an independent force for a better Bristol

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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

This representation is supplementary to our objection of 27 August 2023. It concerns the package of documents (published on 3 and 4 January 2024) supporting the 4.05 metre reduction in the proposed height of the tallest tower and the amended Whole Life Cycle Carbon Emissions Assessment published on 19 December 2023.

Having looked at the revisions and supporting documents we continue to object in the strongest terms to this planning application for the reasons we set out previously. The revised proposals and assessments do not address the fundamentals of our objection and these remain material to reaching a decision on the proposals.

Again, we underline that we support 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. It is disingenuous to suggest (as some do) that opposing these specific proposals means opposing new housing per se. Setting up such a false choice does a disservice to serious consideration.

Even within the narrow terms of such an argument we would point out the PBSA 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.

Design changes

The proposals give rise to adverse impacts on interests of acknowledged importance and have been subject to widespread criticism. We not consider the proposed amendments are a meaningful attempt to address these concerns. Given the overwhelming level of concern about the proposals' height, the proposed reduction - 4 metres - is paltry and little more than tokenism. There has been no serious effort to address the impact of such excessive height in this location. We continue to argue that a realistic, and the most sustainable, option is to reuse the existing building. If the existing building were redeveloped, the replacement height

should not be any higher ie getting on for a 40% reduction in height not the 4% proposed. In terms of delivering human scale placemaking it would be much lower.

Parts of the commentary in the addendum to the submitted Design and Access Statement surprised us. For example, brigading the Civic Society with the city council and Design West in this "Through our extensive consultation, including pre app meetings with BCC, 3 Design West workshops and a meeting with the Bristol Civic Society it has been widely agreed that this is a suitable location for a tall building'. We have consistently said our preference was to reuse the existing building, and if redeveloped the maximum height should not exceed the height of the current building.

We also take issue with the applicant's assessment of the buildings' beauty and impact; for example:

"…. a design decision to increase the slenderness of the silhouette in order to improve long distance views" *Design and Access Statement Addendum, section 2.*
Image courtesy of NPA Visuals, Visually Verified Montages, November 2023

"The form is driven by... the desire to create a slender, elegant building silhouette" *Design and Access Statement Addendum, section 2.*
Image courtesy of NPA Visuals, Visually Verified Montages, November 2023

Whole Life Cycle Carbon Emissions Assessment

We are surprised to see the updated Whole Life Cycle Carbon Emissions Assessment (WLCCE) now uses the major non-residential standard from the regulation 19 draft Local Plan. This has flipped from the applicant's July report which then used the more demanding residential standard. We also note the July report is no longer on the application webpage as a superseded document which makes the change less apparent.

The July assessment in using the residential standard was consistent with the applicant's other submissions, including the submitted Planning Statement that seeks t to apply the tilted balance (which only applies to applications involving the provision of housing).

Using the residential standard also seems appropriate given < 0.5% of the GIA is Class E. The proposed uses which provide living accommodation have more in common with a C3 use than a commercial use notwithstanding their sui generis classification.

It is also inappropriate in engineering terms to use the less demanding major non-residential standard. Non-residential schemes such as offices have the laxer standard for both construction and operational embodied carbon because, for example, larger grid spacings are required for flexible uses of floor plans and larger operational energy loads are required due to the nature of building use and the associated density of users.

A number of other aspects of the assessment seem strangely chosen too. For example, the 'business as usual' standard. The RIBA 2030 Climate Challenge[1] business as usual is business as usual in 2021, not for 2024.

In our opinion, the proposed development cannot be considered "exemplary in its carbon performance", not in terms of the council's own standard, not in terms of LETI[2] or RIBA's Climate Challenge ("The RIBA advocates that buildings designed today [ie 2021] should ideally aim for the 2030 targets now, but as a minimum adopt the 2025 performance targets.") or industry best practice which as a minimum would use the interpolated construction year for embodied carbon targets if prior to 2030.

Recent thinking in the field is that we need more, not less, demanding standards to stay within carbon budgets (see, for example, this recent LinkedIn post[3] and the Ramboll study referenced). This is echoed in the national planning policy emphasis on radical reductions in carbon emissions and guidance in the National Design Guide and the National Model Design Code (which are engaged as policy through paragraph 134 of the NPPF).

<u>Consideration given to reusing the existing building</u>

According to the applicant's assessment, redevelopment produces twice as much carbon as an

[1]https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwipqKbvktaDAxWeTkEAHavDDS4QFnoECA0QAQ&url=https%3A%2F%2Fwww.architecture.com%2F-%2Fmedia%2Ffiles%2FClimate-action%2FRIBA-2030-Climate-Challenge.pdf&usg=AOvVaw3xEs-ejFZpwoLaR9pNz08E&opi=89978449

[2] https://www.leti.uk/_files/ugd/252d09_8ceffcbcafdb43cf8a19ab9af5073b92.pdf

[3] https://www.linkedin.com/pulse/buildings-budgets-setting-meaningful-embodied-carbon-targets-hughes-p98ee

'extensive refit'. Looking just at the upfront carbon (ie the carbon we need to address now to stabilise at 1.5^0C), the refit option is a little over 40% of that from redevelopment. When compared on a m^2 basis, redevelopment (smoothed over a 60-year timescale) produces 77% of the carbon in comparison with refit because over twice as much floorspace is assumed after redevelopment. Looking at just upfront carbon, the gap narrows significantly (77% to 87%). Critically, a more environmentally acceptable height (without the proposals' impacts on townscape and heritage assets) would deliver less floorspace and the m^2 carbon would go up. The applicant therefore has to inflate the height so as to justify not refitting the existing building.

There are other aspects of the applicant's assessment that have to be treated with caution too. Not least where the figures presented internalise assumptions a number of matters and therefore are unclear. For example, it is not entirely clear whether the life cycle analysis for the proposed development properly logs the carbon effects of removing the present building including transport emissions arising from the proposed offsite handing of demolition material. Similarly, the loading on the in-use B modules for refit which seems to rest on questionable assumptions about the building's condition (see below). Assumptions made now about future carbon intensity have to be speculative, and quite why such a carbon load is assumed for 30 years' time (ie post 2050) is unclear when we should be assuming much lower carbon intensity of materials etc.

We note the GIA of the refit option is assumed to be 7,998m (paragraph 6.1) whereas the Floorspace and Accommodation Schedule (12/12/2023 Rev P2) says the full building (with retail) GIA is 9951.5 m^2. Assuming the full floorspace would likely change the assessment results. As would adding the basement's 1681 m^2 to the refit option, which the applicant appears to be taking into account as a saving in the calculations for the redevelopment (paragraph 8.2, "The proposed development has implemented the use of the existing basement and the reuse of demolition material which has saved 38kgCO2/m2 across modules A1-A5.").

What is inescapable is that even the applicant's assessment demonstrates that redevelopment produces over twice as much carbon just when we need to be securing radical reductions in emissions to stay within our carbon budget to stabilise at 1.5^0C.

The structural integrity of the current building is key to the reuse option. Here, again, the reader has to rely on unclear assumptions. For example, in 6.4 we are told "the Applicant has confirmed that the concrete frame is nearing the end of its life". How this conclusion is reached is not stated but we assume it arises from the generalised comments on page 1 of the Trident report. We comment on this below. There is also a significant carbon loading on the reuse option caused by the unjustified assertion in 6.1 that structural limitations will require a subsequent refit after 30 years. The condition survey underpinning this assertion is not provided for public consultation.

As we are left to guess the justification for 6.4, we wonder whether it roots in an extrapolation of the photo and caption on page 12 of the Trident report. However, the only reasonable conclusion to be reached from the photo is that part of the bar was located too near the surface of the concrete. This should not be read as suggesting there is a widespread problem of

corroding rebars. No evidence is presented that this is the case. Rebars with 25mm concrete cover or more do not corrode and reinforced concrete can last almost indefinitely.

Trident refers to a report by Sandberg, the well-known testing house. The appendix headed 'Sandberg – Concrete Testing Report' is blank so we do not hear Sandberg's assessment in their own words. We would have hoped a summary could have been provided especially as the building may be being condemned due at least in part to their findings.

What can be said with clarity is the structure of tower and plinth is evidently a reinforced concrete frame, liquid concrete having been poured into formwork or moulds which contained 'cages' of steel reinforcing bars (rebars). Having first been office use the imposed floor loading the tower was designed to sustain would be greater than that used for residential or hotel use - possibly twice as great as for residential use. This is indication of reserves of strength in this building that are not discussed in the submitted assessment. The reinforced concrete structural frame could easily still be serviceable and sufficiently robust at the end of the 21st century.

For the above reasons, we are left with the feeling that the WLCCE has been drafted to justify the submitted proposals for redevelopment with refurbishment not being thoroughly addressed (as one would have hoped for as we have a declared climate emergency in Bristol). It seems more a case of let's lay out all the problems we can think of rather than setting a pathway for delivering an effective reuse of the building. A positive approach to reuse would have delivered a more comprehensive evaluation of what could be achieved with the existing structure and what was required to deliver this.

Finally, we spotted in 4.1 "A response to the specific comments raised in pre-app response [from the Sustainable City Team] – A response has been provided previously.", but we could not see this response in the list of documents on the planning application webpage.

Conclusion

We set out in detail in our August representation why we oppose these proposals. These recent, limited, revisions fail to address in any meaningful way the concerns we set out (and raised by many others in the consultation responses). In terms of reusing the existing buildings, we have a strong sense the applicant is simply going through the motions with a predetermined 'it's all too difficult conclusion'.

We also remain very concerned that the proposals to redevelop the Premier Inn and Debenhams buildings (23/02827/F and 23/04490/F, respectively) are largely being considered in isolation. These substantial proposals, both involving 28 storey towers, are situated within 100 metres of each other and have significant impacts on the same environmental factors and the same receptors. It is disappointing that in presenting the recent set of (minor) revisions the opportunity has not been taken to update the assessments, including the verified views and impact on heritage assets, so as to address the cumulative effects. Not addressing the combined impacts and omitting them from the assessments supporting the public consultation is unhelpful. It also risks being seen as misleading and circumventing law and practice relating to EIA.