



Premier Business Park Sussex Street Bristol BS2 0RA
Planning application No. 23/01469/F

OMCA Comments
September 2023

Demolition of existing structures and redevelopment of the site for two buildings comprising light industrial use (Class E(g)(iii)); flexible retail/light industrial use (Class E(a) / Class E(g)(iii)); flexible commercial use (Class E(b-g)); student accommodation use with ancillary community space (Sui Generis); public realm works and landscaping; cycle parking; ancillary plant and servicing; and other associated works. (Major)

Community Consultation

We commend the applicant's approach to community consultation; the developer engaged with OMCA and the Dings Community Group early in the design process, holding three face-to-face meetings, listening to what we had to say, understanding the Neighbourhood Plan, and making significant changes as a direct result. The scheme now includes much-needed workshop spaces for local creative businesses, spaces for a supermarket and community use, as well as eight town houses that reflect the traditional housing in The Dings.

At the first meeting (24/11/22) the developer, Dominus, and architect, AHMM, went through their initial thoughts and wished to get a steer on anything that we might want to be incorporated into the scheme and listened to our suggestions/concerns. We highlighted the lack of small workshop units, a supermarket and community space in the neighbourhood. We agreed that Henry Street should be reinstated, and suggested that some student townhouses could be incorporated, similar to those recently built on Jacob Street. We discussed leisure spaces, trees and planting, and also talked about pedestrian crossings on Kingsland Road.

At the second meeting (23/02/23) Dominus and AHMM presented their proposals which incorporated maker spaces (workshops), a small supermarket, dedicated community space, and town houses with Henry Street reinstated as a pedestrian area with maker spaces each side and the main entrance to the student accommodation in the middle.

The third meeting (17/05/23) concentrated on the community space, the activities that it could accommodate, and how Dominus could assist in establishing it as a real community asset, possibly by funding a community engagement person (full or part time).

We would have welcomed a further meeting to specifically discuss the details of what the building looks like in terms of architectural treatment, materials, building height and silhouette. It is addressing these points that forms the main part of our review of the planning application.

The Old Market Quarter Neighbourhood Development Plan

Policies

Given that this planning application is for car-free student accommodation plus ground floor spaces for workshops, retail and communal uses the following neighbourhood plan policies apply to the development of this site:

Policy T1: Development proposals should be designed to reduce the environmental impact of vehicular traffic and encourage movement on foot and by bicycle.

Policy B2: *The design of new development must take account of the history and setting of the Old Market Quarter. New buildings should be designed to be sympathetic to the height and design of neighbouring buildings, street width and frontage lines. Development proposals should also have regard to the Old Market Quarter Design Code set out in Appendix 3.*

Policy B5: *Within the Principal Industrial and Warehousing Areas defined on Map 5: Policies, proposals for development involving the provision of residential or other non-industrial uses will only be permitted where the site is located on the perimeter of the area so designated, where the use remains predominantly commercial, and where it can be shown that a satisfactory standard of amenity would be provided for any residential occupiers.*

Policy C1: *Mixed use development that includes flexible space suitable for accommodating a variety of business uses will be encouraged. This includes small scale office spaces and workshops integrated into residential development.*

Policy C3: *Development will be encouraged that includes space for a supermarket with a minimum area of 370 m²/4,000 ft² provided that the proposal can be shown to be likely to enhance the retailing vitality and viability of the part of the plan area centred on Old Market Street and West Street.*

Policy C4: *Proposals for development which supports the creation of community facilities will be permitted provided they do not detract from residential amenity. Community services that will be particularly encouraged in Old Market Quarter include:*

- *A new Health Centre at the Western end of the Neighbourhood Plan area.*
- *Community centre or space, in the centre of the Neighbourhood Plan area.*
- *New pre-school premises for an expanding population.*

Project SD3 - Midland Road: *There are sites on each side of Midland Road, including some within the designated Principal Industrial and Warehousing Area, which offer development opportunities that would achieve the aim of Policy B5 and the aspiration set out in the Central Area Plan to introduce buildings with active ground floor frontages that address Midland Road to reflect its role as a primary pedestrian route to areas of major change including the Enterprise Zone.*

Appendix 3: Old Market Quarter Design Code

All sections of the code would apply to this application:

- *Public realm*
- *Scale*
- *Urban and architectural character*
- *Materials and details*

Relevance of these policies to this application

OMQNDP Policy T1 relates to neighbourhood plan map 2: Existing and Proposed Pedestrian, Cycle and Bus Routes, which shows instalment of the missing part of the Bristol Bath Cycle path alongside the former waste transfer station site and an important potential future pedestrian route from Alfred Street to West Street through Barton Manor and existing industrial buildings each side of St Philips Road.

OMQNDP Policy B2 states that the design of new development must take account of the history and setting of the Old Market Quarter. New buildings should be designed to be sympathetic to the height and design of neighbouring buildings, street width and frontage lines. Development proposals should also have regard to the Old Market Quarter Design Code. This means that new development will be expected to respect the character and history of the area. However, we wish to see variety, innovation and sustainable design

solutions put forward for sites and the creation of beautiful buildings that can be appreciated for generations to come.

OMQNDP Policy B5 supports the principal function of the Principal Industrial and Warehousing Areas (PIWAs) and recognises their positive impact on the area through provision of local employment. However, the community also recognises the negative impact that warehousing can have on the vibrancy and attractiveness of the area. The plan therefore supports a more flexible approach to the PIWAs by creating the opportunity for changes on the edges of PIWAs. Midland Road and Kingsland Road sit on the periphery of the St Philips PIWA and development along this primary route is supported by OMQNDP Project SD3. In the long term we envisage the large warehouse buildings disappearing and their replacement by mixed use development set within a series of urban blocks as advocated in the Old Market Quarter Design Code.

OMQNDP Policy C1 encourages mixed use development that includes flexible space suitable for accommodating a variety of business uses. In Old Market Quarter this means the inclusion of small-scale office spaces and workshops at ground level in residential development.

OMQNDP Policy C3 states that Development will be encouraged that includes space for a supermarket with a minimum area of 370 m² /4,000 ft² centred on Old Market Street and West Street. Although this policy refers specifically to Old Market Street and West Street, there has long been a lack of anywhere to buy daily provisions in the Dings area and there has been a strong demand from the community for provision of a supermarket locally, preferably independent, that can provide a full range of fresh foods and produce.

OMQNDP Policy C4 identifies formal and informal community facilities in the Old Market Quarter. However, there is no dedicated community hall. Although community events are held at the Trinity Centre, this is some way from Kingsland Road and inconvenient for residents of the Dings.

OMQNDP Appendix 3, Design Code, sets the parameters for new development in respect of the public realm, in particular: boundaries between public and private areas, relationship between street width and building height, building elevations facing onto public spaces, vertical emphasis, architectural character and materials that respect the character of the area including use of brick, render and stone elements, and correct historic application of these materials. Paragraph 2.2 states that building heights to eaves or to top of parapets should not be more than twice the distance from the façade of the building to the centre of the street or lane.

Although not specifically covered by the neighbourhood plan, we consider the provision of student accommodation is acceptable on this site as it is close to the new University enterprise campus. Two student accommodation projects have been completed in the neighbourhood plan area since inception of the plan: The Print Hall and Zinc Quarter. We have some concerns about the concentration of student accommodation in the Old Market area. Together with the Market Gate building, which preceded the neighbourhood plan, the Print Hall and Zinc Quarter developments accommodate over 1,400 students. In its current form this development would add another 627 students, a significant addition.

Review of the application

We have reviewed this planning application in the context of the Neighbourhood Development Plan. Subject to comments that follow we support this application, which is the first in the neighbourhood plan area that seeks to develop land on the edge of a PIWA as promulgated by neighbourhood plan policy B5. We hope that it will set a benchmark for others to follow.

Scheme content

We are pleased that the applicants have incorporated maker spaces (workshops), a 360m² supermarket and a dedicated community space in line with discussions we had at the community consultation meetings.

Provision of these facilities within the scheme meets neighbourhood plan policies C1, C3 and C4, and creates almost continuous active frontage on the three perimeter streets and each side of the reinstated Henry Street, without any student bedrooms being sited at ground floor level.

We note on the ground floor plan that there is a back-of-house area adjacent to the Community Space. We trust that this back-of-house area is associated with to the Community space and will contain the necessary kitchen, toilet, and storage spaces etc.

The application does not affect the possibility of creating new pedestrian and cycle links and incorporates direct access onto the Bristol Bath Cycle Path, albeit using steps due to a 1.5m change in levels between the site and the cycle path, so complying with neighbourhood plan policy T1.

Building height

The building height parameter set out in the Old Market Quarter Design Code paragraph 2.2 states that *Building heights to eaves or to top of parapets should not be more than twice the distance from the façade of the building to the centre of the street or lane*. Application to the proposed layout produces heights to eaves/top of parapets as follows:

17.5m along the Kingsland Road façade.

21m, 18m, 16m and 15m to the centre of the four blocks on Sussex Street, 17.5m average.

15m along the Alfred Street façade.

23.5m, 21m, 21m and 18.5m to the centre of the four blocks facing the railway path, 21m average.

The heights of the proposed buildings exceed the heights generated by application of the Design Code parameters as follows:

The blocks in the façade to Kingsland Road are +5.5, +4.0, -2.0, +1.0 and +2.5m above/below the design code height or on average 2.2m above the design code height.

The blocks in the façade to Sussex Street are +2.5, -3.0, +6.0 and +7.5m above/below the design code height or on average 3.25m above the design code height.

The blocks in the façade to Alfred Street are +10.0, +11.5, +7.0, +14.5 and +13.0m above the design code height or on average 11.2m above the design code height.

The blocks in the façade to the railway path are +8.5, +7.0, -4.5 and +4.0m above/below the design code height or on average 3.75m above the design code height.

The proposed buildings forming the perimeter of the site are too high in relation to the heights set by the Old Market Quarter Design Code. The heights of the blocks along Kingsland Road are overbearing on the existing houses on the opposite side of the road. The heights of the proposed buildings on Alfred Street need to be significantly lowered so that excessive height does not adversely affect potential development on the opposite side of the road.

To address the effects of excessive height we would suggest that the buildings along Alfred Street are reduced by two storeys in height, that the top floor of two of the five blocks in each building are replaced by a pitched roof with accommodation within the roof space, lit by dormer windows, and that the 2.5m high parapets are reduced to 1.0m. Reduction of the height of the Alfred Street Buildings would remove 80 rooms. Replacement of top floors of some blocks with inhabited pitched roofs would remove 13 rooms.

To compensate for the loss of accommodation as above we would suggest that the buildings in the centre of the site are raised by one storey and two bedrooms are added to the top floor of each town house in place of what appears to be a flat roof, inaccessible from the houses. The additional storey to the central building would add 38 rooms and additions to the town houses would add 16 rooms. The town houses would each accommodate 12 students, which is the same as the Zinc Quarter student town houses in Jacob Street.

By lowering the buildings, the average height to eaves/top of parapets along the four perimeters of the development would become:

17.5m along the Kingsland Road façade, the same as the design code height.

19.25m on Sussex Street, 1.75m above the design code height.

18m along the Alfred Street façade, 3m above the design code height.

23m facing the railway path, 2m above the design code height.

The implication of lowering the building heights on the number of student rooms would be a reduction of 39, making 588 in total. We realise that any further reductions in height, e.g. removal of a further storey on the building facing Alfred Street, would significantly affect the project's viability and could potentially result in loss of the workshop, supermarket and community space that is currently incorporated in the scheme.

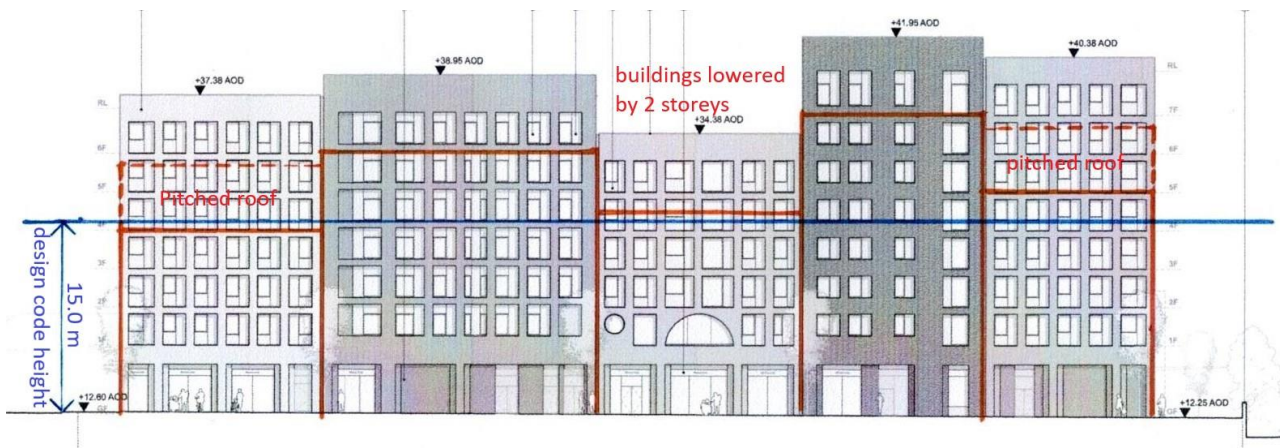
The marked-up elevations that follow show the effect of lowering the building heights:



Elevation to Kingsland Road



Elevation to Sussex Street



Elevation to Alfred Street



Elevation to the Railway Path

Building Appearance

As outlined above in the explanatory text relating to neighbourhood plan policy B2 we wish to see variety, innovation and sustainable design solutions put forward for sites and the creation of beautiful buildings that can be appreciated for generations to come.

We were heartened to see at one of the community consultation events the illustration of the canal-side housing in Amsterdam which is included on page 84 of the Design and Access Statement. This promised a more refreshing approach that could relate well to the locality in a way that other recent schemes in the city have not. Unfortunately, the appearance of the buildings as shown on the submitted application drawings does not reflect the eclectic variety of the Amsterdam houses and the expression of a regular brickwork grid on the majority of the elevations is somewhat monotonous even though variety has been achieved by using five different bricks and altering window opening head and cill levels between blocks. The saw tooth roofs of the town houses are particularly welcomed, emulating the multi-gables on the nearby Shaftesbury Crusade building.

We would suggest that more variety could be introduced into the elevations by having full height and differently configured windows to common areas and the larger studios, more boldness/variety of colours in the profiled metal panels, fewer blocks with an expressed regular grid in the brickwork, perhaps using polychromic brickwork on blocks without an expressed regular brickwork grid, and introduction of pitched roofs as noted in the building height comments above.

Conclusion

The scheme has taken on the suggestions that OMCA and the Dings Community Group have made at the three community consultations there have been with the applicants.

We would have welcomed a further consultation/workshop to discuss building height and external appearance and trust that the comments that we have made above will be addressed.

We welcome this application which is the first to promote redevelopment of part of the industrial areas in Old Market Quarter. The overall design is refreshing and relates to Bristol in a way other recent schemes have not.

We would support the application if alterations to the building heights and external appearance are made in accordance with our comments above. Further variation in height, introduction of pitched roofs and more colourful accent materials would all blend to create an urban scheme appropriate to Old Market. It could well set a benchmark for others to follow.