

RESPONSE TO 22/06035/F – PEUGEOT SITE.

The Proposal.

The application is for 432 dwellings, 830sq m of flexible commercial space plus access, parking and public realm provision. **Bristol Civic Society objects strongly to it.**

The Society's response to 22/01295/PREAPP.

This can be summarised as follows

Although Bristol Civic Society supported the principle of redeveloping this site, we objected strongly to a number of aspects of the proposal including land uses, height, massing, scale, design, quality of living environment and public realm plus early reactions to access, parking, climate change and sustainability issues. We were particularly concerned about:

The proposed building heights, which we feel are intrinsically inappropriate and inconsistent with policies;

The intensity of development and its impact on the quality of life;

The proximity of many flats to the poor air quality and noise adjacent to the major roads;

The high number of single aspect flats, many of which are north facing.

A more equitable balance between residential and commercial uses would enable a development to comply more closely with the Temple Quarter Enterprise Zone Spatial Framework (TQEZ SF) and avoid residential accommodation adjacent to the major roads.

Response to the present application 22/06035/F.

Before making detailed comments, our position can be summarised as little changed. Whilst supporting the principle of redevelopment, we object strongly to this application on broadly the same grounds.

Land Uses.

The Society takes issue with the predominance of residential development proposed for this site. Our concern is based on two factors. Firstly, we have long registered our disquiet about the loss of employment generating uses in favour of residential uses in the absence of more information regarding the demand for commercial floorspace and the mix of employment opportunities required for the range of skills of the workforce in Bristol. Secondly, we consider that much of this site will be subjected to levels of noise and pollution that will be detrimental to the quality of living conditions at this location. Noise and pollution concerns are dealt with in more detail later in this submission. We note that the latest Bristol Temple Quarter Development Framework (BTQDF) suggests that the building adjacent to Temple Gate should be a mixed commercial and residential building and the other two buildings residential. If the Council agrees a residential element to the development, we would prefer the approach of the earlier TQEZ SF which sought a mix comprising up to 60% residential. We strongly suggest that the building adjacent to Temple Gate should be used entirely for commercial uses to avoid future residents having to live in close proximity to the noise and pollution generated by the traffic using this very busy road.

We support the use of ground floors for active frontages.

Height, Massing and Scale.

The Society objects strongly to the height and massing of the proposed buildings. Whilst there has been a reduction in the height of the tallest building to 15 storeys, it would still be a very tall building with a number of other buildings a few floors lower in close proximity. We are not convinced of the need for a tall landmark building here and feel that the gateway function would be better fulfilled with well-designed lower rise building which respected the nearby Grade I Brunel and station buildings. Indeed, the BTQDF seeks a scale and height of development reflecting the area's character and heritage.

A number of blocks of varying height are proposed but the massing is, nonetheless, intense and from some viewpoints will be read as a very solid wall of development.

In terms of scale, the proposal largely exceeds the predominant scale of this part of Clarence Road and Temple Gate although the height does step down toward the lower rise buildings immediately to the west. The Society appreciates that the site immediately to the north is ripe for redevelopment but we are not assuming that the scale for that development should be the same. The TQEZ SF indicated a medium rise 5-8 storey development for that site although it does show potential for a focal building. The BTQDF is less specific about height apart from, as noted above, seeking development of a scale and height reflecting the area's character and heritage.

Even allowing for intensification of use as advocated by the Urban Living SPD, the proposal is still a step change towards much higher and more intensive buildings. The SPD, in any case states, referring to such areas as Temple Quarter,

“ Development in these areas is being guided by adopted and emerging spatial frameworks which set out a clear three-dimensional vision for these areas.”

In summary, the Society feels that the proposed development is far too intensive for the site. It does not reflect the area's character and heritage. Rather, it would be extremely harmful to it.

Impact on Views.

Referring to the AVR report's views showing the impact of the proposed development, the Society has a number of concerns. Views 8,9,10 and 11 show the impact the proposal would have on views towards Bristol Temple Meads when approaching from Bath Road. The Society consider that these plus View 5 from Temple Meads Approach clearly illustrate why we object to the proposed height and massing. Approaching from Bath Road the corner of Temple Gate and Clarence Road presents itself as a solid mass of tall buildings and not, in our view, an inspiring entrance to central Bristol. The view from Temple meads approach is similar. The scale and height does not reflect the area's character and heritage.

Design.

Achieving well-designed and beautiful buildings is enshrined in the National Planning Policy Framework. The Society has a number of profound reservations concerning the design as it stands in addition to the issues we have raised on height, massing and scale. These comments relate to external features of the buildings. We find the heavy emphasis on orthogonal blocks

oppressive and would welcome greater variety in building shapes. The ground floor elevations at street level show some variation in approach which is welcome but the Society considers that more variety in the elevational treatment of the upper floors must be considered. There are large areas of repetitive balconies and some elevations with little or no relief to the pattern of fenestration.

There is a potential to create a stunning development to welcome people travelling towards central Bristol and we feel that this opportunity has been missed.

Quality of Living Environment, Noise and Air Quality.

Noise and poor air quality are particular concerns for this site especially for the elevations to Clarence Road and Temple Gate. Although improvements in the air quality and noise environments can be expected, we don't know how quickly and to what extent these will be achieved. The Society, as mentioned above, has doubts about the suitability of this site for residential use and, in particular, remains to be convinced that air quality and noise issues will not be harmful to the living environment of residents adjacent to the main roads. As noted above we believe land adjoining Clarence Road and Temple Gate would better suit commercial rather than residential development.

The Society strongly urges the Council to ensure it is satisfied that the methodology, including the derived data, adopted in the Air Quality Report accurately reflects actual site conditions and is therefore capable of supporting the conclusions reached. In particular, the air quality assessment should include daily mean and 1-hour mean NO₂ data, as per DEFRA guidance for building façades of residential properties. Temple gate is extremely busy particularly at peak times and when traffic moves slowly or is held up by congestion. We note that the Chief Medical Officer highlighted the impacts of air quality on health in the 2022 Annual Report and stated,

Page 59 "...For short-lived pollutants such as NO₂ and SO₂ the controlling factor that drives distributional trends and exposure is proximity to nearby emission sources. Since the lifetime of NO₂ is only a few hours, concentrations are dependent on very local emissions. This can cause additional inequality with those who live closest to local sources experiencing the highest concentrations. At present there is a disparity in exposure to NO₂ that is affected by an individuals' time spent near to major roads and living in higher-density urban settings. ..."

Page 127 "While compact places may reduce car use, air pollution concentrations may also be affected by building density and form, which can either reduce or increase the dispersion of pollutants. Urban planning can help by avoiding siting homes and active travel routes directly next to traffic routes."

We accept that the increased use of electric vehicles will reduce, although not eliminate, air pollution from vehicles. However, it will be some years before these benefits are felt significantly.

The Noise Assessment states,

"Considering these levels on the AVO diagrams, worst affected facades will have levels above the "SOAEL" level, and above a level at which noise causes a material change in behaviour. As such a whole dwelling ventilation system will be required for these apartments

as when windows are open to mitigate overheating internal noise levels are not acceptable.” Should the Council agree to residential use in areas so affected by noise, it must ensure ventilation is adequate. However, The Society considers that this situation would not provide good living conditions.

53% of the apartments would be single aspect flats. Many of these would face north which would result in limited sunlight for residents. The Society suggests a greater emphasis on dual aspect apartments would improve living conditions and, in particular, a reduction in the number of north facing single aspect flats.

The development of well over 400 apartments will almost certainly bring an additional 1000 residents to this area. The Society urges the Council to assess shopping, medical and educational facilities within reasonable walking distance of the development to determine their adequacy for a population expansion of this magnitude. We are not convinced that home deliveries are the solution to shopping needs and that dependence on them could increase the isolation of residents.

Mix of Tenures and Unit Sizes.

We have already expressed our concerns regarding the use of this site for substantial residential development. Where, however, the Council does agree to residential developments, the Society supports the Council’s drive to increase the number of affordable dwellings. We are utterly dismayed therefore, that the developers propose to provide no affordable accommodation on viability grounds. We urge the Council to challenge this in view of the Local Plan’s requirements and the BTQDF’s proposal that residential development south of Temple gate should provide 40% affordable housing comprising 70% social housing and 30% shared ownership.

Over 90% of the proposed apartments would have one or two bedrooms. Over half would be for one or two persons. We feel, again subject to the Council’s acceptance of residential development on this site, that a greater variety of unit sizes could help to achieve a more balanced community here.

Public Realm.

We support the provision of active street frontages. Similarly, we welcome the concept of greening the street frontages with planting. Many of the flats have balconies but the Society considers that those fronting the main roads, particularly Temple Gate, will not be pleasant to use. An open space at first floor level is proposed. Public realm proposals should contribute to the sense of community and development of contacts among residents in this large development. Outdoor space is provided at ground floor level and on higher terraces. These spaces will suffer considerably from the shading effect of surrounding tall buildings. Overall, the Society does not consider the public realm elements are sufficient to ensure a good quality of life and doubts whether this can be achieved with the density of development proposed.

Access and Parking.

The site is very well located for public transport facilities. Car parking provision need not be substantial but cycle parking and storage facilities need to be at least policy compliant.

Pedestrian permeability is good. Pedestrian access to Bristol Temple Meads station will involve crossing Temple Gate. This is not a pleasant experience at present and the Society would welcome improvements to this if possible.

Climate Change and Sustainability Issues.

We expect the development of this site to be suitable for zero carbon living in a changing climate and in line with the City Council's ambition for the city to be carbon neutral by 2030 which Bristol Civic Society strongly supports. The applicants state that the development is currently intending to achieve an embodied target of 500 kgCO₂e/m² for Upfront Carbon (A1-A5) in line with LETI 2020 standards. This is hardly impressive given LETI's 2030 good practice benchmark for 2030 is <300 kgCO₂e/m² and the city's ambition to be carbon neutral by 2030.