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29th June 2019

The Society's response to the proposal to redevelop Nos. 2-18 Stokes Croft - to provide 245 units of student accommodation and ground floor commercial space - 19/01817/F

1 Summary

The Society supports the principle to redevelop to bring a vacant and under-used site back into beneficial use to provide more housing and promote economic development. The Society opposes the proposed change of use to student accommodation in an area where there is a dominant student population, and which requires further residential accommodation to meet Bristol's housing need in the city centre and to sustain a settled community that will provide year-round support for local infrastructure. The Society does not support the height and mass of the proposed design which would conflict with the character of this part of the Stokes Croft Conservation Area.

2 The site - The proposal relates to large urban block on the south of North Street/Stokes Croft with a return frontage on Moon Street. 2, Stokes Croft are empty offices, the Blue Mountain Club site is demolished, and the remainder of the site is occupied by Seabright Printers.

3 Planning history - The planning history is not a material consideration in relation to the current proposal other than the unbuilt consent 13/02337/F permitted redevelopment of 4-10 Stokes Croft as student accommodation. This permission is not relevant to this scaled-up application.

4 Demolition - Neither of the standing buildings has any architectural merit that merits retention.

5 Change of use

5.1 The loss of employment space - The proposal would reduce the current level of employment space on the site by around 50%. The loss of employment floorspace within the city centre must be considered in line with Policy BCAP7. The Applicant needs to demonstrate that the proposal meets the policy and that the loss of

employment space would not harm the economy and employment opportunities in the local area. Emerging Policy H7 at paragraph 7.49 provides, *“In more commercial areas development should not result in harm to the diversity of uses within that area. Harm is likely to occur when purpose-built student accommodation and associated activities account for a significant proportion of uses within an area. As a guideline threshold, in areas with a largely commercial context the council considers that purpose-built student accommodation (including the proposal) that exceeds 1000 bed spaces within 200 metres of the site is likely to result in harm.”* There are more than 1,000 student bedspaces within this area – see below. The St Paul’s Planning Group has strong evidence of an unmet demand for local employment space.

5.2 Student accommodation - There is currently a demand for purpose-built student accommodation in the city. Policy DM2 ‘Residential Sub-Division and Specialist Housing’ and policy BCAP4 support the principle of student accommodation in the city centre if the development does not contribute to a concentration that would harm the surrounding residential amenity.

5.2.1 Following the 2013 planning permission, which supported the principle of student accommodation, there has been a material change of planning policy. Emerging Policy H7 will manage student accommodation to direct it towards identified areas both in the city centre and elsewhere. The purpose of emerging Policy H7 is to safeguard existing communities and support delivery of new homes whilst supporting thriving universities. To advance this aim paragraph 7.48 of the emerging policy provides, *“Development should be avoided in areas of the city with a strong residential context. These are areas where the majority surrounding land use is residential. In Bristol City Centre they include St. Paul’s, Old Market and parts of Harbourside.”* The National Planning Policy Framework states that consideration should also be given to the Local Plan Review which has now passed the public consultation stage.

5.2.2 The context of this policy reflects the quantity of existing student accommodation:

- Blenheim Court, Marlborough Street 233 students
- [BRI Old Building –preapplication proposal dating from 2015 - 400 students]
- Cherry Court, Barton Street, 175 students
- 13-31 Cumberland Street, 87 students
- 13-19 Dean Street 225 students
- Studio 58, Dighton Street 99 students
- Hamilton Court, 1 flat with capacity for 8 students
- King Square Studios, 61 students
- King Square Studios, 243 students
- IQ, Marlborough Street 362 students
- Marlborough House 339 students
- [29-31 Portland Square 257 students current planning application]
- [7-29 Wilder Street - 348 students – planning refusal subject to appeal]

5.2.3 Neither the Design and Access Statement Society or the Planning and economic statement appears to provide an impact assessment of further development of specialist student accommodation in the area following the Council’s advice letter of the 31st August 2018.

- 5.2.4** Recently, the area has received a large influx of new permanent residents. The local residential population will continue to rise for some years to come. St. Paul's is again a popular residential area. There is understandable local resistance to a substantial increase in student numbers in the area, which residents consider would undermine the principle of a balanced community of permanent residents. The Society would strongly prefer employment use at street level and private residential accommodation on the upper floors. There is a significant market interest in both uses. There is a substantial unmet need for residential accommodation in the city centre. In the Society's submission student accommodation within 200 metres of the site has already reached a harmful concentration which this scheme would increase. The dominant student population is not resident for several months in every year. Experience in other parts of the city where student residents are dominant shows that local businesses find it difficult to survive the lack of business during vacations. This has a negative impact on the range of ancillary services available to the permanent population. This area needs more long-term residents.
- 5.2.5** If the Council supports the Applicant's development proposal, a development of this size should contribute to the local housing needs as part of a mixed development. Emerging Policy H7 further provides, "*At other locations any proposals for purpose-built student accommodation should only form part of mixed-use developments comprising a proportion of other residential uses.*" Stokes Croft is not an area nominated in the emerging policy to develop more student accommodation. The scheme offers no residential accommodation.

6 Mass and height –

- 6.1** The Stokes Croft Conservation Area Character Appraisal says of Stokes Croft' - "*7.2.5 The roofline along Stokes Croft steps up and down between two storey buildings up to five, though the average building height is between two and three storeys, giving the impression of an overall linear form to the street. Exceptions to this are Westmoreland House, nos. 37-39 Jamaica Street, and nos. 77-79 Stokes Croft. In future development, current building heights should be respected in order to retain the overall character of the street and impact of existing taller buildings.*"
- 6.2** Although the southern part of Stokes Croft comprises cheaply designed buildings erected to replace war damaged properties, most of the buildings in the Stokes Croft character area, above the Full Moon Hotel, reflect the original plot sizes. This mix of buildings creates local character and distinctiveness. A building of the size, and height, proposed would totally dominate and overbear the southern end of Stokes Croft and repeat the planning error of the 51.02 building. The proposal must reflect the predominant scale within the Conservation Area and not the exceptionally poor 51.02 building beyond the conservation area boundary. The Grade II listed Full Moon public House would be lost against the mass of new masonry.
- 6.3** The effect the scheme would be to extend the character of the 'student quarter' which is narrow streets dominated by tall buildings rising from to the back of the pavement. It is soulless and dispiriting and lacks any sense of local character or place. The proposal would extend this monotonous character of student accommodation to the

east of Stokes Croft. The scheme would be the antithesis of the placemaking policy and would harm the Stokes Croft Conservation Area. The construction of a building that exceeds the height of St. James House creates a strong concern of potential harm to the opportunity to make Backfields a pedestrian friendly space.

6.4 The local references for a building on this site are the Full Moon Hotel and St. James House in Moon Street. Material planning considerations are the consent for 4-10 Stokes Croft - 13/02337/F - (4-floors above ground) –and for the car park in Wilder Street - 14/03981/F - (4-floors above ground). Westmoreland House – 15/05930/F - is a major, high density regeneration project at the top end of Stokes Croft, it is 5-floors above ground screened by lower, 4-floors above ground buildings. These consents do not create an expectation for a greater height for the redevelopment of Stokes Croft properties. The height should not exceed 5-floors with upper storey set back, to include any plant enclosure.

6.5 The proposed increased pavement width in Moon Street would be a planning gain. The Society welcomes the possibility of improved street level activity in Moon Street which is the appropriate access for bicycle and waste storage.

7 Building design

7.1 The Society supports modern building design in this part of the Stokes Croft Conservation Area. However, the proposed scheme does not respond to the modest prevailing scale of the local urban context or to its relationship to with the Grade II listed Full Moon Pub. Critical to the success of the development is good quality design and materials. The site spans several of the original Burgess plots which it consolidates into larger building blocks. The detail of the architectural elements within each bay are bigger than the prevailing scale of the earlier building further up the Croft that establish the conservation area’s architectural context. The Society suggests that it would improve the sensitivity of the response to the prevailing context of conservation area if the design included vertical elements that marked the boundaries of the Burgess plots. The design turns the North Street/Moon Street corner attractively.

7.2 The internal courtyard would be an inadequate provision of outdoor amenity space for a development of this magnitude. It would be a gloomy space and adequate only as a lightwell.

7.3 The Society expects bespoke student development to be adaptable to other uses should there be a fall in demand. The spacing of the structural walls and windows should be sited to enable the purpose-built student housing to be converted into residential apartments in a manner that minimises modification to the external envelope.

8 The public realm

8.1 The Society is aware of active redevelopment interest by the owners of the Coroner’s Court/Lakota site and the 7-29 Wilder Street / 1-3 Backfields site. The redevelopment of these sites may bring forward for redevelopment other nearby low-grade

commercial buildings. The developers and the Council must consider this development in the context of extensive local redevelopment. Multiple developments give the opportunity to invest in the improvement of the public realm to the benefit of all.

- 8.2** The Society suggests that the developer together with other owners (as above) and the Council undertake a study to select improvement opportunities in the surrounding streets. Apart from upgrading the surviving setts and pavements, an open space at the Backfields Moon Street junction offers an opportunity to create an attractive public place. The Society does not support machining the setts to produce a smooth road surface in this area.
- 9** **Public art** - The Society would prefer that money set aside for public art be spent on better quality street furniture such as street lighting and litter bins.
- 10** **Conclusion** – In a city with strong development pressure like Bristol, it is incumbent upon planners to seek what is best for an area in terms of serving social, economic and environmental needs. This exercise must balance the competing needs of providing new homes, employment space and student accommodation. The effect of the scheme would be to expand the local Marlborough Street ‘student quarter’, an area dominated by large commercial blocks which is soulless and dispiriting. This over-concentration of student accommodation is the antithesis of the Council’s placemaking policy. In relation this site at this stage of Stokes Croft’s redevelopment cycle the need for more homes outweighs other considerations. Permitting further student accommodation would exacerbate an already existing harmful overconcentration that has led to an imbalanced, less inclusive and sustainable community. The construction of a building that exceeds the height of St. James House creates a strong concern of potential harm to the opportunity to make Moon Street and Backfields a pedestrian friendly space.