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The Society's response to the Bedminster Green Framework Document Consultation prepared by the Nash Partnership

1 Summary

The Society thanks the Nash Partnership for an invitation to a presentation of the Bedminster Green Framework (the Framework) to stakeholders. The Society strongly supports the principle of redevelopment of this underused land.

We support all the planning principles that the Framework describes. There is nothing with which anyone could disagree. However, we were disappointed at the lack of specific guidance for this 6-Hectare town centre development project. This is a once in a generation town centre development opportunity. Development on this scale has not occurred since the developments of the 1960/70s that compulsory purchase enabled.

The proposed concentration of tall and mid-rise buildings conflicts with planning policy in several important respects.

2 Planning and development background

Three of the developers' unintegrated proposals are at an advanced stage. These developers have spent considerable time and money to bring their proposals to a full planning application. The preparation of the Framework began towards the end of the preparation of the Council's Urban Living SPD (Urban Living). We hoped to see that the Framework would follow on from Urban Living and drill down to the detail necessary to produce proposals that would integrate the five development plots into a new urban quarter.

3 The Framework applied to the overall 6-hectare development zone could be improved in the following ways:

3.1 An overview of the state of the development.

The Framework is a high level, aspirational document which does not consider how the proposals already put forward on three of the five plots implement the Framework's vision for this massive 6-hectare development zone and integrate with the East Bedminster town centre. The three proposals are at a critical planning stage where the developers and Council planners would benefit from an external oversight of the additional matters to which this response draws attention. Furthermore, there is a possibility that the Little Paradise Street car park and land around Whitehouse Lane/Street will also be proposed for redevelopment.

3.2 The need for a development consortium

The Framework should promote the establishment of a development consortium. The aggregate sites are too large and important to be developer led. It is not intended as a criticism, it is inevitable, each developer wishes to realise the maximum development value. The public interest requires an overall framework to enable an overview of the integration of the development within the East Bedminster town centre. There must be co-operation between the developers and the Council to deliver the necessary infrastructure which should include Bristol's first district heating and power system. There must be a public/private partnership. The aggregate development has aspects in common with the Kings Cross redevelopment; it will transform East Bedminster.

3.3 Building heights

There has been intense local public concern about the height and massing of the development which involves the local councillors. The Framework shows an arrangement of building heights (page 79) but does not justify what is proposed. The Society understands that the developers say that the prices that they could achieve require tall buildings. There are conflicting facts. For instance, it is well known that building above 14-floors increases the cost per square metre over the whole building. Post the Hackitt Report, Building Regulation reforms will increase the cost per square metre of High-Risk Residential Buildings (HRRB).

The Society is unclear how the viability assessment applies to the various accommodation mixes. The current indication is that only the flats in Plot 2 will be for sale. Most space in Plot 1 will be student accommodation, with the residential element either affordable rent or shared ownership. The Plot 4 development will be retained for market or affordable rent.



Urban Living (page 31) – example of large-scale high-density development of amplified height with a tall building



Image of Bedminster Green development illustrated in Firmstone’s planning application documents for Plot 2. This illustration omits Plot 1, 3 or the full extent of plot five resulting in closed roads and reduced green area.

The left-hand image illustrates Urban Living planning guidance. The right-hand image illustrates massing and heights across 4 of the 5 Bedminster plots which corresponds approximately to the Framework document diagram of building heights (page 79). We used the Firmstone image because the Framework document lacks such an image.

These are some of the aspects of Firmstone’s (and therefore the Framework’s) illustrated scheme that conflict with planning policy:

- The scheme consists of a mass of tall blocks. There are no terraces or houses or maisonettes, perimeter blocks, or shallow plan blocks to allow dual aspect units and internal courtyard space.
- The cumulative impact of this mass of tall buildings would have a detrimental effect on the modest-height townscape to the west including East Street, and east of Dalby Avenue, to which there is no transition in scale.
- A mass of high-rise blocks would be out of proportion to the adjacent private and public street and green space. It would be unwelcoming to its residents, it would not provide people-friendly streets and spaces or create a vibrant and equitable neighbourhood. Tall buildings would overbear the only public amenity space, Bedminster Green and be poor neighbours.
- The only private amenity space would be balconies.
- There is a probability that this intense high-rise scheme would deliver an uncomfortable micro-climate for its occupants, neighbours and passers-by.

Urban Living refers to a *“A fine balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new housing, while still creating successful places where people can live healthy lives.”* The priority of the illustrated scheme is to maximise the land use. This intense scheme could not *“Deliver good quality accommodation and an attractive surrounding public realm”* that planning policy requires.

Urban Living quotes Nye Bevan who said: *‘We shall be judged for a year or two by the number of houses we build. We shall be judged in ten years’ time by the type of houses we build.’* The illustration in the Urban Living shows what should be built. Future generations would regret the shortcomings of a development that followed the Firmstone illustration. It would be regarded as a lost opportunity, a repetition of past planning mistakes.

3.4 Communal space within the development.

The five developments will house large numbers of people. The Framework discusses access to local community services, but not communal space other than Bedminster Green. Is this enough space for the projected size of the community? Should each development contribute to communal space? This should be a matter for a development consortium. The Framework should masterplan this aspect in some way and not leave it to each developer. The developers of plots 1, 2 and 4 rely on balconies to provide private amenity space. The sites offer ornamental planting around the buildings. These spaces are too small to be usable public amenity spaces.

3.5 The accommodation mix

- 3.5.1 The Society is very concerned about the preponderance of 1/2 bedroom flats. The Framework looks at the development area in its wider context to justify the provision of a 1/2-bedroom development. However, the development area is a large area in total and it should have a broader variety of accommodation types within it. If it does not it will almost certainly fail to be integrated into the social fabric of the Bedminster as a whole. That would be a poor outcome both for Bedminster and the residents of the new development.
- 3.5.2 The Society agrees that Bedminster Green is well suited to smaller households but considers a more varied and vibrant community would be achieved with the inclusion of a proportion of larger family units in the mix. Flatted development would diversify the neighbourhood housing stock and introduce a new city-living apartment offer. Plots 1, 2 and 4 will provide a range of housing, including private sale, private rented, with a disappointing number of affordable homes. Student accommodation will disperse some of the concentration that has occurred elsewhere in the city.
- 3.5.3 Urban Living advises that, *“Higher density residential developments need to incorporate a variety of accommodation to meet the needs of families, elderly, co-*

living and those with specific accessibility needs, as well as young professionals to help create stable communities where people want to live over the long term.”

- 3.5.4 The Framework’s analysis does not consider the outcome of the development of the five sites on the area’s future housing stock. If all three planning applications receive planning permission, Plot 1 will deliver 240 new homes, Plot 2, 143, and Plot 4, 329. Existing permissions nearby and under construction will deliver 54 flats in the St. Catherine’s House conversion and 271 flats in the Regent House and Consort House conversions in East Street. The total is 1,037 one and two-bedroom flats within a radius of 250 metres. There remain two major sites in the Bedminster Green development area that have yet to publish development plans. The Framework should consider the accommodation mix to ensure that the Bedminster Green development does not create a mono-culture of small flats. Is there a market for this concentration of small flats? So far, no developer has offered town houses, duplexes or maisonettes, which surely, in a development of this size, is a shortcoming and contrary to planning policy?
- 3.5.5 This development intensity always brings into question the quality of life offered to the occupants. The Society draws the Council’s attention to Plot 2 where there is a predominance of single aspect units and which are accessed from artificially lit corridor. We have yet to see the plans for Plot 1 and 4.

3.6 Services

- 3.6.1 There is not much space around the proposed buildings. There is not much space for deliveries to the buildings. There is a risk that delivery and waste collection vehicles obstruct pedestrian and cycle routes. It needs to be clear where the cycles can be stored and that the storage must be conveniently accessible. These points need to be tackled at the Framework level, and not left to uncoordinated planning applications for the individual development sites. It is inevitable, and not a criticism, that each developer will try to ensure space for communal service deliveries is not on their development site.
- 3.6.2 To build the new station and green the proposal would stop-up Whitehouse Lane which commonly gives access to the Windmill Hill residential area. Vehicles will be diverted onto Malago road or Bedminster parade through Hereford Street. See fig 46 [access parameters] page 73.

3.7 Transport

The Framework does not discuss the improvement of local bus services. which is vital to this massive development. Although a Transport Assessment report commissioned from Peter Brett Associates will be filed with each planning application, the Framework could offer a view of future desired bus routes/bus stops. It is probable that buses will be taken out of East Street when footfall increases following development. East Street will benefit from the Government’s Future High Street Fund.

The Framework should recommend that the developers collectively provide section 106 money to improve the East Street public realm.

3.8 Cycle routes

The Framework should refer to the need for the Council as developer and Highway Authority to consider the location of cycle routes through the development area. There will be an AAA-quality cycle route along Whitehouse Lane that links with the newly completed route on Whitehouse Road, but where does an AAA-quality route go further south? The existing Malago route is unsatisfactory. The Council says that it cannot fit bus and cycle priority lanes on Dalby Avenue and Malago Road. Pedestrians will probably have priority in East Street. West Street is too narrow to accommodate both bus priority and cycle priority. The regeneration of Bedminster train station must include secure cycle storage. A segregated cycle route up Whitehouse Lane will require space that will erode Bedminster Green.

4 **The Framework applied to Plot 1 - Malago Road - the A2 Dominion site** – planning application pending - student buildings – 573 bed spaces – 64 homes – built in a series blocks of up to 15 floors, typically 11-floors – 240 dph - per hectare.

4.1 The Society supports the proposed uses of this site. We welcome the design of the street frontage, soft landscape and the Malago stream feature. We infer that there was discussion between the Nash Partnership and this developer during the preparation of the Framework and the current scheme. At page 77 of the Framework there is an aspiration that height for this plot should be *“Between 6-9 floors; with opportunities for additional floors where set back from streets, for elements above to create a varied roof line.....”* The reality of the planning application is for tall buildings that are not set back significantly. Council officers will need to assess whether the abrupt step up from the lower buildings on the north side of Malago Road humanises the Malago Road or harms its potential setting, character and amenity. There will be an impact on St. John’s churchyard greenspace. The Society assumes that the Council will require a views analysis of the impact of the development on view of the Windmill Hill estate from the north and the views from the estate over the city.

5 **Plot 2 - St Catherine’s Place – the Firmstone Consortia** - 18/05310/F – application for 22-storey building. Extant permission 13/05616/P for a 16-storey building containing 143 homes – 247 dph.

5.1 These are some of the Framework’s aspirations,

“The urban environment is primarily experienced at street level and therefore taller elements should sit within a setting of well-defined street frontages. The perception for those using, enjoying and moving through the area should be of good quality, characterful and active street frontages with well-designed taller elements as secondary features in the street level experience.”

“Tall elements should match focal points, such as corners or an open space; or be set back discreetly as to not be overbearing.”

“Building elements should express a tripartite design, focusing on the base and street level, then the mid and top divisions.”

“High density residential can retain the street articulation of typical residential streets. Frequent front doors and the use of duplex units, with living on the ground floor and bedrooms above with a threshold space in front, create a varied street scene.”

- 5.2 The conversion and extension of Catherine House provides a good example of the reuse of a building. The reality in respect of St. Catherine’s Place is that there is an extant planning permission. The permitted buildings Block A and Block B rise from the back of a green edge to the street with little modelling of their elevations. Block A forms a continuous cliff of masonry. The only modelling is the set-back in the plan that incorporates a glazed break. There are large glazed units create a ground floor that could be used as offices or work units. When occupied these units could provide an internal view to animate the street but it is as likely that the occupants would install blinds. From street level Block A would be overbearing and would not achieve Urban Living’s placemaking ambition on Dalby Avenue (the Avenue).
- 5.3 Could the Framework influence the current planning application to improve the permitted design? For example, the Framework could suggest that Block A has a four-floor perimeter block on the Avenue with frequent front doors. The ground and first floor could be duplex units, with employment uses on the ground floor and bedrooms above with a threshold space in front. Domestically ordered elevations would enrich the experience from the Avenue. A perimeter block would create a podium to set-back the upper elements.
- 5.4 Post-Hackitt report, there will be substantial changes to the Building Regulations which may profoundly affect the viability of Higher Risk Residential Buildings (HRRB). It is foreseeable that all HRRB buildings must have a double core. The fire safety requirement will probably make HRRB point blocks uneconomic except in very high land value areas. The current planning application for 21 floors is for a single core development. Post-Grenfell, the single core could affect market interest.

6 Plot 3 - Dalby Avenue Car Park & Whitehouse Lane — Deeley Freed

The Society is not aware of the emerging proposal for this site. The Framework offers only high-level analysis. Specific development advice is necessary if the Avenue is to be humanised to create a city boulevard. Plot 3 faces Plots 2 and 4 where tall buildings are consented or planned. The image copied from the Firststone planning documentation shows tall buildings to the south of the Avenue. The Avenue is blighted by heavy traffic. Framed by tall buildings on both sides it is unlikely to *“Create an environment with a network of attractive spaces to provide for relaxation, meeting others and contact with nature.”*

Following road widening and the closure of Whitehouse Lane and the welcome re-opening of the Malago, it is difficult to assess the final size of the open space.

7 Plot 4 – Stafford Street & Little Paradise – Dandara – 329 homes in blocks of between 4 to 16-storeys 658 dph.

7.1 The relevant vision of the Framework is set out at 5.1 above. We infer that there was discussion between the Nash Partnership and this developer during the preparation of the Framework and the current scheme.

7.2 The reality is the developer has made a planning application. The question is whether the Framework could influence the current planning application to improve the permitted design? The Avenue elevation of 16-floors would create a forbidding cliff of masonry to frame the Avenue. The question for planning officers will be whether the tall building unacceptably extends the St. Catherine’s masonry cliff and/or provides enough height variation to create an interesting skyline.

7.3 The Urban Living aspiration is to create side streets that, *“To form an intelligible place, should be enclosed with spaces framed by buildings; creating a safe and legible environment.”* Little Paradise Street, Mill Street, Stafford Street and St. Catherine’s Place are 19th century minimum Bye-Law width streets which will be flanked by tall buildings. These streets were laid out for two or three-floor buildings. The street width to building height ratios will be a multiple of the original ratio. It is difficult to see how the development can achieve the Framework’s aspiration or the, *“Comfortable scale of enclosure that is appropriate to the existing character and function of the street”* that Urban Living calls for.

8 Plot 5 – Land adjacent to Dalby Avenue – Dandara and Bristol City Council -

There has been a proposal for an 18- storey building but the Society has not seen any evolved proposal. The Framework offers only high-level analysis. We refer to the Firmstone image of the completed development which bears little relation to the Framework diagrams.

9 The Little Paradise Street car park

The Society understands that the inclusion of the car park in the residential development area is under consideration. There are arguments in favour of developing a multi-storey car park to support a regenerating East Street retail district. However, there are policies to prevent the development of new multi-storey car parks in the centre of the city. The Framework should give advice about the future use of the land.

10 Bedminster Green

10.1 The aspiration is that, *“The Green is to be enhanced, brought into community life and better connected as part of an activity and green infrastructure network.”* The reality

is that the Green is a relatively small area – 75m x 75m, about >5,000m². We are not convinced that this area would be available if the green boundary is realigned with Stafford Street at the South West. In addition, these considerations subdivide or take space from the green portions between paths:

- The opening of the Malago culvert.
- The new building in front of the station.
- The widening of Dalby Avenue's existing two lanes and pavements.
- The increase in pedestrian desire lines from two to four figs 44 and fig 46
- The segregated cycle path to Whitehouse Lane may require a 6m corridor.

The effect of these transit demands severely would affect the quality of the green's amenity value for adults but particularly for children.

- 10.2 The aspiration is unlikely to be achieved with framing buildings, up to 10-floors to the north, east and west with opportunity to include a taller building in each range and with a mid-height building to the south. There are examples of parks framed by tall building for example, Hyde Park London and Central Park New York. These parks are much larger. Mature trees screen their boundaries. The Society suggests that the developers and the Council compare this proposal to Queen Square, with its very different ratio of building height to park size, which has been highly successful as a public space following the Council's regeneration. The green could offer few more advantages than a pocket park.

11 Conclusion

This is a massive piece of urbanisation. It is a once in a generation opportunity to deliver an imaginative new district quarter that would transform East Bedminster economically and socially. This opportunity will be lost if each development site is treated as a stand-alone development. The public interest requires a consortium to carry forward the work begun by the Nash Partnership to integrate the Bedminster Green development with the East Bedminster town centre. There should be a public/private partnership as there is with the Kings Cross redevelopment in London.