



an independent force for a better Bristol

28th January 2022

Dear Secretary of State,

Application no. 21/03020/F

Site address: St Mary-le-Port Wine Street Bristol BS1 2AN

Request for call in under Section 77 of the Town and Country Planning Act 1990

I am writing on behalf of Bristol Civic Society to ask that you 'call in' the above planning application for your own decision. This is a matter of urgency as the City Council resolved on 15 December 2021 to grant planning permission subject to a planning agreement. The Society is making this exceptional request (after taking soundings of its membership and consideration by its Management Team on 26 January) because the proposal conflicts with national policy on important matters.

The conflicts are with the National Planning Policy Framework (NPPF) and the stated policy intention to achieve well-designed and beautiful places, and to conserve and enhance the historic environment. We consider that the application raises both significant architectural and urban design issues of more than local importance.

The proposed commercial buildings would be large, 8/9 storey (plus roof top equipment), monolithic blocks which would dominate Bristol's historic heart and townscape. The buildings scale and massing would be inappropriate for the location and, as Historic England have advised, "would challenge the visual primacy of the various Grade II* listed church spires in close proximity to the site. The character and appearance of the City and Queen Square Conservation Area would be irreversibly harmed, as would the setting of several highly-graded listed buildings."

Similar concerns have been made by the Ancient Monuments Society when they say in objecting to the development the "sheer bulk of the new buildings is completely out of scale and context with the low scale buildings opposite, particularly the grade II* St Nicolas Market.". They also correctly underline that the "role of a conservation area is to conserve the historic, architectural and social character of the buildings and spaces within a local area. Intrusive and harmful developments of this scale erode this character and are contrary to the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990's requirement to have special regard to the desirability of preserving heritage assets, their setting, and any features of special architectural or historic interest which they possess."

We would encourage you to also look at the objections from The Society For The Protection Of Ancient Buildings and The Georgian Group. The latter say they “do not object to the development of the site or the demolition of the existing buildings, however we strongly object to development of this scale and massing on the basis that it will cause substantial harm to both the setting of many listed buildings and to the conservation area”.

Similarly, the Civic Society are keen to see an appropriate redevelopment of this important city centre site which currently is an eyesore. However, our strong view is that the wish to see it redeveloped and brought into productive use, should not be at ‘any cost’. Given the site's importance, we had hoped to see compelling architecture that respected its setting and received a comprehensive welcome across the city. As is clear from this [piece](#) in the local press by George Ferguson (former RIBA president) this is far from the case.

Government said in the white paper Planning for the Future that we should "Ask for beauty and be far more ambitious for the places we create, expecting new development to be beautiful, and to create a 'net gain' not just 'no net harm'." This proposal clearly cuts across the stated intention. If government does not call in the application, we fear this will further undermine confidence in the planning process and encourage developers (and the city council) to further chance their hand in disregarding national policy.

If government is to secure the sea-change it has promised then local planning authorities have to drive good design. Development that is not well-designed should be refused. With this application, even a favourable officers’ report assessed that “In terms of building height and, particularly Building B, the development will have a harmful effect on some views to and from the Old City and the heritage assets within”. Yet, their conclusion (accepted by the planning committee on a split vote) was “on balance, the public benefits of the proposals outweigh the level of harm that would occur and recommend that planning permission be granted.” This cannot be what government intended when last year they updated the NPPF to underline that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.”. The policy does not include the ‘on balance’ exception.

I have annexed further information about the application, including our letter of objection.

Yours sincerely,

Simon Birch
Chair, Bristol Civic Society

[Annex A](#): application details

[Annex B](#): Bristol Civic Society response to consultation on planning application

[Annex C](#): illustrations of impact

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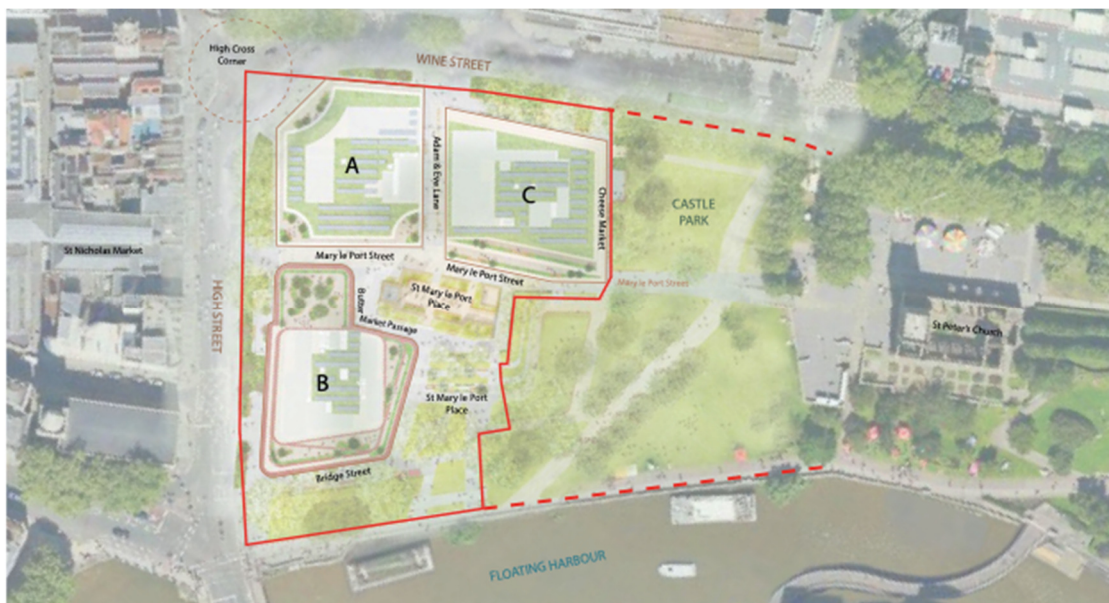
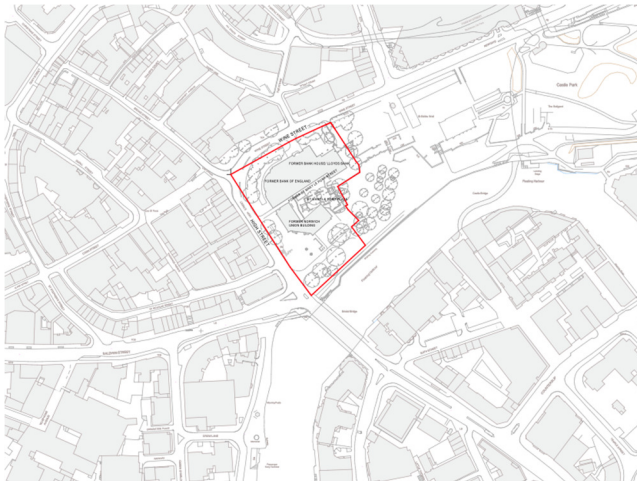
ANNEX A

APPLICATION DETAILS

Application no. 21/03020/F

Site address: St Mary-le-Port Wine Street Bristol BS1 2AN

Proposal: Demolition of existing buildings and structures including the office buildings (including basements and sub-structures) known as Bank of England House, Bank House and Norwich Union House, site clearance and erection of three new office buildings (Class E) with flexible basement and ground floor uses (Class E (commercial, business and service uses) and/or as a launderette, public house, wine bar, drinking establishment, drinking establishment with expanded food provision, hot food takeaway and/or cinema), alterations and repairs to St Mary le Port Church tower and ruins, alterations and repairs to High Street vaults, hard and soft landscaping and public realm improvements (including events space), infrastructure, means of access and all associated works (Major).



ANNEX B

BRISTOL CIVIC SOCIETY RESPONSE TO CONSULTATION ON PLANNING APPLICATION

Summary

The Civic Society is keen to see an appropriate redevelopment of this important city centre site which currently is an eyesore. **However, we cannot support this proposal.** Our strong view is that this is not an appropriate design response to this sensitive site located in Bristol's historic core. Although we have identified a number of commendable aspects of the scheme, the harmful impacts, particularly those flowing from the heights of the buildings, outweigh these.

The site's current condition, and the wish to see it redeveloped and brought into productive use, should not be to the detriment of the historic features and character of this sensitive part of the city.

Ideally, the Society would like to see the application site and adjoining highway land considered together in the redevelopment of the area. Not doing so potentially risks missing an opportunity to deliver an outstanding piece of placemaking that Bristol would be proud of.

The negative aspects

The Society cannot support the proposed heights of the three office buildings because of:

- (i) the substantial harm to the setting (and views) of medieval church spires;
- (ii) the substantial harm to the setting of a significant number of other listed buildings;
- (iii) the overall adverse effect on the City and Queen square Conservation Area; and,
- (iv) harm to views to the development when seen from many viewpoints.

In our initial submission to the public consultation on the draft proposals, we drew attention to the need for the developer to justify the heights of the buildings because, on the basis of the material we had then seen, we had concerns about the proposed heights. This justification has not been provided and the fresh material supporting the application underlines that we were right to be concerned about the appropriateness of the illustrated heights.

In particular, we would draw attention to:

- the views from the east, including from within Castle Park, many of which diminish the prominence of and/or obscure the towers of St Nicholas', All Saints and Christ Churches.
- the very jarring and overwhelming view of Block B from St Nicholas Street.
- the view of Block B from Bristol Bridge, where the building appears as excessively high and bulky. This is strongly exacerbated by its very conspicuous dark red colour, which makes it dominate many views, and makes Block B stand out discordantly from the buildings on the west side of High Street.

- the iconic view along Welsh Back from the Redcliffe Way swing bridge to the listed Bristol Bridge. Again, Block B's conspicuous dark red colour aggravates the damage done.
- the view of Block A from Broad Street.
- the effect of the proposed high-level terrace to Block B on the setting of St Mary le Port when viewed from Castle Park. The terrace introduces a highly discordant note because of its horizontal emphasis, and the incongruous introduction of people (and movement) together with landscaping at 'rooftop' level immediately (as it would be seen) behind the scheduled ancient monument's tower (see drawing SMLP-FCBS-ZZ-ZZ-DR-A-02802).

Our concerns about the heights of the proposed buildings are amplified by the negative contribution of rooftop plant (for building servicing). This adverse impact on views can be seen from many of the viewpoints in the townscape and visual impact assessment, including the longer distance view from St Michael's Hill. This negative contribution in part arises from the strong horizontal emphasis which is alien to the historic roofscape of Bristol.

In our opinion, the illustrated impacts speak for themselves and are significantly detrimental to established and important views, contrary to the written assessment offered by the developer's consultant.

Of the three blocks, Block B has the greatest negative impact as a consequence of its height, bulk and dark colour. We also have significant concerns about the height of Block A. Block C causes us least concern but clearly cannot be viewed in isolation, because of the height reductions (in the order of three stories) that we consider necessary on Blocks A and B.

The buildings' detailed design, including the jettying, divides public opinion. This in itself is disappointing as, given the site's importance, we would have hoped to see compelling architecture that received a more comprehensive welcome. As the government has said in its white paper *Planning for the Future* we should "Ask for beauty and be far more ambitious for the places we create, expecting new development to be beautiful, and to create a 'net gain' not just 'no net harm'." And in saying this, we are not advocating a design solution that is a pastiche of some lost historic past.

The positive aspects

Redevelopment is long overdue and the existing buildings add little to the function and appearance of the city. The proposed scheme has the benefit that it does not extend the developed area and there is no encroachment onto the green spaces of Castle Park. Also most trees in Castle Park are retained, as are those along Wine Street and High Street, although a small number are unavoidably removed.

We also feel the proposed land uses – offices together with restaurants and independent shops at ground level – are appropriate.

We commend the creation of excellent pedestrian routes through the proposed development, including the revival of historic streets, and the links to the old city, especially St Nicholas Market, would work well. Generally, the public realm proposals are well thought out and of an appropriate high quality in terms of materials and design.

Placemaking opportunities have been missed

The opportunity has, however, been missed to consider the spaces between the existing and proposed buildings on both High Street and Wine Street holistically and bring forward integrated placemaking. Such consideration should address traffic issues, the widths between the buildings either side of High Street and Wine Street and their relationship to each other and the quality of the public space provided. The Society in particular urges Bristol City Council and the developer to work together to jointly provide a welcoming and high-quality scheme for the open area bounded by Corn Street, Broad Street, Wine Street and High Street, the historic core of the medieval city. The redevelopment project surely provides the impetus for such a bold scheme working to a publicly-endorsed planning brief.

The proposed development does not push out the building line, and thus leaves High Street and Wine Street as wide highways dominated by their movement function. A planning brief and scheme should also consider both the potential for using the space for activities and the aesthetic character of the street created by old buildings on one side of the street and the new buildings on the other side of the street. If the proposals have to be revisited because the currently proposed buildings are judged to be too high, the building line could be pushed out to narrow the highways to some degree. (Some of the street trees are in poor shape, so we would not disagree with some being sacrificed for a better street arrangement.)

The proposed building fails to reflect the city's ambition to be carbon neutral by 2030

The Society strongly supports the council's drive for a carbon neutral and sustainable city. Unfortunately, the current design does not achieve zero carbon by 2030 and therefore falls short of the council's publicly stated ambition.

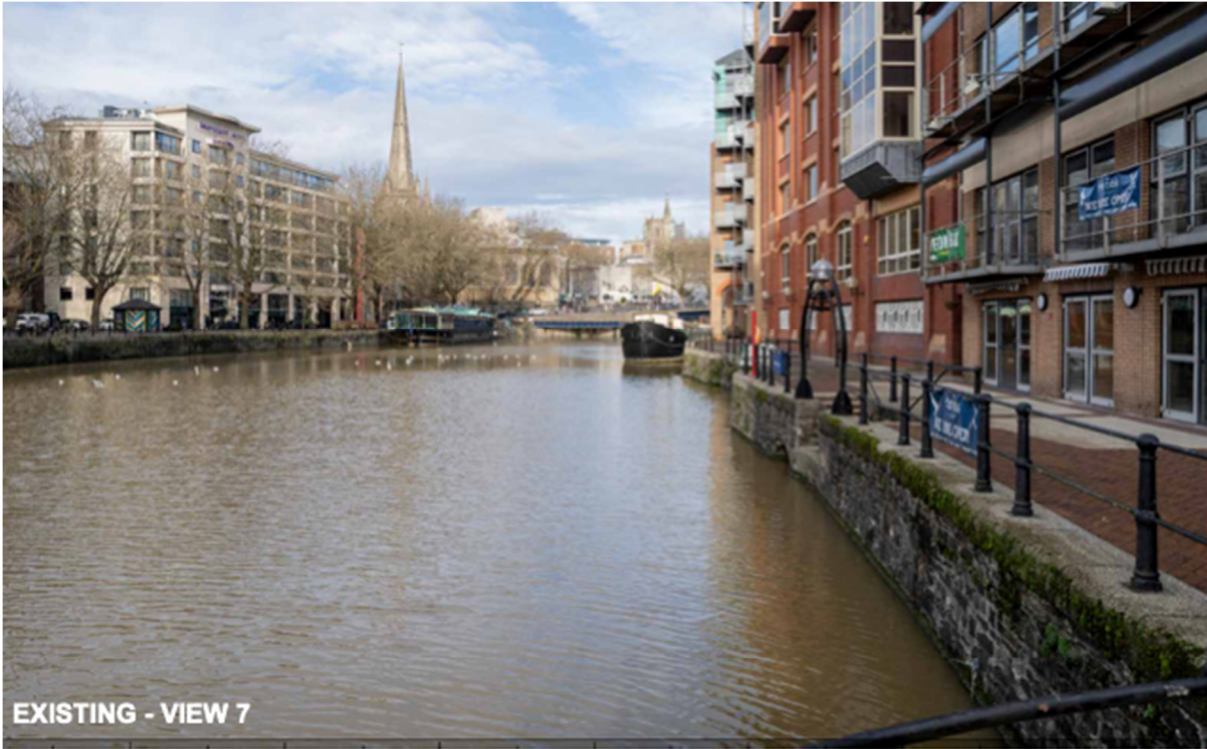
We welcome the steps taken by the developer to green the development through the use of air source heat pumps for heating and hot water production. However, we are disappointed that a standard such as Passivhaus has not been deployed to full effect. Given the significance of the site and the opportunity to deliver a flagship development, this seems a lost opportunity, including for positive publicity for the developer.

The supporting sustainability and energy strategy implies external fixed solar shading fins are to be incorporated. However, it is not clear from the elevations that this will actually be the case. We feel more information on the proposed mechanical cooling is required to understand how often it will need to be used to maintain comfortable indoor temperatures in a warming climate and how much energy will be consumed in doing so. The Society commends the fabric first approach being taken, and would recommend that this is followed through by way of openable windows to allow users control over their thermal environment.

July 16th 2021

**ANNEX C
ILLUSTRATIONS OF IMPACT**





EXISTING - VIEW 7



PROPOSED - VIEW 7

TAKEN FROM THE SUPPORTING DOCUMENT ES V2 HTVIA PART 2 OF 3



EXISTING - VIEW 8

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PROPOSED - VIEW 8

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EXISTING - VIEW 10

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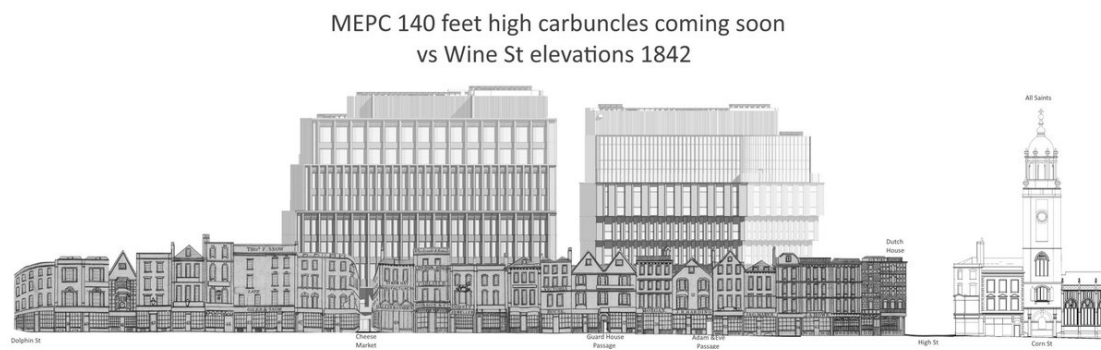
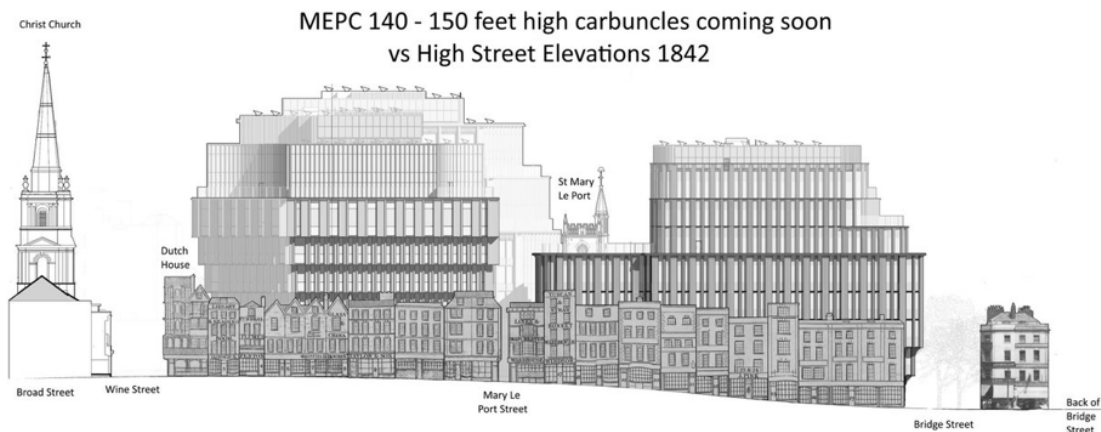


PROPOSED - VIEW 10

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TAKEN FROM THE SUPPORTING DOCUMENT ES V2 HTVIA PART 2 OF 3



SOURCE: GEORGE FERGUSON SUBMISSION TO HISTORIC ENGLAND 22 JANUARY 2022
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