



an independent force for a **better Bristol**

## **Response to Urban Living SPD (Publication Draft August 2018)**

### 1 Introduction

The Society supports the main purpose of the Urban Living SPD. We accept that development that uses land efficiently is needed to meet the need for housing growth, and we support the SPD's aim to ensure that, where such denser development occurs, it is done well. The document includes a wealth of guidance to this effect.

However, we do not think that the draft SPD has responded sufficiently to the weight of consultation responses on the earlier draft, and it should be more cautionary and more explicit about the acceptability of tall buildings. If too many tall buildings are built, it will make Bristol more like other cities (or areas of cities), and the special quality of Bristol might well be lost.

### 2 Acceptability of tall buildings

We think that the SPD should be more cautionary and more explicit about the acceptability of tall buildings.

#### 2.1 Commentary on alternative building forms

The SPD should give a balanced appraisal of alternative building forms, Specifically:

- the SPD should contain an explanation of how high density can be achieved through forms other than tall buildings.
- the SPD should state explicitly that for residential developments mid-rise buildings and terraced housing are the appropriate form of densification in most areas, particularly for families.
- the test for whether a new development responds positively to the local 'context' (page 26) should distinguish between the acceptability of 'amplified height' and the acceptability of tall buildings. The document should promote "amplified height" more.

The SPD should not be partisan in favour of tall buildings. A policy document should use measured terminology. Specifically:

- the SPD should not use the word "encourage" in respect of tall buildings. The following instances should be changed:

- "Development proposals for tall buildings will be encouraged are more likely to be supported where they can be integrated ... " (p50);

- Fig 8. Locational criteria (p51). “Development proposals for tall buildings will be encouraged are more likely to be supported in locations where:...” “

- the following section should be changed because some of it ascribes the benefits of denser development to the specific example of tall buildings as a form of denser development.

“A well-located, well-designed tall building can be a positive feature of a successful walkable, compact neighbourhood and can help the City accommodate its growth targets. Tall buildings can provide memorable landmarks which help people navigate their way around the city. They can be an effective counter-measure to urban sprawl, focussing growth on the more accessible parts of the City thus encouraging a healthy, pedestrian-oriented lifestyle and promoting better use of public transport. Some people like living in tall buildings referring to them affectionately as ‘bungalows in the sky’, with people paying a premium for an apartment with a good view.

A poorly located, poorly designed tall building can have a detrimental impact on the topography, historic townscape and skyline of a city like Bristol. Tall buildings can be poor neighbours, overshadowing surrounding development and open spaces, and putting a strain on local transport and social infrastructure. Critics cite the high costs involved in their initial build and subsequent maintenance and management, including their higher energy usage compared to mid-rise buildings. They are widely considered unsuitable to live in for many groups of people but particularly families with children. Some people complain of feeling isolated living in tall buildings, and afraid for their personal safety.” (p48)

It should be changed as follows:

As with other high-density building forms:

- A well-located, well-designed tall building can be a positive feature of a successful walkable, compact neighbourhood and can help the City accommodate its growth targets.
- tall buildings can be an effective counter-measure to urban sprawl, focussing growth on the more accessible parts of the City thus encouraging a healthy, pedestrian-oriented lifestyle and promoting better use of public transport.

Unlike other high-density building forms,

- tall buildings can provide memorable landmarks which help people navigate their way around the city.
- some people like living in tall buildings referring to them affectionately as ‘bungalows in the sky’, with people paying a premium for an apartment with a good view.

As with other high-density building forms:

- a poorly located, poorly designed tall building can have a detrimental impact on the, historic townscape of a city like Bristol.
- tall buildings can put a strain on local transport and social infrastructure.

Unlike other high-density building forms:

- a poorly located, poorly designed tall building can have a detrimental impact on the topography and skyline of a city like Bristol
- Tall buildings can be poor neighbours, overshadowing surrounding development and open spaces, and putting a strain on local transport and social infrastructure.
- Critics cite the high costs involved in their initial build and subsequent maintenance and management, including their higher energy usage compared to mid-rise buildings.
- They are widely considered unsuitable to live in for many groups of people but particularly families with children.

## 2.2 Policy tests for tall buildings

The policy tests for tall buildings need to be strengthened as follows:

- the Fig 8 list of locational criteria should be amended as follows. Some of these changes are because some items ascribe the benefits of denser development to the specific example of tall buildings as a form of denser development.

- “ where they are likely to have a positive impact on the socio-economic health of the wider neighbourhood, which cannot be achieved by other building forms
- ~~within reasonable walking distance of a range of local facilities and public transport (see Neighbourhood section~~
- where a tall building is needed to provide additional floorspace that other building forms cannot provide, for instance where it can help support patronage to planned new public transport infrastructure
- close to other tall residential or commercial clusters of tall buildings where it can be demonstrated that a new tall building serves to raise the quality and coherence of the cluster, without creating adverse impacts on the microclimate
- at locations where the provision of a landmark building would clearly improve the legibility of the city. “ (page 51)

- The section

“Q3.1 Is the tall building well located?

We recommend

- That proposals for tall buildings should come forward as part of a spatial strategy for the wider area ...
- In the absence of such a spatial strategy, the onus is on the applicant to demonstrate that the site is appropriate for a tall building. ...” (page 50)

should cross-refer to the requirement to provide a masterplan if a tall building is proposed (section 0.4, page 11).

- Instead of saying “The impact of tall buildings proposed in sensitive locations should be given particular consideration.” (page 50), the SPD should explicitly state that tall buildings are unlikely to be considered acceptable in or near conservation areas (since they are unlikely to preserve or enhance the character and appearance of the area), near listed buildings and their settings, scheduled monuments and registered historic parks and gardens,

- the section “Q3.2 Does the scheme make a positive contribution to the long-range, mid-range and immediate views to it?” and Appendix C need enhancing to explain how the information and guidance in Appendix C on visual impact assessments will be used to determine whether a tall building is acceptable.

### 3 Location of areas with potential for intensification

We support the guidance given on location of areas with potential for intensification (pages 14, 15, 22, 23). Fig 3: “Assessing the potential of Bristol’s character areas for intensification” is particularly useful. However, there should be a note to say that the locational boundaries are indicative. There may be exceptions to the advice close to the boundaries shown on the map.

We are unclear why the locational guidance for intensification is to be retained in the SPD, whereas the locational guidance for tall buildings is to be in the Local Plan.

#### Comments on the detail

Where in the document	Comment
Preface	
Venn diagram using the framework	The Venn diagram is a useful way of categorising the other relevant planning policies, but confusingly the rest of this SPD

Land, Context, Place, Liveability (page 7)	document does not use the Land, Context, Place, Liveability framework. The diagram subdivides 'Liveability' between 'environmental' and 'land', but surely Liveability is about 'social' too ?
"The SPD should also be read alongside the Council's other guidance aimed at securing quality developments" (page 7)	The diagram references many planning policy documents, but not the urban living evidence base 'Urban Living – Learning from recent higher density developments' that was part of the initial round of consultation.
Introduction	
Part 1: Guidance for all major developments	
0.4 A design-led approach to optimising density (page 11)	"We recommend that a Masterplan should be prepared at the outset for any significant scheme seeking to increase densities."  The Society believes that the Council should play a more proactive role in ensuring high quality masterplans or spatial frameworks.
Q1.6 Has access, car parking and servicing been efficiently and creatively integrated into the scheme? (page 12)	"On street parking has the potential to be both space efficient and can also help to create a vibrant street, where neighbours have more opportunity to see and meet other people."  We understand the point being made but the wording is unfortunate. On-street parking might be preferable to say rear parking courts, but a street with <u>no</u> cars parked on it supports street 'vibrancy' more than a street with cars parked on it, for instance by making it easier for children to play out in the street.
Q1.1 Has the scheme adopted an approach to urban intensification which is broadly consistent with its setting? (page 23).	"... the district/town centres and transport hubs (see Fig 2)"  But Fig 2 does not show the centres and hubs ?
Q1.1 Has the scheme adopted an approach to urban intensification which is broadly consistent with its setting? (page 23)	"To fully realise the potential of areas which do not currently have an adopted spatial plan in place, we recommend key stakeholders come together to prepare such a plan."  A spatial plan is essential, so this should be required rather than recommended. The Society believes that the Council should play a more proactive role in ensuring high quality masterplans or spatial frameworks. The current conflicting developer proposals for Bedminster Green illustrate the need for this critical requirement.
Fig 3: Assessing the potential of Bristol's character areas for intensification. (page 23)	This map needs labels to identify the areas across Bristol, and to define clearly the yellow-lined central area. The colour shades are too similar to distinguish easily.
Part 2: Guidance for major residential developments	
Q2.2 Does the scheme make building entrances and shared internal spaces welcoming, attractive and east to use? (page 38)	"providing entrances that serve as small a number of units as possible to help foster a sense of community and familiarity with neighbours"  This could be expanded in the specific context of tall buildings, as follows.  "In a tall building, lifts should ideally not serve the entire height of a building, but pause on a common floor area, whose sub-lifts then should

	serve no more than 6 floors. This will help people who live close to each other to meet each other and get to know each other.”
Q2.10 Does the scheme maximise opportunities for natural illumination of internal spaces; avoiding single aspect homes? (page 46)	Should Bristol adopt the London standard of a minimum ceiling height of 2.5m for at least 75% of the gross internal area ?
Part 3: Guidance for tall buildings	
Definition of tall buildings	<p>There are three definitions of tall buildings in the SPD, which is confusing:</p> <p>" Tall Building - schemes which are 30m or higher, (or 10+ storeys)" (pages 17/18)</p> <p>“Contextual Tall building: Buildings that are significantly taller than the prevailing height - more than 1.5 x prevailing height in areas of uniform height - more than 2 x prevailing height in areas of varied height (page 27)</p> <p>0.4 A design-led approach to optimising density: Masterplan required for schemes .... proposing one or more tall buildings (defined as 30m high and over). (page 11) "Part 3 of the SPD provides advice for applicants of tall buildings defined as 30m or higher." (page 48)</p> <p>There should be a single prominent definition near the start of the document. The definition should be used consistently throughout the document.</p>
Appendix C: Guidance for undertaking visual impact assessments (page 65)	<p>“There has been a tendency to date for applicants to use the visual impact assessment to demonstrate that the building cannot be seen from the key vantage points. We would like the emphasis to change, with tall buildings being positively located where they can reinforce the spatial hierarchy of the local and wider context and aid legibility and way-finding. However, this places greater importance on the building being able to demonstrate design excellence.”</p> <p>This guidance would fit better under “Q3.2 Does the scheme make a positive contribution to the long-range, mid-range and immediate views to it?” on page 51</p>
Throughout	There are many images without captions. Are these meant to illustrate the advice ? If so, they need captions.

### Typos

Where in the document	Comment
Page 2 Foreword	“Retuning”.
Page 3 and others	All yellow pages need page numbers for clarity in print.
Page 6	“will be a material considerations”
Page 7 - Venn diagram	DM2-17 is missing a label
Section 0.6/0.7, pp 14,15	section numbering typos

Page 28	Add apostrophe in "the schemes occupants"
Page 33 and page 47	There are two Fig 7s
Page 38	Q2.2 should be Q2.1 "Q2.2 Does the scheme ... attractive and east to use?"
Page 39	" <input type="checkbox"/> Providing a broad a range of amenities possible"
Page 40	Q2.5 and Q2.6 should be Q2.3 and 2.4
Page 42	Q2.7 should be Q2.5
Page 44	Q2.8 and 2.9 should be Q2.6 and 2.7
Page 46	Q2.10 should be Q2.8
Page 52	Q3,2 should be Q3.3
Page 64/65	"Fig 13: Viewing shed prepared in Google Earth Pro" is presumably the illustration on page 64 ? Illustration on page 65 with this same caption is a grey box.
Page 65	"Fig X identifies prominent landmarks ...". Should that be Fig 14, in what is now a grey box ?
Page 70	"Applicants are encouraged to respond positively to the design considerations set out in Chapter 2." There is no Chapter 2 ?
Pages 70 to 73	Appendices E,F,G are wrongly labelled F,G,F