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24/04285/PREAPP 30-64 Pennywell Road, St. Judes, BS5 0TG

Bristol Civic Society response, February 2025.

Introduction

This is the third pre-application planning enquiry in the Frome Gateway Area that the Society has commented on within six months. The first two applications for Houlton Street (24/02910/PREAPP) and Crown Sawmills (24/03876/PREAPP) cause the Society considerable concern, particularly the amount of accommodation and the heights of buildings proposed. This application is no different; it is yet another one which we cannot support.

The redevelopment of 30-64 Pennywell Road proposes the provision of 431 homes to rent, 20 percent at affordable discounted rents, in a mix of 180 1-bed, 214 2-bed and 37 3-bed flats, and 11 new workspace units that would suit local businesses, some potentially at discounted rents.

The site measures 0.85ha in area and is within the Frome Gateway Regeneration Framework area. Although not part of the local plan, the Framework has been endorsed by the council and is therefore a material consideration of any planning application. Other relevant guidance is given in the Urban Living SPD.

Draft Local Plan publication version (November 2023) Policy DS5, Development of Frome Gateway, states that *'development of Frome Gateway will be expected to accord with a regeneration framework which will coordinate the approach to development across the area and the relationship with surrounding locations.'* Explanatory notes to the policy state that the estimated capacity for new homes in this regeneration area is around 1,000 and the appropriate mix of homes will include 25% of homes with 3 or more bedrooms. The Framework includes the aspiration to deliver roughly 1,000 new homes. The total number of dwellings in this pre-app enquiry and the other two highlighted in the introduction above is 1,046, which exceeds the limit suggested in Policy DS5 and the framework. The three sites account for only 40% of the area identified in the framework for residential development.

This pre-application submission appears to illustrate a scheme in the early stages of design development, but it is apparent that the scheme is in fact far more advanced. According to the pre-app document, design work on the proposal has been ongoing since 2019. This has been without any community consultation.

Comments

The proposed development is inappropriate for the site and one which the Society cannot support. Our reasons for this objection fall into the following areas:

1. 431 dwellings on a site 0.85ha in area would result in a development that is two and a half times the optimum density of 200 units/ha that is stated in the Urban Living SPD for sites in an inner city-centre setting. The environment created both in the public and private realms is likely to be oppressive and not satisfactory for everyday living.
2. There is no justification for the proposed buildings to exceed height parameters set by the Frome Gateway Regeneration Framework which are the prevailing height on Pennywell Road – 4 to 5 storeys, and amplified height on the main body of the site – 7 to 8 storeys. The proposed 12/14 storey and 15/18 storey buildings on James Street and White Street are too high. The site is not a suitable location for buildings that greatly exceed the height parameters set by the Frome Gateway Regeneration Framework.
3. The heights of buildings proposed along the western and northern boundaries of the site will severely affect emerging proposals for the Crown Sawmills site on James Street and potential development of the Safestore site on White Street. The proposed 15-18 storey buildings will cause considerable shading of the facades of any buildings proposed on the Crown Sawmills and Safestore sites on streets opposite the 30-64 Pennywell Road site.
4. We understand that an existing live sewer crosses the site and is a site development constraint that is not addressed in the draft plans. The new road through the site should be moved to be above the sewer together with the buildings on either side. This would allow the width of the northern courtyard to be doubled so the space becomes a sensible and usable size, and the ground is not in permanent shade.
5. The provision of eleven flexible commercial (use class E) units at street level is welcomed, which keeps a significant element of employment space on the site. It is hoped that servicing of the units will be direct from their frontage, as would be the case with a traditional street, with no ‘service yards’ which can be such desolate spaces.
6. We are not convinced that this site should be ‘car-free’. There should be provision for those residents who must use a car for their work to park within the residential blocks in addition to maximum provision of on-street parking for visitors and businesses on the site.
7. Draft Local Plan publication version (November 2023) Policy DS5 advocates an appropriate mix of homes to include 25% of homes with 3 or more bedrooms. There are only 8.5% of homes with 3 or more bedrooms in this proposal; there should be more, including townhouses along Pennywell Road.
8. We are glad to see that the existing trees along Pennywell Road are retained but consider that the proposed buildings should be set back further from the trees and the line of the

existing building facades to allow the trees to flourish.

9. We consider that the site can accommodate a maximum of 250 dwellings in buildings up to 7.5 storeys high at a density of 300dph.
10. The scheme bears little relation to what is shown for the site in the Frome Gateway Framework document, so we wonder about the validity of the framework if one of the first schemes for a site within the framework area ignores what is included in the document endorsed by the City Cabinet as recently as February 2024.

Conclusion

Bristol Civic Society are disappointed that this proposal fails to accord with the Frome Gateway Framework, which offers a sound basis for the development of a good livable neighbourhood.

We consider that the proposals cram too much accommodation on the site and would constitute gross overdevelopment.

We strongly object to this proposal and cannot support it.