



an independent force for a better Bristol

8th February 2019

Land At Little Paradise and Stafford Street Bedminster - 18/06722/F - The Bristol Civic Society's response to the planning application

- 1 **The proposal** - Demolition of the site to provide two buildings (4-17 storeys) comprising 329 market rental rent residential apartments including flexible gym, flexible activity space, concierge and residents lounge and landscaping and ancillary facilities.
- 2 **Summary** - On the assumption that the Council supports the change of use to residential, the Society:
 - Supports the principle of residential development on the site.
 - Supports the improvements to Little Paradise and Stafford Street.
 - Regrets that it cannot support the current scheme because of its concerns about the harm that the proposed height would cause to placemaking in Dalby Avenue and Bedminster Green and the impact of the development on the buildings to the north, among other matters.
- 3 **The site** - The site contains a collection of light industrial warehouses and associated car parking on 0.486 ha of land bounded by Malago Road to the south. To the east is Stafford Street. To the west, Little Paradise has supported housing for older persons, a car park and provides a pedestrian link to East Street. To the north of the site are the backs of the East Street retail units.
- 4 **Planning context** - The site is currently designated with a general industrial use. The Developer anticipates that the Local Plan Review will set out an emerging Bedminster Green Regeneration Framework to define a new context for this area. The anticipated change of policy led developers to form the Bedminster Green Group (the Group) who, with Council, have interests in the Bedminster Green development area (Bedminster Green). This response omits specific references to National and local planning policies with which all parties are familiar.
 - 4.1 The Group, led by the Council, have undertaken consultation on a placemaking Framework prepared by Nash Partnership (Framework) to help guide and co-ordinate development within the Bedminster Green. None of the current pre-application proposals, planning applications and permissions reflect the Framework's suggested building heights. The Society assumes that the Framework will not be policy, its planning status would be a material planning consideration.

- 4.2 Such has been the level of local concern about what is perceived to be an uncoordinated mass of high-rise blocks of small flats proposed by separate developers that the Windmill Hill and Malago Community Planning Group (WHaM), with the BS3 Planning Group developed their own Community Planning Brief. The Society sincerely hopes that this positive and committed expression of local interest and concern will also be a material consideration.
- 4.3 The Design and Access Statement (the Statement) records that stakeholder key concerns related to:
- The need for a diverse range of homes for families and people of all ages;
 - The height and massing of the proposed developments;
 - Car parking provision;
 - Social infrastructure provision such as school places and GP surgeries
 - Desire for collaboration with other developers as part of a Bedminster Green Framework.
- 4.4 There is no neighbourhood plan. The site backs on to the Bedminster Conservation Area.
- 5 **Change of use** - The Society assumes that the Council will permit the change of use. The proposals would create 329 apartments comprising 239 one bedroom and 90 two-bedroom apartments; a 72% and 28% split. Although the Society has said that the overall Bedminster Green development should have a broader variety of accommodation types to create a more mixed and sustainable community, on this site we support the proposal to build a private rented sector (PRS) development that will offer a new form of housing for residents close to the East Street town centre.
- 6 **Demolition** - None of the buildings on the site has architectural merit.
- 7 **Height and mass** - All three indicated blocks are tall buildings that engage part 3 of the Urban Living Supplementary Planning Document (Urban Living) checklist.
- 8 **Urban Living checklist**
- 8.1 **Question 3.1 Is the tall building well located?** - The Urban Living raises a presumption that buildings in areas such as Bedminster Green will have amplified height. A developer who wishes to build a tall building must provide justification to satisfy the requirement set out in Part 3 of Urban Living. #
- 8.2 The southern block would dominate the street view from Dalby Avenue and the local view from Bedminster Green to the north. It would obstruct the daylight and overbear the northern blocks including the small open space immediately to the north off Stafford Street. It would shadow the back of the buildings in East Street and the supported-living housing on the west side of Little Paradise which also contains the historic St. John's Churchyard. The building mass would oppress the surrounding, domestic scale streets all day and be particularly oppressive in winter.

- 8.3 **Question 3.2 Does the scheme make a positive contribution to the long-range, mid-range and immediate views to it?** - The south block must be read as part of a continuous building mass that includes (from the east) Block C of St. Catherine's Place, St. Catherine's House, Block A of St. Catherine's Place and the proposed south block of this scheme. There are no CGIs to enable assessment of the cumulative impact on local views of these two tall buildings when viewed from the south. The sheer elevation will face 'Bedminster Green', the only green space that serves a large new population.
- 8.4 Urban Living refers to commonly understood failings in the design of tall buildings.
- The south block 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 the south block and Block A of St. Catherine's Place would have a detrimental effect on the domestic and pedestrian scale of the townscape of Little Paradise, Leicester Street and Stafford Street which define the urban character of this part of Bedminster. The south block and Block A of St. Catherine's Place would overbear Stafford Street, dominate the townscape and shadow the neighbouring land.
 - There is no stepping-down or transition in scale towards the buildings to the west or to the north.
 - The Society assumes that the Council will investigate the effect of the south block and Block A of St. Catherine's Place 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 cliff of the south block and Block A of St. Catherine's Place would appear closed in and unwelcoming to their residents and would not provide a people-friendly place for passers-by in Dalby Avenue.
- 8.5 Little Paradise, Stafford Street and Leicester Street 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 scheme can create a, *"Comfortable scale of enclosure that is appropriate to the existing character and function of the street"* in the local streets. The development should not inhibit the redevelopment of the Church Lane car park whose redevelopment is under consideration or of the proposed redevelopment of 1-2 Leicester Street.
- 8.6 In principle, the Society welcomes the permeability offered by the new east/west pedestrian route. However, New Stafford Street is unlikely to create any sense of 'place'. It would be bordered by a 10-storey block to the south and a nine-storey block to the north. It will probably be windy and shaded for much of the day.
- 9 **Question 3.3 Does the scheme demonstrate design excellence?** - The Society supports the quality of the design, but design cannot overcome the objection to the harm caused by the massing and height of the scheme on the surrounding townscape. The Society welcomes the use of durable materials. We do not support timber

cladding and have hesitate before supporting concrete cladding or render unless it has a high specification.

- 10 **Question 3.4 Does the scheme ensure the safety of occupants?** - The north block and above floor 09 of the south block appear to have single-core access. Post-Hackitt report, there will be new 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. Mid-height buildings do not present the same fire safety problems and enhanced construction costs that tall buildings present. 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 fire risk.
- 11 **Question 3.7 Does the scheme create a pleasant, healthy environment for future occupants?** The Society appreciates the benefits of higher density levels this proposal would have an ambitious density of 675 dwellings per hectare. The example shown in an illustrative masterplan at page 31 of Urban Living to demonstrate key design principles has a density of 250 dph. A design-led approach faces serious challenges managing this kind of density. Living high is not a natural environment for most 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.
- 12.1 **Question 3.9 Will the scheme be neighbourly?** - The accommodation mix is relevant to the question of the density of the development of Plot 4. The scheme must be seen in the context of the development of the other four plots. If Bedminster Green is to create a successful new urban area the development must produce social regeneration as well as economic regeneration. The planning documents fail to consider how the massive development of 329 new homes will integrate with the other Bedminster Green developments or with the existing east Bedminster town centre.
- 12.2 The Society puts this scheme into the perspective of the whole of the Bedminster Green development. All the development consents, applications and proposals have been for, 1/2-bedroom flats or student accommodation. Plot 1 will deliver 64 new homes, Plot 2, 231, Clarke Street (part of Plot 3) 280 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 1,229 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 assumes that they too will offer more 1/2-bedroom flats. This application makes no assessment of the contribution that it will make to the impact of this massive new population on the local social infrastructure and facilities.

- 13 The Society draws the Council attention to matters that conflict with Urban Living planning advice:
- The upper parts of the south block and the north block would have a single access core.
 - There are more single aspect flats than double aspect flats.
 - There are long access corridors. Based on officially recognised research, 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.
 - 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.
 - For a new population in 329 new dwellings, the assessment of the impact of the scheme on local social infrastructure and facilities is inadequate.

14.1 **The public realm** - The Society welcomes the proposals to enhance the private and public space around the scheme. However, New Stafford Street is unlikely to more than an access route. Due to shading and probably wind speed is unlikely to become an attractive area in which to socialise.

14.2 **Dalby Avenue** - In addition to the comments at 8 above, the Council must consider the aggregate impact of the proposed new structures on the opposite, south side of Dalby Avenue. The aspiration is that, "Bedminster Green 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 and this are could be reduced by the proposed widening of Dalby Avenue's existing two lanes and pavements and the Whitehouse Lane segregated cycle path.

14.3 The question for planning officers is whether the tall building of the north block of this proposal unacceptably extends the St. Catherine's Place masonry cliff. 16 floors of the north block beside 16 floors (possibly 21) of Block A of St. Catherine's Place would frame Bedminster Green to the north and be unlikely to realise the aspiration to create a public space that would provide a significant green public amenity in this built up area. The green could offer few more advantages than a pocket park.



Illustration of Bedminster Green development in the Plot 2 planning application which omits Plot 1 and Plot 3 east of the Malago

- 14.4 **Little Paradise, Stafford Street and Leicester Street** - see the comments at 8 above. There is a proposal to redevelop 1-2 Leicester Street with a five-floor block to contain 30 flats which the proximity of the mass of shadow of the northern block could prejudice.
- 15.1 Permission should be refused for lack of urban design. This intense scheme would conflict with the policy requirement to *“Deliver good quality accommodation and an attractive surrounding public realm”*. The proposal overdevelops the site, it would overshadow and harm the amenities of the occupants to the properties in East Street and the supported accommodation to the west of Little Paradise. The mass of the building would overbear and overshadow the surrounding domestic scaled streets. In Dalby Avenue the scale of the south tower alongside the massive elevation of St. Catherine’s Place and the anticipated developments on Plots 3 and 5 on the opposite side of Dalby Avenue would produce a canyon that would be an antithesis of placemaking. The absence of domestic scale on both sides of the avenue would overpower the passer-by and harm the placemaking purpose of local planning policy.
- 15.2 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.
- 15.3 The Society continues to support redevelopment of this land but on Urban Living principles. If the scheme were reconsidered the Society would support the loss of New Stafford Street to enable a greater spread of development to the north of the site. If the car park entrance were moved nearer to Dalby Avenue that too could release more land at the north for development. A perimeter building of amplified height would reproduce the historic street pattern. The Society suggests that a height equal to the attractively redeveloped St. Catherine’s House could produce an interesting and less oppressive Dalby Avenue elevation.