



an independent force for a better Bristol

5th November 2019

The Society's response to planning application - 19/05001/P

1 The proposal - 20 Easton Road / 7-9 & 13-15 Lawrence Hill, Old Market

This outline application seeks planning permission for:

Refurbishment of the existing mixed-use Victorian brick terraces.

Refurbishment and conversion of the existing brick warehouse.

Refurbishment of the existing stone warehouse.

Demolition of the carwash garage and single storey rear extensions to the terraces.

A new 6-storey perimeter block with central tower element rising to 15 storeys.

About 1200sqm commercial floor space.

122 new 1-3 bed apartments.

2 Summary

The Society strongly supports redevelopment of the site with a denser mixed-use scheme. The refurbishment and redevelopment of the neglected Victorian buildings with their fine engineering brick elevations will be a substantial planning gain. The Society regrets that it cannot support the current scheme. The application does not justify a tall building on this site.

3 Planning background

The site lies in the Old Market Conservation Area. The recently adopted Old Market Neighbourhood Development Plan (OMNP) states under the heading - 3.0 Urban and Architectural Character: *"3.1 The character of any new development within the Old Market Conservation Area needs to reflect the local vernacular as set out in the 'Old Market Conservation Area Character Appraisal.'"*

The Old Market Conservation Character Appraisal states, *"The scale of the buildings are relatively consistent across the Conservation Area though, with the exception of local landmark buildings."*

OMNP policy C7, provides planning advice in relation to the site:

"Site 14.6, Leisure Island Site - development should:

- *Take account of the Old Market Conservation Area in which the site lies.*
- *Retain and reuse existing unlisted buildings of merit (see Appendix 3).*

- *Include a new building, maximum 3 storeys plus an attic storey, that correspond with existing eaves and parapet levels of adjacent existing buildings.*
- *Continue an unbroken frontage to Easton Road and Lawrence Hill.*
- *Include a mixture of commercial, leisure, retail and residential uses with active frontages at street level on both Easton Road and Lawrence Hill."*

The Society recognises that the proposals includes important revisions to the 18/06317/PREAPP scheme.

- The tower is reduced to 15-floors plus plant room, a 20-25% reduction in height assuming the same floor to ceiling heights.
- There are now several family sized flats.
- The scale of the perimeter blocks is now 6-floors, not 8, and they have communal roof gardens.
- We are pleased that the proposal would not demolish the structural fabric behind the façade of the former warehouse in Easton Road.

4 **Loss of Employment Use**

The proposal would include 1,200 sqm of commercial space. The Society assumes that the Council will require the applicant to justify any net loss commercial space. Policy DM12 emphasises the importance of retaining existing employment sites near to where people live and within areas of Bristol that are experiencing high levels of socio-economic deprivation.

- 5 **The accommodation mix -** There are 63 single bedroom single person flats, nearly 50% of the total. Single person flats are inflexible and contrary to policy.

6 **The public realm**

The site is isolated on all sides by two arterial roads and the Lawrence Hill roundabout. The whole area is hostile to pedestrians. The Design and Access Statement does not consider measures to mitigate the effect of the surrounding heavy traffic on a residential population that could exceed 300 persons.

7 **Urban Living checklist**

The tower is a tall building that engages part 3 of the Urban Living Special Planning Document (Urban Living) checklist which is set out at the end of this response.

8 **Conclusion**

A design-led approach faces serious challenges managing this level of density. There are always questions about the quality of the amenities offered to the future residents. 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. The hostile local road system that isolates the site makes this aspect critical.

Policy requires that, *"Development will be expected to respond strongly to Old Market's historic character in terms of its scale and massing, grain and the choice of materials used"*. The conservation area is a sensitive area where tall buildings do not

form part of the area's character. The proposal conflicts with planning policy. The site is unsuitable for a tall building. A 15-floor tower would neither enhance nor conserve the conservation area. However, the site might accommodate a marginally taller element as a focal point. The urban block should be considered as a whole, which requires the height mass and design of all new building to respond to the architecture of the extant urban block to produce an integrated development for the whole of the island site.

The Urban Living Checklist

Question 3.1 Is the tall building well located?

The Society is not attracted by the applicant's argument that the closeness of Baynton House, Croydon House, and Kingsmarsh House justify the suitability of the site for a tall building. The zone of the 1970s tower blocks to the east stands 300 metres beyond the boundary of the Old Market Conservation Area. Easton Way and the green open spaces around the Lawrence Hill roundabout separate the zone of the high-rise blocks from the conservation area.

This is a constrained site of 0.21 hectares. Urban Living planning advice says that sites exceeding 2 hectares offer greater potential for taller buildings. Urban Living discourages stand-alone tall buildings. The tower does not respond to the prevailing heights of the surrounding context which is 4 storeys. The tower is a radical departure from the existing urban form and would add a significant mass to the triangle site which is characterised by smaller terraced buildings.

The Leisure Island site is inside the conservation area which National policy requires it to conserve and enhance. There are no tall buildings in the conservation area. The OMNP does not propose the introduction of tall buildings.

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

There is a reasonable concern about the impact of the 15-floor tower on the street level and mid-range views into and out of the conservation area. The Council will no doubt agree critical viewpoints to assess the townscape impact.

Question 3.3 Does the scheme demonstrate design excellence?

The Society agrees that the conceptual design of the proposed tower has architectural merit. However, there is an awkward jump in height from the retained 19th century buildings and the domestically scaled estate on the south side of Lawrence Hill to the tower. Furthermore, the relationship between the elliptical tower and the adjacent 'shoulder' blocks is uneasy and creates a massive masonry cliff to confront the Lawrence Hill roundabout.

The retained warehouse is valued by the Council as an unlisted building of merit. The former warehouse's façade would be inset into the Clarence Road 'shoulder block' which would dominate and cause substantial harm to the significance of the street elevation of the locally listed building.

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

It is unclear how, in this island site with restricted access, fire safety, emergency vehicle access, and evacuation would be managed. The tower has a single core and appears to have only one ground-floor exterior exit. The Society is confident that the case officer will take advice from the Fire Prevention Officer about the advisability of construction of a 15-floor single-core access building.

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

Where a development offers no private or public amenity space life becomes restricted. There is no central courtyard for the residents' amenity. The roof terrace and gardens, even if well maintained, will not overcome the shortcomings of the residential environment, particularly for families. High level terraces appear superficially attractive but are subject to practical shortcomings. They are weather dependent particularly to wind speed which increases above ground level. The terraces would be immediately above the noise and fumes of arterial traffic. The few flats that have balconies face east and overlook the roundabout.

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

- Many of the flats are single aspect, some north facing.
- The tower's elliptical shape compromises the available internal space.
- The Society is unable to judge whether the winter gardens outside the tower flats would be habitable. There appears to be no space set aside inside the tower for common use.
- The proposal does not calculate the likely child yield within the development using the Child Yield Calculator. The proposal fails to provide evidence that any child has the adequate amount of play space as set out in Urban Living. Access to the local parks involves crossing arterial roads.

Question 3.6 - Has the scheme's future servicing, maintenance and management been well considered?

There is little information about this aspect. A single stair does not allow for alternative routes out for tenants. The ground floor plan shows an entrance lobby whose size infers that there would be no concierge. The development requires a central parcel delivery depot. The OMNP advises that development should offer some car parking, the scheme offers none. There is no disabled car parking.