



an independent force for a better Bristol

2 January 2024

23/04490/F | Demolition of existing buildings and erection of a mixed use development comprising residential (Class C3) and commercial (Class E) floorspace, together with amenity space, landscaping and public realm works, car parking, vehicular access, and servicing arrangements. | (Former Debenhams & Building To West) 33-47 (odds) The Horsefair, 6-10 (consec) The Haymarket, St James Barton & 29 - 31 (odds) The Horsefair Bristol BS1 3JE

Summary

Bristol Civic Society objects in the strongest terms to this planning application. We are particularly concerned about the buildings' massive bulk, the height of the proposed 28-storey tower and the proposed living conditions. Our members expressed strong concerns about a number of matters relating to these proposals, including the height of the tower, at a pre-application presentation in the summer. These concerns have been ignored.

Like anybody else who cares about Bristol, our members see tackling the housing crisis as a priority for the city. We also want to see a vibrant city centre. So, when we look at these proposals it's not the 'what' that worries us, but the 'how'. It is simply disingenuous to suggest (as some do) that opposing these proposals means opposing new housing per se. Setting up such a false choice does a disservice to serious consideration. It is not the principle of housing that concerns us, or even the prospect of taller buildings, but the massing of these proposals, their overwhelming bulk, the totally inappropriate height of a 28-storey tower in this location and that they don't provide decent, affordable, homes.

The height of the tower is alien to the Bristol loved by many, both residents and visitors. And the sort of Bristol the clear majority when askedⁱ, have consistently said they do not want. Yet the city council steamrollers on, encouraging developers to bring forward 28-storey towers in advance of any consideration through the formal local planning process; and without the clear strategy for tall buildings we, and others, have repeatedly called for.

These proposals are 'anywhere' architecture that would both dominate the immediate surroundings and loom oppressively over large tracts of the city. By themselves, and with the proposed redevelopment of the Premier Inn, they would diminish the human scale of the city. Critical views, including to the surrounding countryside and nature would be shut off. The skyline would be commercialised for the benefit of a few.

Bristol deserves better than this. Most people do not want this sort of development, but feel worn down when they are not listened to.ⁱⁱ We can house our citizens in decent,

affordable homes and densify with civilised dignity in ways that keep the essence of Bristol. We don't have to panic ourselves into accepting such a dominating and depressing development. National planning policy tells us that creating high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. We should have the same ambition locally.

Detailed consideration

Cumulative effects

The context for the assessments provided by the applicant does not include the proposed Premier Inn redevelopment, in particular its 28-storey tower. Unlike the 28-storey tower shown on the emerging proposals for the Galleries redevelopment, the Premier Inn is a live planning application and is less than 100 metres from these proposals. It may, or may not, be granted planning permission, we hope not, but it would be irresponsible to consider either proposals (these or the Premier Inn redevelopment) without consideration of the joint impact. It is established planning practice to consider cumulative effects when appropriate. We believe it is appropriate, not least as good practice in line with the precautionary principle.

We say this because it is quite possible that impacts such as on the microclimate, overshadowing, air quality, street scene, noise and heritage assets will be significantly different when assessed against the proposals jointly as opposed to separately. In terms of impact on townscape and views, this will most definitely be the case and the cumulative change of character will be significantly worse than simply the sum of the individual impacts. At the very least, verified view visualisations should be provided for both proposals that show the other. In the interests of transparency and good decision-making the visualisations should be available for public consultation and comment. It would be unsatisfactory to rely solely on 3-D modelling (such as VU.CITY) and internal assessment.

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 - a historic city with vibrancy, well-designed buildings and the largely successful integration of development and topography.

The proposed tower would by itself (and the other towers in the pipeline) destroy the unique relationship intrinsic to Bristol of topography, built form and skyline. Bristol's steeply sloping escarpments provide numerous vantage points from which to view the city, across the city and beyond. The impact on views of the historic buildings on the Kingsdown escarpment is particularly worrying (as highlighted over Christmas in B24/7ⁱⁱⁱ). 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 tower would block these views to the detriment of public enjoyment of the city's skyline.

The loss of sky and taking away opportunities to see beyond the city all affect wellbeing - not least through cutting off the sense of being in touch with the countryside and nature. Losing horizon views makes for a claustrophobic, brutalist city that has lost touch with human scale. Tall buildings in effect privatise city and countryside views and restrict them, and the benefits, to a few privileged occupiers of the upper floors.

The National Model Design Code 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. Quite how these influence the decision to place tower at the highest AOD on the site is unclear or what placemaking considerations drove the choice of 28 storeys, coincidentally the same as the proposed redevelopment of the Premier Inn and the tower envisaged as part of the Galleries redevelopment. 28 storeys seems utterly random as a response to placemaking given the absence of any townscape studies or the Council's long-promised tall buildings strategy.

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 redevelopment of the Premier Inn, 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."

The broad 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 extant Premier Inn hotel or that established by the Callowhill Court planning approval should be the maximum acceptable. Reducing the tower's height to these benchmarks would mean less dominance of the city's historic rooflines and less disruption to the ridgeline views that are an important part of Bristol's character.

In this regard we want to query the comment in the applicant's Planning Statement (paragraph 5.71) that "The tall buildings have been designed as an appropriate response to the surrounding urban context, including The Bearpit, and have also considered the emerging context, which could see increased amplified height in the immediate surrounding area including within the adjacent 'Callowhill Court' site, which benefits from an extant consent for buildings of up to 50m." This is potentially misleading. The 50m building would be to the south of Broadmead and the agreed height of the Bond Street frontage was set in 2018 at 35m, dropping to 19m adjoining the pedestrian route to Bond Street from The Horsefair through Barr's Court.

Similarly we want to highlight, as we informed the city council in August, that the VU.CITY model which informed the townscape context for the scheme's development showed mistakenly a tall tower fronting Bond Street. The model's incorrect depiction of the context figured in the public presentations in the summer, and presumably in those given to Design West and the city council. The model reflected the submitted scheme for Callowhill Court not that consented including the approved parameters plan. The tall tower was removed from the scheme in 2018 because of concerns about the impact on the townscape, in particular the heritage value of the nearby Portland and Brunswick Square Conservation Area and its listed buildings. It is a moot point as to what has changed in the last five years. Relevant local and national planning policy have not.

We are not though simply concerned about the height of the tower. The presentation of the elevation to the St James Barton Roundabout is to say the least disappointing. If the Debenhams building is to be redeveloped then what follows should make an equally if not more positive contribution to the street scene and to humanising this highways-dominated environment. Sadly, the opportunity is not taken and instead an unyielding and overbearing massing dominates the street scene. Disappointingly, the building footprint as proposed would help fossilise the current 1960s highways arrangement rather than enabling a more human scale network of streets and buildings

We are also concerned that the bulk and height of the buildings will overwhelm the streets at their base, including the proposed Barr's Street (making it an undesirable route into the city centre).

The proposals see the reinstatement of Barr's Street as a significant gain, as does, it seems, the city council.^{iv} We have been supportive of a more permeable city centre, but have queried in the context of the City Centre Development and Delivery Plan whether a link from Merchant Street to the St James Barton Roundabout was credible as a boulevard because of the significant gradient to be managed within a short distance (and whether this justified the demolition of Debenhams with the resulting hit on carbon).

This concern is borne out by the proposals and underlined because of the dominance of the built form and creation, in effect, of a canyon not a boulevard. The proportions of the reinstated Barr's Street would be very wrong (as well as steep). And if we're to nod in the direction of the past, it's important to note the applicant's own heritage statement comments (in 2.2.2) that Barr's Street was "a mix of largely small scale buildings with considerably varied roofline".

The proposed scheme appears to have been developed on the basis of creating a public thoroughfare, the so-called reinstatement of Barr's Street, with buildings either side and creating a landmark tall building to, inter alia, "help people navigate their way around the city" (presumably those who don't use a maps app on their mobile phone). Apart from the analysis of the potential to convert the existing Debenhams building, there is no indication that any serious consideration has been given to any alternative layouts to avoid the proposals' significant drawbacks. This is disappointing.

Impact on heritage assets

The impact of a 28-storey tower on the settings of numerous designated heritage assets causes substantial harm, including on individual assets such as the grade 1 John Wesley's New Room, the grade 1 buildings lining Portland Square and the grade 2* St Peter's Church in Castle Park. There are dozens of listed buildings and five conservation areas whose settings would also be affected to a greater or lesser extent by the proposed 28-storey tower.

The applicant's assessment of impact lists the step-by-step diminution of Bristol's heritage through significant chipping away at the settings of numerous listed buildings and important conservation areas. They may not assess any one impact on any one listed building or conservation area as being substantial (we would disagree), but the only reasonable conclusion from the assessment is that the proposals will have substantial harm on Bristol's heritage. As national planning policy reminds us, heritage assets are an irreplaceable resource, and we have a responsibility to ensure they can be enjoyed for their contribution to the quality of life of existing and future generations.

Take the impact on the Kingsdown Conservation Area as an example. 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 character appraisal 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.... *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.*"

The applicant's own assessment comments "Unquestionably, given the high percentage of listed buildings within the total built stock within the CA, *the Kingsdown CA must be considered to be a designated heritage asset of high significance. The setting of the CA in the direction of the application site makes a very substantial contribution towards that significance.*" The conclusion is stark "*The analysis shows that the proposed development will substantially impact on the heritage value in the view, drawing the viewer's eye away from the characteristics that are significant to the CA and its character, strongly dominating the view, and resulting in near complete loss of the sense of the wider panorama and especially its current suburban and countryside content.*"

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. The need for housing does not provide this justification because it is not using the site for housing per se that causes this destruction but the applicant's chosen design solution.

Liveability

As well as the impact on the host locality and wider area, it is important to consider the sort of living environment being created for future occupants. The applicant has provided supporting statements including on noise, air quality, daylight / sunlight and thermal comfort. Taken at face value, these could reassure. On closer examination, serious questions must be asked. For example, 23% of rooms will not meet the target values for daylight as set out in the BRE guidelines and 52% will not meet the sunlight target.

The Planning Statement at paragraph 5.46 states that 45% of the total apartments are dual aspect. However, a number of flats that are indicated to be dual aspect in the diagram on page 71 of the Design and Access Report are not dual aspect in practical terms. A dual aspect flat needs to have two complete sides as external wall with windows, either opposite or adjacent, in order to be able to provide cross-ventilation through the flat. Flats that have a single-aspect external wall with a side door onto a recessed balcony should not be considered dual aspect, as effective cross ventilation is not possible. There are getting on for 70 such flats, which reduces the number of dual aspect flats to just under a third of the proposals. This is a poor return and with a different layout and more appropriate density the proportion could be improved.

The proposed layout also results in a substantial number of flats looking out onto service courts where previously only back-of-house windows in the shops overlooked these spaces. This cannot be considered a pleasant prospect for future residents.

Only 1-bedroom and 2-bedroom flats are included in the proposed development. This is contrary to the current local plan which (Policy BCAP3) states that “new housing development within the city centre will be expected to contain a proportion of family sized homes, including flats with three or more bedrooms and an element of usable outside amenity space.” We note that the emerging local plan changes this to “an appropriate proportion of homes of various sizes will be sought”. We are unsure why it would be acceptable or appropriate to provide no family sized housing, not least as affordable homes, given the household characteristics of those on the council’s housing waiting list.

Undermining confidence in the planning process

It is deeply disturbing to see the applicant’s report that in the period “11/2021- 12/2022” there were “ongoing feasibility review meetings to review potential use and initial massing options with BCC officers. Following this a decision was made to proceed with a residential led scheme and detailed design in January 2023.” These meetings must have given comfort to the principle of a 28-storey tower, notwithstanding the significant conflict with Bristol’s own development plan policies on tall buildings, good design and the protection of heritage assets and national planning policy. There was absolutely no engagement with the public at the option stage contrary to the stated requirement in the adopted Statement of Community Involvement (despite the consistency asserted in the applicant’s Statement of Community Involvement). We are also not aware of the referenced meeting “currently

[October] being arranged with Bristol Civic Society". It is also concerning that the public consultation on the planning application has been held over the holiday period.

ⁱ As set out in the Consultation Statement on the Urban Living SPD, and in response to the "quick survey... designed to gauge general views on higher density development and tall buildings":

613 answered the question "Bristol should extensively promote high-rise tower blocks to meet its housing need" - 85% disagreed.

610 answered the question "new residential units should primarily be provided in low and mid-rise developments (places like Wapping Wharf, Paintworks, Junction 3) rather than high-rise tower blocks" - 87% agreed.

Overall, 91% of respondents to the Quick Survey lived in Bristol and 8% worked in the city. 9% of responses were from those professionally involved in the development sector. The majority of respondents were aged between 25-44 forming 39% of response with 45-64 age group forming 35% of responses.

ⁱⁱ <https://www.bristolpost.co.uk/news/bristol-news/bristol-city-centre-set-radical-8942408>, see the comments under this update.

ⁱⁱⁱ <https://www.bristol247.com/news-and-features/news/proposed-28-storey-tower-would-bligh- Bristol-landscape/>

^{iv} <https://democracy.bristol.gov.uk/mgAi.aspx?ID=33639#mgDocuments>

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