

Comments for Planning Application 21/05219/F

Application Summary

Application Number: 21/05219/F

Address: Plot 5 Bedminster Green Hereford Street Clarke Street, Whitehouse Lane Bristol BS3 4NA

Proposal: Demolition and redevelopment to provide 3 new buildings (7-10 storeys) comprising 339 residential apartments (Use Class C3) (including affordable housing), ancillary residential areas, commercial space (Use Class E), landscaping, public realm and parking.

Case Officer: David Grattan

Customer Details

Name: Mr John Payne

Address: 53 Zetland Road Bristol Civic Society Bristol

Comment Details

Commenter Type: Amenity - Residents Group

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:

an independent force for a better Bristol

October 2021.

PLOT 5 - RESPONSE TO CONSULTATION PROPOSALS OF MARCH 2021.

Bristol Civic Society supports the principle of a predominantly residential development of this vacant site. However, we have a number of serious concerns about this proposal which are set out below and cannot support this application.

The proposal.

Dandara's development comprises 339 apartments plus provision of mixed retail, eating and community uses. There are three buildings from seven to 10 storeys immediately to the east, west and south of the Green. The non-residential uses are at ground floor level facing Bedminster Green. Public realm improvements including redesigning Bedminster Green are included.

Height, massing and design.

The Society notes that the proposed heights are consistent with the Bedminster Green Framework (BGF). However, as we said in our response to the BGF, the Green is too small to accommodate buildings of this height on its perimeter along with the proposed cluster of taller buildings on the site immediately to the north of Dalby Avenue. We, therefore, caution against strict adherence to the guidelines in the BGF. We would also underline that the BGF is no more than a material consideration in terms of planning law. It does not carry the weight of the Development Plan in terms of decision making. It has also not been subject to the rigours of a Supplementary Planning Document prepared in accordance with the relevant regulations. In the Society's view, the proposed buildings would have an overbearing presence on the small Green and cast shadow over a significant part of it in the afternoons for much of the year.

Building 1 would be 10 storeys facing Dalby Avenue. At the eastern end of the building this would face even taller buildings opposite producing a canyon effect on Dalby Avenue. A similar effect will occur on Hereford Street if high buildings are permitted at this point on plot 1. At the western end, the proposed building would relate most uncomfortably to the two storey existing houses opposite. There has been no attempt to ameliorate this jarring juxtaposition which would have an overbearing, if not overshadowing, impact on the existing houses.

Building 3 offers the opportunity to make a transition from the tall buildings proposed to the north to the traditional residential development south of the railway line. The BGF encourages a transition from the new to the existing among other things by stepping down in scale. However, a seven storey building would not achieve this. A three or four storey block of town houses would provide a better transition both in terms of scale and residential type. We also consider that the upper storeys of a seven storey building would be more exposed to disturbance from the railway line.

The proposed massing of the three buildings is oppressive. There is little variation in height and no breaks in the facades to allow permeability or light into the developments. The Society would prefer to see less dependence on perimeter development in building 1 away from the elevation to the Green. Building 2 substantially fills its site with very little offered to relieve the solid facades. The space between the southern and northern wings of the development appears very enclosed and shady. We have already suggested a different approach to building 3.

Although the elevations are relieved to some extent by projecting or inset balconies, the overall appearance of the buildings, in addition to the comments above on height and massing, is oppressive and lacks interest and variety. All the proposed roofs are flat and there is little discernible relationship or reference to existing buildings in the area. The Society would like to see this site contribute more visually to stitching new development surrounding the Green into the wider neighbourhood.

In considering these issues, the Society is not convinced that the proposal meets the requirements

of national and local planning policies to achieve a high quality of design suited to the development context. Bristol City Council and the Planning Inspectorate are giving considerable weight to these policy requirements in assessing proposals in the Bedminster Green area.

Impact on Views.

The impact of the proposed development on views is, to some extent, masked by other consented developments. There is no guarantee that these permissions will be implemented and, therefore, it is important to consider the proposed development as a free standing application. Additionally, there are significant and adverse impacts particularly looking from south to north. View 5 shows that Building 1 would cut out a considerable part of the valuable view from Windmill hill towards Ashton Court and Leigh Woods over and above the impact of consented development. View 14 shows blocks 1 and 3 dominating the immediate view north from outside Bedminster station.

As seen from the Alfred Road viewpoint, the proposed development cuts across the grain of the topography and in visual terms flattens the slope. It foreshortens views from this part of Bristol and undermines the cascade of buildings mirroring the slope. In doing so, it significantly erodes one of the defining characteristics of Bristol's Victorian suburbs.

Living Conditions

The Society considers single aspect apartments to offer a less than satisfactory living environment for their occupants. Significant numbers of the proposed dwellings would be single aspect. Many others are described as dual ventilation. These have one elevation in very close proximity to neighbouring apartments and offer very limited outlook. In some cases daylight on these elevations will be compromised. We would support larger windows on southern elevations provided that they were compatible with sustainability objectives.

At least some of the proposed apartments are likely to be occupied by households with children. Each dwelling has a balcony but we are not convinced that there is sufficient external playspace at close quarters for many of the dwellings apart from those facing the Green. We believe this could only be rectified with a different approach to the development rather than the perimeter design proposed for buildings 1 and 2. As it stands, the Society considers that the lack of outdoor playspace in close proximity to many of the dwellings would result in poor living conditions for households with children. We are not convinced that the enclosed open space in building 1 at first floor level and its roof garden will be particularly suitable for children's play.

Building 3 would be seven storeys as proposed. The upper storeys would be exposed to noise from the railway which would adversely affect the quality of life in them. To mitigate the impacts of noise the dwellings should be able to be adequately ventilated with mechanical ventilation with heat recovery, in order that residents do not need to open their windows if, for example, they don't wish to or find it difficult to sleep. Enhanced fabric performance should also be applied to improve acoustics, such as acoustic glazing and acoustic wall insulation.

Size and tenure of proposed dwellings.

30% of the units provided are proposed to be affordable. The Society welcomes this. We are concerned, however, about the preponderance of one and two bedroom apartments which comprise about 87% of the total to be provided. The BGF's vision included seeking to provide a range of new homes and sustainable urban living offers through a mix of residential units and tenures to help meet Bristol's acute needs and contribute to a diverse, thriving and sustainable Bedminster community. We consider that the range of units proposed does not contribute sufficiently to this but rather would lead to a mono-culture of small flats as we warned in our response to the BGF.

Non-residential land uses.

Retail, eating and community uses are proposed for the ground floors of each building facing the Green. If viable and consistent with a revived East Street shopping centre, the Society supports these uses although, as noted above, we consider that building 3 could be reformatted as town houses to facilitate a smoother transition to the character of development south of the railway.

Sustainability.

The Society supports the Council's Local Plan policy commitments to sustainability and reducing the impacts of climate change. The Bedminster Green developments should be exemplars of achieving sustainability. As it stands, the Society has a number of concerns about the sustainability of the proposed development. We urge the Council to ensure that the proposal's sustainability objectives are policy compliant. Our concerns are set out below:

The form factor, i.e. the shape of the buildings, is very poor - there is a lot of heat loss area, so the buildings are not energy efficient and will require a lot of heating.

Overheating is likely due to extent of full-height glazing.

Overheating modelling comments:

- currently only 3rd floor and 1st floor are tested, which are not likely to be worst case - top floor, south-westerly apartments should be tested (as worst case)
- 2020 weather file shows some overheating, which is mitigated by using constant mechanical ventilation. This increases energy demand, and it is not clear how the ventilation is provided. Mechanical ventilation with heat recovery (MVHR) should be employed if ventilation is required to run constantly.
- 2050 weather file results show that air conditioning is required to the apartments tested, which are not the worst case, therefore it appears that a significant number will require air conditioning. As this is not being considered as part of the initial development, it is likely that there will be 'bolt-on' air conditioning units mounted onto the outside of the building which would have a harmful impact on the appearance of the building.
- heating pipework is not modelled in overheating model as 'understood to be located outside' -

unlikely that all heating pipework is to run on the outside of the building, and if it does, the heat losses from this pipework will be significant and inefficient. If the pipework runs within the building (likely) the overheating will be worse than modelling results show.

Airtightness of the building is 3-5 m³/(hr.m²). At these levels of airtightness mechanical ventilation with heat recovery should be employed as otherwise there is a significant risk of mould growth and moisture build-up.

The Society suggests that the Council should assess whether CHP (combined heat and power) as is proposed is a suitable technology for this building type. Air source heat pump (ASHP) technology should be considered to determine if it is more energy efficient.

Traffic and transport.

The BGF envisaged an entrance to Bedminster Station opening directly on to the Green. Bristol Civic Society supported this. However, our own investigations support the view of the developers that this would require prohibitively expensive work and would possibly be disruptive to the train service during implementation. Reluctantly, therefore, we accept that the station entrance must remain to the south of the tracks for the present. We would urge the developers to discuss with Network rail whether a northern station entrance is possible in the longer term and, if so, to protect the location where it could be provided. It is also important that Dandara work with the Council and Network Rail to improve the access to and appearance of the present entrance. In particular, the unfriendly and narrow approach through the bridge needs to become more pedestrian friendly. Sheltering facilities on the platforms would also benefit from upgrading.

Although there are few train services stopping at Bedminster currently, implementation of the Metrowest project including the Portishead line will significantly improve services including cross city routes. It is important that the increase in population from the Bedminster Green project, as well as the existing community, are encouraged to use the train. There is also potential to develop a fairly convenient interchange between rail and bus services including the metrobus.

The Society is not clear how the buildings will be serviced by delivery and other vehicles. There is one layby shown on Hereford Street for Building 1 and Building 2 has access space indicated particularly for disabled drivers to park. It is important that parking on Dalby Avenue does not contribute to traffic congestion on this busy road.

Public Realm.

The Society supports the deculverting of the Malago River. It is important that the future management of it is agreed at the outset, however, in order maintain its aesthetic quality. We also want to see Bedminster Green improved as an open space. We are concerned, however, that Bedminster Green is designed to cope with the pressure of the impending population growth. It is a relatively small space and we have already commented on the overbearing and overshadowing issues that the proposed buildings would cause. Hard wearing surfaces and careful consideration

of the location of facilities and seating will be vital.

The width provided on the north of Buildings 1 and 2 is welcome and we would support the planting of suitable trees to contribute to the creation of an Avenue on Malago Road and Dalby Avenue. Careful consideration of planting on Hereford Road, ideally in conjunction with proposals for the south side, will also be important.