



an independent force for a better Bristol

27 August 2023

23/02827/F | Demolition & redevelopment to provide co-living units and student accommodation, associated amenity spaces, ground floor uses (Class E), access, servicing, landscaping, public realm, and associated works. | Premier Inn, The Haymarket Bristol BS1 3LR

## Summary

Bristol Civic Society campaigns for the good planning and design that successfully integrates new development with what makes the city special. We want new development to uplift the spirit and improve the quality of life for all across the city. We believe an opportunity is being missed to reconfigure this part of Bristol in a way that civilises our streets at human scale.

We back providing the affordable homes desperately needed in Bristol. It is not a question of whether, but how those homes are provided, where and what sort. A decent home is a basic human right, and it is troubling these proposals for redeveloping the Premier Inn fall short in that regard. We share the One City Climate Strategy's ambition of a carbon-neutral and climate-resilient Bristol by 2030. We are, therefore, dismayed by the proposals. Despite the advocacy of the documents supporting the application, they show a disappointing neglect of how we should plan our city in the face of climate change.

National policy tells us that creating high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. These proposals, however, are the epitome of the industrial scale, nowhere but everywhere urban design and architecture that is changing the character of Bristol for the worse. The proposals deploy generic forms and materials which can be found across the globe and have no identity with place.

We are particularly appalled by the proposed 28-storey tower. It is cavalier in its disregard for the principles that make successful places and the unique character Bristol derives from a successful integration of built form and topography. We disrupt this character at our peril. It contributes to the wellbeing of those who have made their home here. It underpins tourism and is a magnet for the many cutting-edge businesses that are the lifeblood of Bristol. It is also our inherited legacy and we have a duty of care. Do we really want future generations to ask 'why did they do that, why didn't they learn from past mistakes?'

We, therefore, object in the strongest terms to this planning application. We set out why in detail below.

## **Development Plan**

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is a material consideration in planning decisions.

As the applicant's Planning Statement notes, Footnote 8 of the NPPF says the development plan policies which are most important for determining a planning application for housing can be considered 'out-of-date' where, as is the case in Bristol (according to national planning rules), there is an undersupply and under-delivery of housing sites. The applicant implies Footnote 8 is engaged and comments that "When the presumption in favour of sustainable development is applied, the planning balance is considered to lean even further in support of the Scheme." This suggests the applicant considers the Purpose Built Student Accommodation (PBSA) to be a housing proposal. If this is the case, we would question why there is no contribution to affordable housing. In our view, it would be unreasonable to apply Footnote 8 to the proposals for PBSA when demand is generated by the expansionary business models of commercial enterprises and not local housing need.

That said, we want to underline that the presumption does not give carte blanche to unacceptable development (as is clear from appeal refusals in Bristol). As the NPPF sets out, permission should be granted *unless* "(i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole." Both exceptions are triggered by these proposals. As NPPF Footnote 7 explains, the policies referred to in (i) include those relating to designated heritage assets. The proposals cut across a number of important NPPF policies and, therefore, also engage (ii). These policies include those for meeting the challenge of climate change, achieving well-designed places, conserving and enhancing the historic environment (including protecting the setting of heritage assets) and supporting healthy living conditions and the wellbeing of communities.

The NPPF also reminds decision-takers that planning decisions must reflect relevant statutory requirements. In the case of these proposals these requirements include the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act. As the Court of Appeal emphasised in *Barnwell*, a finding of harm to a listed building including its setting gives rise to a strong presumption against planning permission being granted which can only be outweighed by material considerations powerful enough to do so. These proposals harm the setting of a considerable number of listed buildings.

## **Fighting Climate Change**

Bristol has a shared ambition to be carbon neutral by 2030. The national target is net zero by 2050. The city's ambition is to be applauded as it recognises the importance of stabilising the rise in global temperatures before irreversible tipping points are reached. The carbon

emissions emitted today, and over the next few years, have a far-reaching impact beyond their equivalence in 30 years' time.

Saving a ton of carbon in 2050 is clearly important but it is the ton of carbon we save now that will determine whether or not we are locked into irreversible climate change. We, therefore, need to focus, and with the commensurate urgency, on cutting emissions today. This fact has profound implications for how we plan our city and how we provide decent homes.

These proposals are in part justified by the applicant's life cycle analysis which says knocking down the existing buildings and starting again is best for carbon. Treating the data supplied at face value this is a highly questionable conclusion. Relying on the data is a leap of faith without the background analysis that is referenced but not available for public scrutiny. For example, we do not know how the planned decarbonisation of the grid has been taken into account; or, whether the fact the building was originally designed for an office has been reflected in the assessment. The design parameters at the time mean the building is likely to have a significant amount of adaptability in its frame, with probably a design life of 100 years. This would give it the spare strength necessary for an imaginative architect and engineer to repurpose the building to a housing use (if there wasn't a market for a continuing use as a hotel). There are examples across the city of repurposing old office towers where this imagination has been shown.

If the case were made for demolition, which it is not, we ask whether the proposed building morphology - particularly the 28-storey tower - is optimal if we are genuinely concerned about cutting emissions. Research evidence suggests it is not. Carbon emissions from new development start to climb above 15 storeys for a number of reasons.

So, in short, the relative contributions to climate change made by so called 'operational emissions' (the emissions associated with inhabiting a building once built) and 'embodied emissions' – those associated with the construction process itself – means our attention should be on the embodied emissions. In the analysis presented by the applicant, the upfront carbon of the materials used in the rebuild would be around three times higher than for refurbishment. The overall carbon load of the redevelopment phase would be some two and half times that of refurbishment. The embodied carbon resulting from these proposals would be the equivalent to the carbon emissions of putting nearly 9,000 extra cars on the road for a year. Or some 20,000 return trips by plane to New York from London Heathrow.

And it is important to bear in mind that the design life reference case for the applicant's life cycle analysis is 60 years, and the upfront carbon is spread over this time period. The shorter the design life, the bigger proportionally the share taken by embodied emissions. At best, it is ironic that the building the applicant is arguing should be demolished has not stood for 60 years.

Contrary to the impression given by the applicant's analysis (not least the graphic in the Design and Access Statement), operational emissions can be kept relatively low with refurbishments. Properly considered, the 'hit' in terms of embodied carbon associated with demolition and rebuild relative to refurbishment begins to look enormous. Judged in terms of the city's

commitment to tackling carbon emissions sooner rather than later there is a clear case for refusing this application.

In his recent decision to refuse the redevelopment of the M&S store on Oxford Street the Secretary of State underlined that because of concerns about carbon emissions “there should generally be a strong presumption in favour of repurposing and reusing buildings, as reflected in paragraph 152 of the Framework.” And it is important to note that the redevelopment of the M&S store would have delivered a BREEAM *outstanding* assessment whereas these proposals are targeting *excellent*, a lower rating. It is also worth repeating in full the inspector’s conclusion on embodied carbon:

“Of the material considerations of which to take account, the extent of embodied energy that would be required weighs most heavily against the scheme. This is particularly pertinent as the extent of carbon release would be long before it could be provided by a decarbonised electricity grid. The Applicant’s calculations suggest that a new building would perform better over its lifetime than a refurbishment but, even if that were found to be true, it would still result in far more carbon emissions than after the UK has achieved a net-zero grid.”

Even if it were accepted, in our view mistakenly, that redevelopment was justified it is important to look at likely embodied emissions arising from the chosen building morphology. The key message of recent research on building height is moderation - the embodied carbon 'penalty' is significant for very low-rise (1-2 storeys) or very high-rise (15+ storey) buildings. This is because there's a 'fixed cost' in foundations and roofs, making bungalows inefficient, and much taller buildings devote space to lifts, staircases and waste material in stability systems.

Contrary to what is asserted by the applicant, the proposals are not exemplary. They fall considerably short of the RIBA 2030 Climate Challenge target metric for embodied carbon and it is misleading to imply, as does the applicant, that “today” in the RIBA target is 2023. The RIBA challenge is included in a 2021 document, which makes it clear “As the targets are for performance outcomes of buildings in operation, the RIBA advocates that buildings in design today [ie 2021] should, as a minimum, adopt the 2025 targets.” The applicant’s timeline for these proposals, which anticipates a planning consent in early 2024, assumes completion could be 2029. Why then benchmark against the 2025 in-use targets?

Similarly, it is unsafe to rely on emerging local plan targets when these have been roundly criticised in the public consultation for including lesser requirements for taller buildings. Respondents also stated the plan should better support prioritising renovation or retrofitting of existing structures, including the response received from the Bristol Advisory Committee on Climate Change.

### **Height and massing**

The 28-storey tower would have substantial, adverse consequences for the character of Bristol. It would undermine and diminish those qualities which make Bristol special and help distinguish it from other major cities. This has consequences for tourism and the city’s ability to attract and retain the cutting-edge businesses which are the city’s future. Bristol competes in a

global market and cannot afford to damage its brand as a historic city with vibrancy, well-designed buildings and the largely successful integration of development and topography. The proposed tower continues the destruction of the unique relationship intrinsic to historic Bristol of topography, built form and skyline. Bristol's steeply sloping escarpments also provide numerous vantage points from which to view the city, across the city and beyond. The verified views show just how this development would further exacerbate the loss of views through the city to the adjoining countryside.

The impact on views of the historic buildings on the Kingsdown escarpment is particularly worrying. The proposals sit in the viewing cones from Windmill Hill and Totterdown, set out in the Tall Buildings SPD1 (the last considered mapping of views that should be protected prior to being replaced by the Urban Living Supplementary Planning Document). Development plan policies about the appropriateness of locations of tall buildings and their design were formulated in the context of these cones (they are a geographical feature) and these cones are still a material consideration. The proposed 28-storey tower would substantially and adversely disrupt these views to the detriment of the city's skyline.

The generality of the location may be considered by some as suitable for a tall building (although we would dispute tall buildings are the most sustainable building morphology), but the height of the Premier Inn hotel should be the maximum acceptable ceiling. It is no accident that even this product of an earlier era of brutalist building tops out at a height that does not loom over the Kingsdown ridge. Interestingly, the Urban Living SPD in defining a contextual tall building gives the reference point for tallness as the prevailing height in areas of varied height. It does not define tall in increments of the height of the tallest building. Such an approach would be absurd in terms of placemaking as tall buildings would look to leap frog from the tallest building in the locality.

The impact of a 28-storey tower on the settings of numerous designated heritage assets causes substantial harm, on individual assets in the immediate locality including the Church of St James Priory, a grade 1 listed building and one of the oldest and historically most significant buildings in Bristol; on Church House, a grade 2\* listed building which incorporates the last standing remains of part of the cloistral range of St James's Priory; and in aggregate on a number of grade 2 listed buildings and structures integral to the St James' Parade Conservation Area and the conservation area itself where the city council's adopted character appraisal states that "preserving the setting and views out from, as well as views into the conservation area, is vital in protecting its character and significance". The document notes that an adopted character appraisal both "provides a point of reference for the planning authority, developers and communities in managing change appropriately" and "provides a tool for development management officers, developers, residents and others to recognise the special interest of the area in order that it can be preserved or enhanced".

More widely, the proposals would affect the setting of a substantial number of listed buildings and conservation areas including the Portland and Brunswick Square Conservation Area where the character appraisal comments that proposals which would cause unacceptable harm to views in and out of the conservation areas or to landmarks should not be permitted; the Stokes Croft Conservation Area where the character appraisal comments critically about the impact of the existing tower block; the Kingsdown Conservation Area (which has a fine grouping of over

200 listed buildings); and the City and Queen Square Conservation Area. The Urban Living SPD is clear that when siting a tall building, it is important to consider a range of long and medium-range as well as local viewpoints to understand the suitability of the site to accommodate a tall building.

The applicant says the 28-storey tower is placed to mitigate the impact on the Priory by orienting its narrowest side to the listed building (and St James Barton Roundabout). We do not think the aim is achieved but by orienting the tower in this manner it presents a 28-storey wall, some 30 metres in length to the Kingsdown Conservation Area. This would block views to the Kingsdown Conservation Area, and from the conservation area across the city and to the countryside rim of Bristol's setting.

The conservation area's character appraisal prepared by the council is unambiguous "What gives Kingsdown its special sense of place is its village atmosphere created by the skyline views, the historic street pattern, and the quality of its Georgian houses." The appraisal continues "The topography of the City is unique and views across it make an important contribution to Bristol's townscape and character. The spectacular City-wide views enjoyed from Kingsdown are fundamental to its special interest". The Portland and Brunswick Square character appraisal comments similarly that the topography of Bristol is "unique and views across it make an important contribution to the city's townscape and character".

The character appraisal for the Kingsdown Conservation Area could not give a clearer warning to decision-takers "To the south [ie where the proposals are located], Kingsdown's streets and precipitous lanes give unique views of the City and beyond - from Dundry in the southwest to Lansdown in the southeast.... The tall houses on the escarpment can be seen from many points across the City..... The preservation of Kingsdown's views is vital in protecting the area's character and special interest."

National planning policy is unequivocal "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. This has not been provided (and we doubt that it could, given the harm that would be done).

The loss of part of Bristol's character only delivers a paltry return. Recent safety requirements mean some 30% of the created floorspace in the upper floors is devoted to access, circulation and service ducting. Above level 17 of the 28-storey tower each floor only accommodates 11 student beds. The building morphology is not an efficient use of the site, contrary to the applicant's assertions. The heavy penalty for embodied emissions for building tall and the staggering impact on Bristol's skyline and heritage has a meagre yield of 91 student bedspaces.

Given the extensive visual impact these proposals will have it is very disappointing to see the limitations of the applicant's appraisal. The verified views (which arrived late) do not address all the likely impacts and can be partial (why hide behind a tree when a clear view is obtainable a few steps to the side in either direction?), there is no cross-sectional appraisal (to understand the impact on the relationship between built form and the city's topography) and limited 3-D visualisation. Bearing in mind all this, and the error in the Vu.City townscape model which mistakenly shows an approved tower on Bond Street, it is deeply disturbing to see the

applicant's report that in September 2022 "BCC agrees principle of height: already a tall building on site, can be used as a landmark and represent a gateway to the city centre". This, if an accurate reporting, would be notwithstanding the significant conflict with Bristol's own development plan policies on tall buildings, good design and the protection of heritage assets, national planning policy and absolutely no engagement with the public at the option stage contrary to the stated requirement in the adopted Statement of Community Involvement.

It would also be mistaken to consider the visual impact solely in terms of the effect on heritage assets, or even the economic cost. There is also a welfare cost. Tall buildings, such as this proposed 28-storey tower, privatise city and countryside views for the privileged – those who can afford to live in the top floors of the towers, or in this instance qualify for PBSA. This, from the applicant's own supporting information, sums up the capture of what was a public good "Sky lounge taking advantage of spectacular views over Bristol. The space is accessible to all residents". Now, in 2023, anyone can benefit from these views and enjoy them as they go about their daily activities. Proposals such as this commercialise the value of Bristol's skyline and views of the sky for benefit of a few. The losers will include the social housing on Dove Street. Those with their homes in the flats will have as their aspect a Bristol Manhattan (verified view package 6) and the backdrop for their children's playground.

The dominance of towering buildings overwhelms the streets at their base. They result in a loss of sky, take away opportunities to see beyond the city and affect wellbeing - not least through cutting off the sense of being in touch with the countryside and nature. Losing views isn't just dispiriting in terms of townscape and heritage (which it is) but makes for a claustrophobic, brutalist city that has lost touch with human scale. The applicant's Health Impact Assessment notes that indicators relating to mental health are already worse in the Central Ward than national comparators. Why takes risks with people's mental health?

The applicant has submitted a detailed appraisal of the design merits of the proposals, which unsurprisingly concludes there is much merit in the design and the tallness of the tower is appropriate. In doing so, Camillo Sitte's D/H ratio principle is cited (where 'D' is the depth or width of a public space and 'H' is the height of its surrounding buildings), as is Lord Rogers' Urban Task Force report. Mischievously in drawing a supportive conclusion on height, the applicant applies the longest axis of the St James Barton Roundabout to justify a 107 metres tower but ignores the relationship with the narrower street width of The Haymarket and the much more intimate Cannon Street. Both would produce a much lower building height. And interestingly, Pasqual Maragall (the renowned former mayor of Barcelona) in his introduction to the Urban Task Force report underlines the importance of consensus building in Barcelona's urban renaissance and a commitment to participative democracy. These proposals have, as outlined in the DAS, largely been drawn up by technocrats behind closed doors with no meaningful public engagement and fail both of Maragall's tests.

The National Model Design Code (NMDC) sets out a number of principles relevant to the design of tall buildings. These principles underline that the impact on the skyline needs to be carefully considered, and both the street and long views. These proposals may be satisfactory on the former, albeit that is debatable, but clearly fail on the latter. Not least because they fail to take account of another NMDC principle "The long and short elevations need to be well-proportioned in terms of their slenderness." These proposals are inelegant with a bulky

massing in their length. Interestingly, the NMDC also says a “tall building needs to follow the building line at street level.” Clearly these proposals do not.

The proposals also cut across several Urban Living SPD tests for tall buildings by masking the topography of the city, harming valued views from key vantage points and having a detrimental impact on the city’s historic environment. They also ignore the combined effect with the near-by proposed Debenham’s tower notwithstanding the advice in the SPD that “When assessing a tall building, it is important to understand the cumulative impacts of the proposals, if there are other tall buildings (either existing or proposed) in the vicinity.”

### **Sustainability and living conditions**

The applicant supports the proposals with a ‘Sustainability Charter’, drawing from a range of technical assessments. In our view, these pose significant concerns about the proposals, such when combined with the carbon load, risk the charter being seen as no more than greenwashing.

For noise, the technical assessment concludes that to be acceptable the accommodation would have to have closed, sound-attenuating windows. This means the buildings will rely on mechanical ventilation and, to avoid overheating in the summer, comfort cooling (air con) to the co-living units and mechanical purge ventilation to PBSA habitable spaces. The additional building mass and air con pumping heat into the surrounding area will exacerbate the urban heat island effect in what is already an overheating part of Bristol but this is not given attention.

When a new development takes away daylight and sunlight from adjoining properties, it has two effects. First, it adversely impacts the quality of living accommodation where the affected property includes habitable rooms, and, secondly, it leads to higher carbon emissions in the affected property because of the need to resort to artificial lighting more frequently. Both the reduction in light and use of artificial light can affect the wellbeing of those who live in the affected properties. According to the applicant’s own assessment, the proposed redevelopment will adversely affect the IQ student accommodation on Cannon Street. The assessment says that over 60% of the assessed windows would not comply with BRE guidelines for daylight (VSC and NRL). A substantial number of the affected windows (for student studio accommodation) would suffer a major adverse impact. Yet, the conclusion is the impact is acceptable. The reasoning is because it’s an urban area (and what else do you expect) and the impact will be a short term one on students “there will be noticeable changes in daylight and sunlight to the central core rooms in the south east facade.... Given the transient nature of the occupants within this building, any potential impact would be on a short-term basis, when compared to a full residential property. It therefore is considered a lower sensitivity for daylight and sunlight.”

Such a conclusion is unacceptable for two reasons. First, students will live in the building in those months of the year when daylight is at a premium. There is an evidential relationship between daylight / sunlight and mental health. Many aspects of human health, including the length and quality of our sleep, are linked to the light signals we receive during the day. There is a known risk of mental health concerns and suicide in the student population. Students’ well-



being should not be so easily dismissed. Second, we need to move away from the throw-away culture prevalent in the building industry. Buildings need to be adaptable. So, even on the applicant's own terms, what would happen to the IQ building if there is a change in demand for PBSA - the applicant accepts the proposed development would make part of the IQ building unacceptable for residential use.

The applicant says there are no directly north-facing single aspect units in the proposals. Whilst this is strictly and narrowly true, over a 100 single aspect PBSA units would in effect face north using the sun compass for the academic year. This has implications for daylight and sunlight.

With regard to daylight in the proposed accommodation, 8% of assessed rooms do not achieve the minimum levels of spatial Daylight Autonomy (sDA) recommended within the UK National Annex of the European standard. In relation to sunlight, 31% of rooms do not achieve at least one and a half hours of sunlight on the equinox as recommended as preferable by the BRE. Nevertheless, the conclusion is given "the inherent external constraints due to the IQ building directly to the north of the site and the transient nature of the student rooms making up the scheme, this should be considered a good result for this site." A good result? Again, the conclusion omits the implications for the building's adaptability and dismisses the welfare of students who (somehow) when they're in Bristol can live with less sunshine than the recommended norm.

The Urban Living SPD allows for an approach where the assessment of daylight and sunlight is informed by what is euphemistically referred to as "comparative contextual analysis". In essence, this allows for a bending of normal expectations in "dense urban environments" where making "efficient use of a site" would mean normal expectations of daylighting and sunlight cannot be met. National policy is however very clear that this is only appropriate in so far as the resulting scheme would provide acceptable living standards. Clearly for a number of residents of both the existing IQ building and the proposed development that would not be the case.

In terms of air quality, the supporting assessment concludes living conditions will be acceptable. This conclusion, however, does not appear to have taken account of the City Centre Development and Delivery Plan's proposed diversion of traffic out of the city centre to The Haymarket and Bond Street. Given this, it is not apparent how the conclusions would be consistent with achieving the government's PM2.5 annual mean concentration 2028 Interim target of 12 µg/m<sup>3</sup> when the development opens in 2028/29. Equally, it seems heroic to conclude that NO<sub>2</sub> will be less than the national target of 40 µg/m<sup>3</sup> when the Stokes Croft roadside monitoring was exceeding the limit up until Covid intervened. It is also striking that the national standards being applied are significantly more permissive than the more precautionary WHO guidelines. The proposals are not compliant with the latter. It is also important to be aware that the European Commission has proposed to revise the Ambient Air Quality Directives (which have informed UK national standards) to align the air quality standards more closely with the WHO recommendations.

In the context, it is material to take into account the advice of the Chief Medical Officer (Professor Chris Whitty). He said in his last annual report (2022) "For short-lived pollutants

such as NO<sub>2</sub> and SO<sub>2</sub> the controlling factor that drives distributional trends and exposure is proximity to nearby emission sources. Since the lifetime of NO<sub>2</sub> 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 NO<sub>2</sub> that is affected by an individuals' time spent near to major roads and living in higher-density urban settings. ...”

And, he continued “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.”

At 28 storeys these proposals will reduce dispersion, and this will be exacerbated if the proposed Debenhams tower on the opposite side of the St James Barton Roundabout was consented.

The transport assessment (and DAS) is worryingly self-congratulatory. The proposals, it is said, are for a sustainable location where residents can use more active transport, save car trips and by implication carbon. We applaud providing greater opportunities to walk and cycle. But the inconvenient fact that has to be put on the carbon balance is the amount of carbon that will be emitted in building these proposals. With the proposed bedspace capacity, the carbon emitted in construction to deliver the opportunity for residents not to use their cars is the equivalent to each resident, each year, driving the average UK car mileage (with the average emissions) for around the next 15 years ie the best breakeven point would not be until the mid 2040s by when the car fleet would have been largely electrified for a number of years. In simple terms, the carbon benefit from reduced transport is nowhere near sufficient to offset the carbon pain from embodied carbon.

The transport assessment also raises other questions, including why use data from 2020 (the AQ assessment uses pre-pandemic data), why model, using comparative data, likely trip rates for a hotel in the middle of Bristol with limited car parking but exclude London data from the analysis and why ignore the likelihood that residents will use taxis and private hire vehicles such as Uber? The envisaged drop-off arrangements for the beginning of term are optimistic at best and are likely to be chaotic with adverse implications for safety on the St James Barton Roundabout.

We would normally welcome proposals that increase public realm and green the city centre. But these proposals are misleading. Under the heading green spaces, we are told that 63% of the site will be public realm ‘providing a welcoming and landscaped space for residents and the local community’. The reality would be different. The bulk of the public realm would be paved not green, dominated and shaded by the enormous bulk of the proposals and the public realm will mostly not be public and not feel inviting as a route from the city centre to the bus station. There is also no illustration that shows the wind mitigation panels that were a late addition required to make the pedestrian access under the PBSA usable. It also beggars belief why a 28-storey tower has to be built to improve permeability. The precast concrete structure housing the substation, perhaps a couple of metres in height and ten metres long, sat at the corner of

Marlborough Street and St James Barton Roundabout will not improve the public realm and it will be a magnet for graffiti (as will all the site, without regular management).

We also note the wind tunnelling / micro climate assessment comments that the introduction of the proposals would increase windiness around the site. This assessment does not include in the modelling the proposals for the Debenhams tower on the opposite side of the roundabout which will affect local conditions. The tower, if approved, would also cast a shadow for a significant part of the day over the limited amount of genuinely green space that is provided.

For the above reasons, the proposals fail the relevant Environmental Quality tests set out in the Urban Living SPD. We cannot comment on whether the shadows cast by the proposals on the public realm are acceptable (Q1.5) because no systematic analysis has been provided.

### **Affordable housing offer**

As is set out in the supporting document, purpose-built co-living can provide a more affordable pathway to renting a home than a one-bed flat and it can have the positive attributes of flat-sharing with access to shared facilities. It is, therefore, a form of accommodation we welcome in principle. There can still be a gap between what is truly affordable and co-living rents, therefore we welcome the commitment to provide affordable housing. We do note that the policy expectation set out in the adopted Core Strategy is 40% not the 20% proposed here (which reflects the fast-track route set out in the latest Affordable Housing Practice Note).

We are concerned, however, that these proposals are a missed opportunity to provide more affordable housing. The proposed co-living building, at 6,500m<sup>2</sup> GIA, will provide 26 affordable units. The PBSA, at 14,500m<sup>2</sup> GIA, does not provide any affordable housing. This means two-thirds of the floorspace being created, including all the controversial 28-storey tower, does not deliver any affordable housing for Bristol. Put another way, less than 4% of the proposed floorspace would be provided as affordable housing.

All affordable units are proposed to be studios. The average size of a studio is 21.3m<sup>2</sup>, with additional internal and external amenity space the total is 29.7m<sup>2</sup> per resident. The Nationally Described Space Standard for a one-person dwelling is 37m<sup>2</sup>. As the applicant states, the city council's Spaced Standards Practice Note (March 2021) currently doesn't look to apply the national standards directly to co-living accommodation. But it does set out an approach that looks to ensure the anticipated living floorspace, including communal floor space is sufficient. It is not clear that such a calculation has been provided or that the overall floor space per person meets the city's requirements.

We also note that the city council has approved co-living developments where the space standards are similar to these proposals. But we sound a note of caution. Just because small co-living bedsits can be let, because they're cheaper, this doesn't mean they should be encouraged and it doesn't mean the spaces standards are appropriate for the affordable housing offer. There was a time when social housing was expected to meet a decent homes standard that exceeded what was being delivered in the private sector.

We are also aware that the success of co-living seems to depend as much on the adequacy of the private space as on the shared spaces. There are concerns about whether the private spaces in co-living developments are too small to be healthy. It is potentially damaging to mental health to live in one small room, and there is no guarantee that residents will consistently feel comfortable accessing common facilities. Developers argue that having communal shared spaces and amenities off-sets the small individual rooms provided. With a likely continual churn of residents, because of the demographic being aimed at, it has to be questionable whether communal facilities will foster communal living, or the reality will be residents will choose to live exclusively in their inadequately sized bedsit.

### **Need / demand for the proposed development and its benefits**

We are very supportive of tackling the housing crisis in Bristol and recognise the demand for student accommodation. PBSA is preferable to students occupying family housing and further conversion of the existing housing stock to student HMOs. It is, however, entirely inappropriate and undesirable for the city's townscape to be sacrificed to the current gold rush of speculative development that, in significant part, roots in the universities' unconditional expansionary business models. These business models also appear to ignore the carbon emissions arising from the off-campus PBSA serving the demand generated by their businesses. The city council shouldn't.

PBSA also only makes a fractional contribution to the city's non-compliant position on its five year housing land supply in comparison with general housing, which makes the damage from the proposed 28-storey tower even more frustrating.

In a number of the supporting documents, the applicant looks to put a value on the development's likely contribution to the city. These assessments are speculative at best, not least the assumptions relating to job opportunities for local people and local procurement. They are also partial in that they look to cost only the asserted benefits and not the costs to the economy we have discussed above. There is also no attempt to cost the adverse impacts on the environment including the upfront emission from embodied carbon. What is common ground is that the proposed PBSA will not contribute any council tax, but will benefit from city services that will have to be paid for by Bristol residents. What also largely slips under the radar is the loss of over 60 jobs provided by the current uses. No attention is given in the supporting information to where in the community those job losses will be felt, or by which demographic.

### **Conclusion**

We have set out in detail why we oppose these proposals. On the basis of all the points covered in the previous 11 pages, we object in the strongest possible terms to this planning application. What is proposed is something of an insult to the values of the people of Bristol and would change the character of their city for the worse. Should it be built, there would be lasting bewilderment as to why this dreadful scheme was ever given planning permission.

End.