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10th January 2019

The Society's supplementary response to planning application - 18/05310/F – St Catherine's Place Shopping Centre East Street Bedminster

1 The proposal

Comprehensive redevelopment of the site to provide mixed use development comprising residential, new retail, leisure and commercial space including a cinema, refurbishment of existing retail facilities together with parking and amenity space, vehicular access, servicing arrangements, public realm, landscaping and associated works. The proposal would build about 270 new homes in five blocks between 4 and 22-floors tall.

2 Summary

The recent redevelopment of St. Catherine's House is a planning gain. The Society is aware of the planning history and the extant permission 13/05616/P for 16-floors on the Block A site. On the 12th November 2018 the Society filed a general response that related principally to the relationship of this development within the larger, Bedminster Green development area. This response responds to the current planning application. The Society welcomes the proposal to demolish and redevelop buildings that do not contribute to the vitality and appearance the area. The Society strongly supports redevelopment of the land around Dalby Avenue that is a once in a generation opportunity to deliver an imaginative new quarter to the Bedminster town centre. The Society regrets that it cannot support the current scheme.

3 Urban Living checklist

3.1 Question 3.1 Is the tall building well located?

Block A would dominate the immediate views into and out of the Bedminster Conservation Area. Block A would have a negative impact on the setting on the

Conservation Area and conflict with the aims and aspirations of the Conservation Area Appraisal. It would not rectify or enhance the negative elements that harm the character of Bedminster town centre.

The public realm at ground level will be overshadowed from the south by Block A which would obstruct the daylight available to the habitable rooms of existing homes during large parts of the day, particularly in winter.

3.2 Question 3.2 Does the scheme make a positive contribution to the long-range, mid-range and immediate views to it?

3,2,1 Block A must be read as part of a continuous elevation that includes (from the east) Block C, St. Catherine's House, Block A and the proposed scheme on Plot 4 between Stafford Street and Little Paradise (Dandara). Dandara proposes a 16-floor block facing Dalby Avenue. Block A and Dandara will be read as a continuous building mass from St. Catherine's Court to Stafford Street. There are no CGIs to enable assessment of the cumulative impact of these two tall buildings viewed from either direction along Dalby Avenue or from the south where a sheer elevation will face the regenerated 'Bedminster Green' which will be the only green space that serves a large new population.

3,2,2 Urban Living refers to commonly understood failings in the design of tall buildings. The design of Block A conflicts with these aspects of Urban Living planning advice.

- Block A rises from the ground as a solid cliff. From street level this building will not be perceived or experienced on a human scale.
- The cumulative impact of this massive cliff of masonry of Block A and Dandara would have a detrimental effect on the domestic and pedestrian scale of the townscape of Little Paradise to the west and East Street to the south which define the urban character of this part of Bedminster. Block A would dominate the townscape and shadow the neighbouring land. There is no stepping-down or transition in scale.
- The Society assumes that the Council will investigate the effect of the Block A and Dandara masonry cliff on the local microclimate. A sheer façade frequently creates a wind tunnel. Dalby Avenue is a busy pedestrian route and has a well-used bus stop.
- The Block A and Dandara cliffs would be unwelcoming to their residents; they would not provide a people-friendly place for passers-by in Dalby Avenue.
- The ground floor glazed commercial units of Block A would not ensure an active and interesting pedestrian experience in Dalby Avenue. They would not create a vibrant or welcoming street scene. Although, when occupied, these units could provide an internal view to animate the street, it is as likely that the occupants would install blinds.

- 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.”*

3.2.3 Stafford Street, Mill 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 Block A can create a, *“Comfortable scale of enclosure that is appropriate to the existing character and function of the street”* in Mill Street/St. Catherine’s Court. Leicester Street or Stafford Street.

3.2.4 To import a suggestion from Urban Living, Block A could, to mitigate its impact, have a perimeter block. The ground and first floor could be duplex units with front doors onto the street. There could be employment uses on the ground floor and bedrooms above with a threshold space in front. Duplex maisonettes could occupy a third and fourth floor. Domestically ordered elevations would enrich the experience from the Avenue. A perimeter block would create a podium to set-back the upper elements.

3.3 Question 3.3 Does the scheme demonstrate design excellence?

The permitted design attempted to modulate the mass of the Dalby Avenue facing elevation with a break-back and a vertical glazed column to separate the two masonry masses. The current design of Block A achieves less. There is no vertical modulation. The only relieving feature is the change from red brick to a contrasting colour in the eastern two bays. The monolithic elevations fail to achieve the standard required by BSC 21 – Quality Urban Design.

3.4 Question 3.4 Does the scheme ensure the safety of occupants?

The single core access - The 16-floor Block A received planning permission before the Grenfell Tower disaster. The Government undertook to accept the recommendation of the Hackitt Report (July 2018) and rewrite the Building Regulations as they apply to High-Risk Residential Buildings. Block A falls within the Hackitt definition of a HRRB. Although the unrevised Building Regulations continue to apply to HRRBs until the commencement of the new Building Regulations, the Report’s conclusions and recommendations that relate to the construction of HRRBs have become a material planning consideration. In Block A, not only are the internal access corridors the sole escape route for up to 13 flats per floor but the single core appears to have the only one ground-floor exterior exit. There is a car park beneath the tower that adds to the fire risk. Although there is no statutory requirement for the local planning authority to consult the fire and rescue authority, the Society is confident that the Planning Officer will take advice from the Fire Prevention Officer about the advisability of construction of a 22-floor single-core access building. There is also the aspect of antisocial behaviour which officially recognised research shows becomes more frequent with the number of flats that share a single core and entrance. A single stair does not allow for alternative routes out for tenants.

3.5 Question 3.7 Does the scheme create a pleasant, healthy environment for future occupants?

3.5.1 Living high is not a natural environment for people. For those with money it may be their chosen way, they can afford the higher cost of construction and maintenance charges. For those on lower incomes living high is often a trap, especially where maintenance and security is poor, and the development offers no private or public amenity space which makes life restricted and miserable. Officially recognised research shows that high density, low rise produces as much space as high rise – Clifton has the highest of any density in the city.

3,5,2 The Society draws the Council attention to matters that conflict with Urban Living planning advice:

- All the 208 flats share a common ground floor entrance.
- The proposed block of 22-floors would have a single access core.
- Up to floor 6 the ratio of single to double aspect flats is 8:5, up to the 11th floor it is 7:4 and above floor 12, 4:3.
- Each floor is served by a single, artificially lit corridor. On the lower floors the access corridor serves 13 flats. Urban Living advises that to encourage a greater feeling of community within the building, there should be no more than 6 flats sharing a corridor. This advice is based on officially recognised research.
- Only flats with balconies have private amenity space. The balconies are tiny and scarcely habitable. There is no space set aside inside the building for common use. The site has no exterior amenity space. Much of the ground level publicly accessible space would be denied sunlight by Block A which would cause it to be underused.
- **Services** - There is not much space around the proposed buildings and little space for deliveries to the residents. The development requires a central parcel delivery depot. 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. For a new population in 271 new dwellings, the assessment of the impact of the scheme on local social infrastructure and facilities is inadequate.

4 The accommodation mix

4.1 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.”*

4.2 The Society is concerned about the monoculture of tiny, 1/2-bedroom flats. Plot 1 will deliver 64 new homes, Plot 2, 231, 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 949 1/2-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 Society questions whether this number of small flats are marketable either as market sales or market rents.

- 4.3 It is a shortcoming for a development of this size, which includes the smaller developments in Blocks B to E, not to offer larger flats, town houses, duplexes or maisonettes. A more varied and vibrant community would be achieved with the inclusion of a proportion of larger family units in the mix like large development schemes that are built on the Continent.
- 4.4 There is no affordable housing. The Society is aware that there has been discussion between the Council and developer but is unaware of what was said. The inclusion of affordable housing is an essential qualification for maximising the site value. The Society supports the criticism made by the Windmill Hill City Farm that the viability report does not meet the RICS Valuation Global Standards 2017 and cannot be relied upon for valuation purposes.

5 Density

Density is a product of design, not a determinant of it. This type of development intensity always questions the quality of the residential offer. This is already a higher density figure for the average in this part of the city. A design-led approach faces serious challenges managing this kind of density. An outstanding omission is the consideration of what is an adequate provision of public/private open space for a development that will accommodate so many people.

6 Conclusion

From the point of view of urban design, the Society cannot support the current proposal. This intense scheme could not *“Deliver good quality accommodation and an attractive surrounding public realm”* that planning policy requires. The application fails to consider or provide information about the integration of this massive scheme with the other four development plots or its integration within the Bedminster town centre. It is critical for urban design to assess, from street-level, the impact of the scheme on the whole Bedminster Green development area in addition to the scheme’s integration into the adjoining streets of traditional buildings. Permission should be refused. The development is a poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.