



an independent force for a better Bristol

25 February 2024

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

Introduction

This representation is supplementary to the Civic Society's objections of 27 August 2023 and 18 January 2024. It responds to the City Council's notification of 8 February 2024. We are responding in particular to the assessment of cumulative effects submitted in early February.

This assessment considers the applicant's proposals to redevelop the Premier Inn alongside the proposed redevelopment of the Debenhams building (planning applications 23/02827/F and 23/04490/F respectively). As you know, we have objected strongly to both proposals and commented that they should not be considered in isolation of each other. So, while we welcome the steps taken to address this concern, we are disappointed that, for the most part, the assessment provided is superficial and cursory. There is heavy reliance on unsubstantiated opinion, and a sense the conclusions have been finessed to support the applicant's proposals.

Comments

The assessment is supported by a number of visually verified montages showing cumulative views of the two developments. These are largely welcome additions to understanding the likely impacts of the proposals. That said, there are a number of occasions where views are obscured by trees where this could have been avoided by taking a few steps in either direction. Nevertheless, the verified montages confirm our fears that the combined impact on heritage assets would be worse than the simple sum of the two proposals, which in themselves cause substantial harm. Examples of this agglomerating impact include the impacts on the St James Parade and Kingsdown conservation areas and their settings (see Annex below by way of illustration).

In addition to the impact on particular heritage assets, the verified montages also demonstrate that these proposals individually, and cumulatively, change the face of Bristol and in doing so undermine its character for the worse. National planning policy expects the planning and development process to achieve the "creation of high quality, beautiful and sustainable buildings and places". By any reasonable metric, including the barometer of public opinion, individually and cumulatively, these proposals fail to do this.

We are also unclear as to the lens type used in the montages and whether they use a 24mm wide-angle lens (which pushes tall buildings into the background and grossly underestimates the impact of these buildings) as opposed to the 50mm lens generally recommended by the Landscape Institute¹).

The somewhat superficial approach taken to the consideration of the impacts listed in paragraph 1.3 of the report is disappointing. Even the daylight, sunlight and overshadowing review “has not been completed with detailed assessments” and the reassurance provided does not sit comfortably with a number of the shadows cast shown on the verified views.²

In terms of the combined effect on wind conditions and microclimate we note that The Haymarket would be windier but that this, as with the rest of the assessment is based solely on a computational fluid dynamics (CFD) test. We note that the City of London expects a more sophisticated and comprehensive approach than demonstrated in this assessment including the use of thermal comfort guidelines, a technique that merges wind, sunlight, temperature and humidity microclimate data at a seasonal level to obtain a rounded understanding of how a place will actually feel to the public.

Specifically on wind assessments, the City expects for proposals “Up to 4 times the average height of surrounding buildings, 50m to 100m for CoL” CFD simulations AND wind tunnel testing (page 7).³ These proposals fall into this category.

Closing comments

We note with concern the following timeline. The closing date for responses to the notification dated 8 February is 29 February. We have just (23 February) been advised that the application will be considered by Planning Committee A on 6 March and that “From the Wednesday before the committee date, a copy of the officer’s report and recommendation can be viewed with the planning application documents”. The Wednesday before the Committee meeting is 28 February ie before the closing date set for comments on the latest package of documents and plans relating to the application.

We have also recently had drawn to our attention that Just Build Homes is promoting this application. Just Build Homes facilitates support for planning proposals, “Clicking send will sign you up to the Just Build Homes campaign and send the above letter of support to the Bristol, City of Council planning department”.⁴ This ‘grassroots’ campaign gets support from the development industry and has connections with Forty Shillings a “communications and engagement agency working predominantly in property, planning and regeneration”.⁵ We do not know how many, if any, of the comments in support of the application came via the Just Build Homes route. Or why this particular application (predominantly for PBSA) was chosen (there are only two ‘campaigns’ in Bristol), or the extent, if any, of developer influence on this choice.

¹ Technical Guidance Note 06/19, Visual Representation of Development Proposals

² See, for example, Fig. 07: View 4, Fig. 09: View 5, Fig. 11: View 6

³ <https://www.cityoflondon.gov.uk/assets/Services-Environment/wind-microclimate-guidelines.pdf>

⁴ <https://support.justbuildhomes.co.uk/borough?postcode=BS6+5UG>

⁵ <http://www.fortyshillings.com>

ANNEX 1: Extracts from the Kingsdown Conservation Area Character Appraisal prepared by Bristol City Council

“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”.

“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.”

Debenhams redevelopment
23/04490/F



Current view



And Premier Inn redevelopment
23/02827/F



Combined impact

