



an independent force for a better Bristol

18th August 2018

The Society's response to the revisions to the development proposals for 21 St Thomas Street Redcliffe.

1. Introduction

- 1.1 This response follows the earlier response dated the 2nd March 2018 to a planning enquiry to demolish the current buildings to develop a 20-floor building to include mixed student and residential accommodation. The apparent difference between the earlier and subsequent enquiries is that the height is reduced to a 13-floor building. The response is based on the information found on the 21stthomasstreet website. The Society maintains its earlier response.
 - 1.2 The Society supported the permitted scheme - 17/03034/F - for the demolition of the existing 5-storey office building on the site to construct a 9-storey building, stepping down to 7-storeys towards Mitchell Lane / Mitchell Court to provide a mixed-use development of commercial space and student accommodation with ancillary services. The Society does not support the current proposal. This is a physically constrained site, where a back of the pavement, tall building would create an uncomfortable scale of enclosure not conducive to the placemaking aim of local planning policy and would harm the Redcliffe Conservation Area.
2. **The site** - The site faces the permitted Redcliffe Quarter development to the west - 16/02349/F. To the north are Nos. 17/19 St. Thomas Street, obsolescent buildings that are negative features in the conservation area and which will probably be redeveloped soon. To the south on St Thomas Street / Three Queens Lane / Mitchell Lane stand buildings that are 5-storeys above ground (Travelodge and Thomas Court) running down to 4-storeys nearer to Victoria Street. The Society shared the concerns of the Council and the Bristol Urban Design Forum about the relationship of the permitted scheme - 17/03034/F, to those buildings. This proposal massively increases the problem of mass and height formerly discussed in relation to the permitted development. Without repeating the contents, the Society refers to its response to the permitted scheme.

3 **Background - planning policy** - To provide clarity for the determination of development proposals, paragraph 154 of the National Planning Policy Framework makes clear that new development should be plan-led with clear policies on what will or will not be permitted. The emerging planning guidance - Making Successful Places at Higher Densities (the Emerging Advice) - draws on current best practice to establish two complementary objectives, to optimise density to use land and good placemaking and design.

4 **The height and mass of the revised scheme**

4.1 The Society recognises the value of tall buildings built on suitable sites. One of the principal failings of the tall buildings from the earlier planning regime was a lack of understanding of the nature of the area around them and the impact they would have on the character of their setting. Tall buildings must interact with other buildings in the street. This proposed building would be a 'stand-alone' tall building that would not form part of the street structure. The developer must establish how this building would enhance the Redcliffe conservation area. What would be the cumulative impact of the building on St. Thomas Street? Would it inhibit the development of the sites neighbouring land to the north? How would this tall building improve the conservation area's character and overcome the striking constraint of the urban grain?

4.2 The Emerging Urban Living planning advice recognises that the principles of sustainability place a limit on densification. *"Hyper-density development, above 350 dwellings net per hectare, will be discouraged and would be subject to much more rigorous impact testing to ensure other policy aspirations are met."* The Society believes that the current proposal would exceed the proposed maximum before aggregating the population of Redcliffe Quarter.

4.3 The emerging advice proposes that there should be a design framework to consider the impact of a tower on the immediate area. This framework should provide a vision for the development on adjacent land, 17/19 St. Thomas Street, which presents another soon-to-be-realised redevelopment opportunity.

4.4 The central tower of Redcliffe Quarter cannot, in the absence of evidence, justify a further tall building to form a cluster. The proposed building must be considered on its merits, and its cumulative impact assessed. The proposed building must demonstrate a positive relationship with Redcliffe Quarter. The Society assumes that the Council will require modelling / visual aids to assess whether the Tower would have a positive relationship within the cluster and the cumulative impact on the surrounding area and longer views.

4.5 This is a physically constrained site, where a back of the pavement, tall building is likely to have a negative impact on the daylight and sunlight penetration of the public realm. The street width to building height ratio facing the mass and height of Redcliffe Quarter would create an uncomfortable scale of enclosure not conducive to the placemaking aim of local planning policy. The developer must provide evidence that the proposed building would not create a canyon effect with an unpleasant

microclimate of ground wind with restricted levels of daylight and sunlight for its numerous future population. Street level shading is not in the public interest. The local streets would not become more characterful, comfortable, convivial or animated. The current evidence appears to show that the proposed building would overdevelop a modest site, overbear its neighbours and create a negative feature in the conservation area. It would harm the area's regeneration.

5 Building design

- 5.1 The proposed building would rise from the back of narrow pavements. There would be no spill out space for active use in front of the entrance proportionate to the intensity of use.
- 5.2 Policy BCS18 requires residential development to provide sufficient space for everyday activities and enable flexibility and adaptability by meeting appropriate space standards. The proposed building would not deliver any communal space for its residents. There is little public open space nearby.
- 5.3 Access to the proposed building would be problematic. The proposed building has a prominently located and generously proportioned entrance to the student accommodation. The Society assumes that the managers of the student accommodation would require a second entrance for the non-student residents over whom they would have no management control. A single entrance for the non-student residents would serve multiple units, contrary to good planning practice.
- 5.4 Waste storage for this densely occupied building would occupy a significant length of street frontage creating inactive space.

6 Housing mix

- 6.1 Policy BCS18 requires that all new residential development should create mixed, balanced and inclusive communities. The proposed building's residential accommodation would not achieve that aim. The proposed building offers units suitable for 'key worker' occupiers. No evidence of 'key worker' market interest is produced. Other sites in the city, similarly marketed, have become student accommodation. An example is the large IQ Student accommodation in Marlborough Street. The developer must produce evidence that the proposed building would attract the broad demographic that the emerging advice states should be achieved by tall building developments.
- 6.2 Policy BCS17 requires developments of the proposed building's capacity to provide affordable housing. There is much well understood research that shows that housing units with minimum space standards in a tower are generally unpopular with residents of affordable housing. Generally, social landlords choose not to invest in tall buildings due to their associated additional management problems and maintenance costs.

7 **Conclusion**

- 7.1 A proposed building facing onto St. Thomas street would inhibit development of adjacent sites particularly Nos. 17/19. There are well understood reasons that regulate the proximity of tall buildings to each other. It is generally expected that tall buildings rise from a podium to enable the set-back of the main mass. This site is too constrained to permit a podium at street level.
- 7.2 A back of the pavement, tall building would create an uncomfortable scale of enclosure not conducive to the placemaking aim of local planning policy. The proposed building would harm and not enhance the Redcliffe Conservation Area.