


Key Issues from Planning Officer's Report


for Memorial Stadium Expansion application 06/03850/F


This document summarises the points in the “key issues” section of the planning officer’s report on the Memorial Stadium expansion planning application.

Each point is reduced to the briefest statement possible. It is then ranked in importance (one star being lowest and three stars being highest). This ranking is somewhat subjective, but issues that affect the most people or which have the strongest effects were ranked more highly. Sometimes comparison with other issues determined the score. For instance, flooding might seem important but 100 year flood events are surely less important than every day air quality.

The officer’s comments are then summarised, again as briefly as possible. They are also categorised as:

 Mitigation - where some voluntary measure is introduced to reduce an otherwise undesirable effect,

 Condition - similar to mitigation, but where the remedy is to be set down in the conditions granting planning permission,

 Excused - some issues are not remedied in any way and are simply factors which cannot be improved,

 Enhanced - in some cases the proposals improve the situation without need for remedies.

The categorisation is based on the planning officer’s intent and not on our interpretation or judgement. Mitigation and conditions do not necessarily completely remove the problem that they address but often merely lessen the effects.

We do not always agree with the planning officer’s conclusions and make notes preceded by “?” to show where we disagree most strongly.

	mitigation	condition	excuse	enhance
3 star	3	3	7	2
2 star	6	6	11	3
1 star	1	4	3	1
total	10	13	21	6

The above table shows the solutions to the various key issues and how they are handled. Twenty three issues are remedied in part by mitigation or conditions while twenty one are unresolved and simply excused. A further six items are claimed as enhancements as a result of the plans. The poor quality of amenity for the students in student flats is not excused or remedied and so does not appear in the above table. Also the two issues on waste and recycling were not problems nor enhancements are not included in the above totals. Some items included both excuses and enhancements in which case the issue was counted in both columns.

Key Issue (A) - Acceptable Land Use

The Stadium

★ ★ ★ **backland site with only on-street parking and limited public transport**

✗ excused: no alternative so use it anyway

Student Accommodation

★ ★ **residential accommodation not permitted on the protected site**

✗ excused: granted for enabling development

★ ★ **Bishopston ward 20% students already**

✓ Enhancement: will shift students from shared houses to purpose built block

? Students living in houses have already chosen not to use student blocks nearer the universities possibly because of restricted car use, why would they choose to use this block?

★ ★ **increase of student numbers in area will "unbalance" local population**

✗ excused: 77% of housing remains available for mainstream residential use

★ ★ **will raise percentage of households of non-family houses to 32%**

✗ excused: sustainable location with good transport links

The Hotel

★ ★ **hotel use not permitted on the protected site**

✗ excused: granted for enabling development

★ **site not ideal for tourism not being near attractions**

✗ excused: stadium and conference centre will generate business


Key Issue (A) - Acceptable Land Use

★ ★	will generate additional vehicular movements and impact car parking
✗	excused: will not coincide with match times
?	this remains an issue as hotel parking will put pressure on local on-street parking at non-match times
The Retail Unit	
★	PPS6 says retail units should be in existing retail areas (in this case Gloucester Rd)
✗	excused: shop used by visitors to the stadium not the general public
★	contrary to PPG6 and policy S9 maintaining existing centres
✗	excused: retail harm outweighed by delivery of stadium
The Office Accommodation	
★ ★	office space use not permitted on the protected site (issue omitted from planner's report)
✗	excused: granted for enabling development

Key Issue (B) - Transport and Movement

★ ★ ★	matches could generate 7030 car trips to the area but must be restricted to 4000
☔	mitigation: add supporter buses and park and ride buses and fare subsidies
?	Mitigation measures have never been demonstrated as effective, buses will be added reactively long after the demand is there (and the increase of car use has happened) and the most significant mitigation factor, car sharing, is not being encouraged or assisted by the travel plan.
★ ★ ★	<ul style="list-style-type: none"> • vehicle/pedestrian conflict • spectators compete with local residents and businesses to use the local streets to park cars. • areas affected by the parking problems fall generally within a one mile radius
☔	mitigation: residents parking zone would protect a limited number of streets representing less than a tenth of the currently affected area
☔	mitigation: cycle parking for 80 cycles will be provided
?	Although the zone prevents parking, it will not prevent match traffic passing through the restricted streets. Although the zone contains around 1000 parking spaces, only 300 would normally be available for stadium attendees which means the effect on the 4000 to 7000 cars arriving will be miniscule.
★ ★ ★	students in flats may park cars locally even when told not to
☔	mitigation: tenancy agreement risks eviction if found in violation, local residents to identify violations
☔	mitigation: bike storage provided for students
☔	mitigation: RPZ to be made permanent if student parking persists
★ ★ ★	car parking associated with office, hotel, conference centre, restaurant, retail unit
✗	excused: will not occur at the same time as matches
?	84 hotel rooms, 60 office workers, 40 full time stadium staff, 500 attendee conference/function centre, 180 parking spaces on site. There will be parking spillage into neighbouring streets.






Key Issue (B) - Transport and Movement

★ ★	Event traffic on the stadium site needs to be planned and managed
	condition: S106 will require a plan
★ ★ ★	difficulties with maintaining a safe and obstruction-free access to the ground along the three access
	condition: council to adopt access roads and impose TROs on them
★ ★	147 wheelchair spaces plus facilities for partially sighted and deaf people but only 8 disabled parking spaces on site
✗	excused: holders of a disabled parking badge will be eligible to park within the RPZ

Key Issue (C) - Resident's Amenity

★ ★ ★	it is considered that there will be an adverse impact to neighbouring local residents in terms of overshadowing and a loss of daylight
✗	excused: the applicant has improved the situation with amendments and it is considered that residual impact would be not be significant enough, given the overall scale and importance of the project, to outweigh the significant benefits of the proposal
?	Amendments have sought to reduce impacts but the report still describes the stadium as “designed on the margins of acceptability”. Modifications to the accommodation at the southern end would only be noticeable to someone who was well aquatinted with the plans and because of its relation to houses the impact is still significant.
★ ★ ★	overlooking and the perception of overlooking will result in an uncomfortable relationship between existing homes and planned development
☔	mitigation: angled windows will limit views directly outwards, therefore overlooking not reason a for refusal
?	At 45° the large student flat windows (1m wide 1.7m high) will still allow views directly out although will bias views to one side. At the corners of the building this will cause direct overlooking of properties to the side rather than in front of the student rooms.
★ ★ ★	increased activity on the site in the week and on match days will generate more noise disturbance
📄	condition: noise assessment to take place after construction
★ ★	noise from match day capacity increase from 12,000 to 18,500
✓	enhanced: enclosed stadium reduces cheering noise
★ ★	potential noise from student flats due to use on this scale is a reason for concern
✗	excused: no more noise than from students in houses
✓	enhanced: no student bar to be included

Key Issue (C) - Resident's Amenity

?	Increased numbers of students in a concentrated area raises the chances of some form of disturbance at any given time. Student windows open and sound of music or raised voices will carry.
★	noise from conference centre and restaurant
	condition: restricted hours of use
★★	noise from hotel, offices, and retail service vehicles
	condition: restricted hours for service vehicles
★	construction noise
	condition: use of best practice and restricted hours of work
★★★	flood light spillage
	enhanced: lights within the stadium will cause less spillage than current lights
★★★	public realm lighting
	condition: prevent lighting overspill into adjoining residential properties




Key Issue (D) - Visual Impact on Area

★ ★	inappropriate mix and intensity of development for a backland location with public uses and activities in close proximity to the private backs of adjoining residential development. It is recognised that this situation currently exists but would be exacerbated with the mix of uses proposed
☂	mitigation: provision of prominent entrance towers
★ ★	the visual impact study identifies that the resulting building will appear monolithic when viewed from Lockleaze, Muller Road and the residential streets to the immediate south
☂	mitigation: alteration to the roof form (to include prominent bow trusses)
★ ★ ★	The detrimental impact of the proposed building on the residential amenity, with overshadowing and overbearing impacts critical issues, particularly in relation to the residential streets to the south and to Trubshaw Gardens
☂	mitigation: reduction in the height of the southern stand of the stadium
★ ★ ★	The poor quality living environment for the residents of the proposed student accommodation. The site lacks outdoor amenity space to serve residential or commercial properties
?	This issue is not addressed by excuse, mitigation or conditions.
★ ★ ★	The main concern remains regarding the proposed mix and intensity of development within this backland location within the centre of a development block, creating a series of very 'public' building frontages onto the 'private' backs of adjoining residential premises. This will inevitably give rise to a problematic functional and visual relationship between the neighbouring and proposed developments, and has clearly posed the appointed Architects with a very difficult design challenge in overcoming the worst of the impacts upon residential amenity. It is recognised that this urban design concern can never be fully overcome because of the character of the site and the quantum and nature of enabling development required to finance the enhanced stadium facility
✗	excused: it is also recognised that the inclusion of this enabling development will give the outer face of the stadium a far more interesting and better articulated series of elevations when viewed as part of the townscape

Key Issue (D) - Visual Impact on Area

★ ★ ★	Overall it is acknowledged that a modern sporting stadium of the scale required will inevitably appear out of place in a predominantly two-storey residential environment
✘	excused: this is a dilemma that is in evidence in towns and cities all of the country
★ ★ ★	concerns about the overall scale
✓	enhancement: would enrich the local skyline
✘	excused: will only be visible from a limited number of vantage points
✓	enhancement : replaces the existing poor quality buildings
✘	excused: would not have a harmful impact on the appearance of the area
?	The report appears confused as to whether the structure would be an enhancement or a detriment to the skyline of the area. The conflict presumably comes from forced justification of a building that will never sit comfortably at this location.

Key Issue (E) - Landscape Quality Impact


★ ★	The proposed north stand would be within close proximity to two rows of mature and healthy Corsican Pines (pinus nigra spp) and a self-seeded Sycamore, growing within a verge of approximately 2.2 m in diameter, adjacent to the NW site boundary. The row closest to the proposed building is protected by a TPO
	condition: protect trees during construction
★	The boundary fences with adjoining properties have a very ad-hoc in appearance, and for the most part are made of open mesh fencing
	condition: build new uniform boundary wall with buffer of semi-mature trees
★ ★	area of unused and overgrown land to south of stadium
	condition: landscape and provide access to adjoining houses
?	Neither the Applicants nor the Council has raised this proposal with neighbouring residents during the planning application to confirm acceptability of these proposals with residents. This area of open land provides a valuable buffer from the stadium. Most residents have relatively low walls and fences along this boundary and to open this land up for communal use would further impede the private enjoyment of garden space as well as cause concerns over security.

Key Issue (F) - Safety and Security

★	on-site disturbances and fighting within the ground
☂	mitigation: CCTV, police control room in north stand and police cells in south stand, segregated away supporters seating
★	on-site non-match day security
✓	enhancement: more active site at non-match times will create greater sense of security
★★	anti-social behaviour in and around the Ground
☂	<ul style="list-style-type: none"> • awareness campaigns for fans via publications and PA announcements regarding neighbourliness and littering • more eating facilities within stadium will reduce litter • home and away fans enter on opposite sides of the building • increased use, surveillance and security on site will reduce disturbances • perimeter wall and landscaping • stadium monitoring group

Key Issue (G) - Sustainable Development

★ ★ ★	comprehensive sustainability appraisal as required by SPD5
☂	<ul style="list-style-type: none"> • the recycling of rain water from the site; • the pre-fabricated construction for the student rooms; • a 10% increase on insulation standards set out in Buildings Regulations
?	<p>BCC SUSTAINABLE CITY TEAM:- This submission includes some very welcome proposals, but many of these do not represent a firm commitment, and need to be fully worked out and agreed before permission is granted. In particular -</p> <ul style="list-style-type: none"> • renewable energy - this would need to be designed in now - if CHP is used it would be essential to build in the distribution infrastructure to the design at this stage • materials – windows and doors; • energy efficiency - the proposal to exceed the building regulations relating to energy by 10% is welcome, but evidence is needed on how this would be achieved. This would need a building design with carbon emissions 34% lower than a notional building built to 2002 standards, which is challenging. <p>The proposal to use electric heating makes this even more challenging, and an exceptional building design would be needed.</p> <p>In general, proposals relating to sustainable building are often made early in the process, only to be dropped through value engineering. It will be important, therefore, to ensure that clear commitments are secured through either conditions or obligations.</p>

Key Issue (H) - Obligations Package	
★ ★	Affordable housing: Student accommodation does not fall within Bristol's City Council's definition of affordable housing
✗	excused: the provision of the development without requiring a separate mainstream affordable housing contribution is justified on this basis. A condition is recommended that shall restrict the form occupation of the accommodation solely to students in full time education.
?	The report does not explain why the development is excused from the requirement for affordable housing, it merely says that the use as student housing will be enforced by condition.
★ ★	Recreation Contribution/Amenity space: The application is deficient in this respect
✗	excused: such a contribution would both impact the economics of the provision the stadium and the ability of parking problem in the area
?	This may exacerbate the generation of noise from rooms and bad behaviour on and around the site.
★	Public Art:- SPD04 requires inclusion of public art in a scheme of this scale
	condition: public artwork will be required
★ ★	Local Employment Issues: provide support for local labour and training initiatives aimed at construction and end use employment
✗	excuse: existing BCC "On Site" construction training and employment scheme can provide local builders
?	This item could be an enhancement or an excuse but since the stadium provides no special measure and this is required of all developments of this scale, the more neutral status of an excuse fit better than an actual enhancement.

Key Issue (I) - Environmental Issues

★ ★	site will be sensitive to ground contamination
📄	condition: ground investigation and pollution risk assessment plus certificate of remediation upon completion
★ ★	risk of flooding
📄	condition: surface water strategy to hold surface runoff in various sustainable drainage systems or to hold it in storage for pitch maintenance
★ ★ ★	reduction in air quality
✗	<ul style="list-style-type: none"> • air quality impact assessment produced • traffic mitigation to reduce increase in pollution
?	<p>The transport assessment and the Air Quality Impact assessment documents were insufficient replacements for a full EIA. They were of a low, unscientific, and unprofessional standard and did not follow conventional methodologies. They did not include baseline average daily traffic flows, no 5 or 10 year road demand forecasts, no junction capacity modeling, air quality was only considered at a national scale, and no traffic data were not obtained for Filton Avenue, where the traffic congestion is worst and persists for longest. The flaws are too numerous to cover in this context as they require a separate document.</p>

Key Issue (J) - Waste and Recycling	
★	how will rubbish be collected
	bins at various locations
?	This does not really seem to fall under mitigation, condition, excuse or enhancement as it seems entirely logical that the stadium will have refuse containers for visitors and residents.
★	will recycling be promoted
	<ul style="list-style-type: none"> • recycling bins will be provided for public use • residential waste will be separated into paper, cardboard, glass, metal and food for normal collection by BCC
?	Bottle banks are often cause of annoyance due to the noise they create.