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4<sup>th</sup> November 2019

**19/03492/PREAPP - The Society's response to First Base's proposals to redevelop the former Soapworks Building, between Old Bread Street and Straight Street, Old Market.**

**1 The proposal**

A mixed-use redevelopment by First Base of the former Gardiner Haskins 'Homecentre' site. The development would include new dwellings, office floorspace, an aparthotel, and retail/food/ units. The proposal includes the retention and conversion of the Grade II listed building ('The Soap Works') for new uses.

**Public engagement**

- 2 The Society is grateful to the First Base development team for presenting the next evolution of the proposal to the Society together with the Old Market Community Association.

**Summary**

- 3.1 The Society supports the principle of the redevelopment of the former Gardiner and Haskins site and Broad Plain Car Park with a denser development. The scheme would add welcome commercial space, new homes, and social amenities in this area where employment and residential coexist happily. The proposed two courtyards connected to new north-south and east-west routes through the site would be a planning gain. The scheme has the potential to add materially to the economic and social regeneration of the Old Market Conservation Area.
- 3.2 The Society has a principled objection to the demolition of the Gardiner's Warehouse save for the retention of the Straight Street façade. We have not seen reasoned argument to demolish the interior.
- 3.3 Subject to later comments the Society supports the proposed new buildings but objects to the 20-floor, south east corner tower. The site presents a great development opportunity, but this tower overdevelops the site.
- 3.4 We fear that some of the proposed ground floor use may prove to be aspirational at this stage of the conservation area's regeneration.

## **Planning background**

- 4.1 The Society notes the references to the Urban Living SPD – Making Successful Living at Higher Densities (Urban Living) but we also observe the lack of reference to the Old Market Neighbourhood Development Plan (OMNP) which the Council has supported recently.
- 4.2 The site borders the Temple Quarter Enterprise Zone. Most of the site falls within the Old Market Conservation Area. The OMNP states at paragraph 7.2.2, “The Neighbourhood Plan supplements policies BCS 2 and 21, CAP 46 and DM 26. “.....new development will be expected to respect the character and history of the area.....”
- 4.3 The Appraisal stated at paragraph 8.4 under the heading, ‘Insensitive Development’ - *“The character of the Conservation Area is at risk from unsympathetic development.”* The management strategy stated, *“Future development control decisions will be made with reference to the findings within the Old Market Conservation Area Character Appraisal.”*

## **Change of use**

- 5.1 The Society assumes that the Council will require the applicant to justify any net loss employment 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.
- 5.2 We support the principle of keeping the ground floor uses as flexible as possible, in case the lack of external footfall makes the proposed retail offer of the food hall) unviable (see our comments on public realm below).
- 5.3 We draw First Base’s attention to the Development Management Policy DM8 which seeks to protect established retailing areas. A ground floor retail offer, even if viable, would draw business away from the Old Market Street retail area.
- 5.4 We support the proposed aparthotel and the 2<sup>nd</sup> floor event space.

## **6 Height, Scale, Massing and design**

- 6.1 The listed building and its curtilages buildings are within the Old Market Conservation Area. The former car park borders the conservation area. For planning purposes the car park cannot be severed from the curtilages of the listed buildings.
- 6.2 In the absence of fully researched reasons the Society cannot support the demolition of building 2, the former warehouse on Straight Street, and building 4 which is attached to building 2. The Society supports the OMCA’s submission that building 2 is capable of refurbishment and reuse particularly if liberated of the later southern additions. The same argument applies to building 4 whose original west elevation survives. We would welcome the replacement of the 1960s screen wall on Straight Street with something more sympathetic to the surviving, carefully proportioned, engineering brick elevations.

- 6.3 In principle we support additional ‘Mansard’ floors on buildings 2 and 4 on Straight Street and Sles Lane subject to an assessment of the impact of the additional floors above the high-quality brick elevations. We are concerned that a two-floor extension would unbalance the elevations’ careful proportions. There should be an appraisal of the impact of other options such as one floor extensions or a larger set back. We support the use of modern materials (but not timber cladding) for the construction of the extensions.
- 6.4 We support the proposal to demolish the buildings attached to the listed Soapworks Building, the reinstatement of the lower parts of the building with suitable traditional building materials. We favour the demolition of buildings 3, 5 and 6 and their replacement with new buildings.
- 6.5 The Society has a major concern about the scale of the 20-floor south east residential tower which would dominate the listed Soapworks. The Temple Quarter Spatial Framework succeeded earlier planning advice for the redevelopment of the area north of the river Avon. The advice was that development should step down from the height of the waterside commercial buildings, towards the domestically scaled areas to the north. Avon Street is dominated by large scale commercial buildings, whose character does not reflect a human scale. Development to the north on Anvil Street, responded to planning advice. Christopher Thomas Court Old Bread Street and Kingsley House New Kingsley Road are 6-floors (including ground).
- 6.6 The height of new buildings should not exceed the building height parameter set out in Old Market Quarter Building Code section 2.0 – Scale. The heights of buildings on New Thomas Street and Russ Street must not inhibit future development on the Gardiner Haskins car park. The Society draws the case officer’s attention to recently permitted development in the block that lies between Jacob Street and Unity Street which follows the OMDP height recommendations. As with the Unity Street development, the proposal should form part of a gradient down to Old Market.
- 6.7 The area already has an identified landmark or ‘signpost’ building, the listed Soapworks Building. The tower would obscure and draw attention away from the local landmark building to harm its status in the conservation area. To maintain the significance of the listed Soapworks Building the corner building should be subservient to it. The Society would support a corner building that does not exceed 8 floors, including ground. The proposed 20-floor tower prompts the questions in Part 3 of Urban Living – see the Urban Living appendix below.
- 6.8 The Society is unconvinced of the usefulness of roof top terraces as amenity space. Terraces are superficially attractive, but their use is limited by their dependence on weather conditions, particularly wind speed which increases above ground level and which the tall Avon Street buildings could influence adversely.

## 7 **Public realm**

We support the public space permeability in the scheme – the NS and EW pedestrian routes. However, there may be little footfall passing through or lingering in the site. Most pedestrians passing through the area will walk to or from Temple Meads Station, and

most of these will probably go via Sles Lane, which is outside the site. We support the proposed plaza east and north of the Soapworks building.

## 8 Conclusion

- 8.1 The Society opposes the demolition of buildings 2 and 4, save for their retained facades. We would support a proposal that retains, repairs, adapts, and re-uses the existing buildings in a conservation-led approach. Subject to a view appraisal, we support a roof top extension to buildings 2 and 4 and the replacement of the Straight Street 1960s screen wall.
- 8.2 We support the proposed restoration and reuse of the Soapworks Building.
- 8.3 We support the demolition of buildings 3, 5 and 6 and their replacement with new buildings of a contemporary design that use of good quality materials. The Old Market Quarter Building Code should inform the height mass and design of the replacement buildings to ensure that the development conserves and enhances the character and distinctiveness of Old Market Conservation Area. The proposal to use coloured brick that refers to the 19<sup>th</sup> century,, Bristol Byzantine tradition is attractive. It would become even more attractive if the brickwork used traditional bonding in place of modern universal stretcher bond.
- 8.4 We oppose the introduction of a 20-floor building but, if this feature is revised, we would support a taller building not exceeding 8-floors (including ground) on the Old Bread Street / New Kingsley Road corner. A reduction of the height of the tower would not significantly reduce the number of flats expressed as a percentage of the total residential offer.
- 8.5 We support the new pathways through the site and the two internal courtyards.
- 8.6 In order to avoid vacant space and competition that harms the Old Market Street retail area, we suggest that First Base reconsider the proposed ground uses with the benefit of local commercial advice.

## APPENDIX

| <b>Part 3 - Urban Living Appendix</b>   |  |
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| <b>Question</b>                         | <b>Comment</b>   |
| Q3.1 If the tall building well located? | The SPD states that proposals for tall buildings should come forward as part of a spatial strategy for the wider area. The design strategy of the OMNP does not propose buildings of the mass and height of the proposal for the conservation area. The conservation area is a sensitive area where tall buildings do not form part of the area's character. Specifically in relation to |

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|  | <p>the proposed 20-floor building on the south east Anvil Street/New Kingsley Road corner the SPD states that tall buildings are better integrated when lower level buildings assist the transition in scale down to the surrounding context (place-shielding) and that tall buildings that do not form part of a block and street structure will be discouraged. The Society dislikes tall buildings that rise directly from the back of the pavement. Both Anvil Street and the New Kingsley Road are secondary streets.</p> |
| <p>Q3.2 Does the scheme make a positive contribution to the long-range, mid-range and immediate views to it?</p> | <p>There has been limited analysis of the impact of the new buildings on the views of Gardiner’s Warehouse, the listed Soapworks Building or the Grade II listed former Gardiner’s office building in Old Bread Street. The proposal would cause substantial harm to the setting and significance of the listed Grade II Soapworks Building.</p>   |
| <p>Q3.3 Does the scheme demonstrate design excellence?</p>   | <p>At the stage of a massing enquiry it is not possible to comment.</p>  |
| <p>Q3.4 Does the scheme ensure the safety of occupants and passers-by?</p>                                       | <p>Yes. The new routes through the site would be a planning gain.</p>  |
| <p>Q3.7 Does the scheme create a pleasant, healthy environment for future occupants?</p>                         | <p>We assume that the Council will analyse whether the new buildings overshadow the new courtyards and the residential buildings to the east of New Kingsland Road.</p>  |
| <p>Q.3.9 Will the scheme be neighbourly, both at the construction phase and following occupation?</p>            | <p>Yes - the scheme will contribute to the economic and social regeneration of the area.</p>   |