

16<sup>th</sup> July 2018

**Cargo Work - former JS Fry Warehouse, Wapping Wharf – 18/02899/M** the Society's response to an application to approve reserved matter to construct office space in repurposed shipping containers within the Grade II listed gaol walls.

# Change of use and planning history

In 2006 the Council approved an overall masterplan for Wapping Wharf which included the redevelopment of sets out the redevelopment for the warehouse as offices. In 2015 Umberslade was granted permission for a two-storey office closely representing the existing heritage building as 15/01162/A. This was about 10m high at its roof ridges and had a similar eaves level to the prison wall at around 7.5m high, very like the old building. Umberslade have brought forward a revised scheme because they say that it is not possible to adapt or build a replica of the warehouse with adequate daylight to the ground floor in a deep-plan building.

## The proposal

The new proposal would provide office space in re-purposed shipping containers on the same footprint as the old warehouse framed by the Grade II listed gaol walls. A central atrium would to provide natural light with open-plan office space on either side across 5 levels. There would be one new opening in the outer wall to create a main entrance. The proposal would be like the successful Cargo 1 and 2 schemes. The storey height is 3m in the container modules which would not now perhaps be adequate in more expensive office developments. This permits five stories to be considered within 15m of building height with a bit more required for the atrium ridge.

## Demolition

The former warehouse and the later exterior wall between the prison wall and the back of the pavement are demolished.

## Key Planning issue 1 - Shipping containers

The Society assumes that Umberslade will satisfy the policy requirements that the containers are thermally efficient against cold and solar gain and other aspects of policy BCS15 – sustainable design and construction. A container development must have the same long-term life-span as the traditional build of the development of which Cargo will form part. Critical to the lifespan of a container development is physical maintenance; a factor that depends on the chance of future ownership. Within the medium-term Cargo would become

the only container development within the Wapping Wharf development. There is a strong argument that a large, permanent shipping-container development would harm and not enhance the Bristol City Docks Conservation Area and the setting of the five Grade II listed prison wall and the five Grade II buildings that face it across Wapping Road. The reason to develop a container development is architectural fashion; containers have no historical association with the Harbour.

## Key Planning issue 2 - Mass and height

The Society regrets the loss of the unlisted former warehouse. Following the demolition of the JS Fry warehouse the proposal increases the height of the new building to about double the height of the repaired prison wall and about twice the height of the eaves of the extant permission. The Council must consider whether the increase in lettable space outweighs the harm that the development would cause to the setting of the Grade II listed wall and the five Grade II listed properties across Wapping Road. The Society suggests that the point of reference for the height of the proposed building is not the permitted heights of the adjacent Blocks E and G but the listed prison wall and the listed Wapping Road properties.

There are other problems that would follow the height increase.

- i. Would the increased height adversely affect the daylight available to the affordable housing block G which abuts directly to the North? The shadow could particularly affect the courtyard amenity area but could also shadow some windows throughout the autumn, winter and spring.
- ii. Would the increased height adversely affect the outlook of the residents of block E, to the East? There is a footpath between the buildings, but it is in a 15m deep canyon.

## Materials

If the container proposal is permitted, the Society assumes that the permission would approve or condition the exterior paint colour.

## The public realm

The exposure, restoration and maintenance of the former prison wall will be a planning gain particularly if supported by a panel to explain the significance of the wall and the recently consolidated prison gate. Outside the walls a new public realm with a wider pavement, cycle path and landscape scheme are welcome. None of the plans showed the new road alignment created by the second Bathurst Basin Metrobus Bridge, the new pedestrian crossings or the configuration of the new cycle routes.

The Society is concerned about the site of the loading bay close to the main entrance. There will be conflict between motor traffic, cyclists and pedestrians which the loading bay would aggravate. Commonly observed driver behaviour suggests that unless protected by bollards, parked vehicles would frequently obstruct the pavement. Refuse bins waiting for refuse collection would add to the hazard. This is an area with a rapidly increasing residential/pedestrian population. On this busy corner, pedestrians will fear leaving the pavement.

The Society suggests that Umberslade creates a central delivery/collection area within the site. We also suggest a parcel collection point for Wapping Wharf phase 2 to consolidate parcel delivery and reduce the number of internet shopping delivery vans that would use the

loading bay. If the Council approves the loading bay there should be a condition against the use of long-term parking in the lay-by to prevent opportunistic use out of business hours.

The Society supports the creation of one new entrance in place of the 6 window openings permitted in the prison wall facing Cumberland Road. The new entrance must be designed to signify the entrance to a large building in a manner suitable to its situation. The Society does not support the current design. The screen would add another obstruction to the pavement without making a worthwhile architectural impact.

## Conclusion

The Society would prefer to see the office building constructed from materials consistent with the permanent form of the remainder of the development. Although the Society supports the development in principle the scheme is not yet in a form that should secure approval. The Society does not support a development with a larger mass and height than the current planning permission. Goods access from Wapping Road remains a significant unresolved problem.

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Section to show height relative to the Grade II listed Prison wall for the permitted scheme.