



an independent force for a better Bristol

19th April 2019

The Society response to planning enquiry - 19/01255/F – the redevelopment of the Avon Fire And Rescue Service Headquarters Temple Back

The proposal

Demolition of existing buildings to redevelop mixed use office and 318 residential units including amenity space and cycle and car provision, with vehicular access, servicing arrangements, public realm works and landscaping.

Summary

The Society supports the demolition of the current buildings that are without architectural merit and the redevelopment of the site. The proposed employment space will replace the employment space lost with the demolition of the current buildings. The Society supports the residential development and the improvements to the surrounding public realm although we believe that there is more that could be done to mitigate the damage caused by post-war redevelopment. A residential building of amplified height is appropriate for the site as recommended in the recently approved planning advice in the Urban Living Special Planning Document (Urban Living). The proposal does not make the case for a and tall building whose height and entrance would have a substantially harmful effect on the amenities of Templebridge Apartments (Templebridge) and on the setting of the Grade II* listed Generator Building and views along Counterslip.

The Urban Living Special Planning Document Urban Living) questions.

Q1.1 Has the scheme adopted an approach to urban intensification which is broadly consistent with its setting?

On the 22nd June 2017, in response to an earlier scheme the Council's planning advice letter said, "*.....the urban design expectation was that the building heights along Counterslip would echo the height of the buildings that had been recently constructed as*

part of the Finzel's Reach development. ' This includes offices of 5+1, 6+1 and the hotel of 8. This establishes a city scale medium rise context on the Counterslip elevation."

Although the Society understands that the tall building proposal has attracted support from others we prefer the original advice which was that a tall building rising from the back of the pavement in Counterslip and the narrower Temple Back would appear bulky, have a poor relationship with both streets and would conflict with the aspiration to narrow Counterslip to improve the urban grain.

The application fails to assess adequately the impact of the proposed tower on the setting of the Grade II* listed Generator Building which it significantly affects. The proximity of the listed building means that the site cannot be considered a landmark site despite its corner position close to the river. The scale of the tower also has a harmful impact on the view into Counterslip from St. Philip's Bridge and from the Victoria Street direction. The scale of the proposed tower would harm the conservation area.

Q1.2 Does the scheme contribute towards creating a vibrant and equitable neighbourhood?

The redevelopment of Counterslip has not produced an active street frontage so far. Although the proposed scheme would add ground-floor office use it is unlikely to achieve a substantial improvement to street level activity which is inevitable, as there is no demand for retail space. We note that the Premier Inn already has two ground-floor café/restaurant areas. The Society suggests a change in the scheme: to transfer the residential block from the St. Philip's Bridge corner to the Temple Street corner of the development, with the entrance to the residential block mid-way along Counterslip where it would stimulate more pedestrian activity.

Q1.3 Does the scheme respond positively to either the existing context, or in areas undergoing significant change, an emerging context? And

Q1.4 Does the scheme provide people-friendly streets and spaces?

The character of the area is dominated by large commercial buildings that do not create a human scale street. The proposal would inevitably contribute to the area's anonymous character. A tall building rising from the back of the pavement would accentuate the scale buildings that frame Counterslip and Temple Back. This site gives no opportunity to mitigate the impact of the tall building at street level by setting it behind a human street scale podium as recommended in Urban Living.

A significant urban design aspiration is to amend the area's urban grain, that post war redevelopment damaged. The Society supports the principle of a perimeter arrangement that reinforces the street frontages notwithstanding that it would be desirable to reflect the scale of Temple Street to create a more human scale and legible route between Victoria Street and Finzel's Reach.

The Society welcomes the use of trees and planting to green the edges of the development and reduce the impact of the street widths.

The two raised tables on Counterslip, narrowed roads on Counterslip, Temple Street and Temple Back are welcome street improvements. It is unfortunate that the entrance to the car park is to be on Temple Street. For pedestrians, the Counterslip improvements will be tempered by traffic queues that use Counterslip as a rat-run through to Redcliffe Way.

The site offers the opportunity to achieve improvements to the historic line of Temple Street and the setting of the listed Cornubia Public House. It is unfortunate that the entrance to the car park is to be on Temple Street. Can the developer discuss with the Council and neighbouring land owners improvements to integrate the remnants of historic fabric including the Cornubia and Temple Church, into a better context for example, a pocket park outside the Cornubia? This issue was raised by the Central Area Plan. The area is a small site with a high visual impact on the Temple Meads Finzel's Reach pedestrian route and is in the Redcliffe Conservation Area.

We note that the scheme does not meet the aspiration of 'The Future of Redcliffe - SPD3 to provide a public route through the site.

Q1.5 Does the scheme deliver a comfortable microclimate for its occupants, neighbours and passers-by?

We anticipate that the Council will verify the wind effect of a tall building on the surrounding streets.

Q1.6 Has access, car parking and servicing been efficiently and creatively integrated into the scheme?

The Society has no comment other than the Council has established policies to assess these aspects.

Q2.4 Does the scheme create attractive, well designed and well maintained private outdoor spaces?

This building would have a density that substantially exceeds the density of 200 dph that Urban Living recommends for the centre of the city. The central courtyard would offer an inadequate private outdoor amenity space for this population. Private roof top spaces are superficially attractive, but their use is limited by their dependence on weather conditions, particularly wind speed.

Q2.5 Does the scheme creatively integrate children's play? Not applicable to this proposal.

Q3.1 Is the tall building well located?

The tower on the corner of Counterslip/Temple Back must be assessed against the requirements of the Urban Living SPD. The Central Area Plan gives no specific advice for the site. Subsequent planning advice has overtaken the Future of Redcliffe SPD. The developer must show that a tall building is more appropriate for the site than a building of amplified height. The scheme adopted must show an approach to urban intensification which is broadly consistent with its setting. Previous planning advice considered the scale of an earlier scheme to be too great and advised that at a lower level, more human scale should be adopted. At 16-floors the tower is a step-change above the surrounding buildings in Counterslip and Temple Back, not the 'amplified height' that the Urban Living recommends as a starting point for city centre urban living. The sense of enclosure by the mass of formal commercial street elevations would not create the feeling of a new urban living quarter or a people welcoming sense of a place.

We shall not repeat the Templebridge response which is fully argued. There are reasonable grounds to infer that when the proposal was considered earlier, those who supported the tall building were not aware of the existence of the Templebridge residences. The developer's shadow illustration shows that the tall building would obstruct sunlight from reaching any part of the Templebridge from October to March; a major loss of amenity. This aspect of the proposal must be assessed properly with a more developed sun path diagram.

We are sympathetic to the Templebridge objection to the location of the entrance to the residential block.

The suggestion to transfer the residential block from the St. Philip's Bridge corner to the Temple Street corner of the development does not affect our comments on the height of the residential building.

Q3.2 Does the scheme make a positive contribution to the long-range, mid-range and immediate views to it?

The Society's view is that the tall residential building rising on two sides from the back of the pavement would have a poor relationship with Counterslip and Temple Back. All the surrounding buildings are of amplified height and a tall building in this closely built up area would feel oppressive at street level.

A tall building close to the Generator House would overbear and draw attention away from the Grade II* listed building which would harm this character area of the Redcliffe Conservation Area.

We support the Templebridge proposal that the residential block be moved to the Counterslip/Temple Street corner. The advantages would be:

- Templebridge would face only an amplified height building with a corresponding improvement to access to sunlight.
- Only commercial buildings would border the residential block's entrance.

- An entrance mid-way along Counterslip would generate greater footfall to animate the street.
- An amplified height building would not overbear the setting of the Grade II* listed Generator House. If the curved double-height entrance is transferred to face St. Philip's Bridge, those approaching Counterslip from the bridge would enjoy the view of the 'welcome area' into the interior of the building which would be a planning gain.

Q3.3 Does the scheme demonstrate design excellence?

The Society supports Historic England's concerns set out in their response dated the 15th April 2019 about the southern end of the development and its relation to Temple Church and the view from Victoria Street.

Q3.4 Does the scheme ensure the safety of occupants and passers-by? And

Q3.5 Does the scheme interfere with aviation, navigation or telecommunication, and does it have a detrimental effect on solar energy generation on adjoining buildings? And

Q3.6 Has the scheme's future servicing, maintenance and management been well considered?

The Society has no comment other than the Council has established policies to assess these aspects.

Q3.7 Does the scheme create a pleasant, healthy environment for future occupants?

Although a critical aspiration of Urban Living is to achieve a high-density residential development that promotes stable tenure the Council may consider that a new form of build to rent model that gives residents access to communal space and other facilities outweighs other factors. A communal living approach would add a new form of housing for residents in the expanding city centre residential market albeit, one with a relatively high turnover of residents.

The Society appreciates the benefits of higher density level, but the ambitious density of this proposal significantly exceeds the illustrative masterplan at page 31 of Urban Living that demonstrates design principles with a density of 250 dph. A design-led approach faces serious challenges managing this kind of density.

No private amenity space is provided. The Council must assess whether the internal public amenity space is adequate for the projected number of apartments many of which will have two occupants. National Space Standards must apply to the private residential areas.

There are aspects of the scheme that conflict with Policy DM29 which applies to the design of new buildings.

- The apartments are arranged around a double stacked corridor. There would be little natural light within communal circulation areas which would require continuous artificial light.

- The corridor gives access to a high number of apartments. There is nationally accepted research that describes and quantifies the disadvantages of multi-flat access corridors to the sense of neighbourliness, community and effective management.
- The scheme contains a great number of north facing units or units that face into a narrow courtyard which fail to deliver the required residential amenity advocated within Urban Living.

Q3.8 Is the scheme sustainably designed? And

Q3.9 Will the scheme be neighbourly, both at the construction phase and following occupation?

The Society has no comment other than the Council has established policies to assess these aspects.