

WARD: Central

CONTACT OFFICER: Kayna Tregay

SITE ADDRESS: Eagle House Colston Avenue Bristol BS1 1EN

APPLICATION NO: 18/00847/F Full Planning

DETERMINATION 17 April 2018

DEADLINE:

*Rooftop extension (including plant room) for office (B1) use.*

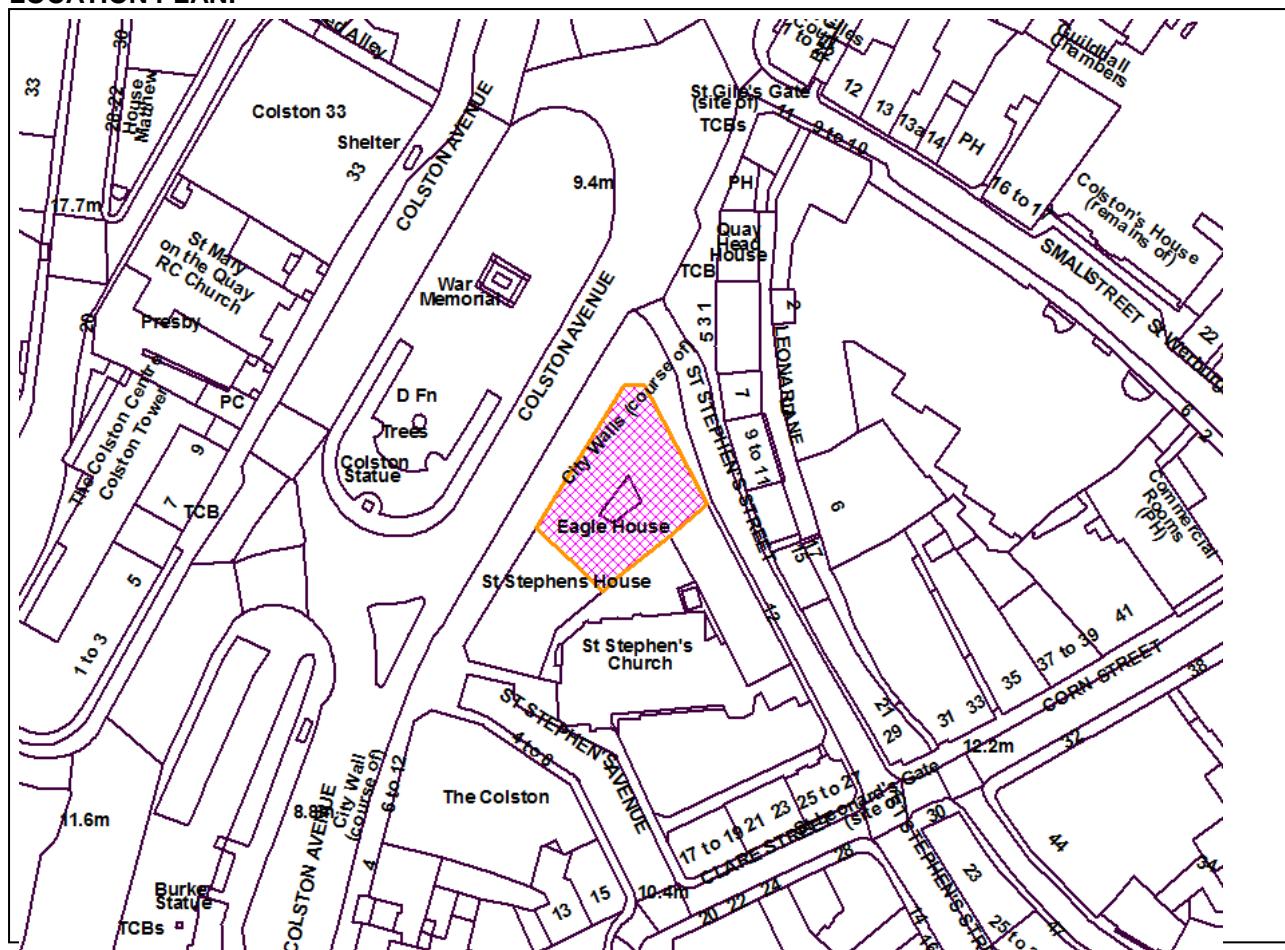
RECOMMENDATION: Refuse

**AGENT:**  
 Stride Treglown Limited  
 Promenade House  
 The Promenade  
 Clifton Down  
 Bristol  
 BS8 3NE

**APPLICANT:**  
 Immediate Media Company Bristol  
 Limited  
 Tower House  
 Fairfax Street  
 Bristol  
 BS1 3BN

*The following plan is for illustrative purposes only, and cannot be guaranteed to be up to date.*

#### LOCATION PLAN:



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## SUMMARY

This application is for a rooftop extension to Eagle House and is being referred to Committee due to the polarised views given by internal and external consultees and the finely-balanced nature of the case. Strong objections were expressed by consultees including Historic England regarding impacts on heritage assets. Strong support relating to the economic benefits of the proposal has been expressed parties including the Bristol City Centre Business Improvement District.

In particular, there has been significant concern about the impacts on the setting of the Grade I listed structure known as St Stephen's Church. The setting of a heritage asset is the surroundings in which it is experienced. The National Planning Policy Framework (NPPF) states that when harm is "less than substantial" (as is considered to be the case) it must be weighed against the public benefits of the case and this is at the heart of this case. Council officers have carefully considered both sides and in this instance believe that harm to heritage assets is not outweighed by the public benefits.

Concern has also been raised about the loss of light to the St Stephen's Church churchyard, but the applicant has submitted a shadow study to demonstrate that there will be no overshadowing arising. The applicant has satisfactorily addressed matters relating to policies on transport, acoustic impacts and sustainability.

Overall, all matters have been resolved, save for concerns about heritage impacts which are the reason for the officer recommendation for refusal.

## SITE DESCRIPTION

The application site is Eagle House. This is a five storey office building on the corner of Colston Avenue and St Stephen's Street in the city centre. It is currently vacant. The rooftop currently houses existing plant, including air conditioning units.

Eagle House lies within the City and Queen Square Conservation Area. The Conservation Area Character Appraisal defines it as a "neutral building". The adjacent buildings of St Stephen's House and 12 St Stephen's Street are defined as "Unlisted Buildings of Merit".

To the south of the site lies St Stephen's Church. This is a Grade I listed building. To the northwest of the site lies the Cenotaph which is a war memorial and a Grade II listed structure. Other listed buildings within the setting of Eagle House include Electricity House to the north (Grade II) and other Grade II buildings on St Stephen's Street. The churchyard associated with St Stephen's Church (to the south of the church) is designated as an Important Open Space in the Local Plan (policy BCS9 and DM17).

The site lies within the Old City Neighbourhood, as defined by the Bristol Central Area Plan.

## RELEVANT HISTORY

09/01838/F - Installation of a new roof level, air conditioning, condenser unit, with supports and access ancillary items, Eagle House. Approved 28 July 2009.

05/02586/F - Proposed installation of two new roof mounted heat pump units on top of the existing Eagle House roof. Approved 9 September 2005.

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07/05710/F - Demolition of the existing caretaker's flat and the construction of 8 new studio apartments on roof of St Stephen's House. Approved 7 March 2008 [adjacent to application site].

17/06872/PREAPP - Pre-application inquiry, rooftop extension.

18/00654/F - Replacement of external facing windows, alterations to existing doors and provision of new doors at ground floor level - Pending consideration at the time of writing. [This application is being considered in parallel. It is not considered contentious and it would be a delegated decision with a recommendation to approve].

**APPLICATION**

The applicant proposes a roof extension. The roof extension would facilitate additional office accommodation and a replacement rooftop plant room, as shown on the appended plans. Solar panels are also proposed.

No change of use is proposed.

Some key features of the proposed design include:

- An increase in parapet height of 600mm.
- A setback from the parapet.
- Dormer windows.
- Zinc cladding, similar to that of the adjacent St Stephen's House rooftop extension.
- Height to be the same as that of the St Stephen's House rooftop extension.

During the lifetime of the application, the proposed southeast elevation was amended from ribbon glazing to dormer windows.

The applicant has submitted a number of 'verified views' in support of the application, plus further information setting out what they considered to be the public benefits of the proposal.

It is important to note that application 18/00654/F for replacement windows and doors and other external alterations has been submitted by the same applicant, and has been considered by officers concurrently to the rooftop extension application.

**RESPONSE TO PUBLICITY AND CONSULTATION**

The application was consulted on via site notice, press notice and neighbour letters.

**External representations**

Three objections were received. One representation of support was received. These are set out in full below, and are summarised as follows:

**Objections**

- The proposals would harm the setting of St Stephen's Church which is a Grade II listed building.
- The proposals would harm the setting of the Grade II listed Bristol Cenotaph.
- The proposals will fail to preserve or enhance the character of the conservation area.
- The proposals would overshadow the churchyard of St Stephen's Church.

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**Supporting comments**

- The proposals will bring economic benefits to Bristol, in that it will retain a high value employer and help keep 500 jobs in the city centre.
- There will be economic benefits for the city centre as a whole.
- Listed buildings are important, but harm to them should be weighed against the benefits of a proposal.

**Historic England commented on the initial proposals as follows:**

**"Summary**

Historic England objects to these proposals on the grounds of unjustified harm to the setting of the Grade I listed tower of St Stephens Church, a heritage asset of the highest significance. We also consider the proposals will cause harm to the setting of Bristol Cenotaph, Quay Head House and 1-5 St Stephens Street, all of which are listed at Grade II. It follows that in harming the setting of these individual structures, the proposals will also fail to preserve or enhance character and appearance of the City and Queen Square Conservation Area.

**Historic England Advice**

The proposals are for a rooftop extension to Eagle House, a Portland stone-faced interwar office building facing the Centre, Bristol. The application envisages an extra storey of office space atop the existing building, with a further floor housing plant above that.

Behind Eagle House stands St Stephen's Church, a Grade I listed building of exceptional architectural and historic interest. Formerly the parish church of Bristol, St Stephen's originally stood on a quay alongside the River Frome. That river was culverted in the late 19th century, and a civic space was created above its former channel, which today housing recently-renovated public space that incorporates the Bristol Cenotaph (Grade II listed). The upper stages of the 14th century tower to St Stephen's church still rise above Eagle House, retaining a strong visual connection to the city centre. In certain views the connection between the church tower and the Grade II listed Cenotaph is of particular appeal, with the proportions of the two structures and their similarity in constructional materials setting up a visual illusion that allows for both structures to be read as one object.

Eagle House itself is a polite building - we are surprised that it is only identified as a "neutral" contributor to the character and appearance of the conservation area in which it stands. In our view, notwithstanding its screening of St Stephen's church from the former quayside, it makes a positive contribution. Its scale and massing mediates between the domestic scale of listed buildings on St Stephen's Street (Quay Head House, 1-5 St Stephen's St, Concorde House; all Grade II listed) and the larger, civic, scale of buildings surrounding The Centre. It is a successful piece of townscape which still allows the church tower to be read and celebrated as part of The Centre, which is surely not an accident of design.

Viewed in isolation, the proposed additional floors respond to the architecture of Eagle House. However, we have great concern that the proposed additional height will block views of the tower of St Stephen's from the Centre, to the significant detriment of its setting. Being able to see a large part of the church tower from The Centre is essential to the setting (and thus significance) of this Grade I listed building, which allows the observer to understand and appreciate its historic significance.

We are also concerned that the proposals will harm the setting of Bristol's Grade II listed Cenotaph through diminishing its relationship with the church tower. In addition, the proposed additional storeys to Eagle House will adversely affect its established contextual relationship with the domestic-scale historic properties of St Stephen's Street, alongside.

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NPPF 132 states that "great weight" should be given to the conservation of heritage assets, and the more important the asset, the greater the weight should be. In this context, we remind you that St Stephen's Church is a Grade I listed building that is integral to the history and development of Bristol and still makes a significant aesthetic contribution. The significant harm to its setting should not simply be weighed against any wider public benefit, as suggested by the applicant's heritage statement. There are many locations in the city where additional floors could be accommodated on existing building to optimise density, but this is not one of them. The application should be refused.

**Recommendation**

Historic England objects to the application on heritage grounds.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires decision makers to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity."

**Historic England commented on the amended proposals and submitted verified views as follows:**

**"Historic England Advice**

In response to our letter of 14 March 2018, the applicant has produced further visualisations of the proposed development. The images supplied confirm our concerns that the proposals will adversely affect the setting of St Stephen's Church and its relationship with the Bristol Cenotaph, the character and appearance of the City & Queen Square Conservation Area and the setting of the College Green Conservation Area.

The harm falls within the bracket of less than substantial, but that does not mean your authority should automatically proceed to NPPF 134's exercise of balancing the harm against any wider public benefit offered by the proposals. NPPF 132 is quite clear: the more significant the asset, the greater the weight that should be given to its conservation. This is a Grade I listed building, a heritage asset of the highest significance and a defining piece of Bristol's history. Any public benefits offered by the proposals would need to be very substantial indeed to outweigh the harm to a heritage asset of such calibre.

**Recommendation**

The additional information supplied does not alter the views we gave in our letter of 14 March. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please continue to treat our correspondence as letters of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity."

**Bristol Civic Society has commented as follows:**

"Bristol Civic Society fully supports the submission of Historic England and has nothing to add" (objection).

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**The Church Warden of St Stephen's Church has commented as follows:**

"We wish to object to this proposal to extend Eagle House by one additional floor.

We agree with the comments from English Heritage, that the extra height would significantly reduce the visibility of Saint Stephen's church tower from the city centre, and affect the overall setting of the Grade 1 listed church in its historical city centre location.

Additionally we are concerned about light levels in the churchyard, a public space that is already overshadowed by the surrounding buildings."

**Bristol City Centre Business Improvement District (BID) has commented as follows:**

"Eagle House is one of the only available office opportunities in Bristol city centre and it requires investment to bring it up to date. It presents an opportunity to retain a high value employer in the city centre.

It is not unusual for office occupiers who wish to stay in the city centre to spend years searching for suitable accommodation. Immediate Media Co must have spent considerable time and patience waiting for such an opportunity as this.

This patience and determination to keep 500 jobs in the city centre and thereby support other businesses and the economy of the city centre as a whole should be welcomed. It would be admirable if the city council were able to support businesses who wish to remain in a city centre location.

All cities require a mixed and successful economy to thrive. All these elements are inter-dependent and without the ability for companies to expand and modernise their facilities Bristol will become a less successful and attractive environment in which to run a successful business.

Historic listed buildings are important but placing too high a priority on their sightlines and visibility risks Bristol city centre becoming an unattractive and unwelcoming place for businesses to locate. It is already the case that huge proportions of previously usable office space has been permitted to alter its use class in various types of accommodation and this trend is continuing.

It is a very substantial benefit to have an employer of Immediate Media Co stature and reputation remaining in the city centre. The consequent economic benefit to the city centre of 500+ skilled jobs working and spending money in the wider city centre economy is more than substantial. Without such employment the city centre would cease to have the ability to support the spread and number of retail and leisure outlets.

Innovations and success stories such as the growth of street markets cannot be successful without consumers who are predominantly provided by commercial businesses such as this.

**NPPF 134**

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Historic England recognise that the development will do 'less than substantial harm' and 'this harm should be weighed against the public benefits.'

The optimum viable use of Eagle House is as office space. Immediate Media proposal supports the 'optimum viable use'."

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**Internal representations**

Bristol City Council's (BCC's) Conservation Officer has commented as follows:

"St Stephen's Church is a grade I Listed building. It is of national significance and requires the greatest weight placed upon its conservation and upon its setting.

The church tower is a prominent landmark on the city skyline from both distant views and within the Conservation Area. Of particular value are the views from Claire Street, where the tower is picturesquely framed at the end of St Stephen Street, and views from Colston Avenue and Quay Street. These views are a critical and sensitive part of the setting of the Grade I Listed asset and are therefore afforded protection under the National Planning Policy Framework.

The proposals seek to add an additional storey to the roof level of Eagle House; this building, dating from the late 1930s, is an attractive if Spartanly detailed building of Portland Stone rising to five storeys. The height of the building, matches that of its neighbour to the South and has group value with a number of other 1930s buildings gathered close to the Cenotaph that share a similar architectural vocabulary and materiality. The building to the south of Eagle house, formerly Bristol and West House, had the addition of another storey in 2007, prior to the current planning context provided by the NPPF. The additional storey follows the generic approach of a boxy zinc-clad structure which mars the setting of the church from several angles.

The intention is that Eagle House is retained in office use and an additional storey added to provide the future owner with additional floor space. The new roof storey has been designed to step back from the edge and try and minimise its impact upon the church tower when viewed from Colston Parade. At the rear the extension will be seen above the parapet of the Grade I Listed church when viewed from Clare Street and St Stephen's Street. The verified views in the revised Visual Impact Assessment raise a few concerns about the impact of the new addition on the church tower and its architectural features; of greatest concern is the loss of significance and legibility of the tower when viewed southwards from Quay Street. Presently the full top stage of the tower can be enjoyed in views towards the recently refurbished Colston Parade.

The arched belfry windows and of the tower and the blind tracery and canopies are high quality architectural elements that lend a distinction to the streetscape. The proposed extension would be visible from the pavement in Quay Street and obscure the principal window and much of this decoration. Whilst the tower will not be completely obscured the impact upon such a highly graded asset is severe (see fig 5, viewpoint 01 in the Visual impact assessment). The impact of the roof will also be felt from the other viewpoints within the Colston Avenue area, and above the roof from Clare Street. Whilst that impact is lower from these locations it is the damage to the legibility and clear architectural expressing from Quay Street that poses a significant degree of harm to the special interest of that building and its setting.

We assess that the degree of harm posed is less than substantial under the definitions of the NPPF, however it is a moderate to high degree of impact upon a highly graded asset. Where this occurs we are required to place "great weight" on the conservation of the building's setting, and development should be refused unless there are substantial and tangible public benefits under the definitions of the NPPF. We recognise that retention of the building in office use, and the environmental enhancements possible through the improved thermal envelope would constitute some of that benefit, but we are not convinced that the duty to conserve heritage assets, placed on us by the NPPF, is satisfied by the current proposal. We cannot support this application in its current form."

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**Bristol City Council's Economic Development Officer commented as follows:**

"I write to support the application to provide additional office floorspace at Eagle House, Colston Avenue.

There are significant economic benefits arising from this proposal. It will allow Immediate Media Co, a major employer currently providing 450 jobs in Bristol City Centre, to develop and expand to provide a further 53 jobs. Employment opportunities will also be provided during the construction phase and amongst the local supply chain.

It's vital that we continue to see a mix of uses in the City Centre, including employment to support the wider economy. There are likely to be significant positive impacts on spending in the retail, leisure and service sectors as a result of retaining and growing jobs in the City Centre.

The proposed investment will enable a prominent and currently vacant building to be brought back into active employment use. The area has recently benefitted from public realm improvements - open space and transport infrastructure. The property is in a highly sustainable location from a transport and accessibility perspective.

According to supporting information, Immediate Media have been searching for office space within the City Centre for some 2 years. The Council's Economic Development Team and Invest in Bristol & Bath receive a high level of office property enquiries. We are increasingly concerned about the shortage of office space in the City Centre to support both existing businesses and those wishing to invest in the city. This concern is reflected by the business community and in office market reports by commercial property agents, see examples:

<http://content.knightfrank.com/research/1221/documents/en/uk-regional-cities-office-market-report-2018-5298.pdf>

[http://www.jll.co.uk/united-kingdom/en-gb/Research/JLL\\_Research\\_The\\_UK\\_Office\\_Market\\_Outlook\\_Report\\_H2\\_2017.pdf](http://www.jll.co.uk/united-kingdom/en-gb/Research/JLL_Research_The_UK_Office_Market_Outlook_Report_H2_2017.pdf)

<https://pdf.euro.savills.co.uk/uk/office-reports/bristol-office-spotlight-spring-2018.pdf>

The Knight Frank report states '*The ongoing supply shortage in Bristol served as a restraining factor for leasing activity in 2017. Nevertheless, overall takeup reached 614,000 sq ft, 12% above the 10-year average for the city and the third highest annual total of the past decade.*'

The JLL report states '*Supply remains under considerable pressure and the overall vacancy rate stood at 3.0% at end-2017. New build Grade A vacancy rate remains at zero, making Bristol the tightest of all the Big 6 markets. There is no real sign of this pressure being alleviated through current pipeline activity with only 158,000 sq ft due to complete over the next six months.*'

The Savills report states '*Bristol enjoyed another solid year (2017) of occupational deals in the city centre, with 611,000 sq ft of office space taken, 6% above the long term annual average..... One of the challenges for the Bristol office market during 2018 will be the shortage of options for occupiers.*'

The proposal could help meet the Council's Corporate Strategy 2018-2023, which includes the theme of 'Develop a diverse economy that offers opportunity to all and makes quality work experience and apprenticeships available to every young person.' If approved, we would welcome a discussion with Immediate Media about how they provide such opportunities. According to the company's website they are patrons of the Prince's Trust, so may already be providing such opportunities."

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**Bristol City Centre's Pollution Control Officer commented as follows:**

No objection, subject to conditions relating to noise levels.

**Bristol City Council's Nature Conservation Officer commented as follows:**

"Evidence of nesting feral pigeons and probably herring gulls was recorded on the roof of the building during the building inspection (ecological survey) dated February 2018. Please note that feral pigeons can nest at any time of the year." Accordingly the officer recommended a planning condition is recommended. The officer also recommended a living roof be incorporated into the proposals and also recommended a condition requiring the inclusion of swift brick or boxes.

**RELEVANT POLICIES**

City and Queen Square Conservation Area Character Appraisal

Planning (Listed Buildings & Conservation Areas) Act 1990

National Planning Policy Framework – March 2012

Bristol Local Plan comprising Core Strategy (Adopted June 2011), Site Allocation and Development Management Policies (Adopted July 2014) and (as appropriate) the Bristol Central Area Plan (Adopted March 2015) and (as appropriate) the Old Market Quarter Neighbourhood Development Plan 2015.

In determining this application, the Local Planning Authority has had regard to all relevant policies of the Bristol Local Plan and relevant guidance.

**KEY ISSUES**

**1. PRINCIPLE OF DEVELOPMENT**

Eagle House has an established B1 use (offices) and is located within Bristol City Centre as set out in policy BCS2 of the Bristol Core Strategy (2011) and the Bristol Central Area Plan (2015). Policies BCS2 and BCAP1 support a mix of uses within the city centre, subject to other policy considerations being addressed. For these reasons, it is considered that the development is acceptable in land use terms.

**2. HERITAGE AND DESIGN**

**a) Legislation and policy context**

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Authority is also required (under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990) to pay special regard to the desirability of preserving or enhancing the character or appearance of the area.

Section 12 of the national guidance within the National Planning Policy Framework (NPPF) 2012 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with any harm or loss requiring clear and convincing justification. Paragraph 132 of the NPPF states that

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significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Further, Para.134 states that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

In addition, the adopted Bristol Core Strategy 2011 within Policy BCS22 and the adopted Site Allocations and Development Management Policies within Policy 31 seek to ensure that development proposals safeguard or enhance heritage assets in the city. Policy BCAP44 of the Central Area Plan states that development will be expected to preserve, enhance and, where appropriate, reinstate the Old City's historic character.

Policies BCS9 and DM17 seek to preserve existing green infrastructure and state that the townscape and landscape quality of open spaces will be protected.

b) Significance of the heritage assets

The NPPF requires the significance of heritage assets to be understood, including any contribution made by their setting. In this case, relevant heritage assets include St Stephen's Church and churchyard, The Cenotaph, other listed buildings on St Stephen's Street, The City and Queen Square Conservation Area and its setting. The significance of these are considered in turn.

**St Stephen's Church:** This is a Grade I listed building. It was built in the 14th Century and rebuilt in the 15th Century. It is thus over 500 years old. Historic England states that the church is of "exceptional architectural and historic interest". The upper part of the church tower rises above Eagle House and can be seen from a number of key viewpoints. The applicant's heritage statement sets out what they consider to be the key viewpoints. During the lifetime of the application, officers set out the LPA's opinion of the key viewpoints from which the setting of the church appears most prominently in the streetscape. These are locations where its key features can be best viewed and appreciated. The applicant then submitted verified views (photomontages) from these viewpoints: North side of Quay Street, East side of Rupert Street, South side of Clare Street, North side of Colston Avenue. These are appended to this report. The tower of the church is considered particularly significant; the arched belfry windows and of the tower and the blind tracery and canopies are high quality architectural elements that lend a distinction to the streetscape and the Old City as a whole.

**The Cenotaph:** This is a Grade II listed structure, and due to the lower grading, is considered less significant than the church.

**St Stephen's Churchyard:** This is not a designated heritage asset, although it is a designated open space, as set out above.

**Other listed buildings:** The listed buildings on St Stephen's Street are considered less significant than the church due to their lower grading (Grade II).

**The City and Queen Square Conservation Area:** The relevant Conservation Area Character Appraisal describes this particular Conservation Area as being "of national significance" (para. 4.1). Section 6 describes St Stephen's Church as a "Landmark Building". This is a building that due to its height, location or detailed design stands out from the background and contributes significantly to the character and townscape of the local area. Landmark buildings are a dominant characteristic of this part of the conservation area (page 24) and are thus considered to contribute heavily to the special character and distinctiveness of the conservation area.

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## c) Impact of the proposed development

St Stephen's Church: The proposed roof addition would be a permanent additional to Eagle House and the roofscape of the site. Historic England and Bristol City Council officers consider that the proposed development would cause less-than-substantial harm to the setting of St Stephen's Church. Historic England has objected to the proposals. Historic England states that the current design of Eagle House allows the church tower to be read and celebrated as part of The Centre, and have stated that the church is "integral to the history and development of Bristol and still makes a significant aesthetic contribution". The addition of a storey would block views to the church tower, harming its setting. When standing at the viewpoints mentioned above, a viewer can currently see a significant proportion of the church tower, including the decorative belfry window and detailing on the tower. The proposals would lead to the obscuring of much of the tower, including the aforementioned features and detailing being obscured from three out of the four viewpoints (North side of Quay Street, East side of Rupert Street and North side of Colston Avenue).

Out of these, the first viewpoint (Quay Street) is of greatest concern because a high proportion of detailing is obscured; from the Rupert Street and Colston Avenue viewpoints, the upper stage architectural detailing is partially obscured, but does still appear legible. As stated by Historic England, "being able to see a large part of the church tower from The Centre is essential to the setting (and thus significance) of this Grade I listed building, which allows the observer to understand and appreciate its historic significance". The fourth viewpoint (South side of Clare Street) is considered to be less affected. The development will not obscure views to any of the features of the church from the Clare Street viewpoint, although impact remains, since the proposed extension would appear to rise above the existing nave roof, diminishing its prominence.

The Cenotaph: Historic England's letters of objection state that the proportions and materials of the Cenotaph and St Stephen's Church are similar and allow both structures to be read as one object. This is noted, but council officers consider that because the structures were built at different periods and not designed together, any relationship between them is coincidental. Hence, whilst there is some harm to views of the Cenotaph posed by the addition of the roof extension, this harm is considered minimal and the impact on the relationship between them is of less concern. This is also in consideration of the fact that the Cenotaph is of a lower listing than the Church.

St Stephen's Churchyard: As stated above, the open space to the south of the church is a designated open space and so impacts on its visual amenity must be considered. Given the existing roof extension on St Stephen's house, and the general context of the site, it is not considered that there will be any harm to the visual amenity of the churchyard arising from the proposals.

Other listed buildings: No concerns have been raised about impacts on the settings of the other listed buildings in the vicinity of the site including those on St Stephen's Street. Officers do not consider that impacts on these buildings is of concern, due to their lower grading and greater distance from the application site.

City and Queen Square Conservation area: St Stephen's Church is a landmark building and is considered to contribute to the special character and distinctiveness of the conservation area. It will be partially obscured by the proposed development as set out above. It is thus considered that there will be harm to the character and appearance of the conservation area arising from the proposed development.

Summary of impact: Officers consider that the proposals will result in less-than-substantial harm to the setting of the Grade I listed St Stephen's Church and the character and appearance of the City and Queen Square Conservation Area. The impact on the view from Quay Street is considered to pose the highest degree of harm.

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- d) Is the Impact of the Proposed Works (Harm/Loss of Significance) Justified or Outweighed?

With reference to paragraphs 132 and 134 of the NPPF, it must be considered whether the less-than-substantial harm is justified and outweighed by public benefits. The provisions of policy DM31 also must be considered (bullet points i-iv of the policy under the heading "conserving heritage assets").

The applicant has described in various parts of their submission (including the Heritage Statement, Design and Access Statement and other supporting statements) the rationale for the design and how impact of the proposals has sought to be minimized, especially when compared when the pre-application proposals. For example, it is stated that the roof extension has been set back from the parapet; louvres have been omitted; a pitch has been added to the proposed roof; zinc has been used (same material as the adjacent St Stephen's House) extension; and the proposed ribbon glazing on the southeast elevation has been replaced by dormers. These are noted and it is agreed that the impact of the design has been reduced compared to proposals presented at the pre-application stage. It is also worth noting that neither Bristol City Council officers, nor external consultees, have any concerns about the design impacts on Eagle House in isolation. The applicant's response to Historic England's objection is appended to this report.

The applicant and the Council's Economic Development Officer have described the public benefits of the proposals. These can be divided into three types: economic, aesthetic and other:

Economic benefits:

- The proposals would bring a vacant building back into use and would support the growth of a Bristol-based media company, Immediate Media, which wishes to remain in Bristol City Centre. The company currently employs circa 450 staff and is currently based at Tower House on Fairfax Street. The applicant has set out that the proposals would enable the company to achieve their planned growth to 503 people. It is understood that the company has been searching for alternative premises for two years. The applicant stated that the growth would not be possible without the proposed roof extension, and will allow the company to commit to Eagle House as a long-term solution. The applicant has set out how the company seeks to employ local people and is part of the Business Improvement District.
- There will be jobs arising from the construction process and amongst the local supply chain.
- There are likely to be significant positive impacts on spending in the retail, leisure and service sectors as a result of jobs in the city centre.

Aesthetic benefits:

- As set out above, the application has been considered in conjunction with application 18/00654/F for the replacement of external facing windows and doors. Within that application, several improvements to the public realm have been made:
  - o A bulky (non-original) canopy is to be removed.
  - o A high quality decorative screen would be added to the Colston Avenue elevation.
  - o The current windows would be replaced.
  - o Existing signage would be removed.
  - o Removal of a redundant fire escape on St Stephen's Street and reinstatement of a window opening in its place.
  - o The entrance would be relocated from Stephen Street to Colston Avenue so as to be facing the newly-improved public realm.

These are considered to be improvements to the appearance of the building and thus the appearance of the conservation area.

**Development Control Committee A – 16 May 2018****Application No. 18/00847/F: Eagle House Colston Avenue Bristol BS1 1EN****Other benefits:**

- It is understood that Immediate Media have a strong green travel philosophy, with 100 of their staff currently cycling to work. The proposals for a city centre location would continue to support this, putting less pressure on parking and the public transport systems.

These benefits are acknowledged by officers and should be weighed against into the balance of the proposal, including securing its optimum viable use, as required by paragraph 134 of the NPPF. The NPPF is clear that "great weight" should be given to an asset's conservation and states that the more important the asset, the greater the weight should be (paragraph 132).

Officers have carefully considered both the harm to heritage assets and the public benefits that the proposals will bring. In this instance, it is not considered that the harm is outweighed by the public benefits and this is due very much to the high grade of the asset. The church tower is a 15th Century Grade I listed structure and a key landmark within the conservation area. The views to it are considered to be a critical and sensitive part of the setting of the church. The detailing of the tower, including the arched belfry windows and surrounding decoration are high quality architectural elements. Whilst the whole tower would not be masked, the principal window and much of the decoration would be obscured from the aforementioned viewpoint on Quay Street. As set out above, impacts from other viewpoints are of lesser concern and impact on other heritage assets (The Cenotaph, other surrounding listed buildings and the churchyard) are not of such concern as to warrant refusal of the application on the grounds of impacts to those assets alone.

The applicant has, as set out in their supporting documentation, given clear reasons why they consider the proposal is justified, and officers acknowledge the considerable public benefits of the proposals. However, in this instance, officers feel that the harm to the setting of the Grade I listed structure and the character and appearance of the conservation area is not outweighed by these benefits. For these reasons, the officer recommendation is that the application be refused.

### **3. AMENITY**

Policy BCS21 states that development will be expected to safeguard the amenity of existing development. Policy DM27 states the layout and form of development should enable existing and proposed development to achieve appropriate levels of privacy, outlook and daylight. Policy DM30 states that extensions and alterations to buildings will be expected to safeguard the amenity of the host premises and neighbouring occupiers.

The applicant proposes windows within the roof extension and a north-facing terrace. Whilst this will result in overlooking, particularly to the properties on the St Stephen's Street and any users of the churchyard, this impact is not considered any greater than that of the existing situation, since there are already windows on all elevations of Eagle House.

In terms of impacts arising from overshadowing, loss of daylight and loss of sunlight, officers have considered the concerns raised by the St Stephen's Church warden regarding the impacts on the churchyard. For clarity, this is an area to the north of the church and immediately south of Eagle House, and is not designated as an open space. The applicant has submitted a shadow study which demonstrates that impacts would not be any more detrimental than existing, and this has been appended to this report. Hence, officers do not have concerns in terms of loss of light or overshadowing.

Rooftop plant is proposed in order to replace the current plant. Bristol City Council's Pollution Control Officer had no concerns, subject to the inclusion of conditions limiting the noise from plant and equipment to a level 5 dB below the background level. The applicant's acoustic consultant has stated that some emergency equipment would be included in the proposals. This would require periodic short-term testing and it is anticipated it would breach the proposed limit set out above.

**Development Control Committee A – 16 May 2018****Application No. 18/00847/F: Eagle House Colston Avenue Bristol BS1 1EN**

The proposed testing would not be of concern if noise levels were 10 dB below the background level, which the applicant has confirmed would be the case. This issue could be resolved by the imposition of conditions requiring further information, and is not considered to warrant refusal of the application.

**4. TRANSPORT AND MOVEMENT**

Policy BCS10 states that developments should be designed and located to ensure the provision of safe streets and create places and streets where traffic and other activities are integrated. Policy DM23 states that development should provide safe and adequate access onto the highway network and should not give rise to unacceptable traffic conditions.

The proposals would facilitate the building to be used by a wider number of employees than is currently the case, so impacts arising from a greater number of trips must be considered. However, the increase in floorspace is not sufficient to trigger the requirement for a Travel Plan or a Travel Plan Statement. No change of use is proposed. The applicant has submitted a Transport Technical Note, stating that the development would continue to be car-free and that the applicant proposes site-secure cycle storage as well as changing facilities within the building. This site is in a sustainable city centre location on a main pedestrian route and close to numerous public transport and cycle routes, so the absence of car parking is not of concern. Details of cycle storage and changing facilities could be required by condition. For these reasons, the increase in trips would not lead to concerns relating to transport and movement.

**5. OTHER KEY ISSUES**

In respect of sustainability and ecology, matters are considered resolved, subject to the inclusion of suitably-worded conditions.

**CONCLUSION**

In making a recommendation to committee, officers have fully recognized the economic, aesthetic and other public benefits of the proposals and have carefully considered the views of all those who have made representations. There has been a difficult and finely-balanced assessment to be made in terms of weighing these benefits against the impact on the setting of the Grade I listed church and the character and appearance of the conservation area. All other matters are considered to have been resolved to an acceptable level (subject to conditions), so the recommendation is based on impacts on heritage assets only. Officers believe that the less-than-substantial harm to heritage assets is not outweighed by the public benefits in this instance. It is important to be clear that the recommendation is based on the impact on the setting of St Stephen's Church when viewed from Quay Street (as shown in the photomontages) and the associated impact on the character and appearance of the conservation area. The impact on the setting of the church when viewed from other points, and impacts on other heritage assets, are of less concern and would not warrant refusal of the application.

The proposed rooftop extension would result in less-than-substantial harm to the setting of the Grade I listed asset known as St Stephen's Church when viewed from Quay Street. It would also harm the character and appearance of the City and Queen Square Conservation Area. The proposals are therefore contrary to Policy BCS22 of the adopted Bristol Core Strategy (June 2011), Policy DM32 of the Bristol Site Allocations and Development Management Policies (July 2014), Policy BCAP44 of the Bristol Central Area Plan (March 2015) and Section 12 of the NPPF.

The application is accordingly recommended for refusal.

**Development Control Committee A – 16 May 2018****Application No. 18/00847/F: Eagle House Colston Avenue Bristol BS1 1EN****COMMUNITY INFRASTRUCTURE LEVY**

How much Community Infrastructure Levy (CIL) will this development be required to pay?

Development of less than 100 square metres of new build that does not result in the creation of a new dwelling; development of buildings that people do not normally go into, and conversions of buildings in lawful use, are exempt from CIL. This application falls into one of these categories and therefore no CIL is payable.

**RECOMMENDED      REFUSE**

The following reason(s) for refusal are associated with this decision:

**Reason(s)**

1. The proposed rooftop extension would result in less-than-substantial harm to the setting of the Grade I listed asset known as St Stephen's Church when viewed from Quay Street. It would also harm the character and appearance of the City and Queen Square Conservation Area. The proposals are therefore contrary to Policy BCS22 of the adopted Bristol Core Strategy (June 2011), Policy DM32 of the Bristol Site Allocations and Development Management Policies (July 2014), Policy BCAP44 of the Bristol Central Area Plan (March 2015) and Section 12 of the NPPF.

**Advice(s)**

1. Refused Applications Deposited Plans/Documents

The plans that were formally considered as part of the above application are as follows:-

- 151668-STL-00-XX-DR-A-ZZZZ-01104 P26 Proposed roof plan, received 20 April 2018
- 151668\_STL\_00\_05\_DR\_A\_ZZZZ\_01100\_P15 Fifth Floor Plan existing, received 20 February 2018
- 151668\_STL\_00\_05\_DR\_A\_ZZZZ\_01101\_P26 Fifth floor plan proposed, received 20 April 2018
- 151668\_STL\_00\_06\_DR\_A\_ZZZZ\_01102\_P26 Sixth floor plan proposed, received 20 February 2018
- 151668\_STL\_00\_06\_DR\_A\_ZZZZ\_01103\_P15 Existing roof plan, received 20 February 2018
- 151668\_STL\_00\_XX\_DR\_A\_ZZZZ\_02100\_P15 North east elevation existing, received 20 February 2018
- 151668\_STL\_00\_XX\_DR\_A\_ZZZZ\_02101\_P15 North elevation existing, received 20 February 2018
- 151668\_STL\_00\_XX\_DR\_A\_ZZZZ\_02101\_P15 North elevation existing, received 20 February 2018
- 151668\_STL\_00\_XX\_DR\_A\_ZZZZ\_02102\_P15 West elevation existing, received 20 February 2018
- 151668\_STL\_00\_XX\_DR\_A\_ZZZZ\_02103\_P15 South east elevation existing, received 20 February 2018
- 151668\_STL\_00\_XX\_DR\_A\_ZZZZ\_02104\_P15 North East Elevation Proposed, received 20 February 2018
- 151668\_STL\_00\_XX\_DR\_A\_ZZZZ\_02105\_P15 North elevation Proposed, received 20 February 2018
- 151668\_STL\_00\_XX\_DR\_A\_ZZZZ\_02106\_P26 South east elevation proposed, received 20 April 2018
- 151668\_STL\_00\_XX\_DR\_A\_ZZZZ\_02107\_P15 Site Location Plan, received 20 February 2018

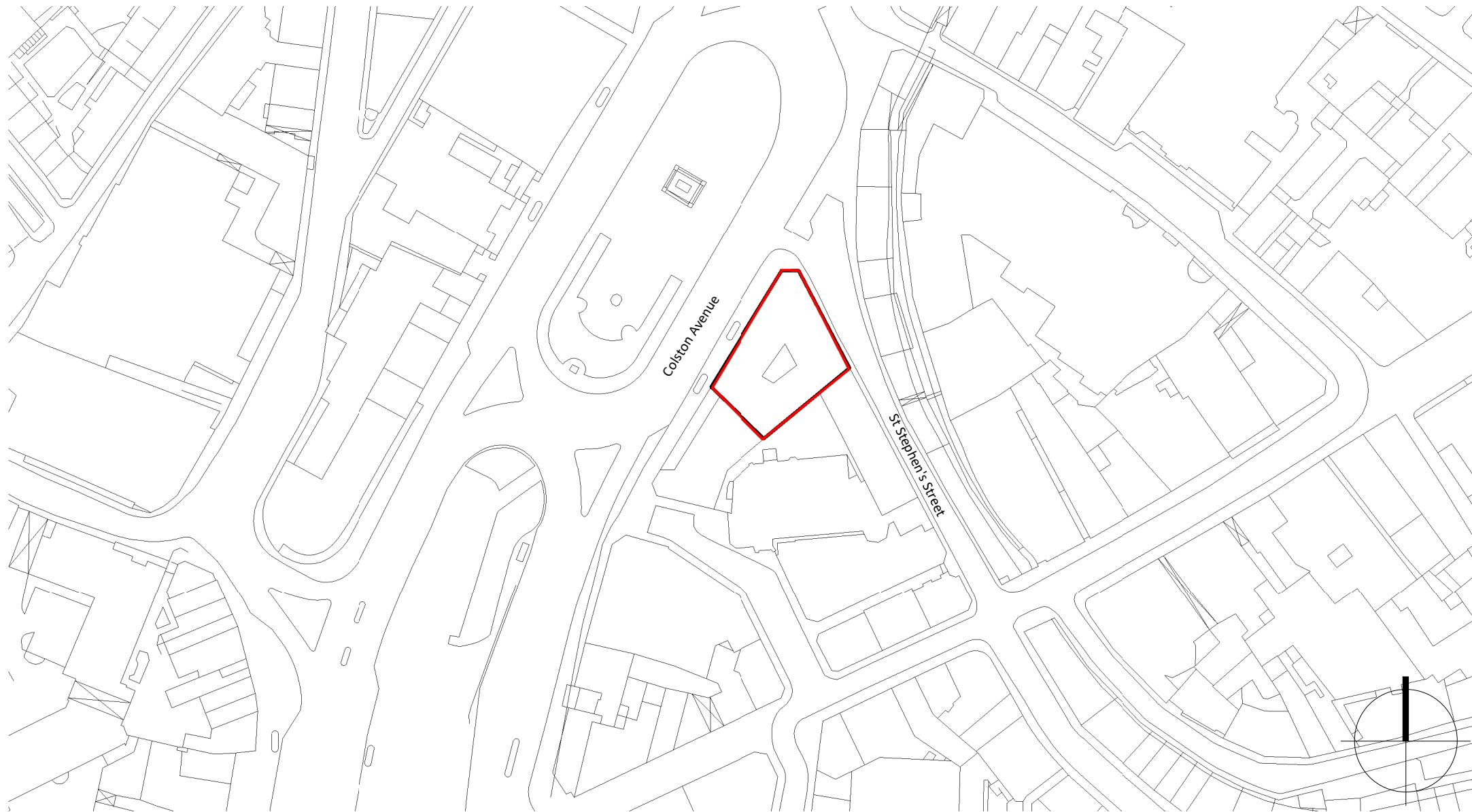
## Supporting Documents

### 4. Eagle House Colston Avenue

1. Site location plan
2. Proposed northeast elevation
3. Proposed west elevation
4. Verified views (photomontages)
5. Applicant response to Historic England
6. Improvements proposed under application 18/000654/F
7. Decorative canopy proposed under application 18/00654/F
8. St Stephens (Church) Garden Shadow A
9. St Stephens (Church) Garden Shadow B

0mm	50mm
STATUS P1	REV P15

DATE 14/02/18 DESCRIPTION Issue For Planning



TITLE: Site Location Plan

PROJECT: Eagle House

CLIENT: Immediate Media

REVISED BY: MS

CHECKED BY: ATM

ORIGINATOR NO: 151668

SUITABILITY STATUS: PL: PLANNING

SCALE: 1 : 1250 @ A4

PROJECT - ORIGINATOR - ZONE - LEVEL - TYPE - ROLE - CLASS. - NUMBER

151668-STL-00-XX-DR-A-ZZZZ-09100

REVISION: P15

0mm 50mm

STATUS	REV	DATE	DESCRIPTION
P1	P15	14/02/18	Issue for Planning
P1	P16	27/02/18	Re-issued for Planning



TITLE: North East Elevation - Proposed  
PROJECT: Eagle House  
CLIENT: Immediate Media

REVISED BY: MS  
CHECKED BY: ATM  
ORIGINATOR NO: 151668

SUITABILITY STATUS: S1: SUITABLE FOR CO-ORDINATION  
SCALE: 1 : 100 @ A3

PROJECT - ORIGINATOR - ZONE - LEVEL - TYPE - ROLE - CLASS. - NUMBER  
151668-STL-00-XX-DR-A-ZZZZ-02104  
REVISION: P16

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INFORMATION SHOULD BE TAKEN FROM FIGURED DIMENSIONS ONLY

0mm 50mm

STATUS REV DATE DESCRIPTION  
P1 P15 14/02/18 Issue for Planning  
P1 P16 27/02/18 Re-issued for Planning

Level 06 - 6th Floor  
30745

Level 05 - New Floor Level  
28145

Level 04 - 4th Floor  
24670

Level 03 - 3rd Floor  
21340

Level 02 - 2nd Floor  
17680

Level 01 - 1st Floor  
14000

Level 00 - Ground Floor  
9380



TITLE: West Elevation - Proposed  
PROJECT: Eagle House  
CLIENT: Immediate Media

REVISED BY: MS  
CHECKED BY: ATM  
ORIGINATOR NO: 151668

SUITABILITY STATUS: S1: SUITABLE FOR CO-ORDINATION  
SCALE: 1 : 100 @ A3

PROJECT - ORIGINATOR - ZONE - LEVEL - TYPE - ROLE - CLASS. - NUMBER  
151668-STL-00-XX-DR-A-ZZZZ-02107  
REVISION: P16

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# Eagle House Colston Avenue Bristol

Visually Verified Montages

18/00847/F | Rooftop extension (including plant room) for office (B1) use  
April 2018 | NPA 11008 IMC |

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# PROJECT SPECIFIC METHOD STATEMENT

**Project:** Eagle House

**Prepared by:** Nicholas Pearson Associates (Npavisuals)  
The Farm House  
Church Farm Business Park  
Corston, Bath,  
BA2 9AP  
Tel: +44 (0)1225 876990

**Client:** Immediate Media

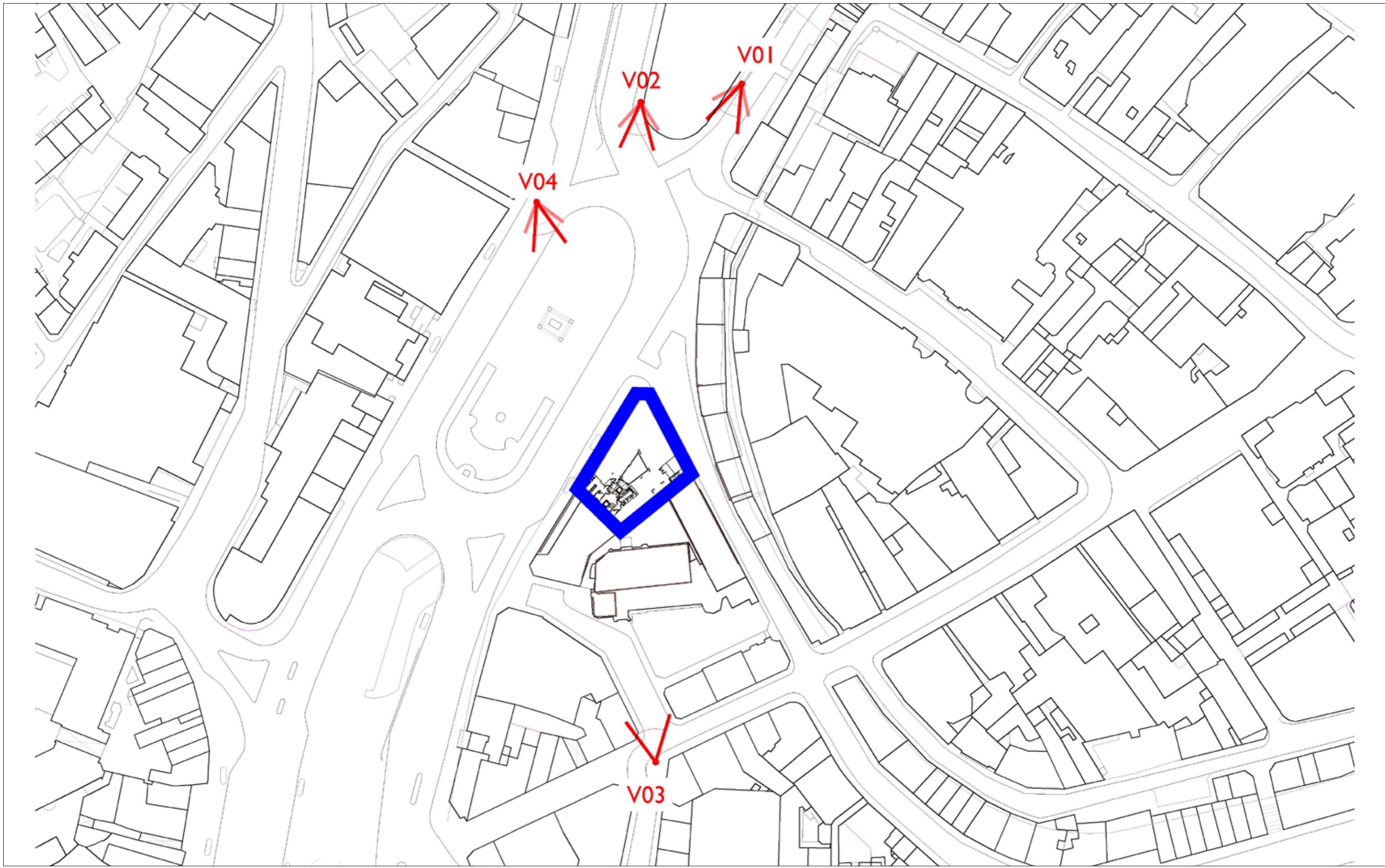
**Architect:** Stride Treglown

Npavisuals were commissioned by Stride Treglown to prepare a series of Accurate Visual Representations of the proposed development at Eagle House, Colston Avenue, Bristol, BS1 1EB to accompany the planning application 18/00847/F | Rooftop extension (including plant room) for office (B1) use

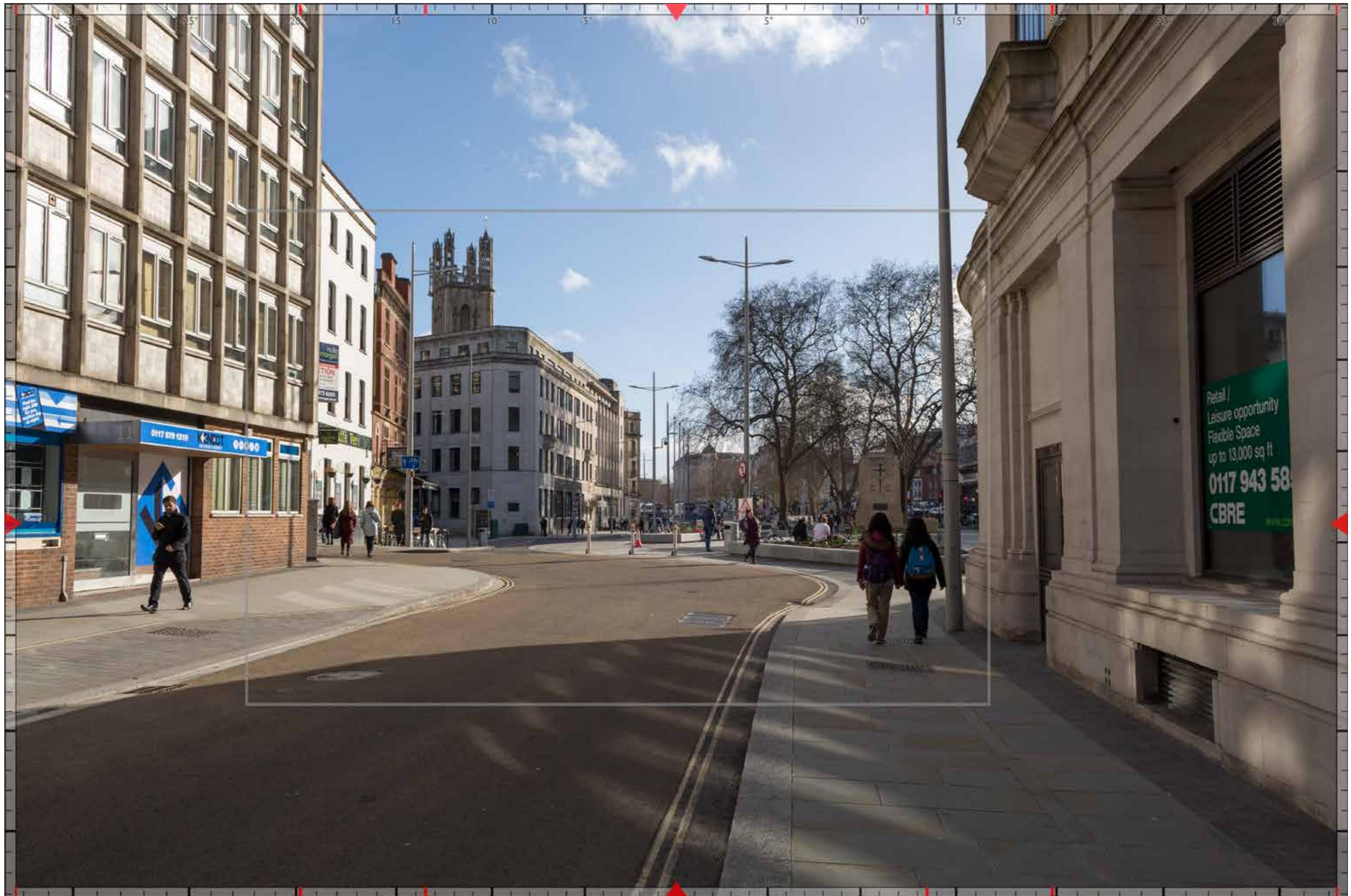
The viewpoints were selected in consultation with the planning professional and the Bristol City Planning Officer

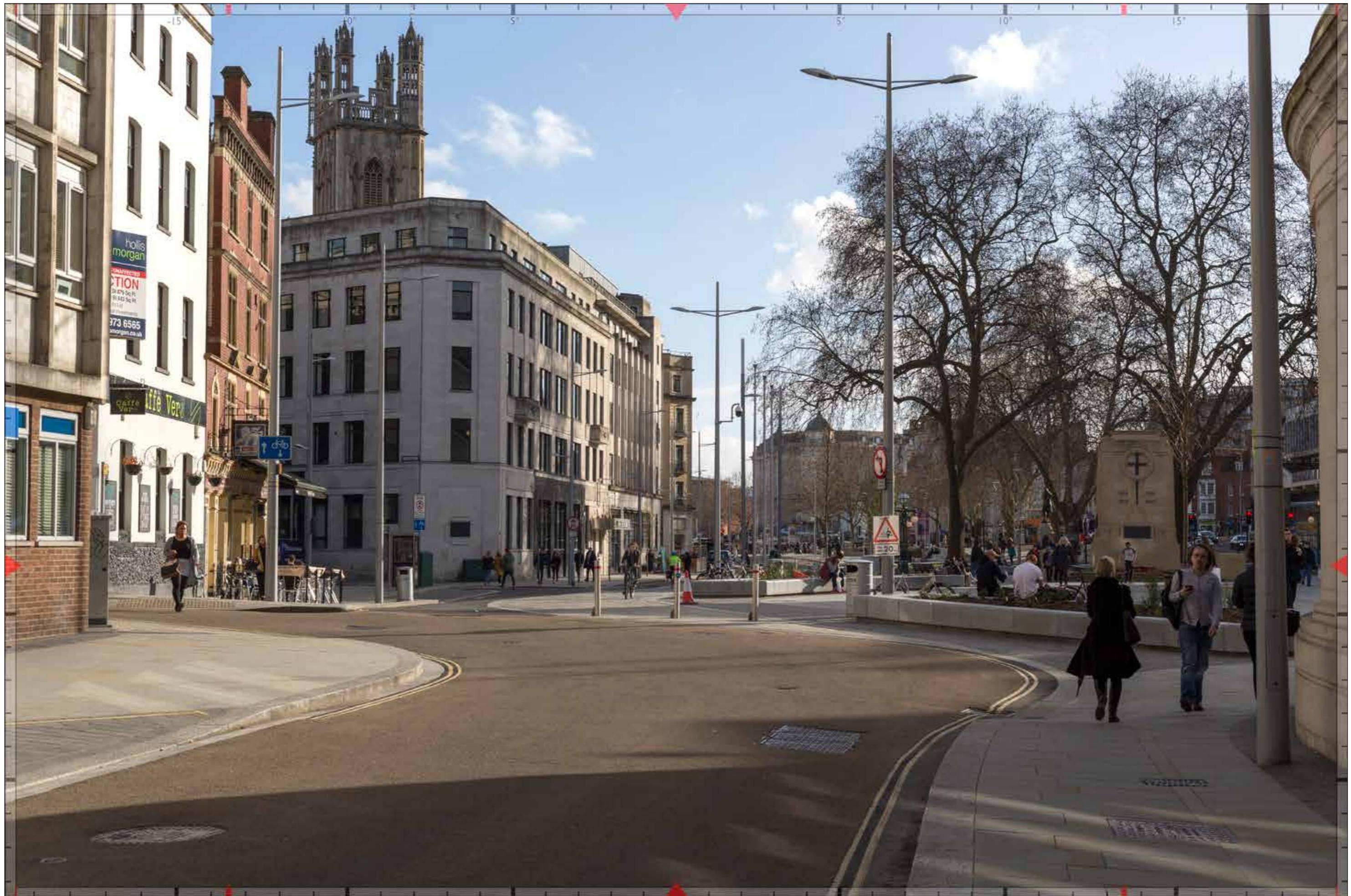
Viewpoint representation levels and Fields of Views were selected to best accurately portray the perceived view when viewed at A3. (Please see methodology for further details)

3 no. AVR Level 3 / 39 Degree Field of View  
1 no. AVR Level 3 / 74 Degree Field of View (Portrait)



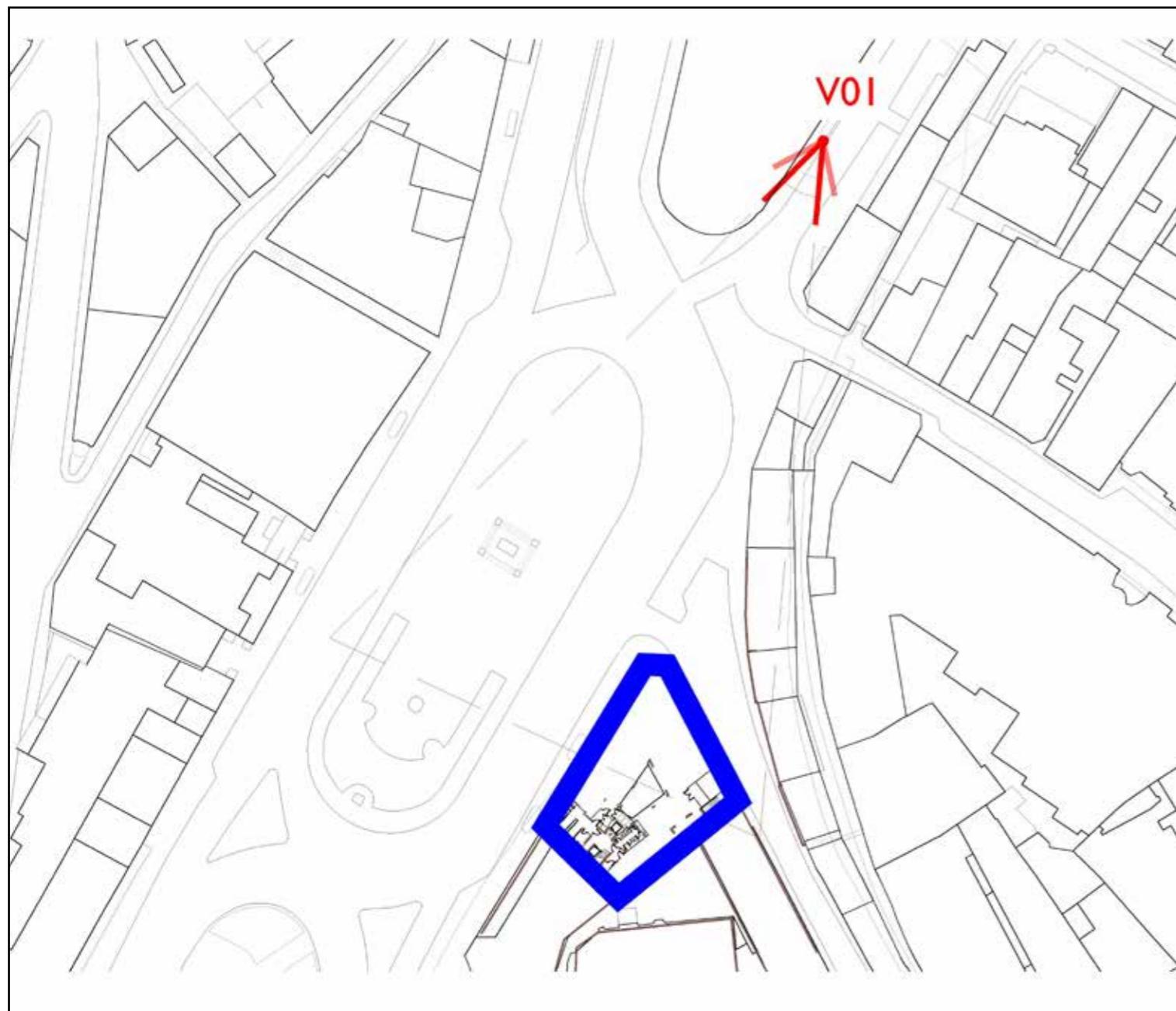
Viewpoint Location Plan







## View Location



## View Verification



## View Verification



**View Number** I

**AVR Level** 3

**Page Viewing Distance** 540mm @ A3

**Location** North side of Quay Street (adjacent to Electricity House)

**Coordinates** 358680.616, 173124.807 (to EPSG 27700)

**Bearing** 185

**Distance** 120m

**Eye Level** 10.8494 m AOD

**Camera** Canon EOS 5D MK III

**Frame Type** Single Frame

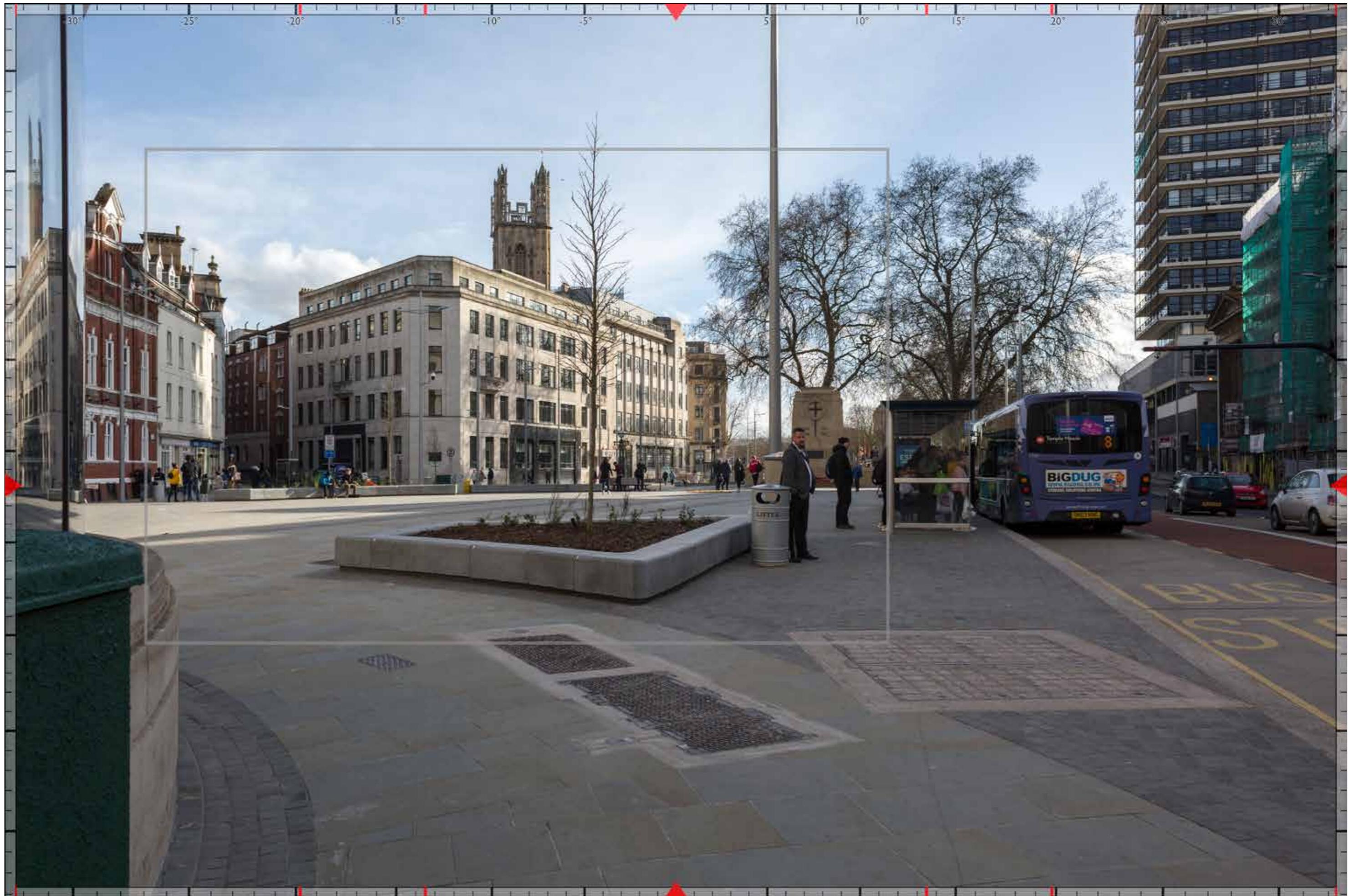
**Focal Length** 50mm

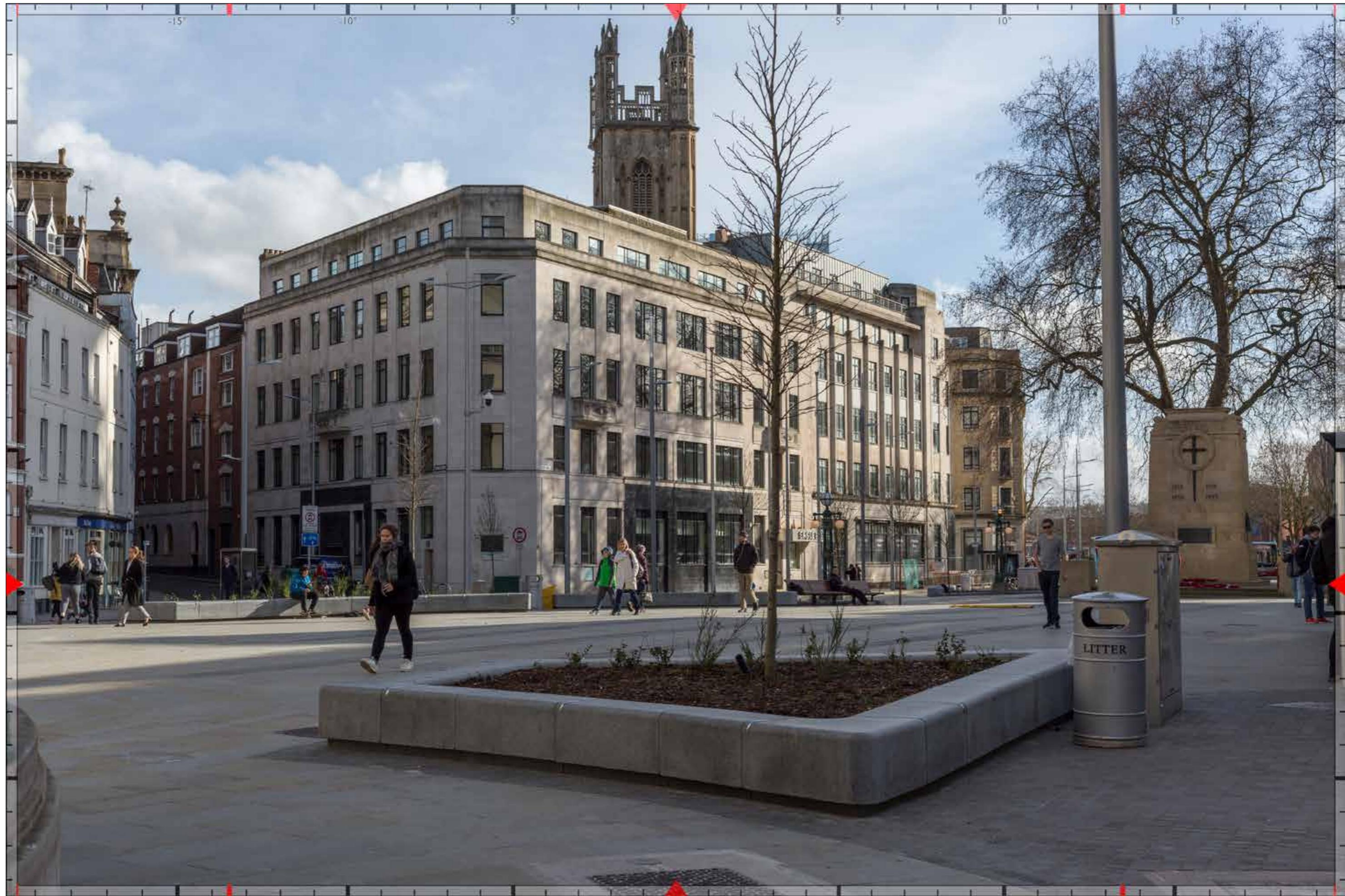
**Horizontal FOV** 40°

**Vertical FOV** 27°

**Date of Photo** 03/04/2018 17:31

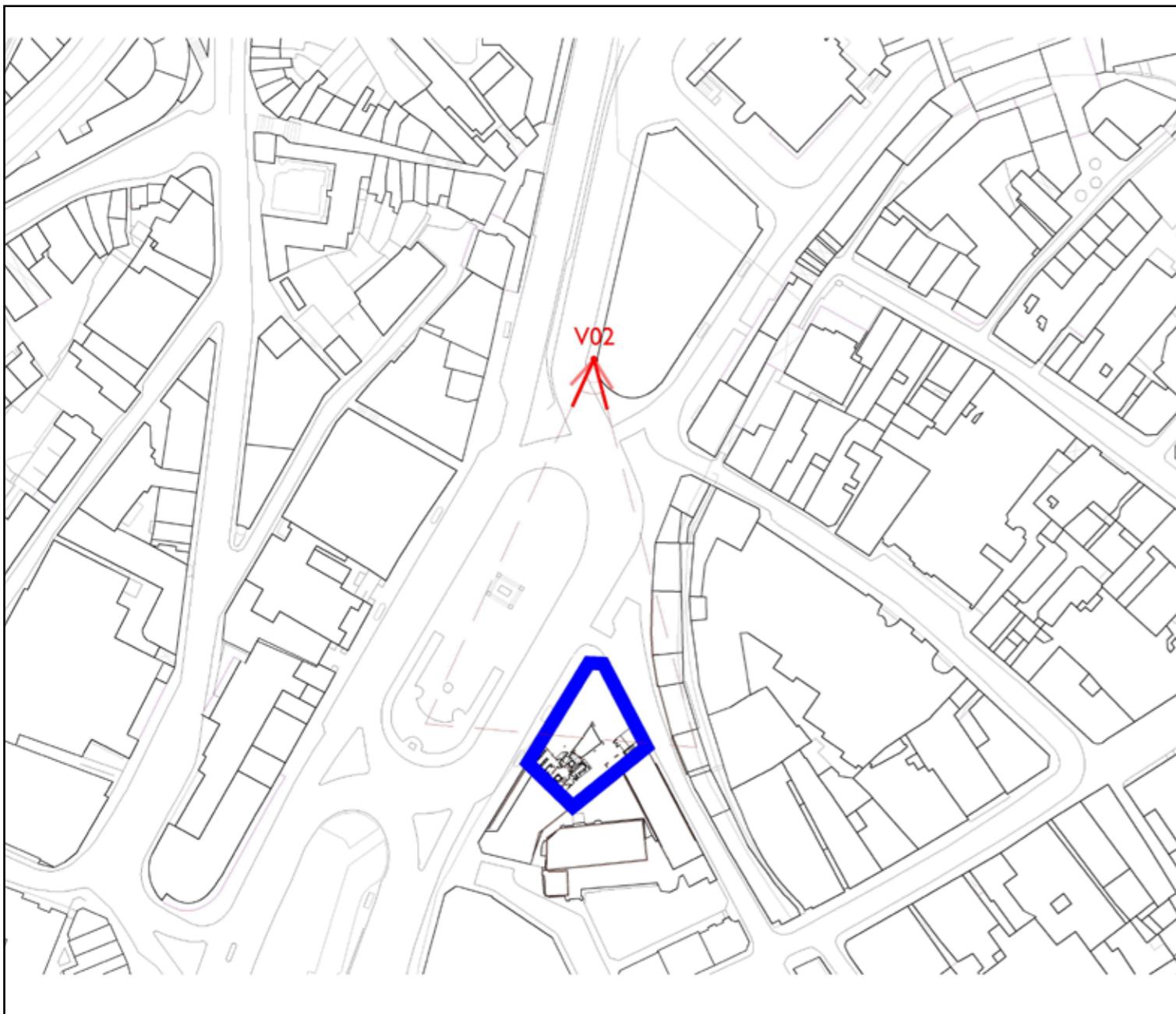
**Weather** Clear & Sunny







## View Location



**View Number** 2

**AVR Level** 3

**Page Viewing Distance** 540mm @ A3

**Location** East side of Rupert Street (adjacent to Electricity House)

**Coordinates** 358710.839, 173130.267 (to EPSG 27700)

**Bearing** 205

**Distance** 113m

**Eye Level** 10.5 m AOD

**Camera** Canon EOS 5D MK III

**Frame Type** Single Frame

**Focal Length** 50mm

**Horizontal FOV** 40°

**Vertical FOV** 27°

**Date of Photo** 03/04/2018 17:10

**Weather** Clear & Sunny

## View Verification



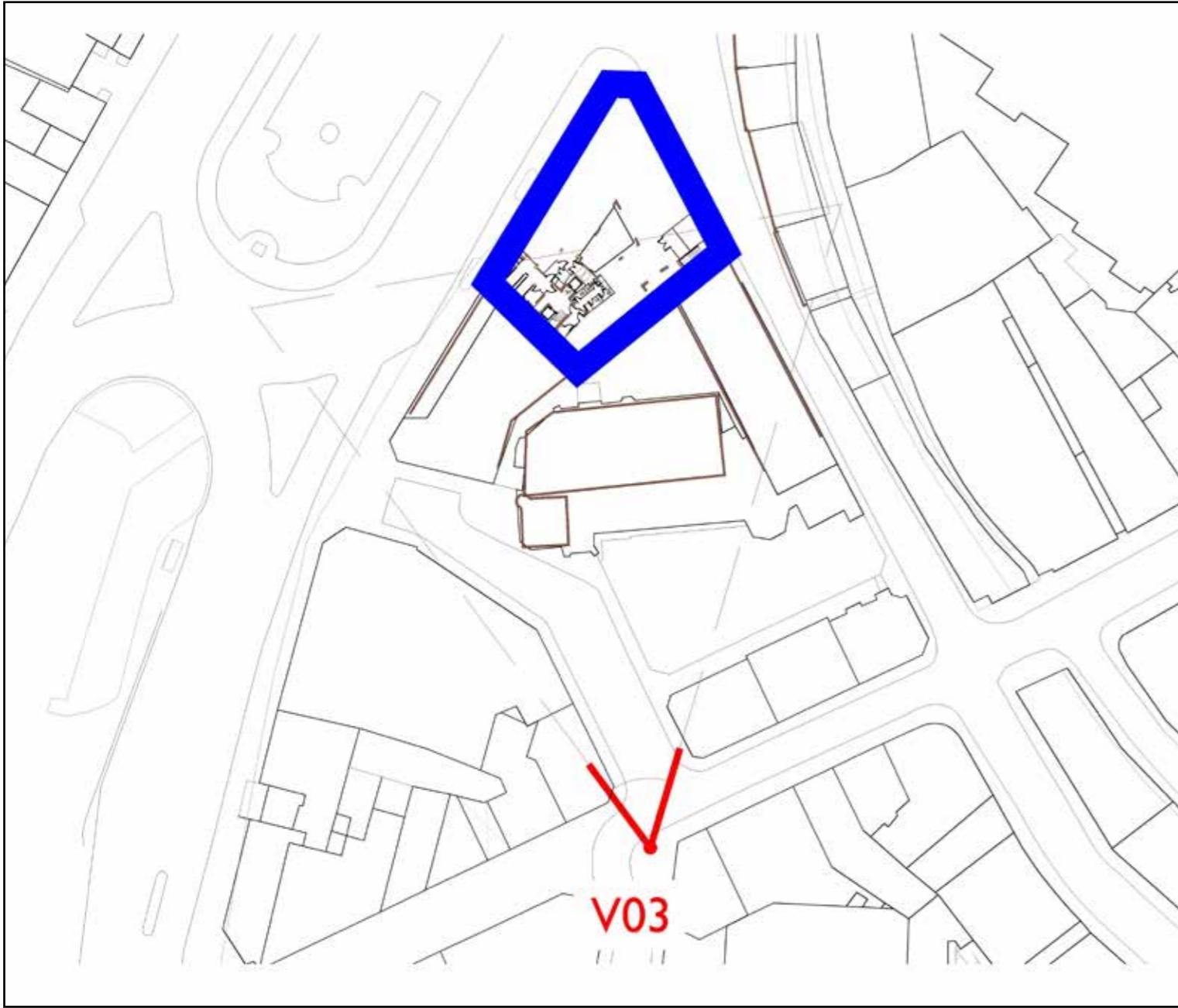
## View Verification







## View Location



**View Number** 3

**AVR Level** 3

**Page Viewing Distance** 260mm @ A3

**Location** South side of Clare Street (adjacent to parking meter)

**Coordinates** 358685.06, 172927.195 (to EPSG 27700)

**Bearing** 340

**Distance** 89m

**Eye Level** 11.8865 m AOD

**Camera** Canon EOS 5D MK III

**Frame Type** Single Frame

**Focal Length** 24mm

**Horizontal FOV** 53°

**Vertical FOV** 74°

**Date of Photo** 03/04/2018 16:14

**Weather** Clear & Sunny

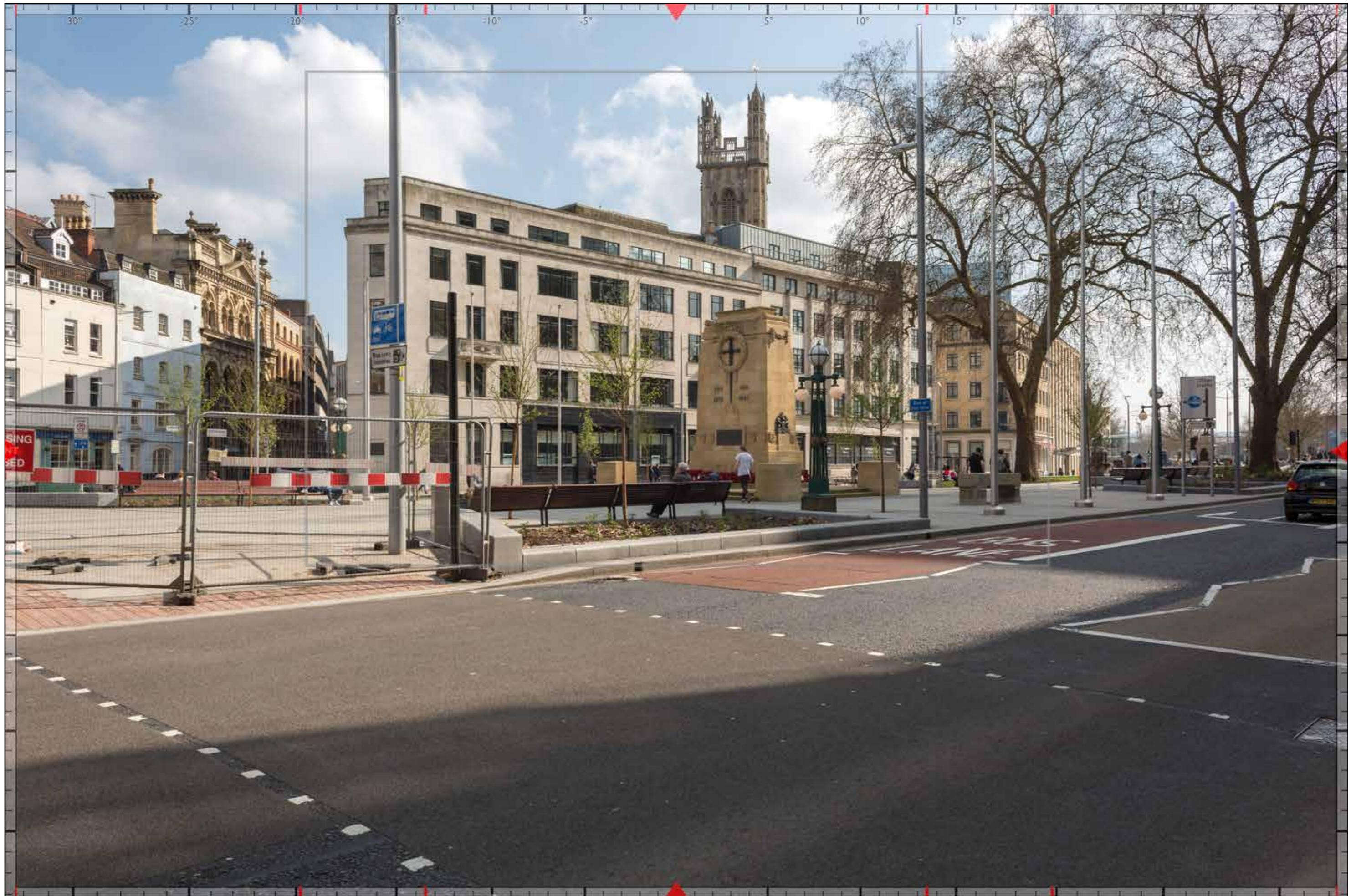
Please note: portrait view is represented on a horizontal page  
please view at 90 degree angle

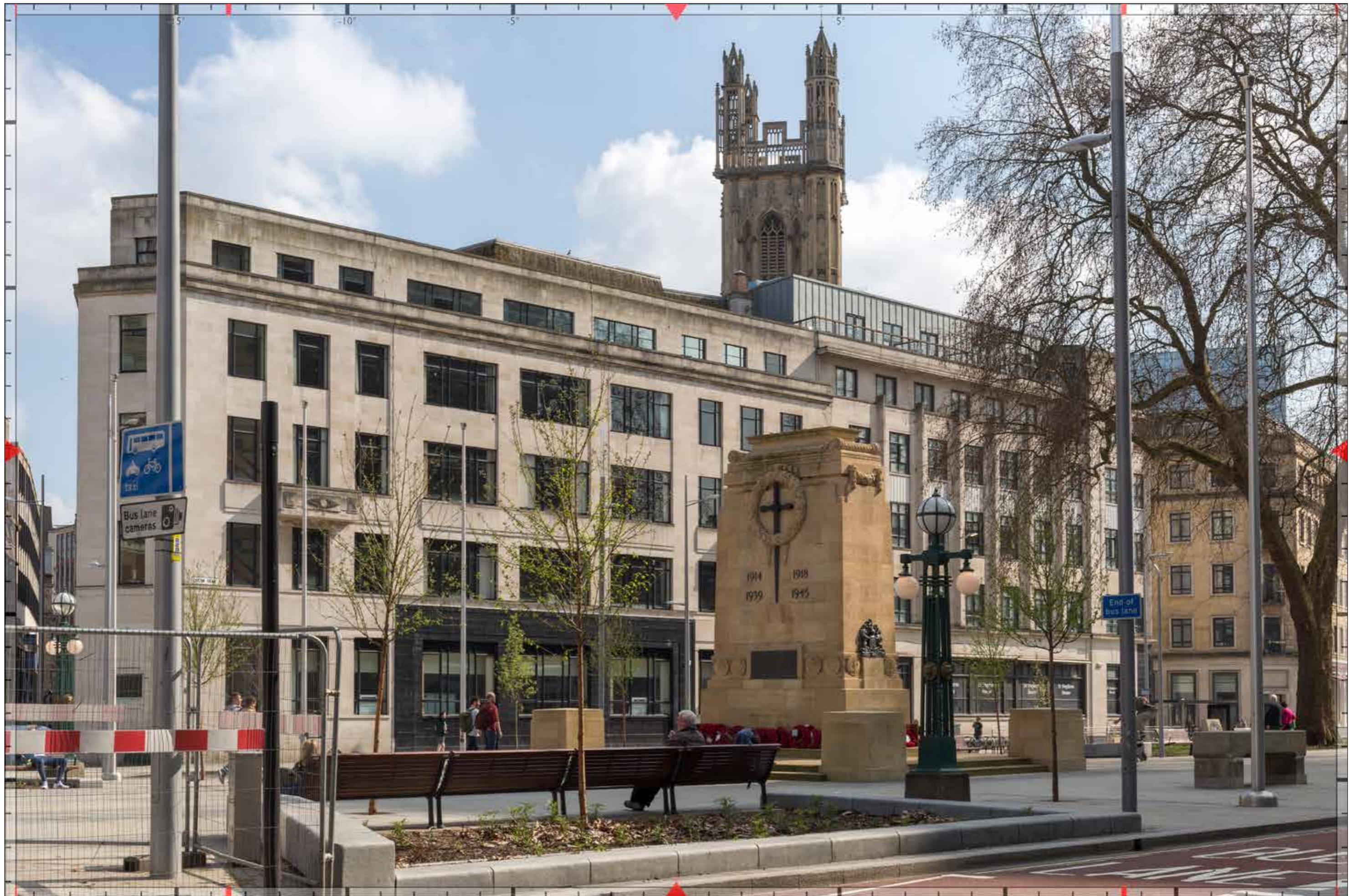
## View Verification

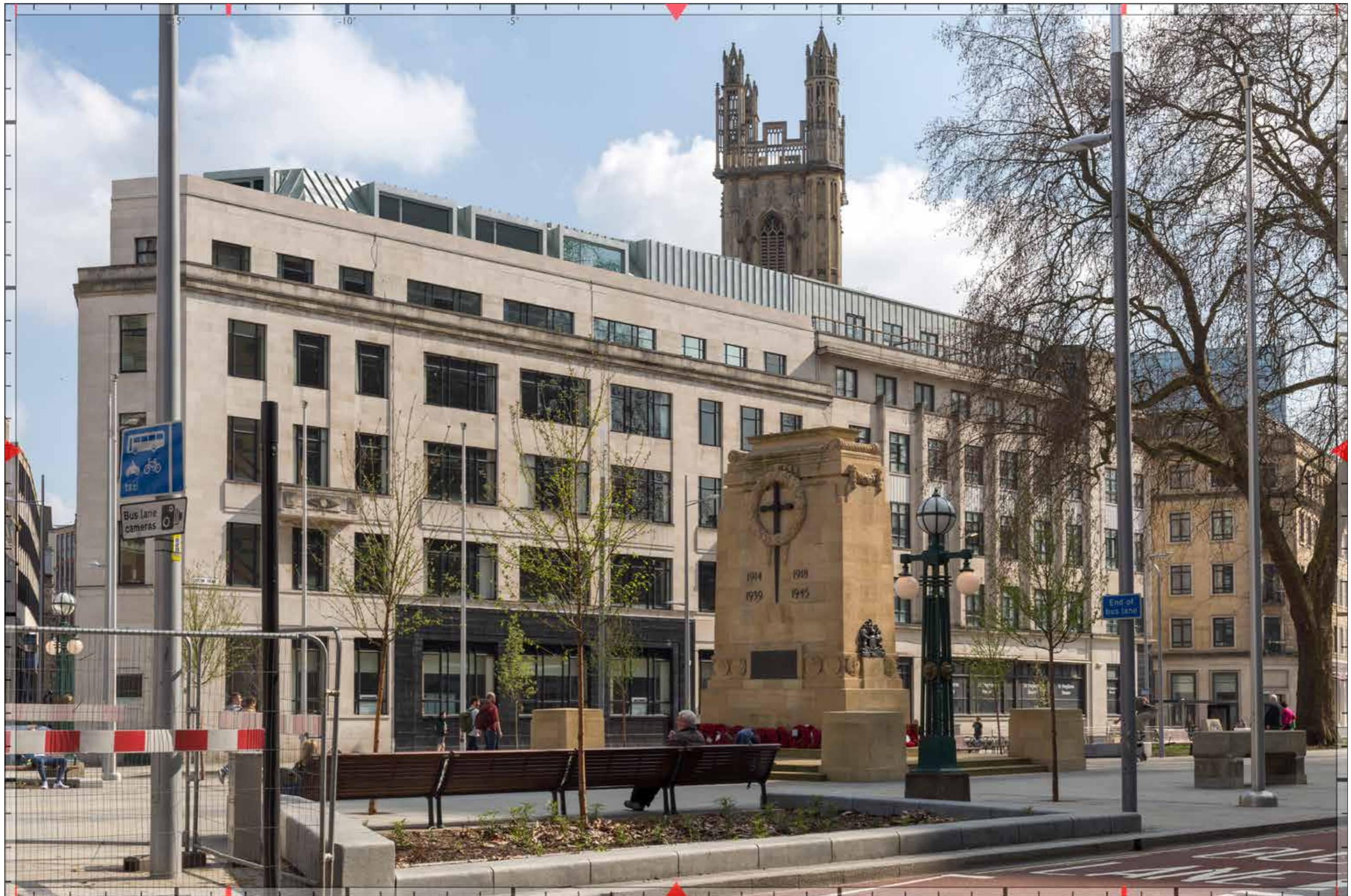


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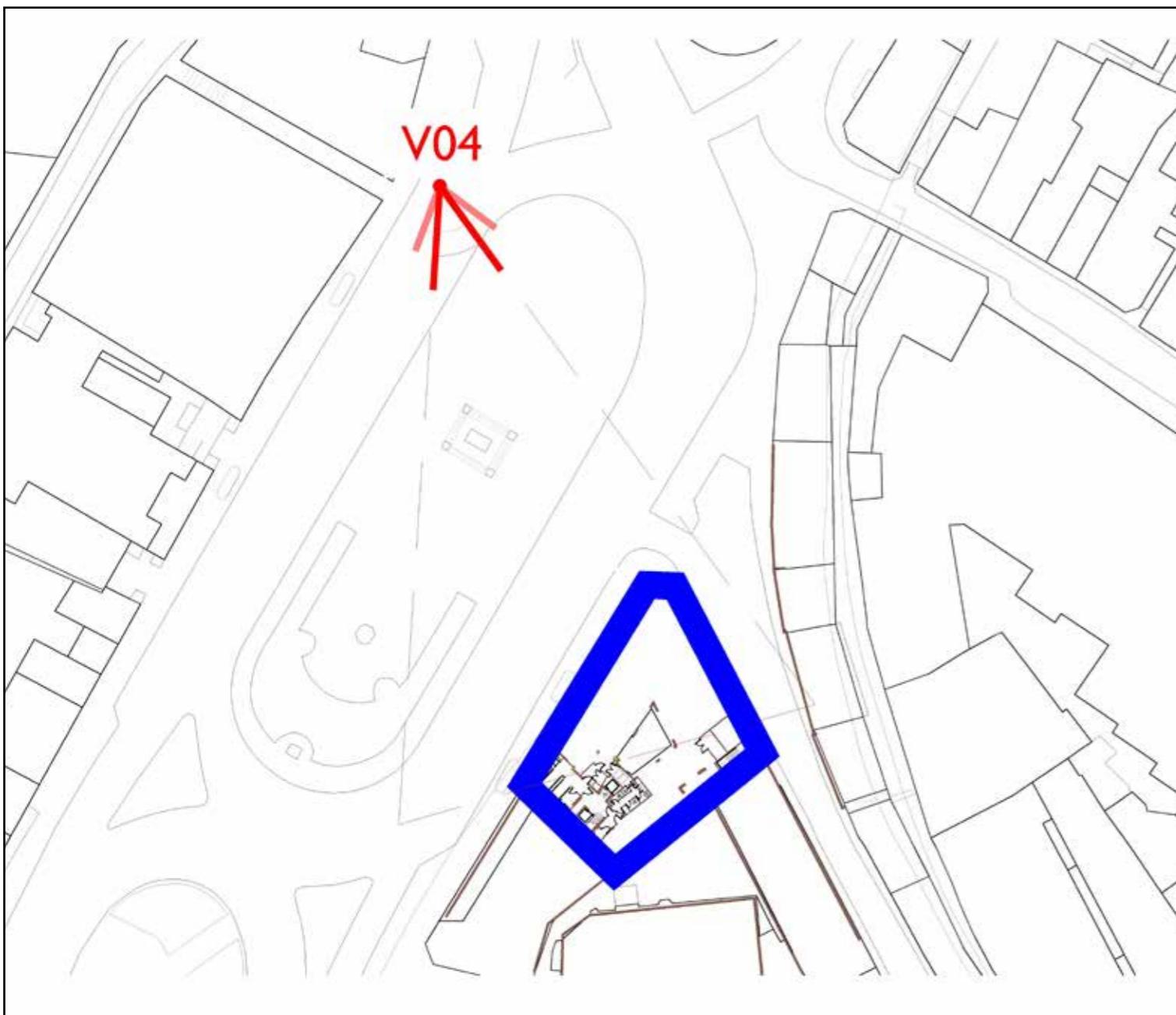








## View Location



**View Number** 4

**AVR Level** 3

**Page Viewing Distance** 540mm @ A3

**Location** North side of Colston Avenue

**Coordinates** 358649.068, 173096.436 (to EPSG 27700)

**Bearing** 167

**Distance** 67mm

**Eye Level** 10.54 m AOD

**Camera** Canon EOS 5D MK III

**Frame Type** Single Frame

**Focal Length** 50mm

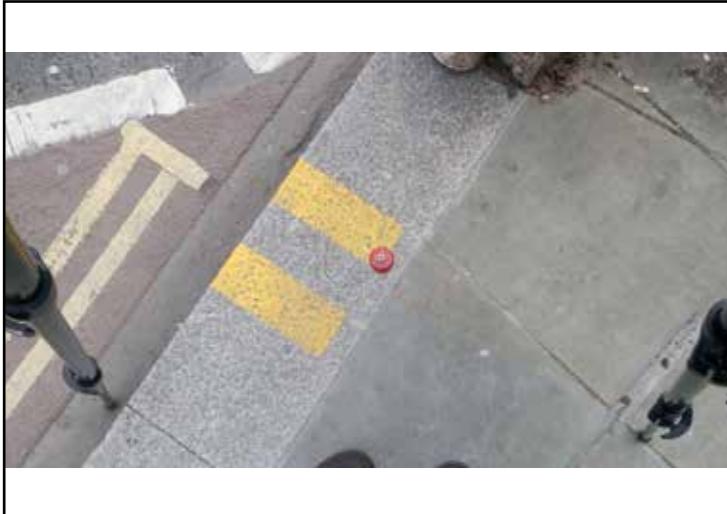
**Horizontal FOV** 40°

**Vertical FOV** 27°

**Date of Photo** 14/04/2018 15:40

**Weather** Clear & Sunny

## View Verification



## View Verification



# Visually Verifiable Montage Methodology

## INTRODUCTION

Nicholas Pearson Associates has an established reputation within the environmental and landscape consultancy field for the production of Visually Verifiable Montages (VVMs) for urban and rural developments and has successfully presented these for planning applications and as expert witnesses at public inquiry.

The methodology used by Nicholas Pearson Associates accords with the following guidance documents where appropriate:

- The Third Edition of the good practice Guidelines for Landscape and Visual Impact Assessment 2013; produced by the Landscape Institute and Institute of Environmental Management & Assessment.
- Visual representation of development proposals Landscape Institute Technical Guidance Note 02/17 (31 March 2017)
- LI Guidance Note 02-17 Visual Representation
- Photography and photomontage in landscape and visual impact assessment Landscape Institute Advice Note 01/11. March 2011.
- London View Management Framework Supplementary Planning Guidance: Appendix C: Accurate Visual Representations. March 2012.

The purpose of an Accurate Visual Representation or Visually Verifiable Montage (VVM) is to, impartially represent the proposed development, as it would appear in reality using a baseline of verifiable visual data and information. A VVM combines photographic views with accurate CAD 3-D representations of the proposals to an agreed level of detail. Using quantifiable data this verifiable image can then be used by others (if required) to scrutinise the work, without its veracity being questioned.

## Methodology Summary for Eagle House, Bristol

### Site Location:

Eagle House, Colston Avenue, Bristol, BS1 1EB

### Status:

- Planning

### Photography equipment:

- Canon 5D full frame digital SLR camera
- Canon EF 50mm f/1.8 STM lens
- Canon EF 28mm f/1.8 USM Lens
- Canon TS-E 24mm f/3.5 L II
- Manfrotto Tripod
- NN4-D16-Nodal Ninja NN4 Panorama head with RD-16 rotator base
- NN-EZ-Nodal Ninja EZ Leveller MKII
- Plumb bob
- Compass

Using detailed topographic survey and Ordnance Survey mapping, the Camera was mounted on a tripod at height of 1.6m above existing ground level, which best represents the average human eye level and positioned on a pre-surveyed feature which can be identified on the 3D model. A leveller was used to ensure that the camera was horizontal.

Photographs were taken in a RAW format using manual settings to enable the best quality results. The photographer took note of the weather conditions and direction of view. All other details relating to the photograph are stored in the image EXIF data. If necessary the original RAW file can be submitted as part of the verification process.

### Baseline photograph formats:

The photographic format is dictated by reproduction size whilst considering the areas of interest. Invariably A3 is the preferred format and therefore a balance must be struck to place the proposal within meaningful context whilst providing the clarity for the viewer.

When the proposed development is at a particular distance, whilst the observer is aware of the wider area within their peripheral vision they tends to focus on the area in question. Therefore it is important to consider the limitations of printed technology; so when representing proposals that are at a distance, the verified view is presented as a baseline photograph with a smaller field of view so that it can be reproduced at a scale suitable for viewing at a reasonable distance.

To ensure that we are providing the viewer with a representation of the wider context, a “representative” view with a larger field of view is presented alongside to demonstrate this. Wherever possible, we will consult with the relevant planning professional on the matter.

There is no one suitable format of photograph which can be used in the preparation of verified views and therefore the following formats were deemed appropriate for this project.

- The baseline photographs for Viewpoints 1, 2 & 4 are single photographs taken using the Canon 50mm f/1.8 lens with a 39.6 degree field of view, reproduced suitable to be viewed at 540mm @ A3. This format is selected as suitable to assess architecture and site layout which occupies a key portion of the viewpoint requiring a greater level detail to

# Visually Verifiable Montage Methodology

represent in print what may be visible with the naked eye. The verified view is presented with a photograph showing a wider field of view (see below) to provide information on the wider context.

- The representative view photographs for Viewpoints 1, 2 & 4 are single photographs taken using the Canon 28mm f/1.8 lens with a 65 degree angle of view, reproduced suitable to be viewed at 300mm @ A3. This format is selected as suitable to assess architecture and site layout within its local setting whilst providing context for the verified view
- The baseline photographs for Viewpoint 3 are single photographs taken using the Canon TS-E 24mm f/3.5 L II with a 74 degree field of view (Portrait), reproduced suitable to be viewed at 260mm @ A3. This format is selected as suitable to assess larger architectural form and site layout within a restricted local setting. This lens removes parallax distortion, particularly on high buildings at close proximity. This lens and format was selected to ensure that the full height of St Stephen's Church was visible in relation to the proposed rooftop extension. *This method accords with the London View Management Framework Supplementary Planning Guidance: Appendix C: Accurate Visual Representations. March 2012.*

The original Canon RAW files are processed in Adobe Photoshop to adjust white balance, colour accuracy and sharpness. The images undergo further correction procedures to ensure the horizon is precisely horizontal and any barrel distortion is compensated for.

## Mapping & Survey data:

- 2D/3D Topographic site survey
- Z Map / Revit Survey Model

To assist in the verification process the topographic survey is used to identify 3D point locations. In many cases these may include existing building ridgelines, tree canopies, lighting columns or similar such details. Data includes Camera locations and specific 3D points to assist in the camera matching process.

## Viewpoint Surveying

For each agreed photo viewpoint, a location plan was provided to the surveyor along with marked up a referenced photograph showing the camera in situ. The surveyor then established the location of each viewpoint using a Leica Global Positioning System (GPS). Where GPS positioning was not possible near to the required survey point, the surveyor traversed traditionally to the position from an established GPS point.

The surveyor recorded a range of reference points, using a reflectorless Total Station. These viewpoint marker points were in the foreground and background, high level and low level.

Data processing was conducted and referenced back to Ordnance Survey.

Data was presented in an Excel Spreadsheet, 3D DWG plus a photograph marked with the reference points.

## Applications:

- AutoCAD
- Revit Architecture
- 3D Studio MAX
- Adobe Photoshop
- Adobe InDesign

## Proposals supplied:

- Revit Model
- Site Plans
- Elevations
- External Levels

The proposals supplied by the architects were all combined with the site survey and mapping data so that they correspond with each other. The map coordinate system is used when doing this so that information regarding viewpoints can be accurately located, such as the viewpoint markers. The Revit model supplied was cross-checked with the site plan and elevations to ensure it accurately matched the design drawings, including FFLs, ridge heights and footprint.

## Camera Matching & Verification:

Irrespective of whether the final VVM is output as a single or composite panoramic image, each Verified View is based upon a single rendered frame.

Viewpoint markers were used to tie the photograph to the CAD Camera view. These are surveyed features and points such as lamp posts, walls, boundaries and buildings; in essence anything that has a known location. At least six points are required to be as accurate as possible, and within the central portion of the image; some of which should be at a height above ground level i.e. tops of lampposts and building ridges & parapet edges. The background plate photograph is imported into 3D Studio Max to verify the accuracy of the match.

The location accuracy and angle of view can also be checked by triangulating the position and preparing view line sections. This is a reliable method successfully used for location finding in the field.

## Texturing, Rendering & post production:

3D Studio Max was used for applying the photorealistic surfaces and materials to the 3D model. Material references and planting sizes were based upon information provided by the Architects.

# Visually Verifiable Montage Methodology

The exact resolution of the photograph is noted and used as the size for the final rendered output of the 3D Model view so that the two overlay each other precisely. Adobe Photoshop CC is used to blend the modelled information with the existing base line / base plate photograph.

## AVR Level:

- AVR Level 3 \* See notes below

## Reproduction

To assists the viewer in understanding the characteristics of the lens used; all baseline photographs and verified views are annotated around the boarder indicating the field of view and optical axis. The boarder is divided up into degree increments indicating the field of view. The position of the optical axis indicates whether the photograph was taken with horizontal shift or vertical rise.

The document is intended to be reproduced at A3 and all images viewed at the specified distance.

Each viewpoint within the document will be supplied with the following information:

- Figure Number
- Viewpoint Number
- Viewpoint Details
- OS Coordinates (12 digit)
- Eye level (A.O.D)
- Direction of View (Bearing)
- Camera Height (AGL)
- Date & Time
- Principle Distance (Viewing distance)
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- Horizontal Field of View
- Weather / Lighting Conditions
- Camera Type
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Each viewpoint is accompanied by a viewpoint location plan and photographs of camera locations together with a version of this methodology.

Visually Verifiable Montages (VVMs) are also referred to as:

- Verified Views
- Verified Visual Image
- Accurate Visual Representation (AVR)

When producing architectural VVMs a series of options are available to aid design and planning decisions according to the level of detail required. To assist agreement between all parties prior to

AVR preparation, the following classification types are presented to broadly define the purpose of an AVR in terms of the visual properties it represents.

This classification is a cumulative scale in which each level incorporates all the properties of the previous level.

*AVR Level 0 Location and size of proposal*

*AVR Level 1 Location, size and degree of visibility of proposal*

*AVR Level 2 As level 1 + description of architectural form*

*AVR Level 3 As level 2 + use of materials*

Further summaries of our approach and verified view methods can be found on our website:

<http://npavisuals.co.uk/approach/>

<http://npavisuals.co.uk/verified-view>

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ARCHITECTURE  
INTERIOR DESIGN  
BIM  
MASTERPLANNING & URBAN DESIGN  
LANDSCAPE ARCHITECTURE  
TOWN PLANNING  
BUILDING SURVEYING  
HISTORIC BUILDING CONSERVATION  
PROJECT MANAGEMENT  
SUSTAINABILITY  
HEALTH & SAFETY/CDM  
GRAPHIC DESIGN

Kayna Tregay – Planning Officer  
Development Management (Place Directorate)  
Bristol City Council  
City Hall  
College Green  
PO Box 3176  
Bristol  
BS3 9FS

Dear Kayna

## TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)

### PLANNING APPLICATION 18/00847/F ROOFTOP EXTENSION (INCLUDING PLANT ROOM) EAGLE HOUSE, COLSTON AVENUE, BRISTOL, BS1 1EB

Further to our meeting on 26th March and the submission of amended plans and details for both applications (18/00847/F and 18/00654/F), please see below our response to Historic England's letter dated 14 March 2018. Our comments are outlined in red text against the relevant paragraph(s), where we consider it appropriate to respond.

If you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely,



Paul Haworth  
Senior Associate Town Planner  
For  
STRIDE TREGLOWN

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## RESPONSE TO HISTORIC ENGLAND'S CONSULTATION LETTER

Dear Ms Tregay

**T&CP (Development Management Procedure) (England) Order 2015**

**& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**EAGLE HOUSE, COLSTON AVENUE, BRISTOL, BS1 1EN.**

**Application No. 18/00847/F**

Thank you for your letter of 9 March 2018 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

### Summary

Historic England objects to these proposals on the grounds of unjustified harm to the setting of the Grade I listed tower of St Stephens Church, a heritage asset of the highest significance.

We consider that the proposed development does not constitute "*unjustified harm to the setting of the Grade I listed tower of St Stephens Church*". We have acknowledged within our Heritage Statement that the rooftop extension would cause harm, which we consider falls into the category of being '*less than substantial*' and that this needs to be weighed against the public benefits of these proposals.

This approach accords with paragraph 134 of the NPPF that states; "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use*".

The rooftop extension is justified to the extent that Immediate Media have considered other available offices in central Bristol and none are available that provide the size required in this central location.

The rooftop extension will maximise the efficient use of Eagle House that will secure its optimum viable use, enabling Immediate Media to occupy the building, which in turn will bring about economic benefits through their occupation and spin-off associated economic benefits.

We also consider the proposals will cause harm to the setting of Bristol Cenotaph, Quay Head House and 1-5 St Stephens Street, all of which are listed at Grade II. It follows that in harming the setting of these individual structures, the proposals will also fail to preserve or enhance character and appearance of the City and Queen Square Conservation Area.

There are numerous buildings (some listed and/or buildings or identified as buildings of merit) within close proximity to Bristol Cenotaph, Quay Head House and 1-5 St Stephens Street that have had rooftop extensions, which add to the evolution of the city scape and its current context.

The rooftop extensions closest to the tower of Stephen's Church are situated on St Stephen's House and 8-10 Colston Avenue. The rooftop extension at St Stephen's House was approved planning permission under delegated powers (application 07/05710/F) by Bristol City Council on 7 March 2008 (report not available online to view). The rooftop extension on 8-10 Colston Avenue was approved

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planning permission under delegated powers (application 11/01073/F) on 18 August 2011 (report not available online to view).

HE's guidance on '*The Setting of Heritage Assets*' (Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (December 2017 version) acknowledges that the extent of setting is often expressed by reference to visual considerations, although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors, such as noise, dust and vibration from other land uses in the vicinity and by our understanding of the historic relationship between places. In this particular case, the relationship is considered to be mainly a visual relationship, which is intimately linked to townscape and urban design considerations.

It's important to note that Eagle House is one of many buildings that are situated close to the heritage assets identified by Historic England, including St Stephen's Church.

The visual relationship between the proposed rooftop extension and the listed buildings referenced above can be described as follows:

## Cenotaph

The relationship between Eagle House and the Cenotaph is available when viewed from the north side of the Colston Avenue (A38). View 4 of the recently submitted verified views includes this viewpoint. This verified view demonstrates that only a very small section of the church tower is obscured by the proposed rooftop extension. The majority of the obscuring of the tower has already taken place by virtue of the existing rooftop extension on St Stephen's House. It is the St Stephen's House rooftop extension that intersects the direct line of sight between the Cenotaph and Church tower. The impact of our proposed rooftop extension only masks a small proportion of the tower. The key features of the upper part of the church tower would still be visible and able to be experienced by the viewer.

It should also be noted that this is a 'transitional view' and one that is experienced as you travel west towards Anchor Road/Park Street. This view is not experienced from a specific area of public realm where there is seating, a public space or other type of attraction where people would naturally gather. Instead, the location of this viewpoint is part of the pavement along the north side of Colston Avenue of which is divorced from the main public realm and cenotaph by the busy highway.

## 1-5 St Stephens Street

The proposed rooftop extension is set back from the edge of the St Stephens Street façade. This set back is sufficient that when standing on St Stephens Street and gazing upwards towards Eagle House, the rooftop extension would not be visible.

When viewed at a longer distance, from the on the public realm adjacent to Electricity House (refer to View 2 of the submitted verified views), this is also a transitional view and one that changes as you travel west towards Anchor Road/Park Street. 1-5 St Stephens Street are much lower buildings than Eagle House and form the edge of the medieval city and are experienced in a different context to that of Eagle House and St Stephens House that are of a much greater scale and of a different age and character to that of 1-15 St Stephens Street. Because the rooftop extension would be set back from the edge of the building, the association between the proposed rooftop extension and 1-5 St Stephens Street is not significant. Dormer windows are a strong feature along some of the roofs of certain properties along the east side of St Stephen's Street and the adjoining unlisted building of merit of 12

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St Stephen's Street . The dormers that feature along the east side of the proposed rooftop extension for Eagle House are, therefore, considered to be appropriate features that provide a modern and contemporary form of dormer that respects the character of the host building and the surrounding buildings and area.

## Quay Head House

Quay Head House faces west across Colston Avenue towards the new public realm and the Cenotaph. Although Quay Head House can be viewed with Eagle House from the west (when stood on the new area of public realm), the visual association between Eagle House and Quay Head House is not obvious; Quay Head House is visually disassociated from Eagle House and is part of the wider city scape. This is due to the different siting and styles of these buildings and the separation distances between them. As mentioned above, the proposed rooftop extension would be set back from the edge of Eagle House and this helps to maintain a subservient feel to the rooftop extension that does not jar or cause harm to the setting of Quay Head House.

The proposed amendments to the St Stephen's Street elevation of Eagle House will greatly improve the aesthetics of this elevation, bringing with it public benefits, including to the heritage assets along the east side of St Stephen's Street.

## **Historic England Advice**

The proposals are for a rooftop extension to Eagle House, a Portland stone-faced interwar office building facing the Centre, Bristol. The application envisages an extra storey of office space atop the existing building, with a further floor housing plant above that.

Behind Eagle House stands St Stephen's Church, a Grade I listed building of exceptional architectural and historic interest. Formerly the parish church of Bristol, St Stephen's originally stood on a quay alongside the River Frome. That river was culverted in the late 19th century, and a civic space was created above its former channel, which today housing recently-renovated public space that incorporates the Bristol Cenotaph (Grade II listed). The upper stages of the 14th century tower to St Stephen's church still rise above Eagle House, retaining a strong visual connection to the city centre. In certain views the connection between the church tower and the Grade II listed Cenotaph is of particular appeal, with the proportions of the two structures and their similarity in constructional materials setting up a visual illusion that allows for both structures to be read as one object.

Refer to View 4 of the submitted verified views and the comments above relating to the impact of the proposed rooftop extension on the visual connection between the Cenotaph and the church tower.

Eagle House itself is a polite building - we are surprised that it is only identified as a "neutral" contributor to the character and appearance of the conservation area in which it stands. In our view, notwithstanding its screening of St Stephen's church from the former quayside, it makes a positive contribution. Its scale and massing mediates between the domestic scale of listed buildings on St Stephen's Street (Quay Head House, 1-5 St Stephen's St, Concorde House; all Grade II listed) and the larger, civic, scale of buildings surrounding The Centre.

The scale of Eagle House is generally smaller than those located on the north side of Colston Avenue and lower than the buildings close by, such as Electricity House and 8-10 Colston Avenue. Even with the proposed rooftop extension in place, Eagle House would remain a polite building that maintains its neutral contribution to the character and appearance of the conservation area; its overall scale and

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mass would not cause harm to the buildings along the east side of St Stephen's Street or the wider conservation area.

It is a successful piece of townscape which still allows the church tower to be read and celebrated as part of The Centre, which is surely not an accident of design.

The submitted verified views demonstrate that the church tower would still be able to be read and celebrated as part of the city centre.

Viewed in isolation, the proposed additional floors respond to the architecture of Eagle House. However, we have great concern that the proposed additional height will block views of the tower of St Stephen's from the Centre, to the significant detriment of its setting. Being able to see a large part of the church tower from The Centre is essential to the setting (and thus significance) of this Grade I listed building, which allows the observer to understand and appreciate its historic significance.

It is positive to note that Historic England consider the additional floor responds to the architecture of Eagle House. The amendment to the rear elevation recently submitted continues the design of the rooftop extension to deliver a well-considered and 'completed' rooftop extension that will respect the host building and its immediate surrounding context.

As outlined above, and demonstrated by the verified views, the rooftop extension would not 'block' views of the church tower from the centre. As demonstrated from the verified views, the proposed rooftop extension would partial mask a small proportion of the tower from a selection of viewpoints situated to the north and east of Colston Avenue. The proportion of the tower that would be masked by virtue of the proposed rooftop extension is not significant, in our opinion, and much less than that which has already been blocked by virtue of the rooftop extension of St Stephens House.

With the proposed rooftop extension in place, any observer would still be able to see and appreciate the historic significance of St Stephen's Church.

We are also concerned that the proposals will harm the setting of Bristol's Grade II listed Cenotaph through diminishing its relationship with the church tower. In addition, the proposed additional storeys to Eagle House will adversely affect its established contextual relationship with the domestic-scale historic properties of St Stephen's Street, alongside.

As outlined above, the verified views have demonstrated that the proposed rooftop extension would not diminish the relationship between the Cenotaph and the church tower.

The design and set-back of the rooftop extension from the fourth storey means that this proposal would not adversely affect the established contextual relationship between the domestic scale historical properties of St Stephen's Street.

NPPF 132 states that "great weight" should be given to the conservation of heritage assets, and the more important the asset, the greater the weight should be. In this context, we remind you that St Stephen's Church is a Grade I listed building that is integral to the history and development of Bristol and still makes a significant aesthetic contribution. The significant harm to its setting should not simply be weighed against any wider public benefit, as suggested by the applicant's heritage statement. There are many locations in the city where additional floors could be accommodated on existing building to optimise density, but this is not one of them. The application should be refused.

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In the context of heritage assets, the NPPF establishes two types of harm; *substantial* and *less than substantial*. The terminology used above, uses the term 'significant' harm, which is not recognised by the NPPF. Our opinion is that the impact of the proposed rooftop extension would be *less than substantial* and that this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. However, even where the harm caused would be considered to be *substantial*, the NPPF still allows the applicant to demonstrate that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

There are numerous public benefits that this proposal will deliver. These include:

- The economic benefits associated with bringing Eagle House back into an active office use after a long period of non-use.
- The proposals will make an efficient use of a city centre site for a media company who wish to remain in Bristol.
- The spin-off economic benefits of Immediate Media being located in the heart of the city centre. As previously stated, the proposed rooftop addition is vital for Immediate Media Co. to enable them to house their 500 strong team. The fifth floor would provide them with the available space to commit to Eagle House as a long-term solution.
- The addition of a fifth floor would form part of a sensitive and sustainable refurbishment of the building that will provide a high-profile base for the company.
- Immediate Media Co. are committed to remaining in Bristol and are actively part of the Bristol City Centre BID and are enthusiastic about growing and employing local talent and would need the certainty of the fifth floor to allow this to continue to happen.
- All of the physical improvements to the building that are proposed under planning application 18/00654/F

In combination, all of these amount to significant public benefits of which should be weighed in favour of this proposal.

## Recommendation

Historic England objects to the application on heritage grounds.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires decision makers to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Amendments and further information have been submitted following consultation with the Local Planning Authority. We welcome the re-consultation of Historic England on this information.

# **STRIDE TREGLOWN**

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Please contact me if we can be of further assistance.

Yours sincerely

**Simon Hickman**

Principal Inspector of Historic Buildings and Areas  
E-mail: simon.hickman@HistoricEngland.org.uk

Existing windows to be replaced with slim profile thermally broken aluminium windows  
to match existing colour and pattern

Building exterior to be sensitively cleaned to restore original stonework texture & colour

RESPONSIBILITY IS NOT ACCEPTED FOR ERRORS MADE BY OTHERS  
FROM SCALING FROM THIS DRAWING. ALL CONSTRUCTION  
INFORMATION SHOULD BE TAKEN FROM FIGURED DIMENSIONS ONLY

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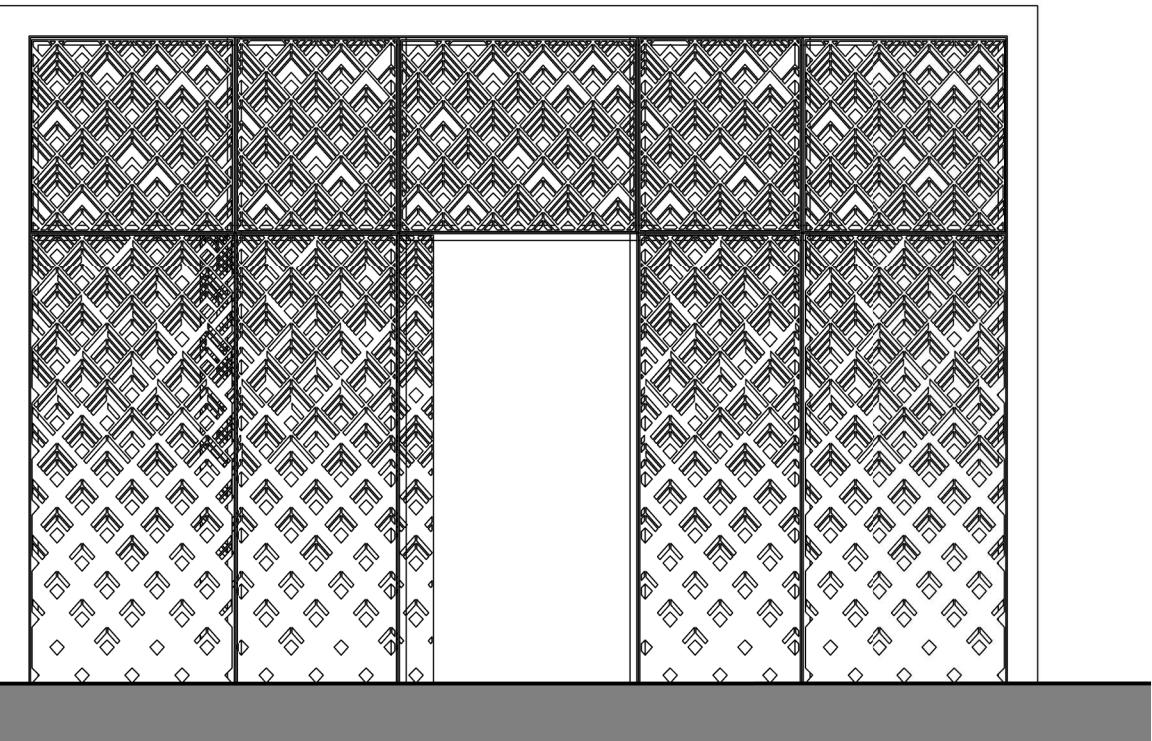
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PROJECT: Eagle House  
CLIENT: Immediate Media

REVISED BY: MS  
CHECKED BY: ATM  
ORIGINATOR NO: 151668

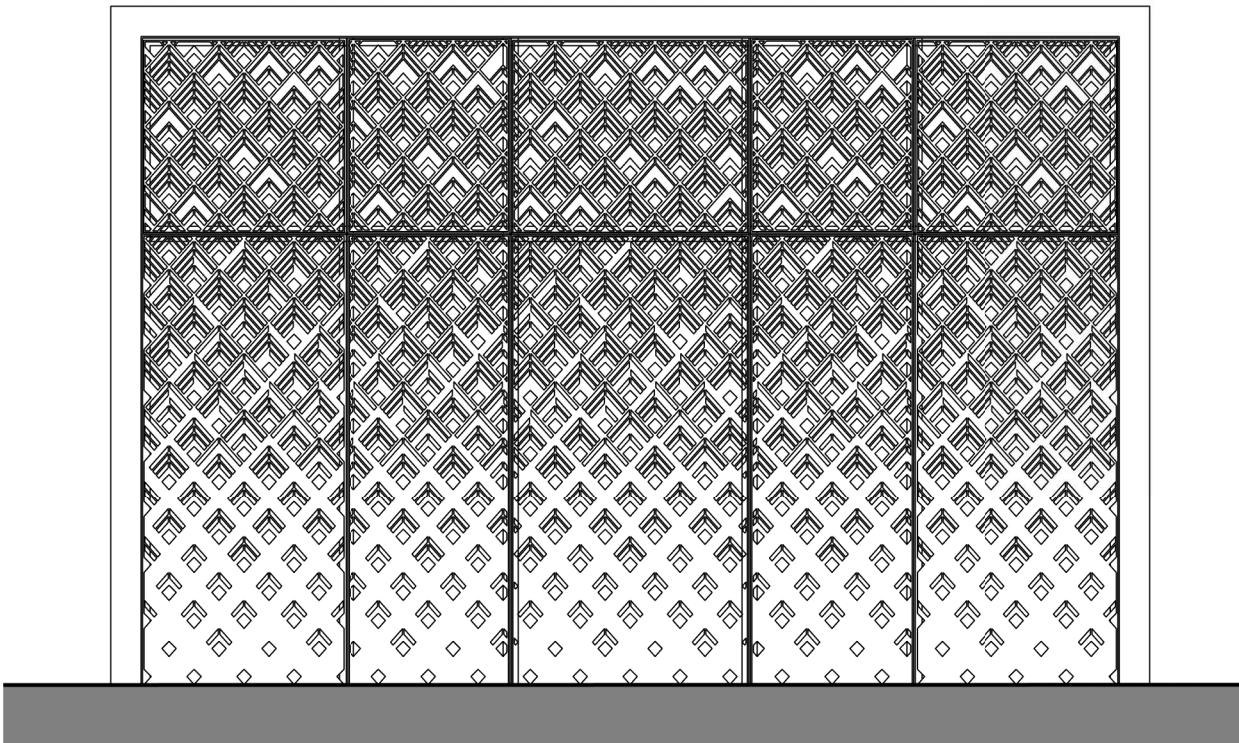
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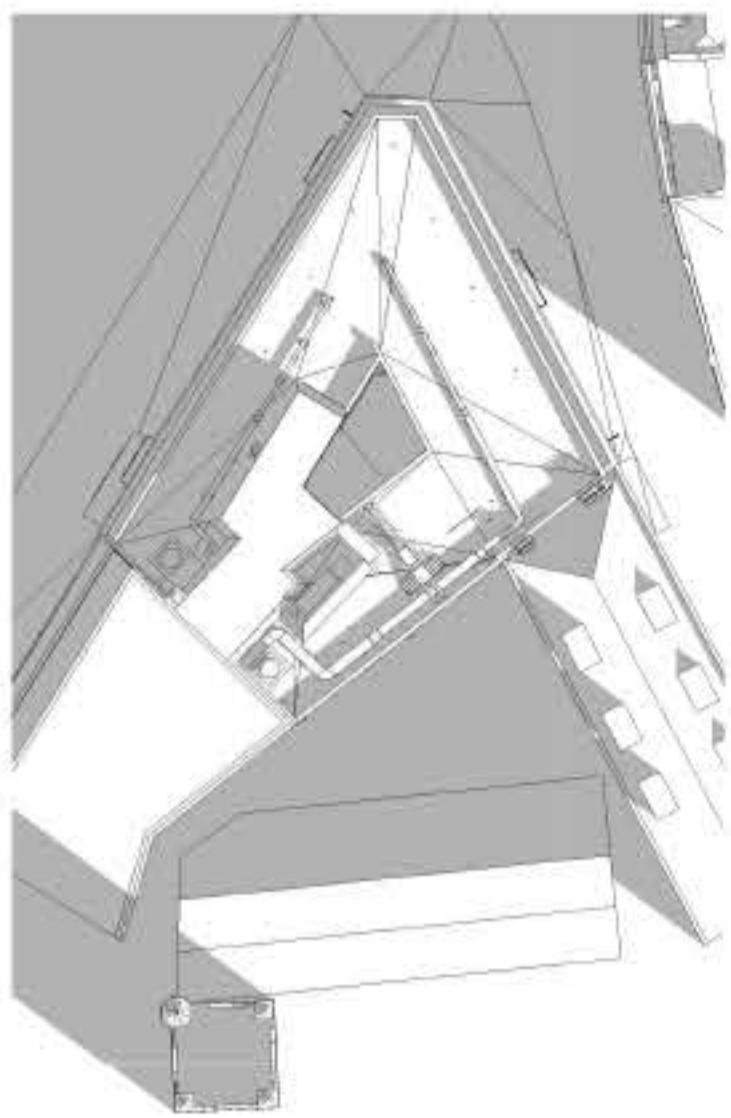


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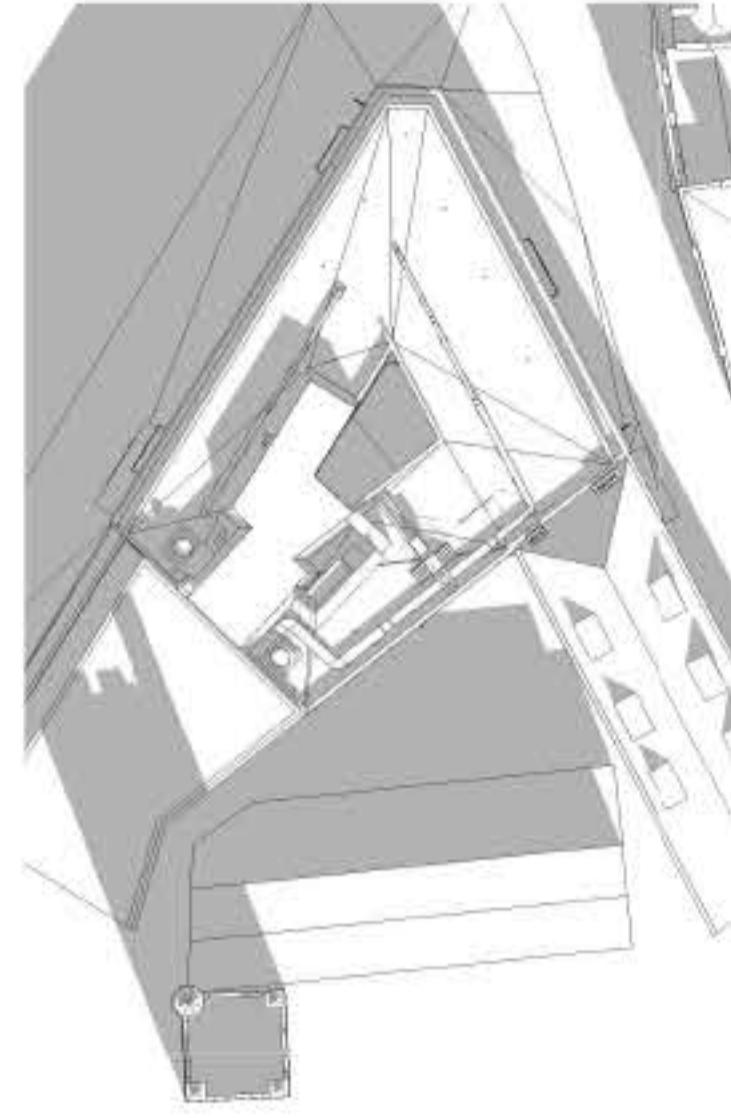
The new entrance screen will have a oil brushed bronze finish. This bold texture has been used to provide the building with a contemporary entrance that gives it an enhanced sense of identity within the city centre. Whilst still providing a sympathetic touch to the history of the building.



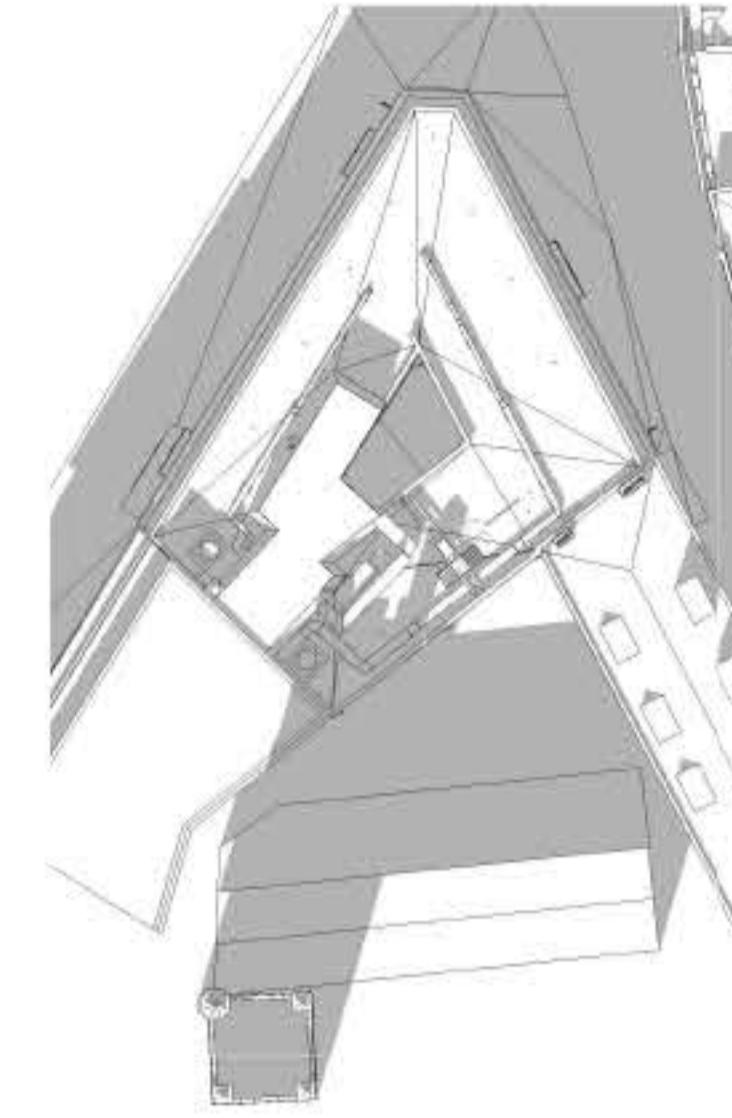
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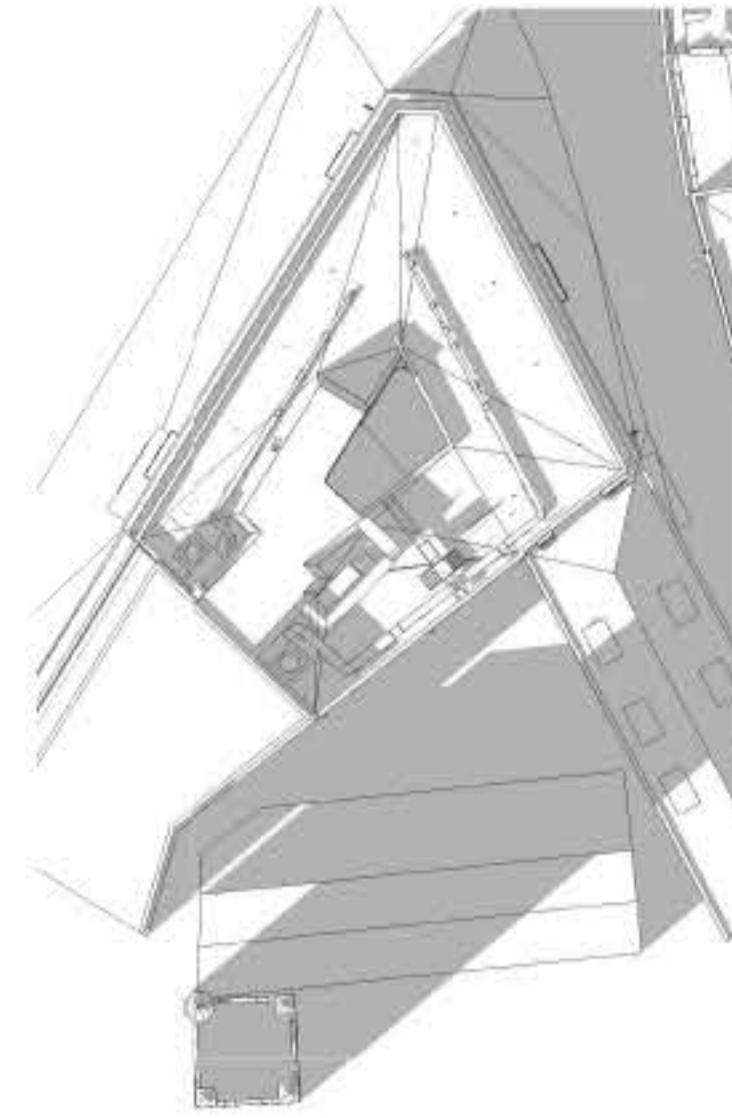
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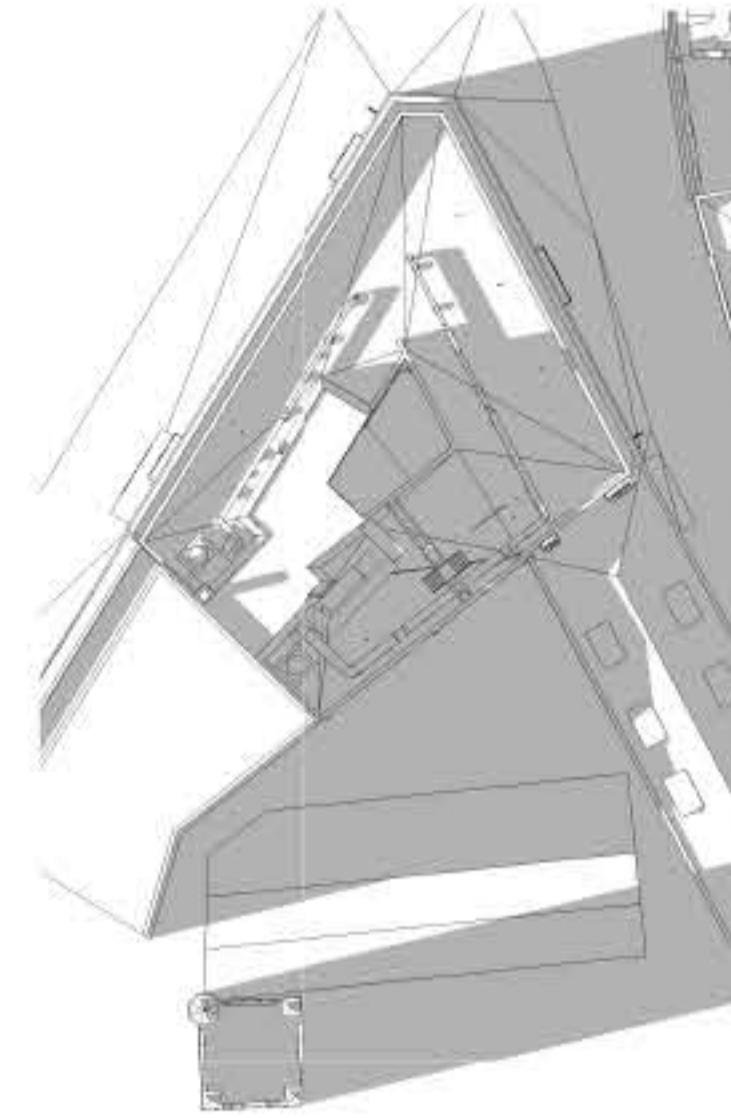
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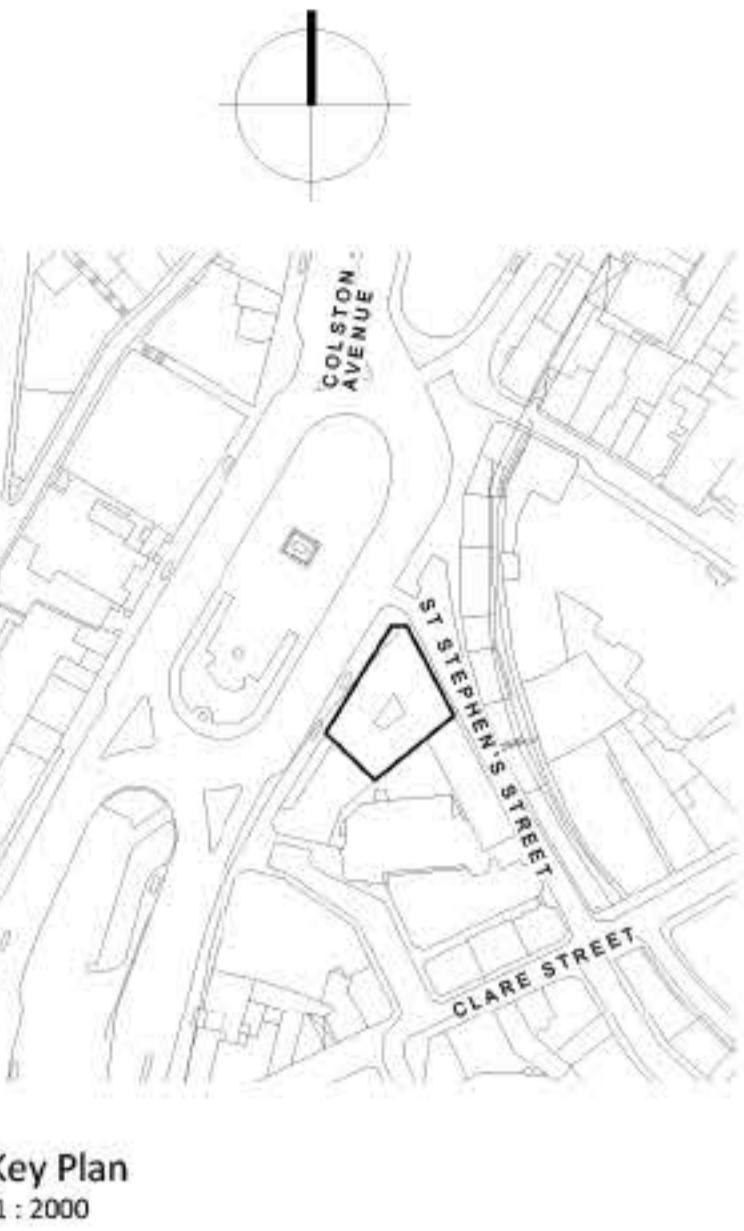
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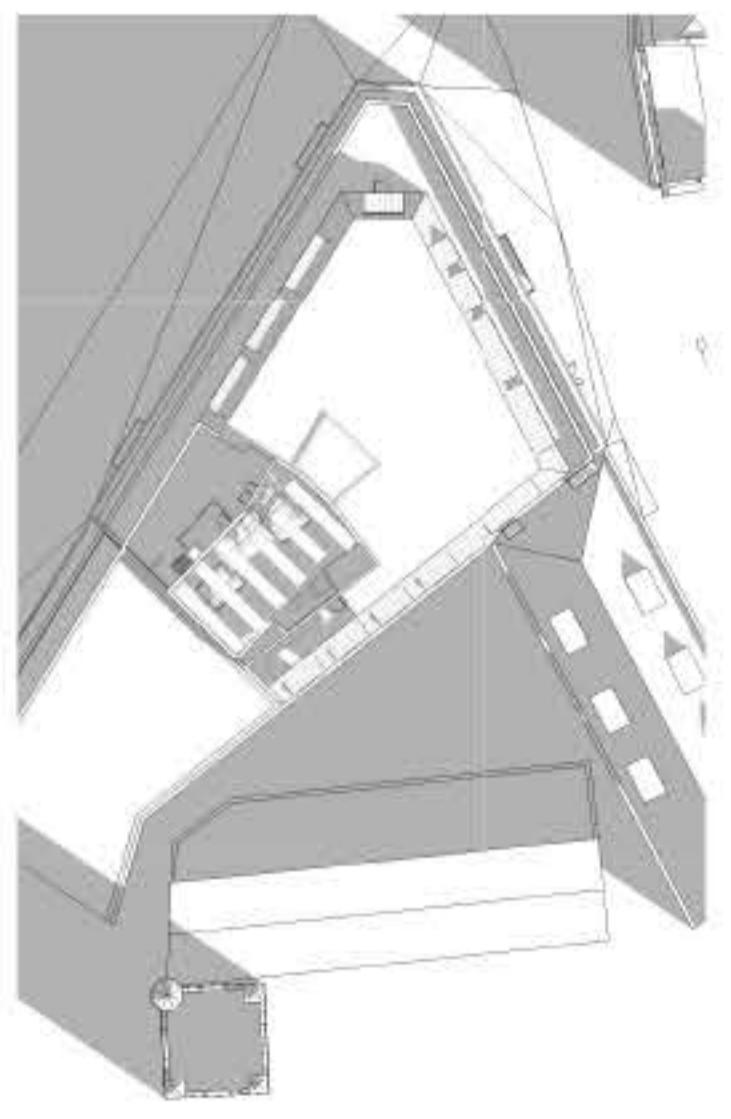


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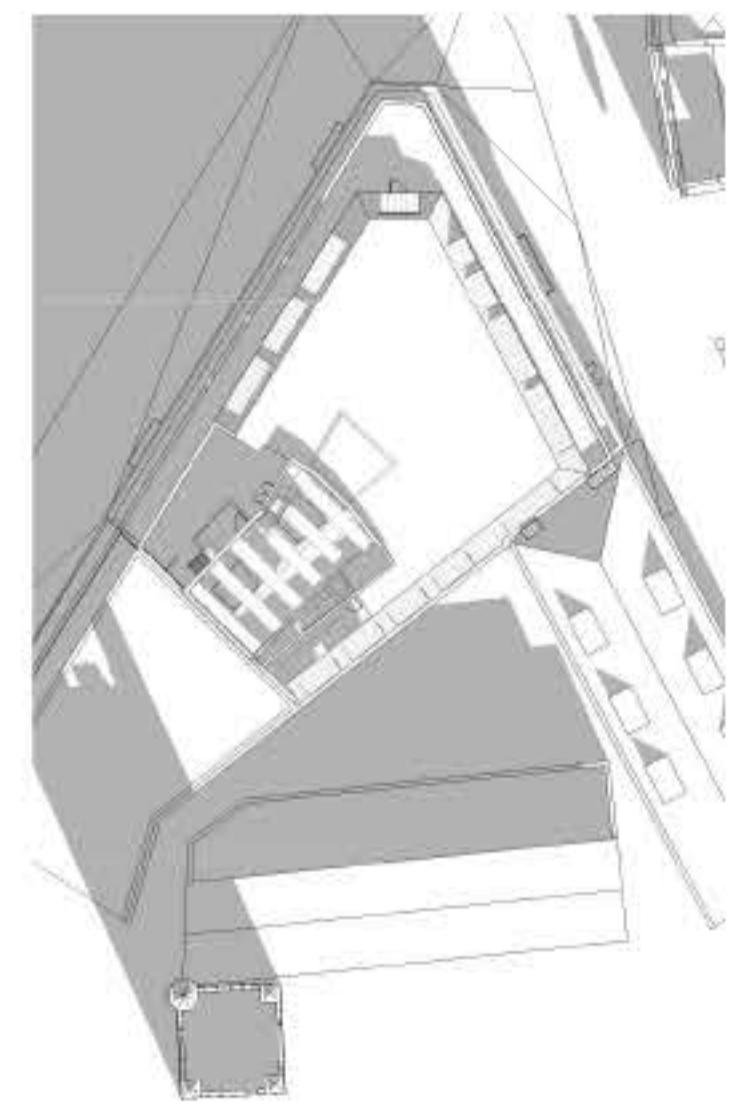


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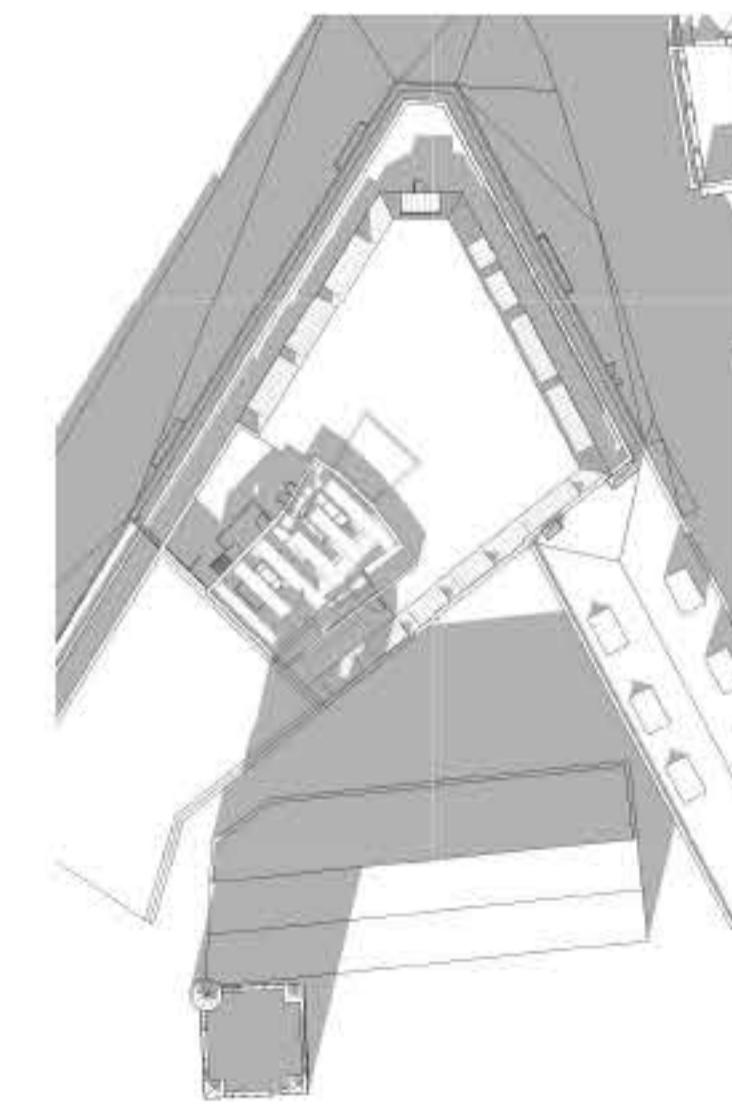
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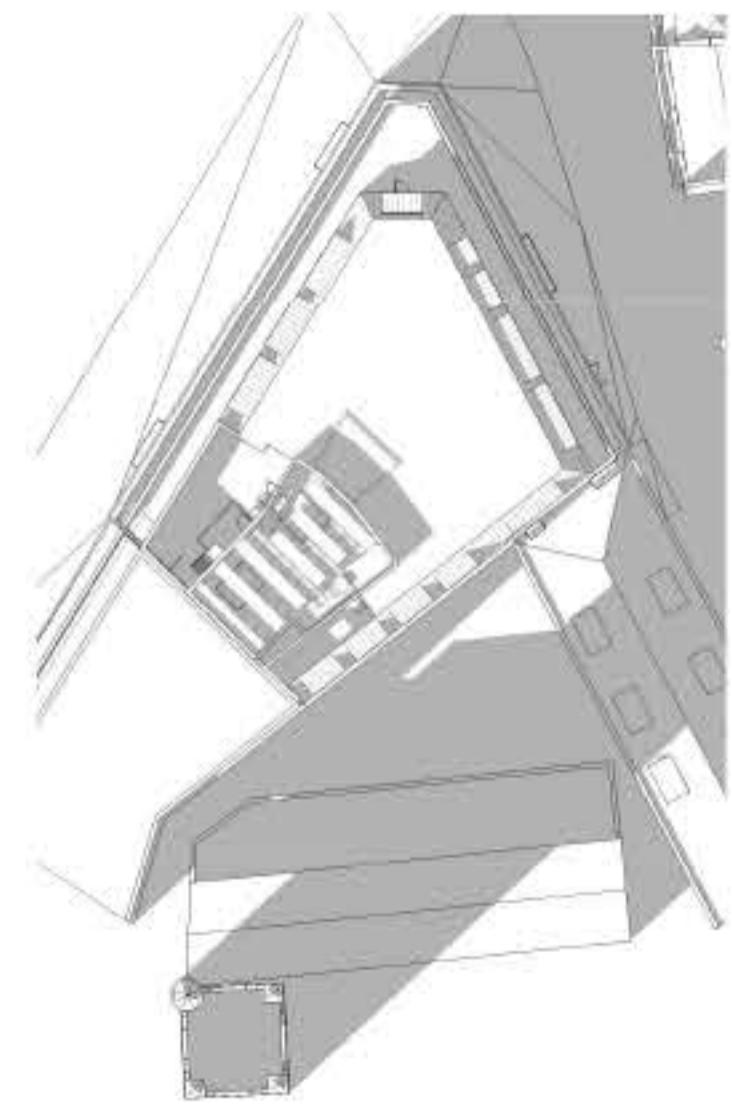
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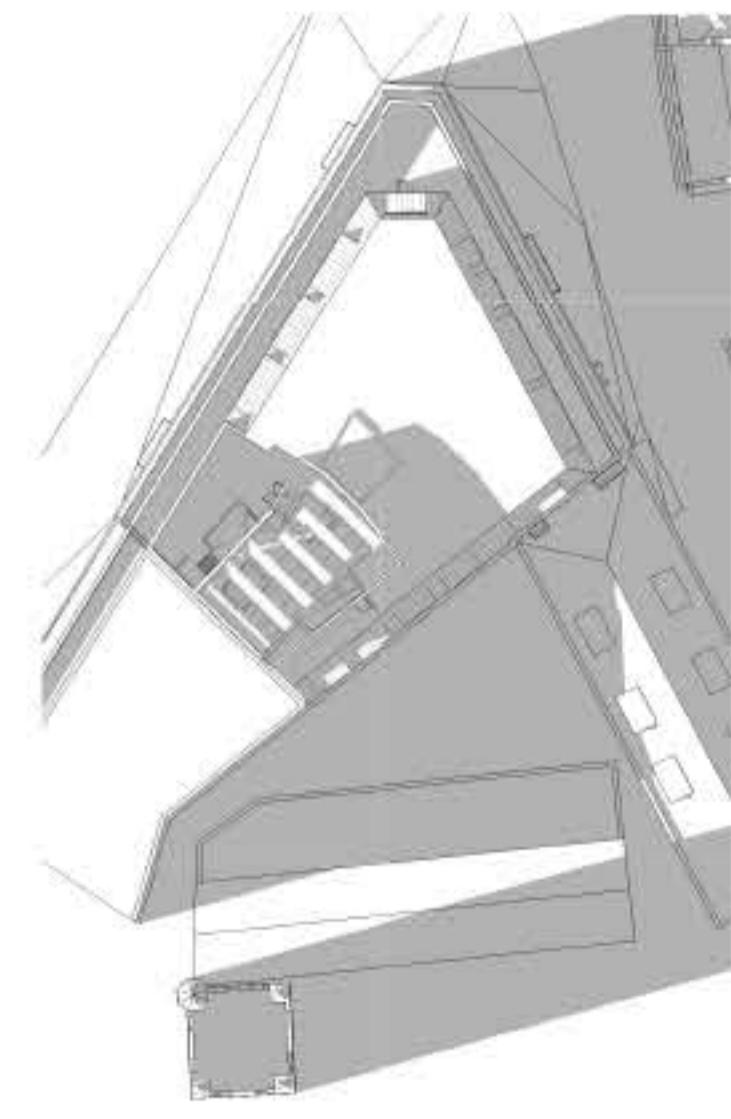
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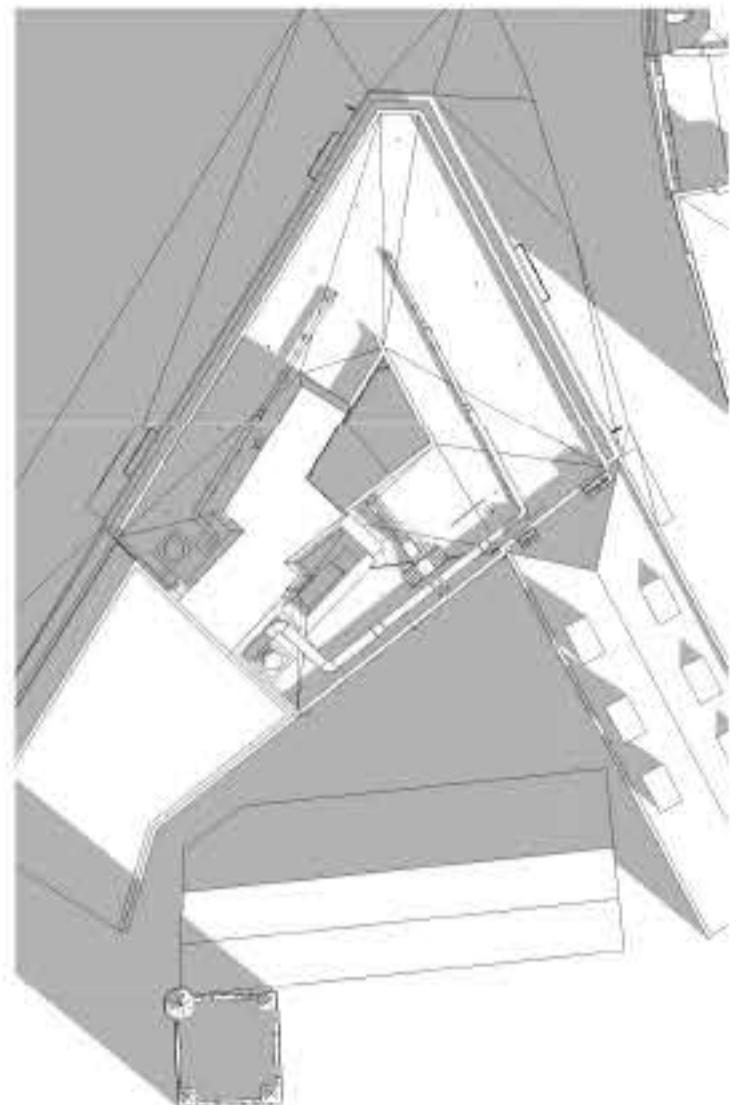
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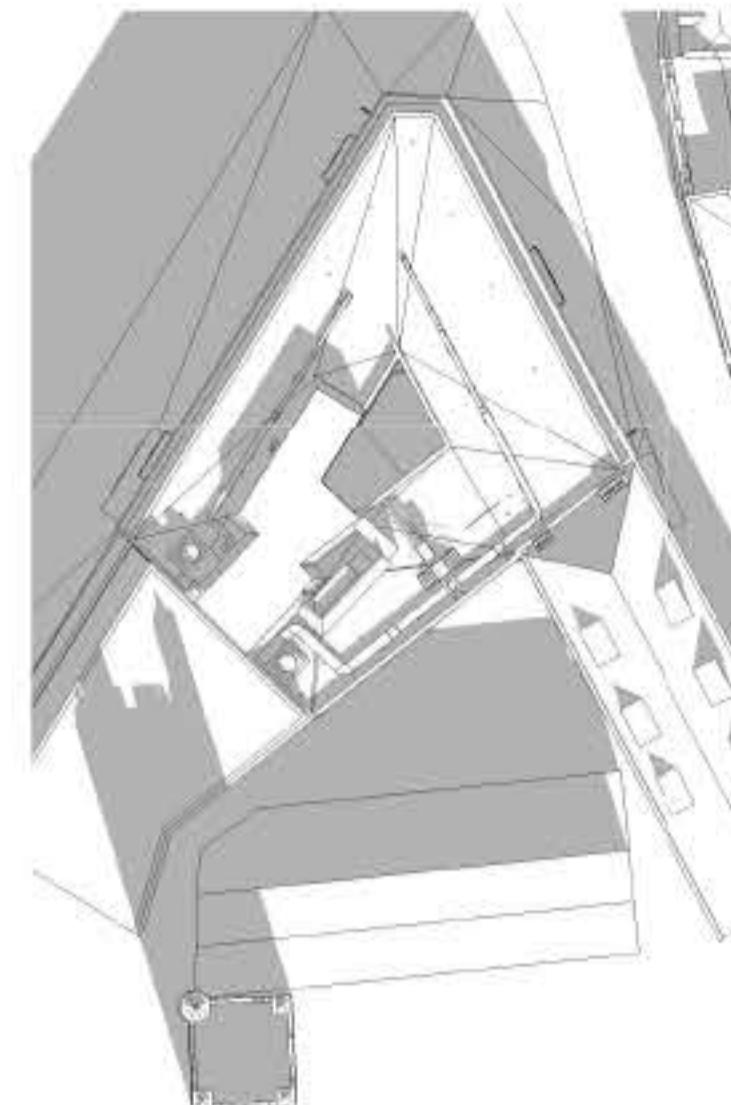
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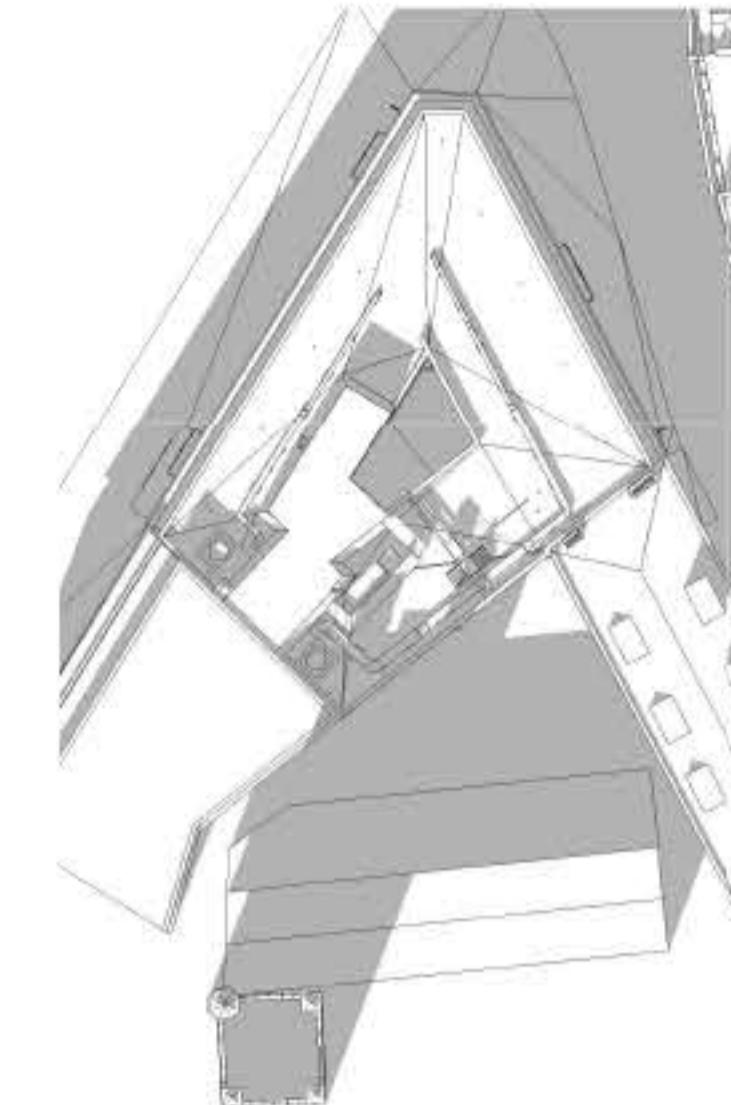
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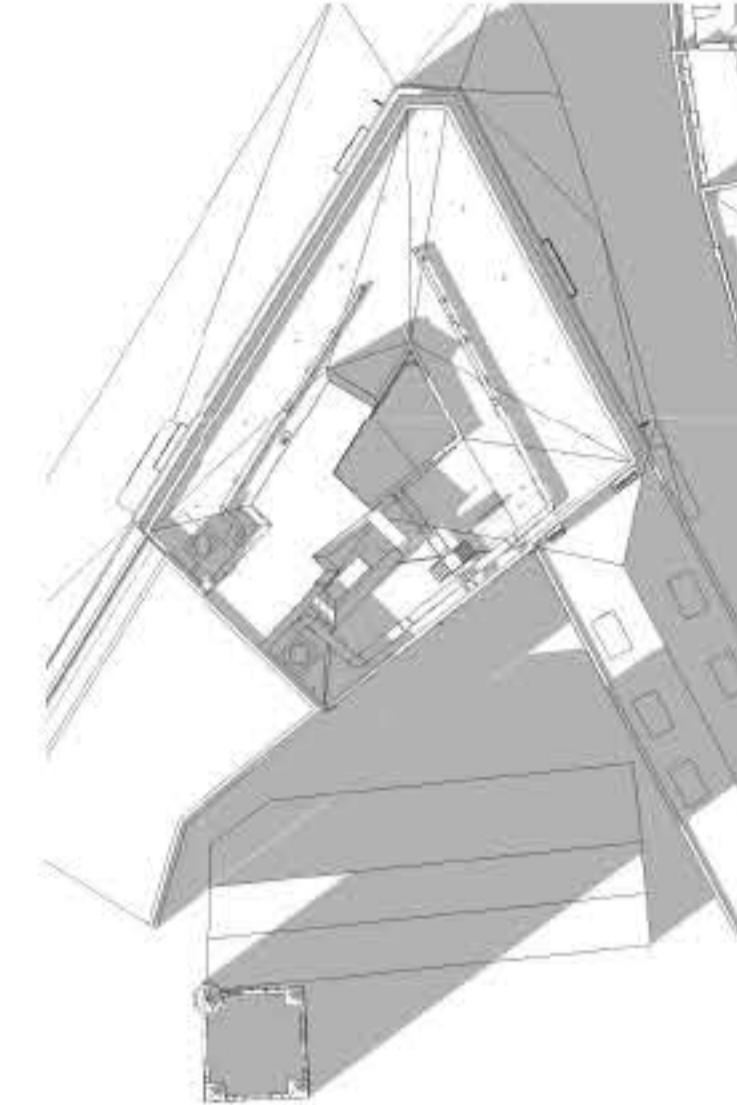
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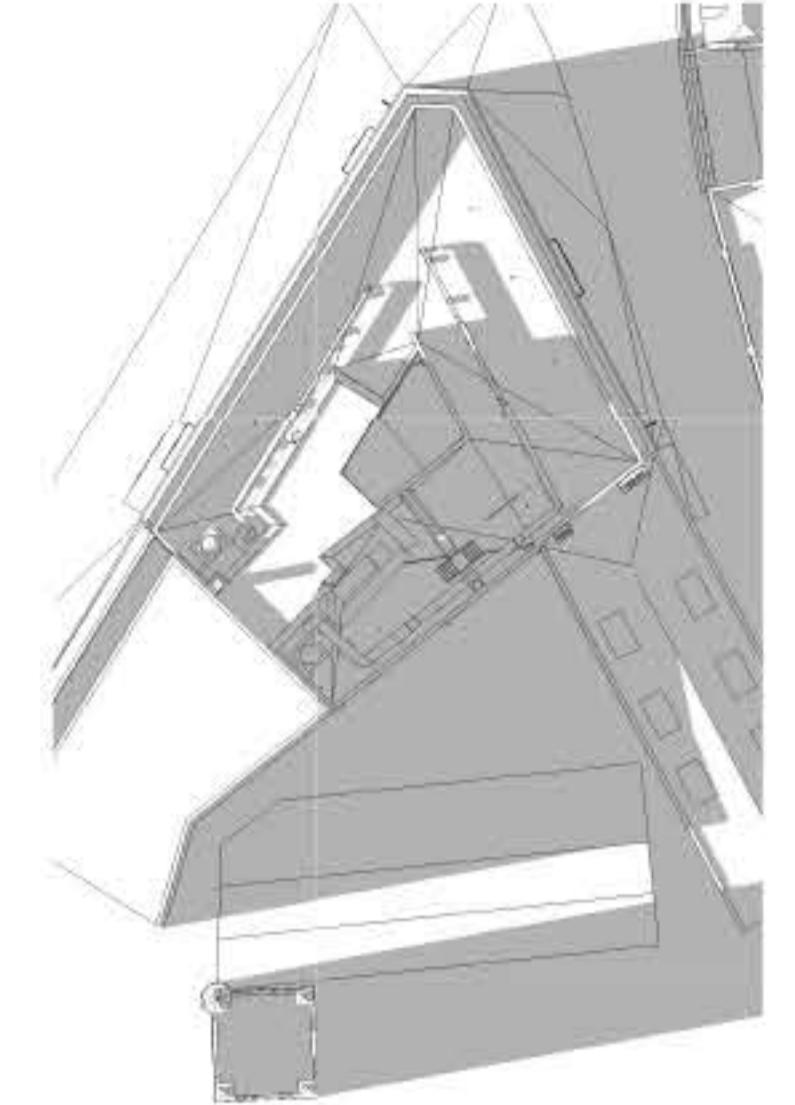
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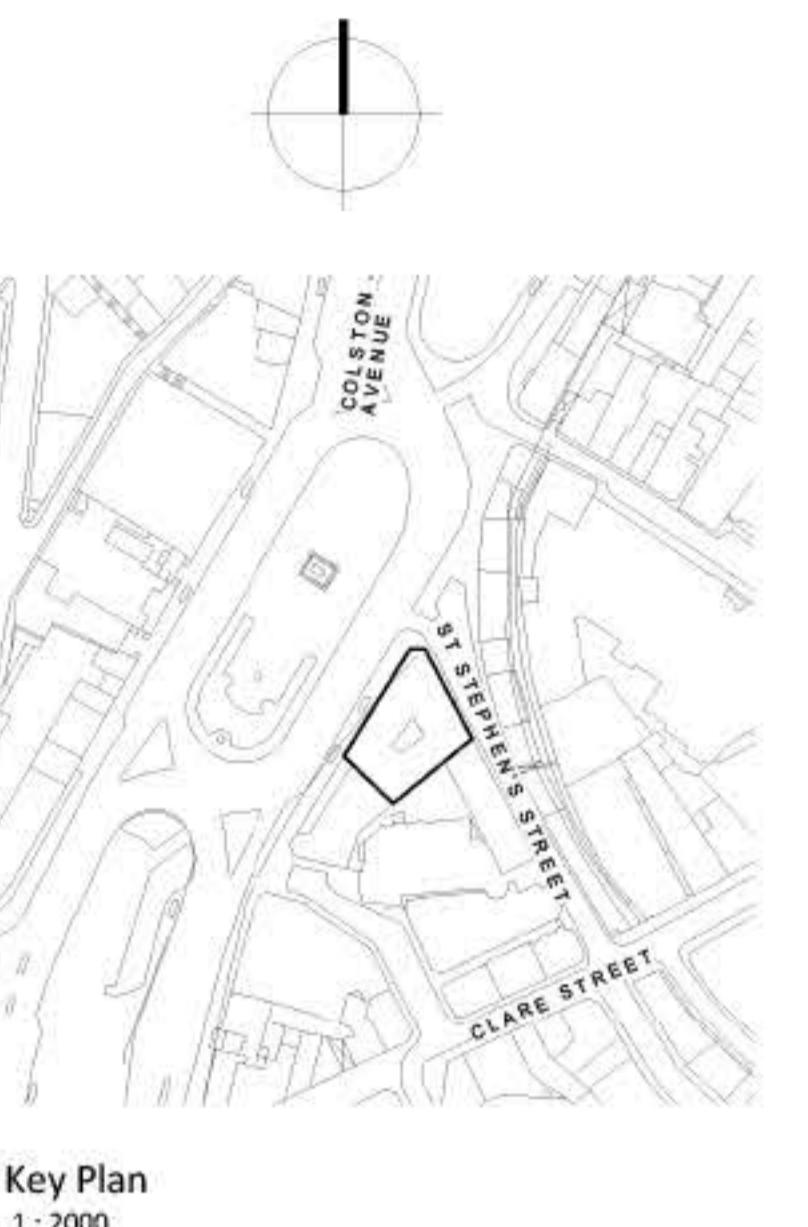
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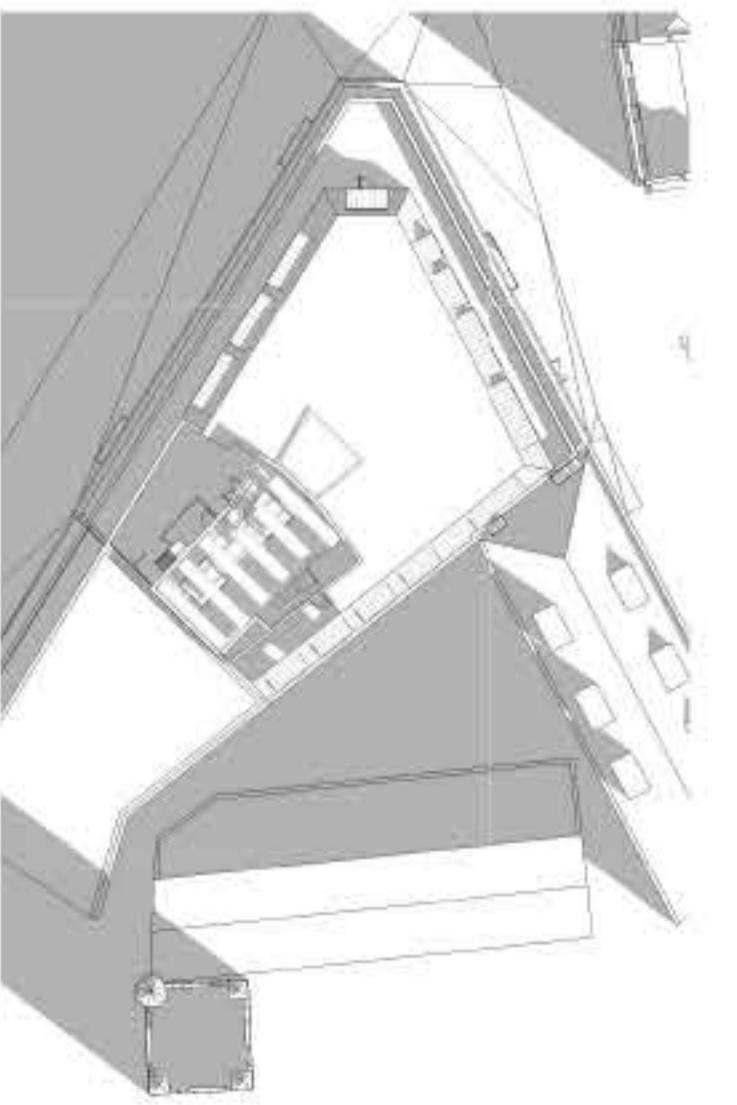
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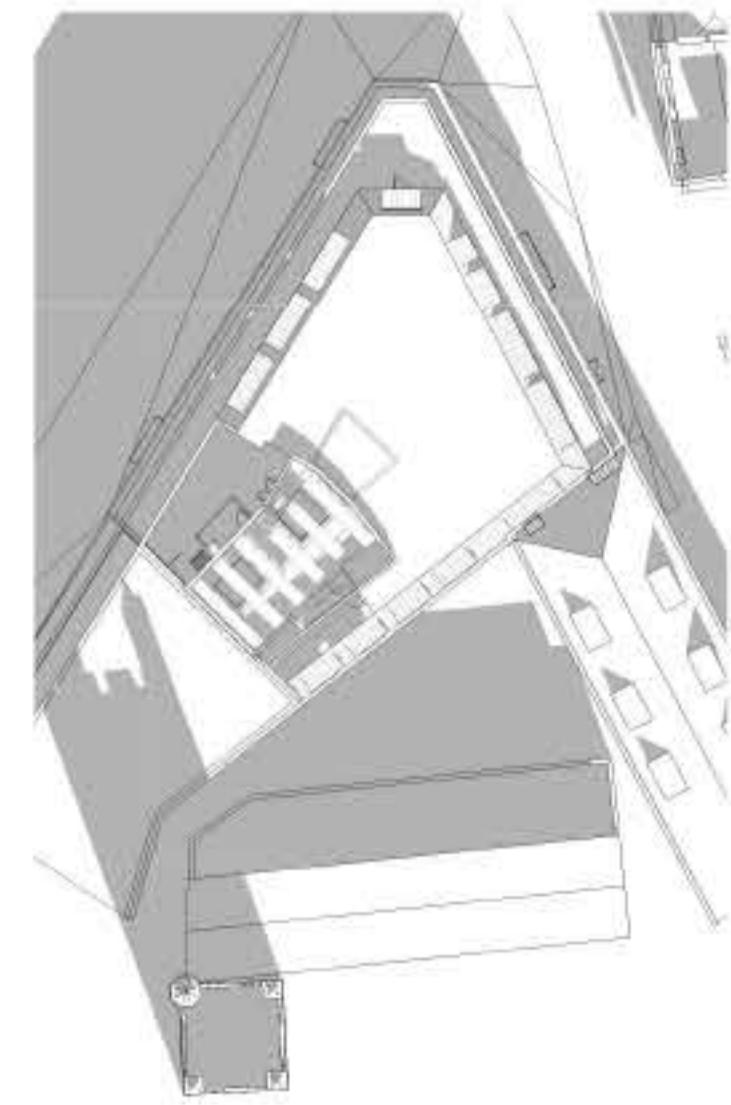
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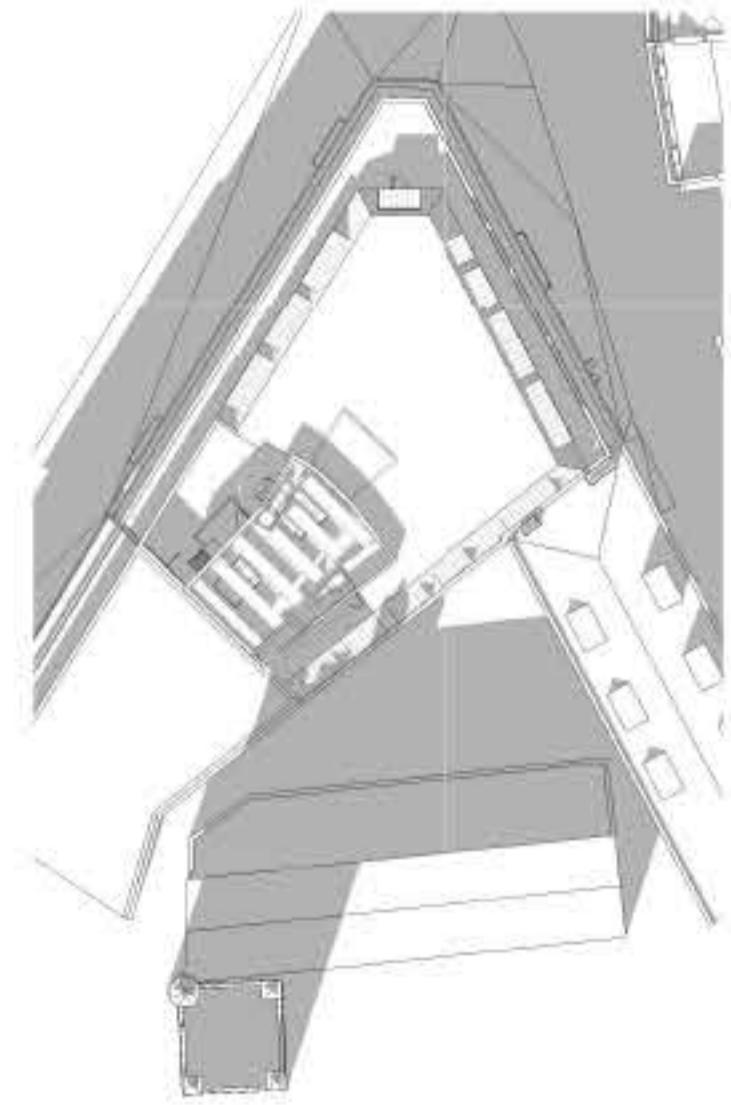
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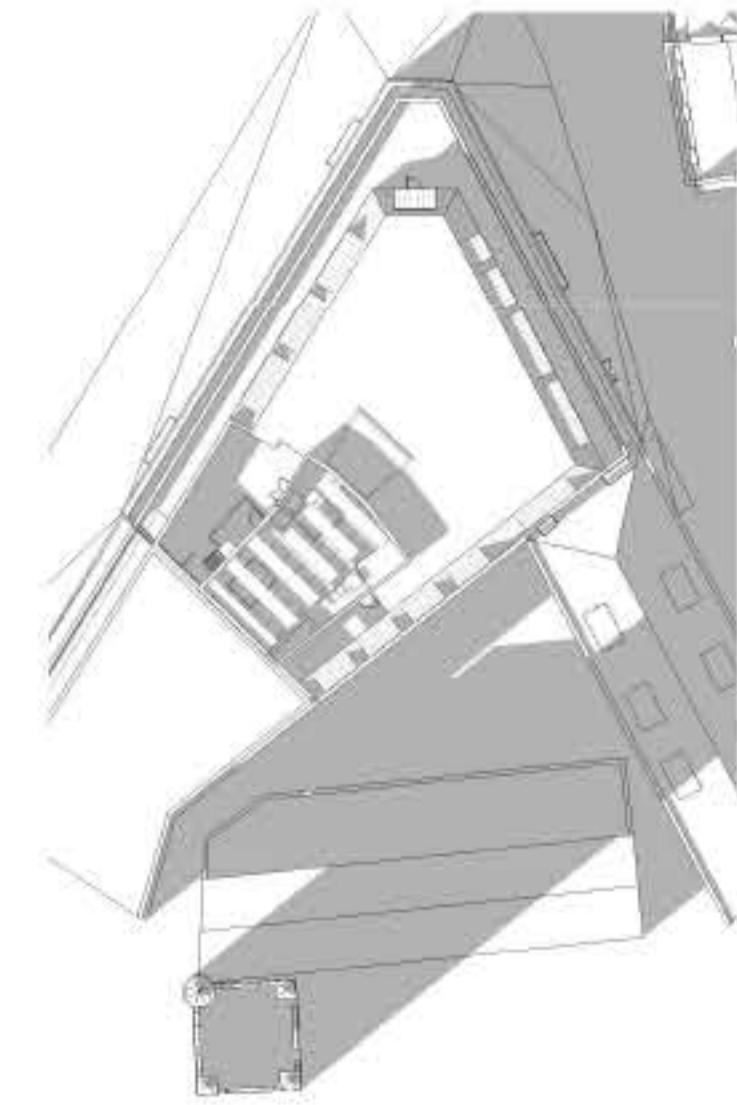
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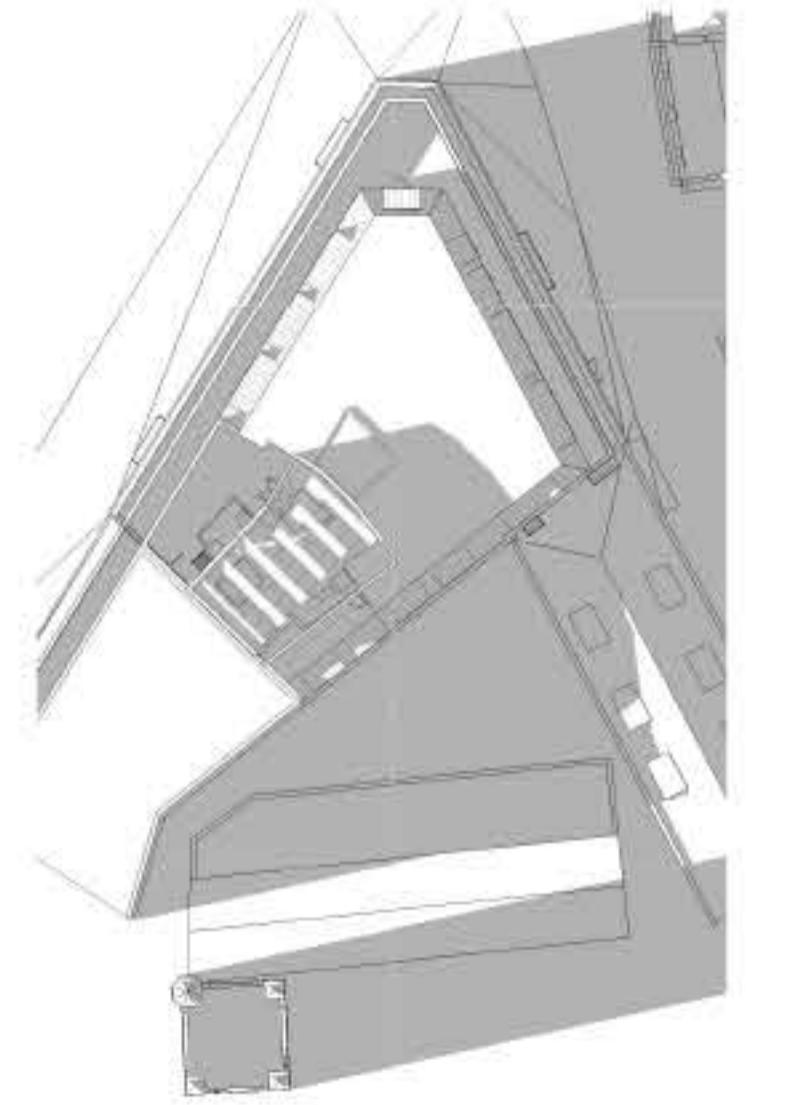
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