrone NI, BT80 8TS  <a href="https://housingcare.org/housing-care/facility-info-11164-sperrin-court-cookstown-northern-ireland">https://housingcare.org/housing-care/facility-info-11164-sperrin-court-cookstown-northern-ireland</a>	Rented (social landlord) retirement housing. 41 flats (mix of 1-bed and 2-bed). No care provided. No additional facilities.

It is clear that none of these examples are suitably similar to the private Extra Care arrangements that St Christophers Square is offering: the first one is a care home, in which no residents would have cars; the second and third are different forms of retirement housing which do not provide care, and cater for a substantially different demographic and need than the proposed residents of St Christophers Square. The units are primarily single occupancy (which distorts the pro rata calculations). Neither



do these sites provide the extra community facilities proposed for St Christophers Square, which will require more staff and attract more visitors.

(Although the applicant only references three of the supposed six in this TRICS category, their lack of relevance suggests that TRICS simply does not include Extra Care facilities, implying that the other three schemes will be no more suitable for comparison purposes.)

### **1.2.5 Reference to other “Extra Care” scheme in Bristol**

Transport Statement 6.14 refers to parking provision at the site covered by Bristol Application 17/06914/F in Bishopsworth, which was approved with 22 spaces for 62 units.

However, the demographic of residents of this scheme (Brunelcare Waverley Gardens) is entirely different from that proposed for St Christophers Square. The majority of the units are single-bedroomed, and the site provides 100% affordable housing to applicants on Bristol City Council’s health and social care waiting list<sup>2</sup>. This is totally different from the private ownership of largely 2-bedroomed flats in St Christophers Square. Neither does the scheme provide the proposed additional community facilities, with the associated additional staff and visitors of St Christophers Square.

Furthermore, the amount of parking provision at this site does not prove that it is sufficient for all parking requirements or that there is no overspill. In fact, the Bishopsworth application shows that the applicant based their own parking estimates on comparison date (from TRICS) for residential care homes<sup>3</sup>, which do not allow for parking spaces for residents. While there may have been a reason why this was seen as valid in the case of Waverley Gardens (eg to cater purely for the additional staff requirements), this does not make it comparable to St Christophers Square, which is being marketed with available residents’ parking. In fact, BCC commented on the application that “there must be measures in place to maintain this low level of parking demand and prevent an increase, which if overspilled onto the surrounding highway could create congestion”. None of this is comparable with St Christophers Square.

It is notable that the applicant has avoided comparison with a far more similar local site - the Westbury Fields Sommerville Retirement Village two miles away, which provides private retirement accommodation. This is one of Bristol City Council’s approved Extra Care Housing sites<sup>4</sup> and is registered by the CQC to “provide care and support to people living in specialist ‘extra care’ housing”<sup>5</sup>, with only a slightly lower minimum age of 60 compared to 65. This development provides more than one parking space per dwelling.

### **1.2.6 Meaningless comparison with occupation by guardians**

The applicant states (Transport Statement 7.10) that “90 ‘guardians’ are currently living in the buildings, providing round the clock live-in surveillance. Effectively this is the same as 90 separate residential units operating from the site, and likely to have a higher impact on parking and traffic movements than the proposed use.”

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<sup>2</sup> From Application 17/06914/F on the Bristol City Council Planning Portal: “Affordable Housing Statement” and “Housing Delivery Response”

<sup>3</sup> From Application 17/06914/F on the Bristol City Council Planning Portal: “Trip Rate Calculation”

<sup>4</sup> <https://www.bristol.gov.uk/social-care-health/extra-care-housing> - Section “Where you could live”

<sup>5</sup> <https://www.cqc.org.uk/location/1-126473607#accordion-1>

This comparison is simply ridiculous, and is yet another subjective assertion with no evidence base or relevance.

- Firstly, this application can only be judged on the additional parking requirements from the previous approved use – as a residential school for disabled children, where the only parking requirements were for staff – rather than on a comparison to an unapproved interim situation. The applicant appears to be implying that there has already been de facto approval for 90 residential units on the site – this is obviously incorrect, and clearly should not be taken as an approved starting point for further increases.
- Secondly, the applicant provides no evidence or rationale to support their assertion that the new Extra Care facility would have a lesser impact than the current use by guardians. We have been told by one of the guardians that only about 10 of them have vehicles, which are able to be kept on-site, and rarely used apart from to travel to festivals. There is in fact no comprehensible reason why 90 individual guardians – largely young people, looking for cheap temporary accommodation – would require more parking than the occupants of 122 primarily 2-bedroom apartments intended for relatively wealthy retired couples and individuals, together with the supporting staff and visitors of an Extra Care facility.

### **1.2.7 Summary**

Overall, it is clear that the applicant has provided no reliable evidence to indicate that 65 spaces will be sufficient to avoid parking overspill onto neighbouring roads.

## **1.3 Research-based estimate of likely parking requirements**

As the applicant has not produced any actual estimates or evidence of the likely parking requirements for the site, this section provides a basis for making a reasonable estimate of the parking needs for each category of site user.

This results in a total estimated demand for parking for 116 vehicles. This number is explained in detail below, together with references to the supporting research.

### **1.3.1 Residents' parking requirements**

The applicant justifies the low number of parking spaces by suggesting that “car ownership levels within an integrated retirement community are far lower than an open market housing development<sup>6</sup>”. However, they do not provide any evidence to justify or quantify this statement.

On the contrary, all sources we have identified show there are continued high levels of car ownership throughout retirement, as evidenced below. The data sources referenced, and defined assumptions below, indicate a likely need of **76 parking spaces for residents**.

Firstly, it should be noted that the applicant states that there will be “a minimum age of 65 for lead residents; although experience confirms the average age of residents at the point of entry will be late 70’s and on a needs basis.”<sup>7</sup> Unfortunately, the applicant provides no sources to evidence the

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<sup>6</sup> Statement of Community Involvement Part 1 Page 50 (or Page 51 of PDF)

<sup>7</sup> Planning Statement Page 14 Paragraph 4.2 (Page 17 of PDF)

“experience” which supports this assertion, which cannot therefore be treated as a reliable basis for estimates.

In fact, the proposed Heads of Terms<sup>8</sup> confirms that the minimum age is 65 for lead residents, but also shows that there is no minimum age or care requirement for a cohabitee (who may continue to live in their property following the death of the lead resident). The applicant has promoted the development as being appropriate for couples where one partner may be younger and more independent, while the other is starting to need some care.

There is no data to indicate that car ownership of this demographic will be low. In fact, a survey by Statista<sup>9</sup> in 2017 states that “British people aged 60 years and older were the age group with the highest share of car ownership”.

Furthermore, the ONS dataset entitled “Table A47 - Percentage of households with cars by income group, tenure and household composition – UK, financial year ending 2018”<sup>10</sup> shows a high percentage of car ownership amongst retired adults. In particular, for retired couples who are not mainly dependent on state pension (the key likely demographic for St Christophers Square), **89% of retired couples own one or more cars** as shown in the following extract:

	One car/van	Two cars/vans	Three or more cars/vans	All with cars/vans	Weighted number of households (000s)	Households in the sample (number)
<b>All households</b>	<b>43</b>	<b>27</b>	<b>8</b>	<b>78</b>	<b>27,150</b>	<b>5,410</b>
<b>Household composition</b>						
One adult, retired mainly dependent on state pensions <sup>3</sup>	42	--	--	43	750	130
One adult, other retired	50	--	--	52	2,770	510
Two adults, retired mainly dependent on state pensions <sup>3</sup>	66	[18]	--	85	440	100
Two adults, other retired	55	30	4	89	2,780	630

There is no reason why car ownership for the population living at St Christophers Square would be any less than these figures demonstrate. In fact, Department of Transport data<sup>11</sup> shows that while the number of “car trips as driver” (NB – this refers to individual trips, not car ownership) may decrease with age, there is a corresponding increase in “car trips as passenger”, indicating that as the care needs of one person increase, they become more reliant on their partner (or carer) to be able to drive them, so are still likely to retain their cars.

The nature of the development (the applicant refers to it being aimed at retired people “who want to still live independently”<sup>12</sup>, and their website claims that “The services will help residents to live independently for longer<sup>13</sup>”) and its location, surrounded by residential streets with non-restricted parking, suggest that many potential buyers would see it as a benefit that they can retain their cars, parked either on-site or very close by. (This is not the case for out-of-town retirement schemes, where

<sup>8</sup> Draft Heads of Terms Page 2 (Page 4 of PDF): Definition of “Qualifying Person”

<sup>9</sup> <https://www.statista.com/statistics/682596/consumers-who-own-a-motor-vehicle-in-the-united-kingdom-uk-by-age/>  
#:~:text=British%20people%20aged%2060%20years,were%20planning%20on%20purchasing%20one.

<sup>10</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/datasets/percentageofhouseholdswithcarsbyincomegrouptenureandhouseholdcompositionuktablea47>

<sup>11</sup> NTS0601: Average number of trips (trip rates) by age, gender and main mode

<sup>12</sup> Transport Statement Paragraph 5.2

<sup>13</sup> <https://www.stchristophersbristol.com/benefits-of-extra-care>

there is no viable alternative to parking on-site and car ownership is limited to the actual on-site provision.)

Assuming that 50% of the 122 flats at St Christophers Place are occupied by two adults (although it may well be more than this initially), and 50% by a single adult, and that all have income above state pension level (as is likely to be necessary), the ONS figures indicate that an average of 70% of flats will have occupant(s) owning one or more car. Even assuming that this would be limited to only one car per individual or couple (which may be reasonable, if not enforceable), this would result in a potential 85 cars to be accommodated.

The applicant proposes the use of a car club (with 2 allocated spaces) to reduce car ownership, which is appreciated, but there is no data to support the likely take-up of this. It is interesting that the applicant proposes (Transport Statement 7.11) that Bristol City Council will be solely responsible for promoting this to residents – showing that the applicant takes no responsibility for encouraging car ownership reduction through its usage. However, as an estimating assumption only, if a further 10% of residents give up their cars due to the availability of 2 car club cars, this would lead to a reduced estimate of 76 residents' cars needing to be accommodated.

### **1.3.2 Staff parking Requirements**

Travel Plan 1.1.1 and Transport Statement 6.6 refers to the site having between 15 and 20 staff on site at any one time and apply BCC's standard of "1 space per 2 Full time staff" to this figure (rather than to the 33 FTE shown in the Application Form). However, there is no rationale or evidence to support either figure, which are at best unvalidated and unenforceable. In fact, 15 – 20 on-site staff is likely to be a significant under-estimate, particularly at peak hours. **The following analysis shows that an estimated 38 staff are likely to be on site during peak hours.**

A fairly optimistic estimate of 50% of staff travelling by car suggests the need for at least **19 car park spaces for staff.**

As the applicant has not produced any supporting information to explain the number of permanent staff on site, or to indicate the basis for estimating the likely number of carers who will be required to support the residents, this section provides some research basis for likely estimates of what staffing will be required.

The only information about levels of care provision is given on Page 14 of the Planning Statement, where paragraph 4.4 states that "residents must have a minimum package of 2 hours support per week". There is no maximum, and residents may ultimately receive 24-hour care, with paragraph 4.1 confirming that "residents may also organise night service or care companions for episodic care of permanent appointments".

It is surprising that the applicant has not conducted more detailed research into the amount of care they are likely to be providing. Fortunately, there are a number of research documents indicating the patterns of care provision in Extra Care communities. A commonly expressed view is that effective Extra Care communities typically provide a balance of care across the entirety of the range, eg "extra care providers often aim for a balance of care needs among residents, such as one third each with high, medium and low needs"<sup>14</sup> and "Keeping a community balance of high, medium and low care needs is likely to be vital"<sup>15</sup>.

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<sup>14</sup>Cambridge University Press - Extra Care Housing: The Current State of Research and Prospects for the Future - 11 Nov 21

<sup>15</sup> ILC-UK - Establishing the extra in Extra Care - September 2011

This indicates that a range of care requirements should be expected at St Christophers Square, from the lowest to the highest needs; in other words, the care requirements are likely to fully cover the range from 2 hours a week to 24 hours a day. One study states that “on average any extra care - housing scheme for older people should be based on an average of 12 hours per resident of care and support per week. This should give ample scope to offer less care to those who will not require it and to offer intensive care when people are experiencing a crisis and not coping very well with personal care.”<sup>16</sup>

This seems a reasonable assumption on which to estimate the care hours to be provided at St Christophers Square. Assuming that 50% of the 122 flats at St Christophers Place are occupied by two adults, and 50% by a single adult, there would be 183 residents, requiring an average of 12 hours care per week, leading to an average provision of 2196 hours care a week, or 313 hours a day. If this was spread evenly over a 12-hour day, this would equate to 26 carers on site throughout the day.

However, the care requirements of individuals mean that care is unlikely to be spread evenly throughout the day. Residents will expect to receive care when they need it, rather than to fit in with a smooth resource profile, and can choose to use their own carers if necessary. By far the most common care requirement is assistance in the morning with getting up, and in the evening with going to bed, so there are normally significant peaks between 7am to 9am and again from 5pm to 7pm, with the majority of the remaining care likely to be spread in between.

Assuming that a third of the residents need an hour of care morning and evening (in line with a third having high care needs, as referenced above – although in practice many of those with medium needs may also need care during these hours), and there are 183 residents (as assumed above), this would lead to the need to provide care to 61 people during each of these 2-hour periods, which would equate to 30 carers being on site during peak hours.

**The above suggests that the number of carers on site may range between 24 to 30 throughout a normal day.**

It should be noted that the peak hours coincide with the busiest times in the surrounding roads, when commuters are arriving and leaving, and when children are being dropped at the neighbouring Westbury Park Primary School, when the roads can least absorb any additional parking demands, or accommodate extra traffic from cars searching for spaces. It is therefore important to plan for the parking demands of these key hours.

As well as the care staff, there will be other on-site staff providing the following functions: Management, Admin, Concierge, Food & Beverage Provision, Activities. The applicant does not provide a break-down of the proposed 33 FTE; a minimal assumption of 25% being for non-care related activities would suggest **a further 8 staff on site during working hours.**

**Together this leads to a likely total of 32 to 38 (at peak hours) staff on site throughout a normal day.**

The applicant does not estimate the number of staff who would be expected to drive to work, although they imply that the proximity of local bus-stops would reduce this. They have also suggested that they could reduce the number of staff driving to work by using a mini-bus to pick up staff (Transport Statement 6.8 and 7.8). However, there is no evidence that this would be successful, and unfortunately these suggestions do not reflect the nature of care work.

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<sup>16</sup> Institute of Public Care at Oxford Brookes University - Predicting and managing demand in social care Discussion paper - April 2016

Carers normally aim to minimise all travel time, as it is unpaid, and frequently arrive at work early in the morning and leave late in the evening, or at night. For this reason, public transport is unattractive, and they are equally unlikely to drive to a pick-up location in order to be collected, or wait at the end of their paid hours for the next arranged mini-bus, as this will simply lengthen their day and unpaid hours. Amicala cannot force their staff (or those of other care agencies which residents may choose to access) to use the mini-bus or public transport. It is also interesting that the applicant proposes (Transport Statement 7.11) that responsibility for reducing car usage amongst staff would lie with Bristol City Council.

Nonetheless, it is assumed that there will be some take-up of public transport and mini-bus facilities, so it is estimated that only 50% of the staff will drive to the site. It could well be much more than this, and it is obviously impossible to enforce this estimate. **This would lead to a need for a minimum of 19 on-site parking spaces being required for staff.**

### 1.3.3 Visitors Parking Requirements

Although the applicant does not provide any estimate of likely visitor numbers, they use the C2 standards for visitors parking spaces, which suggest (for a care home) 1 visitor space per 6 beds. With 11 x 1-bedroom apartment and 111 x 2-bedroom apartments, this comes to the 39 spaces referred to by the applicant in Transport Statement 6.5.

It is possible that this guideline could be applied differently for 2-bed apartments, in which two residents may be expected to be related and have visitors in common. Applying the guideline to dwellings rather than bedrooms would reduce the requirement to 20 spaces.

It is also recognised that visitor numbers may be slightly lower than those for residential care homes (assuming that many of the residents are mobile enough to be driving, as covered in section 1.3.1), and a reduced ratio of 1 visitor space to 8 dwellings (which we understand is used by some Local Authorities) would result in **15 spaces being required for visitors.**

However, it is likely that the number of visitors may be higher than this at popular times.

### 1.3.4 Requirements for Visitors to Community Facilities

The applicant refers to the site including “outward facing facilities open to the wider community”<sup>17</sup>. They state that the site “will be open to the public, providing ... community facilities in the restored Grace House”<sup>18</sup> and that “The deli/café and bar will be open to the public”<sup>19</sup>. Amicala have also publicly stated the site will “provide a new social and leisure hub for Westbury Park, opening up the site and offering a wide range of facilities for residents and local people to enjoy”<sup>20</sup>.

If the site is providing such a wide range of publicly accessible facilities, this will also lead to increased parking demands. The applicant appears not to have considered this in their estimates.

Without knowing more about the facilities on offer, which have not been elaborated in the planning application, it is difficult to assess the parking requirements, but it would be reasonable to assume a **minimum of 3 spaces for external visitors to the site** (although it could be a lot more at certain times of day).

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<sup>17</sup> Planning Statement Paragraph 1.3

<sup>18</sup> Statement of Community Involvement Part 1 Page 54 (Page 55 of PDF)

<sup>19</sup> Planning Statement Paragraph 6.37

<sup>20</sup> Bristol Post 21<sup>st</sup> March 2022 <https://www.bristolpost.co.uk/news/bristol-news/major-85m-development-could-built-6804183>

### 1.3.5 Total Parking Requirements

The above estimates and assumptions result in the following minimum parking requirements.

Residents' spaces	76
2 car-club + 1 mini-bus	3
Staff (including carers)	19
Residents' visitors	15
Visitors to facilities	3
<b>TOTAL Required Spaces</b>	<b>116</b>

It should be noted that the estimates used in this section have been made on as reasonable a basis as possible and are not maximums/worst case scenarios. We have assumed that some reductions will be able to be made on the base estimates from our research; **without this, a total of 140 - 150 cars (or more) could require parking during peak hours, and this is still possible**, given that none of the estimating assumptions are enforceable in practice.

### 1.4 The neighbouring roads cannot accommodate any extra cars

Section 1.3 provides a reasonable estimate of the parking requirements at St Christophers Square as 116 spaces. The applicant currently plans 65 spaces, which would result in an overspill of an estimated 51 cars trying to park on surrounding roads.

The surrounding roads simply do not have the capacity to absorb any more cars. All roads in the area are already normally filled with parked cars, especially during the working day, because:

- The area suffers from being just outside the Cotham North Residents Parking Zone. It is frequently used for commuters to Bristol City Centre, who use the free parking in these roads and then take the bus (or walk/cycle) into the city
- The roads immediately surrounding the site contain a primary school, five nurseries and preschools, three nursing homes and two assisted living facilities<sup>21</sup>, leading to a high demand for parking from staff, parents and visitors to these facilities.

We understand that Bristol City Council are aware of the resulting parking stresses in these roads.

The issues with high demand for parking already lead to road safety concerns. The constant hunt for limited parking spaces leads to traffic circling the area. The roads are narrow (including cul-de-sacs), with parking on both sides, and cars coming in opposite directions normally have to reverse to let one pass. This is made more difficult due to the density of parking, and the parking on corners and on pavements. Obstructive parking limits drivers' visibility and causes a real hazard to all users of these roads.

#### 1.4.1 Existing road safety concerns

The road safety issues are particularly concerning because there is a primary school and five preschool/nurseries very close to St Christopher's Square. Children walk down these roads on their

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<sup>21</sup> Westbury Park Primary School, Daisychain Nursery, Harcourt Preschool, White Tree Preschool, Red House Nursery, Torwood Lodge Nursery, Belvedere Lodge, Meadowcare, Glenview, Abbeyfield, Freeways-2 The Glen

way to school, and the obstructive parking on junctions, and volume of cars looking for somewhere to park, increases the risk of accidents.

SCAN commissioned Mindset Research<sup>22</sup>, an independent market research company, to undertake a survey of parents of children attending the school or nursery, as well as other local residents, and ask for their views about local road safety. There were 298 respondents, of whom 282 live in the area between Westbury Park (road), Coldharbour Road, Linden Road and North View. 134 have children attending Westbury Park Primary School or Daisychain Nursery.

The full results are provided in Annex 1, but in summary, of the respondents:

- 63% believe the roads in the area to be very unsafe or fairly unsafe
- 81% see parking in Westbury Park having a dangerous impact on road safety (comments referred to obstructive parking, as further described in section 1.4.2 below, and driver stress)
- 67% said they had witnessed accidents, incidents or near misses in this area (44% more than once).
- The top two issues were reported to be:

Issue	% of respondents reporting this as an issue	% of respondents reporting this as their number one issue
Children struggling to cross roads safely	72% (rising to 80% of parents with children at Westbury Park Primary or Daisychain)	33%
Lack of parking available	89%	30%

It is clear there is a high degree of local concern about the impact of parking issues on road safety, and these issues will only be exacerbated with the volume of additional cars competing for spaces.

#### **1.4.2 Existing issues with obstructive and dangerous parking**

There are frequent examples of dangerous and obstructive parking including:

- cars parked on corners and right up to junctions, and on double yellow lines
- cars blocking dropped kerbs (preventing wheelchair users from safely crossing the roads, as well as blocking people's drives)
- cars parked in restricted areas (such as disabled spaces)
- cars parked along the pavement, making this unusable for people with wheelchairs and pushchairs.

The obstructive parking leads to blocked visibility at junctions, leading to safety concerns.

This type of parking also demonstrates the current over-demand for parking space, as, typically, most people will park legally if there is a space available. This can only be exacerbated if there is an increased demand from c 50 more cars.

Annex 2 provides photographic evidence of this type of parking, taken during March 2022.

<sup>22</sup> <https://www.mindsetresearch.co.uk/>



### 1.4.3 Evidence of lack of capacity to absorb more cars

We believe it is the applicant's responsibility both to identify the amount of parking which may be required and to demonstrate that the surrounding roads have capacity to absorb any overspill. Unfortunately, they appear to have done neither.

Therefore, a number of local residents have attempted to provide our own data and evidence to demonstrate the current lack of parking availability in these roads.

The applicant is proposing five pedestrian entrances around the perimeter of the site. There are 12 residential roads which fall (either fully or partially) within 150m of one of these entrances, which forms a significant area. We obviously do not have the resources to undertake simultaneous surveys of the whole area ourselves, or to commission an independent survey. However, we have undertaken a number of different surveys which together demonstrate the density of parking and lack of spaces throughout a typical day and week.

#### Two 1-hour surveys of the whole area

A resident has undertaken two surveys of the entire area, at approximately the same time on two separate mornings in March, in which any available spaces were counted. This was evidenced by photographing all cars parked in the roads. It took an hour to get round all the roads, so the available spaces were those found over the course of this hour, and not necessarily all available concurrently. These two surveys showed

- 6 spaces during the hour on 24<sup>th</sup> March
- 5 spaces during the hour on 28<sup>th</sup> March.

#### 1-week survey of each road

A number of residents of the surrounding roads have undertaken surveys of the parking situation in their own area, supported by photographs, and we have collated the results in this submission. The results show a week in March for each road (with one count a day). The number of spaces available for each road were as shown below. (NB, due to residents' differing availability, these were not all taken during the same week or at the same time of day; the numbers are not intended to show concurrent availability, but to demonstrate the typical lack of availability in each individual road.)

Road	Weekday spaces available Mon, Tues, Wed, Thurs, Fri	Average avail. weekday spaces	Weekend spaces available Saturday, Sunday
Westbury Park	0,1,0,0,0	0.2	3,0
Clay Pit Road	0,0,0,0,0	0	1,1
Belvedere Road	0,1,1,0,1	0.6	10,3
The Glen	0,0,3,0,1	0.8	7,4
Bayswater Avenue	0,1,2,1,1	1.0	6,7
St Helena Road	1,1,1,0,0	0.6	0,1
Ladysmith Road	0,0,1,0,0	0.2	0,0
Florence Park	1,0,0,0,0	0.2	0,0
Etloe Road	1,0,0,0,0	0.2	-,2
Queen Victoria Road	1,-,4,0,-	1.7	-,-
Royal Albert Road	1,2,2,2,0	1.4	6,7
Redland Road	0,0,0,0,0	0	-,-

There were also cars parked obstructively in most of these roads when the surveys were undertaken, suggesting that when those cars arrived there were no valid spaces.

### **Further details of surveys**

Annex 3 explains the methods used and includes the detailed data from each road, showing the date/time that it was surveyed and the number of spaces available at that time, as well as the concurrent obstructive parking. There is photographic evidence supporting each count.

The results of the surveys indicate that there were sometimes 1 or 2 spaces in some of the roads. This is not surprising, as cars obviously come and go throughout the day, and there will be spaces available for a short period before another car arrives. However, **it is the cars searching these roads for the limited spaces which cause the additional traffic and road safety issues, and this can only increase with the additional c50 cars connected to St Christophers.**

### **1.5 Potential loss of car parking spaces on Westbury Park**

The map on Transport Statement Page 35 indicates an increase in double yellow lines along Westbury Park and Royal Albert Road. It appears likely that this may reduce the available road-side parking in these roads, although unfortunately the applicant has not made this clear.

Although this would be likely to be subject to a separate TRO, it should be expected that the need for this, and the effect on surrounding roads of a further reduction in publicly available spaces, would be considered with this application, so that the net impact on local parking can be considered in its entirety.

There is also no mention of whether the large emergency access to the site from the end of The Glen would involve removal of the current on-road parking space in front of 15 The Glen, or whether it would require further parking restrictions along The Glen to enable access for large emergency vehicles. We ask it is confirmed as a condition that this new access point will not lead to any reduction on current on-road parking on The Glen.

Overall, we ask that the current application is updated to confirm exactly how many existing on-road parking spaces would be lost due to the proposed development, and that the impact of this is considered along with the additional parking requirements.

## **2 The proposed new accesses at Etloe Road and The Glen will increase road safety issues and exacerbate existing parking stresses.**

### **2.1 Vehicular access at Etloe Road will increase road safety risks in the vicinity**

It is proposed that there will be an entrance from Etloe Road, which will “serve 4 proposed parking spaces.”<sup>23</sup> This access point has not previously been used for normal vehicular access to the site, and is in a dangerous position for regular use, being very close to the junctions of Etloe Road with Royal Albert Road, and Bayswater Avenue with St Helena Road, as well as adjacent to Daisychain Nursery and close to Westbury Park Primary School.

Etloe Road and the adjoining Bayswater Avenue are heavily used by children of Westbury Park Primary School and the five local nurseries, as well as by commuters competing for the highly limited parking spaces. Residents’ concerns about the existing road safety issues are reported in Section 1.4.1 and Annex 1. This survey also shows that 91% of the respondents with children at Westbury Park Primary School or Daisychain Nursery stated that their children walk to school, and 63% of these respondents believed the road environment near the school to be very unsafe or fairly unsafe. The safety risks can only be exacerbated by cars entering and leaving St Christophers Square at this point.

As recently as 20<sup>th</sup> April 2022 there was a road traffic accident involving a collision between two cars right outside the proposed entrance. Police were called and both ends of Bayswater Road were closed while the accident was dealt with. The applicant refers to an accident where a pedestrian was injured by a reversing car at the junction of Etloe Road with Royal Albert Road, at 08:35 am<sup>24</sup> (ie school drop-off time). The applicant also states that their details of Personal Injury Accidents only include those reported to the Police, and our survey results show that there are frequent incidents and “near misses”.

In Bristol City Council’s response to the applicant’s earlier pre-application (8<sup>th</sup> November 2021) they stated “Currently the site has a vehicular access point on Etloe Road which the applicant proposes to retain in order to serve a small car park for residents only. As this is directly next to the Daisychain Nursery and adjacent to the junction with St Helena Road, thereby requiring motorists to undertake a significant amount of checking before pulling out, it must be abandoned and the footway reinstated to full kerb height to reduce the risk of pedestrian/vehicle conflict.” This advice has been ignored by the applicant.

The applicant states that “The traffic generated by the car parking spaces [for the Etloe Road entrance] is in the order of one car or less an hour at peak times, and nine two-way movements over a day”. However, there is no evidence to support this and this obviously cannot be enforced in practice.

Overall, the applicant has not justified that vehicular access can be established from Etloe Road without increasing the risk to road safety in this area.

### **2.2 Creation of a new access point at The Glen will exacerbate current road safety issues in The Glen and Belvedere Road**

The applicant is proposing to create a new entrance to the site from The Glen, for pedestrians and emergency vehicles. Their claims (Travel Plan 3.1.5 and Transport Statement 2.3) that “There is also a gated access from The Glen” are misleading. The gate referred to was only allowed to be used during the construction phase of a previous application (02/00500/F/N and 02/00501/LC/N). The applicant

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<sup>23</sup> Planning Statement Paragraph 6.87

<sup>24</sup> Transport Statement Paragraph 2.15 and Appendix A

at the time stated in a letter to BCC (Mr McCamphill), dated 3/4/02, "Once the work is finished the access will be sealed.... The Glen entrance cannot and will not be used even when we develop the North House" and subsequently a condition of the approval (SC44) was that "Means of vehicular access to the permitted building after construction shall be from the main entrance of Carisbrooke Lodge, Westbury Park only" and this condition was complied with.

Local residents appreciate and welcome that there will be no regular vehicular access from The Glen, which is a narrow cul-de-sac. Concerns about the proposed emergency access are covered in Section 2.3 below.

Creating a new pedestrian gate between St Christophers and The Glen will encourage residents, staff and visitors to use The Glen and Belvedere Road for overflow parking, particularly for the neighbouring blocks of flats. Section 1 makes it clear that 65 on-site spaces will not be enough for all users of the site, and Travel Plan 1.2.2 states that on-site parking "spaces for residents would be rented/leased, rather than owned by tenants." This further incentivises residents to park off-site, and The Glen will be perceived as free and unrestricted parking, which is actually closer to one block than some of the on-site parking.

There are existing road safety issues on these roads, caused by their location on the edge of the Cotham North residents parking zone and the additional traffic created by the three nursing homes on Belvedere Road and assisted living homes on The Glen.

Cars are frequently parked dangerously and obstructively. This is evidenced by the frequency of PCNs issued in Belvedere Road. In 2021 there were 85 PCNs issued on Belvedere Road, with one or more PCN being issued on 45% of the traffic warden's visits<sup>25</sup>. Even for Westbury Park this is high! Annex 2 (pages 2 – 6) provide photographic evidence of the frequent dangerous parking on junctions.

Belvedere Road is frequently blocked by ambulances and delivery vehicles visiting the three nursing homes. Cars looking for parking in The Glen have to reverse back down this cul-de-sac, past the junction with Belvedere Road, where visibility is often obstructed by cars parked on the corners. All of this will be made significantly worse by the overspill of another c 50 cars circling the roads trying to find spaces.

The road safety issues on these roads have been acknowledged by Bristol City Council, who rejected two recent planning applications – 19/93194/F and 20/06030/F – due to the additional parking demands they would place on these roads, and the impact on road safety. Additionally, the report from the Planning Inspectorate in response to an appeal on 19/93194/F upheld the Council's decision, summarising that "I found that parking is at a premium, which is currently causing significant hazards for all users of the highway<sup>26</sup>."

The parking issues on these roads are even acknowledged by the applicant, who states (Transport Statement 6.7) that "Roads to the south such as The Glen and Belvedere Road are on the edge of the residents parking zone and have issues with lack of on-street parking for residents."

Installing a pedestrian gate on The Glen makes parking on these roads significantly more accessible and attractive to residents and staff of St Christophers Square; the resulting increased parking demand, and traffic circling looking for spaces, can only increase the existing road safety issues for all residents and other road users (including children walking to the nearby Westbury Park Primary School).

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<sup>25</sup> FOI request 23900191

<sup>26</sup> Application 17/06914/F on the Bristol City Council Planning Portal: "Costs Decision"

### **2.3 The proposed emergency access points from The Glen and Etloe Road have not been justified as essential or feasible, and would require enforceable conditions to prevent them being used unnecessarily**

The applicant refers to there being a “gated emergency vehicle access<sup>27</sup>” from The Glen as well as showing the entrance from Etloe Road as providing emergency access. However, they do not make clear under what conditions either entrance would be used for emergency access or how this would be limited and controlled.

The plans show two primary entrances allowing vehicular access to the site from Westbury Park, which provide more spacious access points for emergency vehicles than either The Glen or Etloe Road. This is demonstrated by the plan showing the waste collection vehicle route swept paths<sup>28</sup>, which shows that large vehicles can access all accommodation blocks from the Westbury Park entrances. It is therefore unclear what further benefit is provided by the additional entrances from The Glen and Etloe Road.

Large vehicles accessing the site from either road would have to manoeuvre round tight corners (frequently blocked by obstructive parking) and enter through narrow roads with parking on both sides (with The Glen being a cul-de-sac). The applicant has provided no feasibility study to indicate whether this is even possible, or whether it would be necessary to further restrict parking on either road in order to enable access.

If the proposed emergency entrances cannot be evidenced as being both feasible and necessary for safety reasons, they should not be established, as they risk becoming used for other purposes and increasing traffic and road safety issues on the respective roads.

If the proposed entrances are proved to be both essential and feasible for use by emergency vehicles, there should be clear conditions for the applicant to ensure that they are only used for this purpose.

These should include:

- confirmation as to the specific types of emergency vehicles which would be granted access (which should be limited to fire and/or ambulance responding to 999 calls, and not ambulances, or other vehicles, for any non-emergency purposes)
- agreement of the limited conditions under which either entrance would need to be used instead of one of the primary entrances on Westbury Park, and how this will be enforced
- confirmation that implementation of the new entrances will not involve removal of any existing on-road parking
- commitment that the access will never be used for any other purpose than the agreed emergency vehicles
- agreement of a clear physical mechanism which will prevent the access being used for any other purpose or by any staff or residents under other conditions.

Clearly, if the entrances are essential and feasible for safety or emergency purposes, this use has to be acceptable. However, for many residents, the concern is that new entrances are being established which may become increasingly widely used in future, creating further traffic and road safety issues.

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<sup>27</sup> Planning Statement Paragraph 6.88

<sup>28</sup> Transport Statement Paragraph 5.10 and Figure 3

## **2.4 Applicant's failure to abide by commitments made during Consultation Process**

The applicant has told Westbury Park residents on a number of occasions that pedestrian access from The Glen was not required for the purposes of the development itself, and would only be implemented if this was seen as a benefit by the existing community (eg by providing a short cut from The Glen to Etloe Road). This was communicated in the first meetings in July 2021 and repeated in the second webinar on 20th January 2022<sup>29</sup>.

However, this commitment has not been honoured. An analysis of all feedback included in the applicant's "Statement of Community Involvement Part 3" shows that there was significantly more opposition to the gateway (for the reasons given in Section 2.2 above) than support (which was limited to a small number of comments primarily about public access). Notably a poll of residents of The Glen and Belvedere Road (61 households, more than 100 residents), who would be most likely to benefit from any "improved connectivity", showed no support for the access and raised many concerns. This was submitted to the applicant in January.

Furthermore, the proposed access is stated to be limited to use by St Christophers residents only, so is clearly of no benefit at all to other local residents.

It is disappointing that, in the one aspect of the development where the developers committed to base their decision on the local residents' preference, they are knowingly doing the opposite to the vast majority of the feedback received.

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<sup>29</sup> Minutes included in Statement of Community Involvement Part 3 Pages 160-161 (Page 85-86 of PDF), also stated on the Applicant's website, and recordings of webinars available on the Applicant's website

## **ANNEX 1 – ROAD SAFETY SURVEY**

# SCAN Research 2022



For more information:

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## Quantitative research findings

April 19<sup>th</sup> 2022  
Project MS1573



# Objectives and methodology

## Objectives

- Measure perceptions of how safe the road environment is in Westbury Park, particularly near Westbury Park Primary School
- Better understand traffic issues that apply to Westbury Park
- Evaluate how available parking is in the Westbury Park area and how this impacts road safety
- Investigate how road safety could be improved in Westbury Park

## Who completed the survey?

- Total of 298 online survey responses
- All who responded were Westbury Park residents and / or parents of children attending Westbury Park Primary or Daisy Chain Nursery

## How?

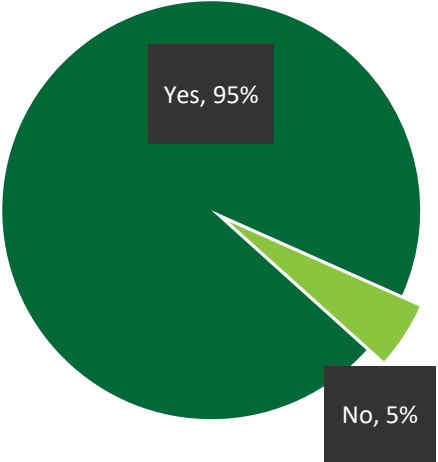
- Online survey, taking around 10 minutes to complete
- Survey invite & link distributed via community / school / nursery social media

## When?

April 2022

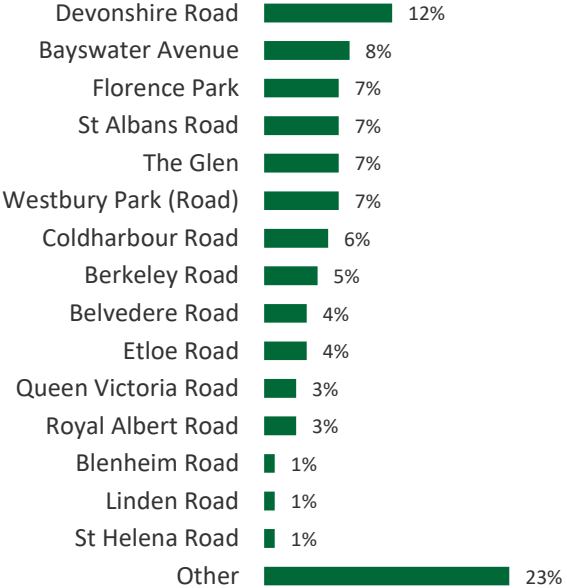
# Sample profile: Demographics

Live in Westbury Park?



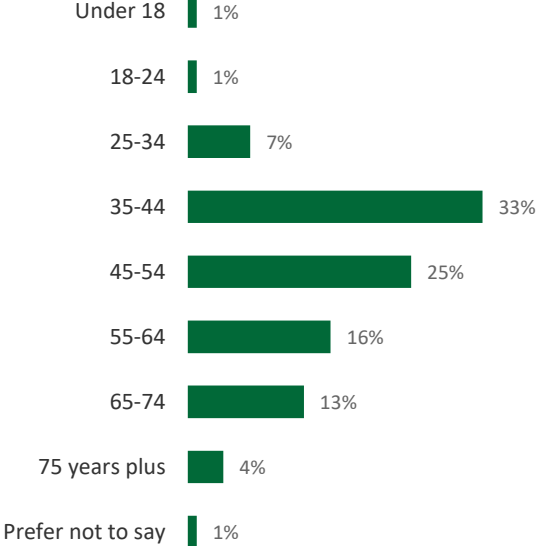
Base: 298

Live on which road?



Base: 282

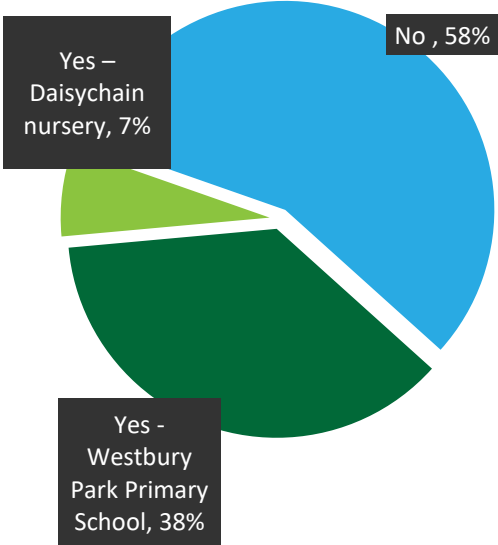
Age?



Base: 298

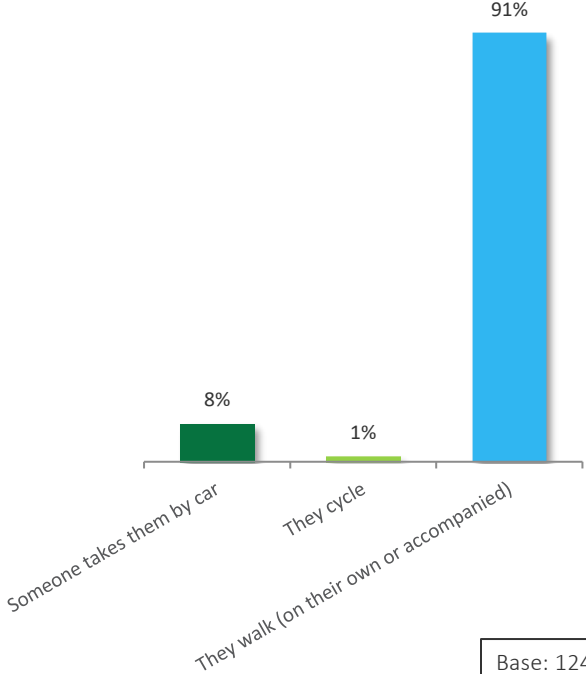
# Children at school / nursery and mode of transport

Children at school / nursery?



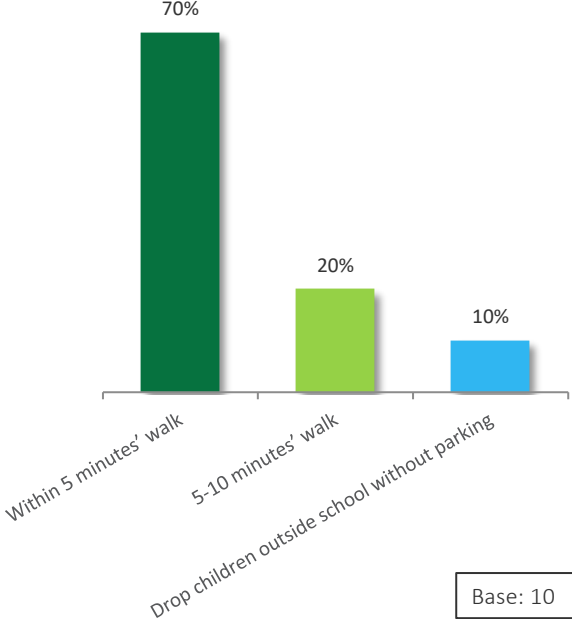
Base: 298

Mode of transport to school



Base: 124

Parking distance from school

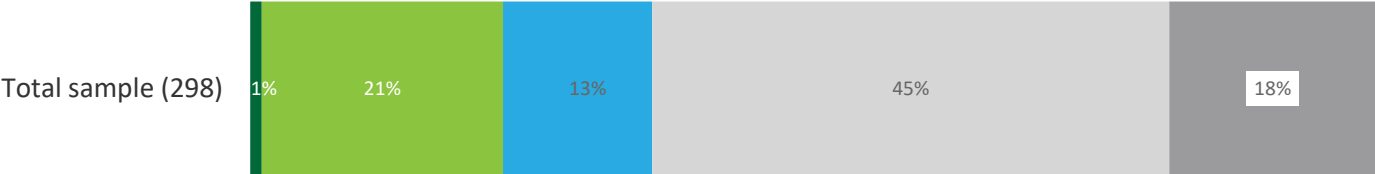


Base: 10

Q2 Do you have children at Westbury Park Primary School or Daisychain nursery?  
 Q3a How do your children usually travel to school/ nursery? Please specify their main mode of transport.  
 Q3b When driving to school/ nursery, how close do you normally park?

# Road safety in Westbury Park (particularly near Westbury Park Primary)

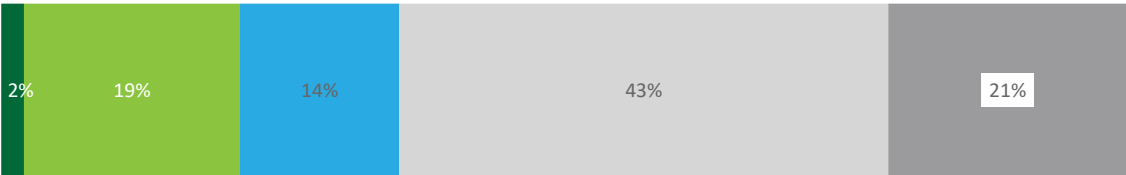
Very safe    Fairly safe    Neither safe nor unsafe    Fairly unsafe    Very unsafe



Parents with children at WP Primary / Daisychain Nursery (124)



Westbury Park residents, with no children at WP Primary / Daisychain Nursery (174)



# Why do you say that?

*Too many parked cars causing poor visibility.*

*There is no safe place for children to cross the road. It is very busy with cars right outside the school. Cars block driveways and drivers get frustrated so drive more dangerously.*

*Bayswater has cars parked both sides of the road and there's no crossing for the children from one side of Bayswater to the other to funnel movement so children spring out everywhere from between parked cars.*

*Most days cars will drive through the zebra crossing between Harcourt Road and Bayswater Road and there is nothing we can do about it. I will not even now let my 11 year old cross using that crossing. He is well versed in how to use a zebra crossing but it seems drivers consistently aren't. There just isn't enough parking to make the streets safe for so many small children.*

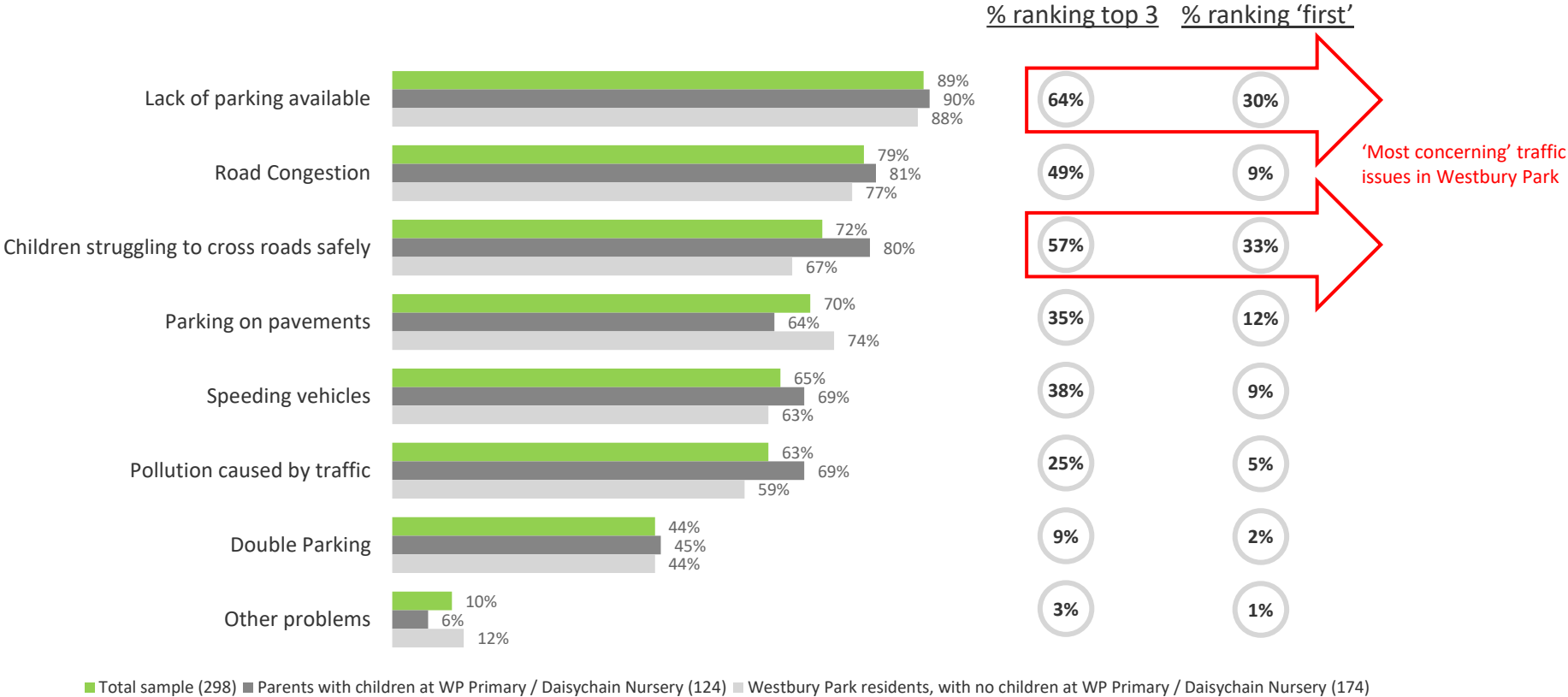
*Parking on corners restricting visibility, parking on pavements. Volume of traffic generally is high with commuters cruising for spaces at peak times.*

*Coldharbour Road zebra crossing is often dangerous as cars are busy concentrating on traffic turning from Cousins Rd/ Bayswater Av they don't notice the crossing. I have had several near misses. Bayswater Av often has builders vans, lorry's and other large vehicles using it. Many small children and hazards that could result in serious injury or worse. I would love for the Road to be one way to reduce the risk on so many families and make it a much safer road.*

*Excessive parking leads to dangerous parking on pavements and road junctions, and to traffic circling the roads looking for any available spaces, which all provide hazards for children around the school area.*

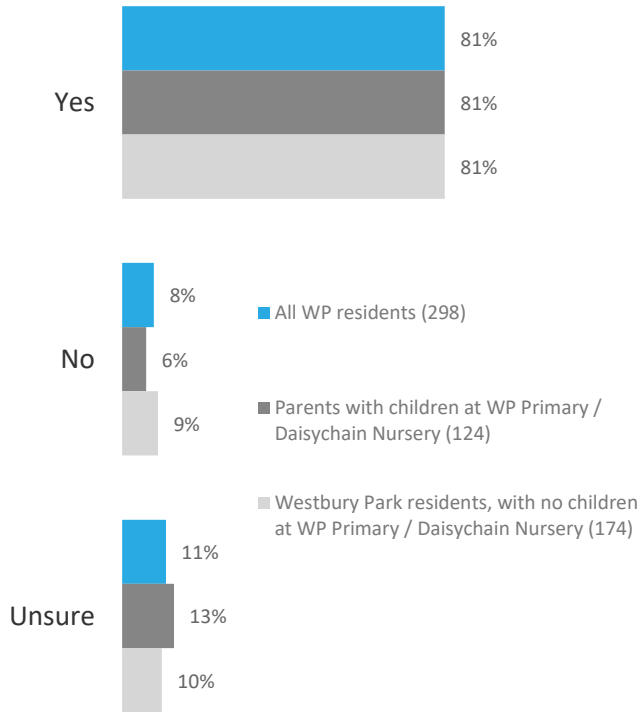
*Traffic drives too quickly for the environment during school drop off and pick up times.*

# Westbury Park traffic issues



Q6 In your opinion, which of the following traffic issues apply to Westbury Park? Please tick all that apply.  
 Q7 Which of the issues you have ticked are you most concerned about? Please rank your top three.

# Impact of parking on Westbury Park road safety



*Parking on corners and right up to junctions obstructs drivers' views and limits manoeuvrability, both of which cause safety risks. Parking over dropped kerbs forces people in wheelchairs into the road. Parking on pavements forces people (in wheelchairs and with pushchairs) to walk on roads, which is also dangerous.*

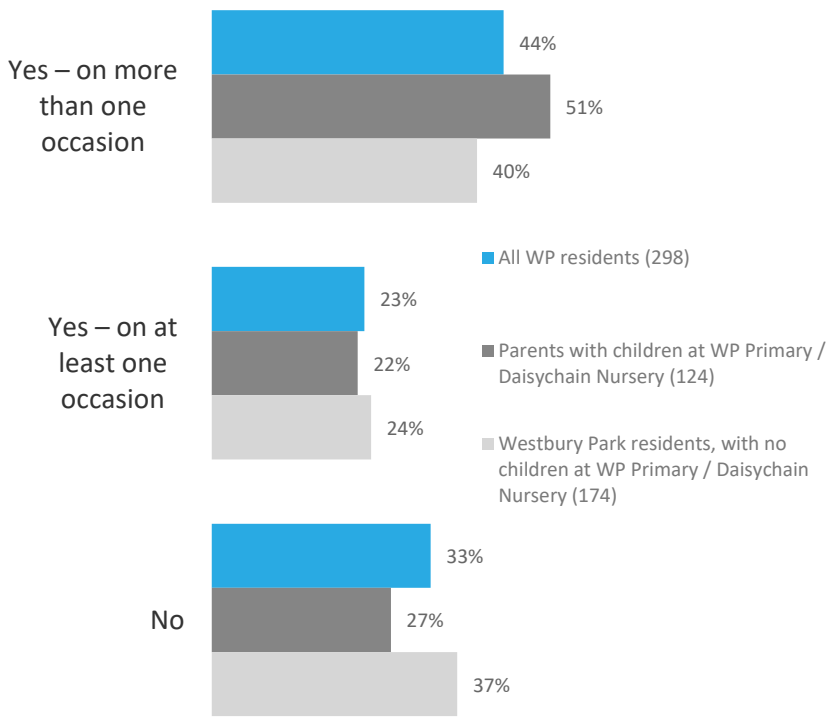
*Parking is a problem - there are already a huge number of parked cars and this makes it difficult to cross roads safely particularly with small children and buggies.*

*Cars are parked on corners, you have to pull out too far before you can turn. The whole thing is a massive accident waiting to happen. I consistently want to move away as I am afraid for my children.*

*Double parking. Blocked views. Pavements smothered. Poor visibility. Stressed motorists. Incredibly dangerous.*

*Parking on corners is a frequent and dangerous activity for both pedestrians and all road users.*

# Witnessed any accidents, incidents or near misses



*Several times we have seen near misses by adults and children by cars. I have nearly been hit by a car when cycling to work after dropping the children.*

*The visibility, large trees and double parking on Bayswater Av makes crossing difficult. Paths are often congested due to volume of pedestrian traffic so using road becomes an alternative in school rush time-can be dangerous. Coldharbour Rd cars drive very fast and often ignore the zebra crossing.*

*My sister was hit by a car while using the zebra crossing on Coldharbour Road a few years ago. I have also heard many accounts of incidents involving speeding cars. A mum at my primary school (Westbury Park) started a petition for traffic lights after her daughter was hit by a car.*

*We live near the school. I have seen several near misses with children trying to cross road and not being able to see traffic because views blocked by badly and illegally parked cars.*

*At the zebra cross on Coldharbour Rd by St Albans church. Cars are not careful enough when children cross this road to go to school or home. This Rd is extremely busy at school start and end of day.*



# Suggestions to improve road safety

*Blocking roads to limit traffic.*

*No through road dead end roads to avoid rat runs. Less space for cars and more space for people, less parking and more pavement space, cycle space, safe space for children.*

*Traffic calming measures on Bayswater Ave near the school, and a clear crossing point on Bayswater where there are no cars on either side. A clamp down on people using the zig zag lines at the school to drop off. Instead a designated drop off zone eg by St Albans church . A clamp down on parking on pavements esp on cousins road. Some passing points on St Albans road.*

*Slow down traffic on Coldharbour. Make Bayswater Av one way road to stop cars using as a thoroughfare to the Downs/White Tree roundabout.*

*It needs a residents permit, this should remove the numerous cars and vans being left and commuters parking on pavements causing safety issues for children and older people who have to going the road to get past them.*

*Parking permits would be a huge help in improving the lack of parking in the area. As Westbury Park is one of the first areas with no permits, I'm sure that people park their cars here who don't live in the street which makes it really difficult to find a space.*

*Residents parking zones and also block the volume of building being proposed for the St Christopher's site which would lead to even more overspill parking.*

*Introduce Residents Parking Zone to stop the area being used as "park and ride" by city commuters.*

*Make Devonshire Road one way from the Coldharbour Road end. Put a speed camera or 2 on Coldharbour Road and one on Devonshire Road.*

# SCAN Research 2022



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*End of presentation*

## **ANNEX 2 – OBSTRUCTIVE PARKING**

## **Annex 2 – Obstructive Parking**

This appendix shows some examples of the frequent obstructive parking throughout the area around the St Christophers site. This is due to the high demand for the existing parking spaces, which leads many people to park obstructively when there are no valid spaces available. This leads to safety concerns with frequent parking on corners, as well as parking over dropped kerbs and on pavements making the roads less accessible for those in wheelchairs or with pushchairs.

Some examples are included of parking on the Downs/grassy area outside St Christophers.

These photos were taken by residents during March 2022. NB there are normally multiple occurrences on most days, these photos by no means indicate all occurrences, but represent just a small sample which were photographed for the purpose of this study.

JPEGs of photos are available if required by Bristol City Council for validation purposes.

**Belvedere Road & The Glen – frequent parking on corners, and across dropped kerbs, at junctions with The Glen and Westbury Park**

5<sup>th</sup> March



5<sup>th</sup> March



8<sup>th</sup> March



8<sup>th</sup> March



8<sup>th</sup> March



9<sup>th</sup> March



9<sup>th</sup> March



9<sup>th</sup> March



10<sup>th</sup> March



10<sup>th</sup> March



10<sup>th</sup> March



11<sup>th</sup> March



11<sup>th</sup> March



12<sup>th</sup> March



12<sup>th</sup> March



12<sup>th</sup> March



13<sup>th</sup> March



16<sup>th</sup> March



18<sup>th</sup> March



18<sup>th</sup> March



20<sup>th</sup> March



21<sup>st</sup> March



23<sup>rd</sup> March



24<sup>th</sup> March



24<sup>th</sup> March



26<sup>th</sup> March



26<sup>th</sup> March





26<sup>th</sup> March



30<sup>th</sup> March



6<sup>th</sup> April



**Clay Pit Road – there is a dropped kerb providing wheelchair access to the path to the bus-stop, frequently blocked by parked cars**

6<sup>th</sup> March



7<sup>th</sup> March



8<sup>th</sup> March



10<sup>th</sup> March



12<sup>th</sup> March



13<sup>th</sup> March



16<sup>th</sup> March



19<sup>th</sup> March



24<sup>th</sup> March



24<sup>th</sup> March



30<sup>th</sup> March



**Westbury Park – frequent parking on corner with Belvedere Road, also over restricted places and on the Downs**

13<sup>th</sup> March



13<sup>th</sup> March



13<sup>th</sup> March



23<sup>rd</sup> March



23<sup>rd</sup> March



24<sup>th</sup> March



24<sup>th</sup> March



26<sup>th</sup> March

2<sup>nd</sup> April



#

March 2022

## Examples of 'stress-parking'

As a part of the parking survey within 150m of the proposed new traffic entrance to the St Christopher's site, we also collected these examples of 'stress-parking'.

These roads are often full, yet the demand for spaces does not stop there. So, in addition to counting spaces each day, additional photographs were taken of cars parked illegally, demonstrating "stress-parking", on the basis that these cars would not have parked so badly had they been able to find a space.

Stress-parking included vehicles parked on double yellows, school zigzags during restricted times, blocking access ramps, overlapping junctions, blocking access and so on. Some pictures below cover several categories in one instance.

Clearly there have been many other such offences committed, these were just the ones a small number of residents were able to photograph when they were out, demonstrating the sort of regular inconveniences, and safety hazards, that users of this road (cars and pedestrians) face today, without the extra pressure of St Christophers.

### Double Yellows



9<sup>th</sup>



9<sup>th</sup>



15<sup>th</sup>



16<sup>th</sup>



16<sup>th</sup>



18<sup>th</sup>



22<sup>nd</sup>

### School Zigzags during restricted periods

Multiple offences every weekday, too many to capture them all. Many of them are short drop-off stays, but are also exactly what parents would not be doing if they could find proper space to park.



9<sup>th</sup>



16<sup>th</sup> x2



17<sup>th</sup>



21<sup>st</sup>

### Junction overlaps



16<sup>th</sup>



17<sup>th</sup>



21<sup>st</sup>



22<sup>nd</sup>



22<sup>nd</sup>



23<sup>rd</sup>



23<sup>rd</sup>



24<sup>th</sup>



25<sup>th</sup>



25th



27th



27th

Blocking access/dropped kerbs/garages



22nd



24th



25th



26th

Pavement



13th for 2 weeks



23rd



23rd



29th



## Etloe Road

Etloe Road is too narrow for cars to be parked on both sides without obstructing traffic flow. However, cars are frequently parked on the pavement on one side of the road, causing hazards and preventing access for wheelchair and pushchair users, as well as on corners and double yellow lines.



15<sup>th</sup>



22<sup>nd</sup>



22<sup>nd</sup>



24<sup>th</sup> March double yellow lines



28<sup>th</sup> (double yellow lines, pavement and corners)

## **ANNEX 3 – PARKING SURVEYS**

### **Annex 3 Residents' Parking Surveys**

Local residents have undertaken their own surveys to demonstrate the typical lack of parking available in the surrounding roads. This Annex provides photographic evidence for the figures in Paragraph 1.4.3 of our statement. The following describes the methodology we have used.

- We have identified the roads (and sections of roads) which fall within 150m of any proposed entrance of the site. We do not have precise measuring tools, so this is our best estimate from local maps. Figure 1 (page 3) shows a map of the area covered. This also shows areas unsuitable for parking, such as driveways, dropped kerbs, and other restricted areas.

- As a result we have surveyed the following roads:

Westbury Park  
Clay Pit Road  
Belvedere Road  
The Glen  
Royal Albert Road  
Queen Victoria Road  
Etloe Road  
Bayswater Avenue  
Saint Helena Road  
Ladysmith Road  
Florence Park

NB – the area of Redland Road which falls within the 150m range is covered by a Residents Parking Zone, so has been excluded from our survey, as no day-time parking spaces are available for non-residents of Redland Road.

- As well as counting spaces, we have counted cars parked obstructively, ie on a corner, dropped kerb, double yellow line or other restriction or pavement, which normally indicate there were no spaces when that car arrived. Please note that the BCC standards for Parking Surveys do not count spaces within the first 10m of a road junction as available. The photographs show frequent occurrences of this – however, these have not been highlighted or counted as obstructive (unless blocking a dropped kerb or the corner) as this is simply normal in these roads. Excluding these would reduce the number of available spaces still further.
- JPEGs of photos (confirming date/time taken) are available if required by BCC.

#### **Survey 1: 2 x 1-hour surveys of entire area**

A resident walked round the entire area at the following times:

- 24<sup>th</sup> March 2022 between 8:10 and 9:10
- 28<sup>th</sup> March 2022 between 7:30 and 8:30

Photographs were taken of all roads, aiming to show all cars parked and any spaces which were available for parking. The photos also show areas unsuitable for parking (such as drive-ways and dropped kerbs) – these are also identified on the map in Figure 1.

The following table shows the spaces available.

Date	Time	Road	Spaces Available
24 <sup>th</sup> March	8:24	Royal Albert Road	1
24 <sup>th</sup> March	8:37	Saint Helena Road	1
24 <sup>th</sup> March	8:40	Florence Park	2
24 <sup>th</sup> March	8:43	Etloe Road	2
28 <sup>th</sup> March	7:41	Saint Helena Road	2
28 <sup>th</sup> March	7:44	Florence Park	2
28 <sup>th</sup> March	7:54	Royal Albert Road	1

The photographs for both days are provided in Attachment 1. They have been annotated to identify the valid spaces, as well as highlighting clear cases of obstructive parking.

**Survey 2: 7 days of surveys for each road in the area**

In order to demonstrate the continuous typical parking density for all roads in the area, we have also undertaken further surveys of each individual road, as follows:

- Over the course of a week, a resident has assessed parking availability in the road at a point in each day when they have time to do so. Although this has had to fit with each resident’s availability, broadly, we have tried to ensure that each set of readings includes:
  - Some different times of day
  - Some repeated times of day
  - Some approximately common times of day across all roads
to ensure that the readings are as fair as possible a reflection of the situation throughout a day and week.
- The resident has also taken photographs of the street at that time, to show the density of parking and any spaces that were identified. This was limited to 2 or 3 photos per road – it was simply not practical for everyone to take photos of every car parked along every road – but we believe these fully demonstrate the density of parking.
- We have only counted parking spaces in which a car could reasonably park. Some of the gaps in the photos are not included as spaces, as they are across a driveway (which are shown in Figure 1), or are too small to be parked in.
- The surveys were undertaken over a week in the second half of March, although the actual week was determined for each road based on the resident’s availability. There are a very small number of days which were omitted due to no-one being available on those days.
- Finally, we recognise that this is not a full statistical survey, but hope it is understood that we have done the best we can with very limited resources. What we have tried to achieve is simply a demonstration of the general density of parking throughout the week, showing that there is no spare capacity to absorb another 50 or so cars looking for spaces in which to park.
- The photographs for each road are provided in Attachment 2. Clear cases of obstructive parking are highlighted.
- A table providing all results is shown in Figure 2 (page 4).

Figure 1 – Map of Area Surveyed (150m range of proposed St Christophers entrances)



**Figure 2 – Details of dates, times and counts on each road in Survey 2**

Road	Survey w/c	Monday			Tuesday			Wednesday			Thursday			Friday			Saturday			Sunday		
		Time	Spaces	Obstructive Parking	Time	Spaces	Obstructive Parking	Time	Spaces	Obstructive Parking	Time	Spaces	Obstructive Parking	Time	Spaces	Obstructive Parking	Time	Spaces	Obstructive Parking	Time	Spaces	Obstructive Parking
Bayswater Avenue	14th March	14 Mar 08:45	0		15 Mar 12:00	1		16 Mar 08:15	2		17 Mar 13:00	1		18 Mar 09:50	1		19 Mar 12:00	6		20 Mar 11:00	7	
St Helena Road	21st March	21 Mar 18:00	1	1	22 Mar 18:30	1	1	23 Mar 19:15	1	1	24 Mar 09:30	0		25 Mar 09:45	0	1	26 Mar 10:30	0	1	27 Mar 18:45	1	
Ladysmith Road	21st March	21 Mar 18:00	0		22 Mar 18:30	0		23 Mar 19:15	1		24 Mar 09:30	0		25 Mar 09:45	0		26 Mar 10:30	0		27 Mar 18:45	0	
Florence Park	21st March	21 Mar 18:00	1		22 Mar 18:30	0		23 Mar 19:15	0		24 Mar 09:30	0		25 Mar 09:45	0		26 Mar 10:30	0		27 Mar 18:45	0	
Etloe Road	11th March	14 Mar 16:00	1	9	15 Mar 14:50	0	3	16 Mar 09:00	0	6	17 Mar 09:00	0	4	11 Mar 16:00	0	4	12 Mar 15:00			13 Mar 08:45	2	2
Queen Victoria Road	14th March	14 Mar 16:00	1					16 Mar 09:00	4		17 Mar 09:00	0										
Royal Albert Road	14th March	14 Mar 10:30	1		15 Mar 09:55	2		16 Mar 09:45	2		17 Mar 09:15	2		18 Mar 16:35	0		19 Mar 16:55	6	1	20 Mar 17:00	7	
Westbury Park	14th March	14 Mar 08:10	0		15 Mar 09:50	1	1	16 Mar 11:50	0	1	17 Mar 09:50	0		18 Mar 14:20	0	1	19 Mar 15:30	3		20 Mar 10:05	0	1
Clay Pit Road	17th March	21 Mar 11:50	0	1	22 Mar 08:55	0	1	23 Mar 15:50	0	1	17 Mar 12:25	0	1	18 Mar 10:30	0	1	19 Mar 16:30	1	1	20 Mar 09:25	1	1
Belvedere Road	17th March	21 Mar 11:50	0	1	22 Mar 08:15	1		23 Mar 15:50	1	1	17 Mar 12:20	0		18 Mar 10:30	1	1	19 Mar 16:25	10		20 Mar 09:20	3	
The Glen	17th March	21 Mar 11:55	0		22 Mar 08:15	0		23 Mar 16:00	3		17 Mar 12:20	0		18 Mar 08:45	1		19 Mar 16:25	7		20 Mar 09:20	4	

“Obstructive parking” refers to cars parked on dropped kerbs, double yellow lines, pavements, corners etc. It does not include other cars parked within 10m of a junction.

**Key to following photos:**

 **Dropped kerb (or disabled bay)**



**Obstructive parking**



**Valid space**



**Attachment 1a – 24<sup>th</sup> March 2022**

**Westbury Park Royal Albert Road towards North View**



**Westbury Park Royal Albert Road towards Clay Pit Road**





**Clay Pit Road**



**Belvedere Road (Westbury Park end)**





**Belvedere Road (The Glen end)**





The Glen







Bayswater Avenue – from Westbury Park School towards Etloe Road









Royal Albert Road – from Etloe Road to Westbury Park



Royal Albert Road – from Westbury Park to Etloe Road



St Helena Road – from Bayswater Avenue towards Florence Park





**Ladysmith Road – from St Helena Road towards Devonshire Road**



**Florence Park – from St Helena Road towards Coldharbour Road**







Etloe Road – From St Helena Road towards North View





Queen Victoria Road – East from Etloe Road



Queen Victoria Road – West from Etloe Road



Attachment 1b – 28<sup>th</sup> March 2022

Westbury Park – Walking from No. 12 towards junction with Belvedere Road









Clay Pit Road



Belvedere Road (Westbury Park End)





The Glen (walking from St Christophers towards Blenheim Road)









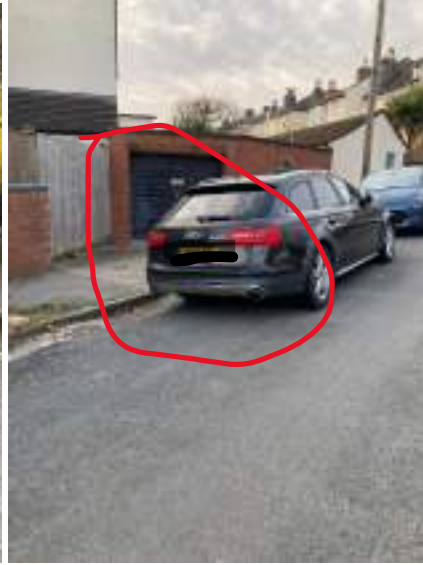
Belvedere Road (The Glen end)



St Helena Road – walking down from Bayswater Avenue junction







Ladysmith Road







Florence Park





Royal Albert Road (walking from Etloe Road to Westbury Park)









Queen Victoria Road - East



Queen Victoria Road - West



Bayswater Avenue (walking from Coldharbour Road towards Etloe Road)













Etloe Road (walking from Bayswater Avenue towards North View)







**Annex 3 Attachment 2 – Photos of Weekly Surveys**

**Westbury Park**

Monday 14<sup>th</sup> March 2022 – 8:10







Tuesday 15<sup>th</sup> March 2022 – 9:50







Wednesday 16<sup>th</sup> March 2022 – 11:50





Thursday 17<sup>th</sup> March 2022 – 9:50





Friday 18<sup>th</sup> March 2022 – 14:20





Saturday 19<sup>th</sup> March 2022 – 15:30





Sunday 20<sup>th</sup> March 2022 – 10:05





Notes on Residents' Parking Survey – covering 150m from the proposed new entrance on Etloe Road  
(going East – West is covered by separate survey) – March 2022

This survey was carried out by residents of Bayswater Avenue and St Helena Road. Each day photographs were taken and a count was made of the number of legal, parkable spaces available.

These roads are often full, yet the demand for spaces does not stop there. So, in addition to counting spaces each day, additional photographs were taken of cars parked illegally or without consideration, demonstrating “stress-parking”, on the basis that these cars would not have parked so badly had they been able to find a space. (Stress-parking = double yellows, school zigzags, overlapping junctions, blocking access, excessive pavement parking etc)

**Note - Bayswater Ave**

The residents felt that a special case needs to be made for surveying Bayswater Avenue. This survey answers the ‘exam question’ with results as required for the 150m from the proposed new traffic entrance (next to the Daisy Chain Nursery) to number 8 Bayswater Ave. But we also added an extra survey from number 8 Bayswater covering the approx. 70m to Coldharbour Rd.

This was done because in our view Bayswater needs to be looked at in totality. This stretch of road has two children’s nurseries, the church, church hall and of course a large primary school. The road is also long, straight, and relatively wide and is often used as a ‘fast cut-through’ by motorists at all times of day. Not only is parking an issue in Bayswater, but speed too and concern for safety both residents and also school users etc. Speeds well in excess of the 20mph are witnessed often.

We have not just surveyed at 9am and 3:30pm at the start and end of each school day largely because that is obviously when the road is at its absolute worst. Two 20-25 min periods each weekday seeing significant numbers of parents and children walking down the road, as well as the pavements; all car parking taken and significant (short term) selfish parking across many driveways, and off road parking spaces; as well as multiple offences from parents of parking on the yellow school zigzags. Every day of the week, twice a day.

The photos included show the following views:

**Bayswater Ave**

For each date...

- Photograph 1 – from no 8 Bayswater to Coldharbour Rd (outside the 150m)

Within 150m

- Photograph 2 – from no 8 Bayswater looking down the 150m to Daisychain nursery
- Photograph 3 – from the proposed new entrance looking back towards (2)
- Photograph 4 – from same spot as (3) looking from the entrance toward Etloe Road

**St Helena Rd and Ladysmith Rd**

For each date...

- Photograph 5 – from the junction with Bayswater Ave looking down St Helena
- Photograph 6 – looking up St Helena Rd from the junction with Ladysmith Rd
- Photograph 7 – same place as (6) looking down St Helena Rd cul-de-sac
- Photograph 8 – same place as (6) looking down LadySmith Rd

## **Florence Park**

For each date...

- Photograph 9 – From house number 32 on Florence Park (150m limit) towards St Helena

The remainder of photos in this section cover the following roads:

**Etloe Road**

**Queen Victoria Road**

**Royal Albert Road**

**Bayswater Avenue**

Monday 14th March 8:45am

1



2



3



4



Tuesday 15<sup>th</sup> March - 12pm



Weds 16<sup>th</sup> March - 8:15am



Thurs 17<sup>th</sup> March - 1pm





Friday 18<sup>th</sup> March - 9:50am



Saturday 19<sup>th</sup> March - 12pm



Sunday 20<sup>th</sup> March - 11am



**St Helena Rd and Ladysmith Rd**

Monday 21<sup>st</sup> March - 6pm

5



6



7



8



Tuesday 22<sup>nd</sup> March - 6:30pm

Photograph 6 missing/lost for this date



Wednesday 23<sup>rd</sup> March - 7:15pm



Thursday 24<sup>th</sup> March - 9:30am



Friday 25<sup>th</sup> March - 9:45am





Saturday 26<sup>th</sup> March - 10:30am



Sunday 27<sup>th</sup> March - 6:45pm



**Florence Park – towards St Helena Road**

Monday 21<sup>st</sup> March - 6pm



Tuesday 22<sup>nd</sup> March - 6:30pm



Wednesday 23<sup>rd</sup> March - 7:15pm



Thursday 24<sup>th</sup> March - 9:30am



Friday 25<sup>th</sup> March - 9:45am



Saturday 26<sup>th</sup> March - 10:30am



Sunday 27<sup>th</sup> March - 6:45pm



**Etloe Road**

Friday 11<sup>th</sup> March 2022 – 16:00



Sunday 13<sup>th</sup> March 2022 – 8:45



Monday 14<sup>th</sup> March – 16.00



Tuesday 15<sup>th</sup> March – 14:50





Wednesday 16<sup>th</sup> March – 9.00



Thursday 17<sup>th</sup> March – 9.00



**Queen Victoria Road**

Monday 14<sup>th</sup> March 16.00



Wednesday 16<sup>th</sup> March – 9.00



Thursday 17<sup>th</sup> March – 9.00



**Royal Albert Road**

Tuesday 15<sup>th</sup> March – 10:40



Wednesday 16<sup>th</sup> March – 11:26



Thursday 17<sup>th</sup> March – 8:52



Friday 18<sup>th</sup> March – 16:35



Saturday 19<sup>th</sup> March – 16:55



Sunday 20<sup>th</sup> March – 17:00

