

Comments for Planning Application 24/05162/F

Application Summary

Application Number: 24/05162/F

Address: Land North East Of Hope Road Bristol BS3 3NZ

Proposal: Demolition of existing structures and redevelopment of the site comprising 88 residential dwellings (Use Class C3) and ancillary residential uses, including access and vehicular parking, public realm works and landscaping, cycle parking, ancillary plant and servicing and other associated works. (Major)

Case Officer: Amy Prendergast

Customer Details

Name: Not Available

Address: Not Available

Comment Details

Commenter Type: Amenity - Residents Group

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The Bristol Civic Society's response to - 24/05162/F Land North East of Hope Road Bristol BS3 3NZ

Demolition of existing structures and redevelopment of the site comprising 88 residential dwellings (Use Class C3) and ancillary residential uses, including access and vehicular parking, public realm works and landscaping, cycle parking, ancillary plant and servicing and other associated works. (Major)

Pre-amble.

The Society participated in a SCI consultation on this plot in October (Redevelopment of existing industrial site to high-density housing Hope Road Bedminster). We said that If this came forward in the near future as a planning application, drawn up substantially as here presented, the Society was minded to Object. The application with its extra documents is substantially the same as the consultation exercise. The society objects.

Summary:

Like other groups, :

- We object to this application as we feel it represents over-development of the site.
- We object to the loss of permanent employment space opportunity.
- The result of this over-development is a significant loss of light for neighbouring properties.
- We are very concerned that the proposals would result in 107 neighbouring windows no longer meeting the standard set out in BRE guidance for VSC, with 78 neighbouring windows no longer meeting the DD standard set out in BRE guidance.

- We consider that the proposals having an impact to 107 neighbouring windows is an unacceptable loss and could result in a significant impact on the living condition of residents within BS3.
- The neighbours clearly think there are insurmountable parking issues implied by the proposal.

Pre-application History

The Society has objected to two previous formal Pre-apps on grounds of Loss of employment land, it retains that primary objection, and awaits a full application with more informative drawings. Whilst recognising a housing crisis, the Society also perceives a wholesale discarding of medium to high wage employment land from the BS3 postal district under current and recent market forces. Jobs of some types are simply leaving the City with Bristol residents expected to follow in new commutes, which is not sustainable.

We have responded to the September-October 2024 SCI exercise, and copied BCC.

Have Earlier Concerns arising from the SCI boards been addressed? (A. Generally Not)

- Q1. Whether the correct layout choice of three has in fact been made by the developer?

[The Developer has stuck with the horseshoe plan opening onto the main-line railway.]

Trains passing at speed cause noticeably abrupt roaring in Hope Road.

- Q2. Insufficient information available at SCI, not just on tenure etc., but engineering levels and their implications for neighbours and daylight, views in and out, etc?

[As a list these are now clarified,

1. Tenure is for sale,
2. Ground floor is based on the Factory basement so below Victorian street level despite repeated denials in SCI events.
3. Daylight report reveals considerable interference with neighbours

- Q3. Particularly whether the ground level of the proposal is at current factory basement level, or set at another artificial starting point? Street level was claimed in presentations.

It Does now appear that the site ground floor accommodation is at factory Basement level;

- Q4. Also whether the site (south boundary) has to retain in engineering terms the stability of Argus Road backs & Gardens in general and Hope Street houses in particular? (Street level claimed, as above in SCI talks)

The proposal for the south block is fudged with a South walkway in-filling the gap between Argus Rd back gardens and the proposal's window sill level for the ground floor south apartments. This would in part support Argus Road backs in completed form (Not during construction however) but tanking issues and rain-splash into the windows might be material if this is a landscaping strip with access. Then the privacy issues re those foot-or-ankle-level windows need consideration.

- Q5. Whether the density of homes proposed here would result in insufficient amenity for the intended residents, and also guarantee unacceptable juxtapositions with both the Airpoint

statement building, and the two-storey Victorian terraces as Western neighbours?

In our view the proposal is too dense and the proximity to neighbours causes daylight issues which affect neighbours as well as residents. The outlook of Airpoint with its fully glazed glass South wall is particularly affected and there are privacy and overlooking issues in both directions.

- Q6. Whether there would be insufficient daylight in many of the residents flats even if they are dual aspect. Particularly if some are in effect set in open basement below boundary walls and other buildings.? (Quarterly shadow studies interpretable by laymen and neighbours were promised at SCI.)

In Practice the BRE method is used in a numbers based report that neighbours or prospective purchasers cannot be expected to understand. This is dually disappointing as the method is behind a paywall and the results are in practice dire. There are no shadow studies visible to commentators. Light wells appear to have been broken into the South deck-access of the building since the SCI.

- Q7. The practicality of a car-free proposal super-imposed in a remote corner of a sub-district with a lot of existing private allocated parking, as in Airpoint or the Hope Road infills, or the saturated on-street parking, as is already the case with the Argus Road cul-de-sac proposed here as sole means of access ?

In practice Parking seems to be the number-one concern of neighbours.

- Q8. Likely increase in deliveries to a car free community of over 200 residents?

- Q9. We find the proposal flawed on several "Urban-Living" and other grounds.

Introduction:

The Autumn 2024 SCI for this application was in effect the third residential pre-app by different developers that the Society has seen in five years for the former printing works site off Hope Road and Argus Road BS3. There has also been a further screening application by yet another party in 2023. Overall this testing of the planning and engineering involved perhaps points to non-viability at both greater and lesser densities than here presented, and in alternate layouts. We think other layouts might provide a far better housing scheme at lesser density than this one; but can really only "Crit" or criticise what is here proposed. We are concerned that viability arguments will drive a poor development outcome for both site-residents and their pre-established neighbours.

Change of use [COU]

Loss of employment

Policy DM12 emphasises the importance of retaining existing employment sites near to where people live and within areas of Bristol with socio-economic deprivation. This is a significant employments site; it is 0.45ha. While the Society agrees that the current buildings are dilapidated there is no evidence that a site of this size could not be redeveloped for employment purposes. The retention of employment space is important for the economic and the social regeneration of

Bedminster. Developments at Bedminster Green are rapidly replacing with residential development a significant amount of local employment land. This large-scale change of use adds importance to the retention of this valuable employment site. The residential redevelopment of Bedminster Green is adopted in the Sites Allocation Development Plan Document which does not in turn allocate this site for residential redevelopment. This employment space should be protected.

The change of use is not supported by planning policy. The site has seen other valid workplace use for start-ups in addition to the printing works. The Society has consistently defended the workspace use under DM12 and continues to do so. On 2014 Adopted policy map, site is adjacent a PIWA and important open spaces on two flanks, one of which is here proposed for felling. It is not formally allocated for residential use in the emergent Local Plan "site allocations" document. There is no framework in place for Sheene Road and its surroundings to be other than a PIWA going forward. The site is isolated by both topography and the GWR main line from apparent neighbours on maps. Its geographically isolated presence in the extreme South-West of emergent local plan zone DS8, or "Central Bedminster" , does not confer on any former industrial site exclusive rights for either fortress-PBSA or purely residential use. There is in any case in DS8 a presumption of workspace being incorporated into such COU sites agreed elsewhere. None is here proposed. To reach any other development plot in DS8 by car from this one you have to leave DS8 and re-enter.

The site is not appropriate for residential use for the following reasons. As with the previous pre-apps, for both more and for fewer flats, this proposal creates difficulties for both the existing low-rise Victorian housing stock adjacent in proposing abruptly tall neighbours on the printing site, together with their access requirements down a long and heavily parked cul-de-sac, (Argus Road), and also the decimating effect on outlook and solar path for the earlier Bedminster landmark Airpoint development of the preceding decade.

The current intense housing proposal of 88 flats, car-free, is unlikely to find any friends in the existing community therefore. This site adjacent the GWR main line is isolated by both topography and lack of access rights from the Sheene Road Lidl and other recent retail sites "down there" by the St Johns Lane Railway Bridge.

The Proposal

The Society makes the following observations:

- The developer proposes 88 Flats with no serious parking provision/ just disability minima, centred at some 200m distance from West Street BS3.

Mix is 48 x One-bed, and 40 x 2-bed, tenure is for sale to market. Total population not stated.

- Density is not stated but we estimate up-to 220 D/Ha from previous site statistics which is intense for the district.

Affordability criteria are not stated.

- As with many other intense developments proposed in the DS8 district (car-free or not) aspirations for interesting ground floor uses are swept aside by basic bike and bin-store requirements, and the desire to maximise sale of units. This site proposal loses half its ground

floor to this type of use, and proposes housing for the remainder of the ground level...

- There is no workspace proposal, (or even a captive retail proposal), contrary to emergent local plan requirement.

Site Layout

Whilst the architect had presented three options, the client has already chosen one layout.

Whilst it is tempting to call it a South or Railway-facing horseshoe it is more accurately a narrow hairpin of a courtyard with a crank in the taller Eastern seven-storey block that reduces sun penetration to the North end. This North end at the lower amenity level is taken up with bike and bin stores and essential car-parking.

Exact dimensions are not given but we deduce the following:

The distance between living rooms at the narrowest point of the courtyard is 15.5m and 22.0m at the widest point, and the distance between the edges of the access decks each side of the courtyard is 9.5m at the narrowest point and 16.0m at the widest point. The access decks appear to be 3.0m wide, split 1.2m for communal circulation and 1.8m for 'private' patios. The possible overlooking due to the meagre distances between the access decks and living rooms each side of the courtyard must be considered unacceptable.

The access decks and the siting of the 'private' patios on the decks removes any privacy to the living areas of the flats.

The 3.0m projection of the access decks will cast permanent shade to the windows in all the flats, resulting in insufficient daylight and sunlight penetration into the living spaces.

In the lower three storey building the balconies have been pierced for light wells, but this in turn limits the implied amenity of balcony space.

The 7-storey Northern corner of the proposed development is 13.0m - 17.0m from the adjacent Southeast facing façade of the existing Airpoint building which will obstruct daylight and sunlight entering flats in Airpoint and eliminate views from them.

The Height-stepping North West link block may present several overlooking issues.

The West block adjacent the Victorian housing is of three stories covered with a solar farm; and the Northern link block steps up by degrees, four five and six stories with roof terraces. The East block is of seven stories supposedly matching the same parapet height as Airpoint. Behind these parapets the proposal stacks a solar farm whilst Airpoint houses its signature amenity at the same level, the rooftop running track. There is scope for interference between these uses.

The ground floor is not at grade with Argus Road but an open basement relative to Hope Road. Cross sections show the West flats have a footpath at their window sill level and these windows further shaded by adjacent garden fence.

Implications of these variables would differ. Headers might include Daylight, Landscaping, Safety, Drainage, etc.

IMPLICATIONS FOR NEIGHBOURS

Maximum disruption is thus caused to the adjacent Airpoint development as the proposal is said to share its parapet height. i.e. the seven storey height block relates to Airpoint's Six to the North. Blockage of outlook, solar path and daylight will occur for some. AND there may be overlooking

issues from intermediate North-end roofs on the proposal.

(It also seems likely the PV arrays in the current sketches would reflect as severe Glare into Airpoint in some circumstances.)

Victorian stock neighbours in two story dwellings with gardens to the West are concerned about garden overshadowing. They are also concerned the "car-free development" will not prove car free in practice and will overspill site-resident's vehicles into West Street's side-streets such as Argus Road unofficially.

IMPLICATIONS FOR SITE RESIDENTS

Dual aspect for the flats is commendable in principle but achieved using deck-access on the courtyard side of each block. Whilst an amenity benefit is claimed for the decks there is a distinct day-light penalty to be paid by each flat internally as a result of overshadowing (already discussed above). Will internal daylight prove adequate? Or will permanent electric lighting be required? The Daylight report shows several failures.

Communal Amenity is really all down in the green courtyard with the long roofs all bristling with photovoltaic panels, though some claims are made for the access-decks and a few atypical private balconies depicted as amenity also. The status of three North roofs on intermediate levels is unclear, but problems with overlooking neighbours from them appear to have been anticipated from the outset.

The courtyard will be open to abrupt and potentially loud noises from passing trains on the GWR main line to the South, some of which will pass at speed, as they do today. There might be some particularly bad node points for this affecting one flat more so than another.

Car-free residents are likely to be limited in what they can carry home from school or work and are remote from some bus route stops. They are therefore more likely to call-in deliveries. Gig economy, Taxis and other shopping deliveries to the "car-free development" are in addition to any Cycling generated by the proposal, likely to increase movements along Argus Road which is already heavily parked in the evenings, causing alternate traffic flow by agreement between car-drivers. New Bin-Lorry movements will result also.

Unfortunately, no mode of transport, including pedestrian, has any direction of access or egress other than directly up Argus Road to West Street, the site is so constrained by topography, the railway and existing development. Some trespass within Airpoint may be possible but only offers a further diagonal approach to West street, and may cause later friction.

The Railway meanwhile seems to wish to cage in South or track-facing balconies?

Nature etc (This comment is not necessarily comprehensive)

The proposal fells an interesting row of red cedar trees currently visible from Both Airpoint directly and from Hope Road (over the top of the works); and instead imposes a tall housing block above and adjacent the main railway. There may be implications for the adjacent Railside nature corridor and for Bats.

The current 2014 local plan allocation map values the avenue of trees as open space in green.

ENDS

(A headed copy of this objection will be sent to DM also.)