

Urban Living SPD- Making successful places at higher density:

Statutory Consultation

August 2018

Themes and Responses

Number of responses

137 responses which breakdown approximately as follows:

Amenity groups: 12%

Public: 70%

Professionals: 18%

General Themes

The headline responses were a general support for the new format into 3 parts but there is a continued perception that the SPD is encouraging Tall Buildings (part3) against the weight of public opinion and the need for further clarification on the areas of character map.

Feedback from the second round of consultation has been grouped as follows:

1. Tall buildings;
2. Relationship with the Local Plan;
3. Assessment Criteria;
4. Masterplans;
5. Bedminster; and
6. Other comments.

1. Tall buildings

General themes

- Many amenity groups and members of the public disagree with the current definition, arguing it should be 6storeys +.
- SPD is too encouraging of tall buildings. Greater focus should be on mid-rise high density forms.
- Developers and agents object to statement relating to Outline Applications not being suitable for tall buildings.
- The current SPD1- Tall Buildings more appropriate guidance for tall buildings.

Comments on tall buildings including:

- Disagreement with definition of tall building. Most respondents who disagreed specified 6-storeys would be more appropriate definition.
- SPD does not reflect previous consultation responses, and clear, strong rejection of tall buildings.
- Greater emphasis on the flexibility of tall buildings to be converted to other uses.
- Tall buildings are not suitable living environments, particularly for families.
- SPD should not encourage tall buildings; language should be changed to be 'will be considered'.
- SPD 1-Tall buildings more appropriate for assessing tall building applications.
- Objection to SPD stating that Outline Applications are not suitable for tall buildings; not within the remit of an SPD, or the Local Plan to preclude this.
- Tall buildings are not suitable in a Bristol context, due to impact on skyline, lack of human scale, and poor living environment.
- Greater constraints needed on tall buildings.
- Location criteria too broad to restrict tall buildings in unsuitable areas.
- Location criteria likely to lead to 'scatter-gun' approach.
- Tall buildings should be located in clusters.
- Case Study Report-needs to include more tall building examples; making clear the downsides of this form of development.

Officers Comments

Whilst it is worth noting that the SPD has been written to give guidance on tall building design and their assessment - and is not a document advocating tall buildings - it is apparent from the nature of responses to this round of consultation that this is how it is being interpreted by a variety of groups and individuals.

In response to this, the following changes have been made to the SPD:

- **The preface has been amended to say that 'whilst tall buildings are one way of potentially optimising densities, they aren't the only way, and aren't appropriate in all circumstances';**
- **The critique of tall buildings (page 48) has been edited to more clearly differentiate tall buildings from other high density building typologies;**
- **Fig 12. Locational criteria (page 51), has been amended to say 'Tall buildings are more likely to be supported in locations....' rather than 'Tall buildings will be encouraged in locations....'**

We believe that the Tall Buildings SPD has been a useful and effective planning tool since it was adopted in 2005, but that some aspects of the SPD need updating for the following reasons:

- The 10 assessment criteria do not allow for the assessment of a building's liveability
- The guidance on which areas are appropriate for tall buildings only considers the city centre, and therefore does not acknowledge that a number of the city's future Growth and Regeneration areas are outside the city centre
- In terms of the City Centre, a more robust 3D analysis of specific sites suitable for tall buildings can now be found in the Temple Quarter Spatial Framework (adopted 2016) and the City Centre Framework (currently being updated following consultation)
- Some of the technical advice relating to undertaking visual impact assessments and daylight/sunlight assessments has moved on since the publication of SPD1 in 2005..

The following table summarises some of the key differences and similarities between the two documents:

	Tall Buildings SPD1	Urban Living SPD
Definition of a tall building	9 storeys and above Or <i>'those that are substantially taller than their neighbours and/or which significantly change the skyline.'</i> Discretion of officer when the guidance is used	10 storeys and above to bring it in line with the Building Regs definition Or 2 x prevailing building height Discretion of officer when the guidance is used
Assessment criteria	10 questions	15 questions + 8 additional questions for residential tall buildings
Siting a tall building	Generic criteria. Plan indicating where tall buildings are considered suitable in the city centre, supported by city centre urban design appraisal & view protection framework	Generic criteria. Expectation that 3D spatial frameworks will be required for all Growth and Regeneration Areas, supported by context appraisal and these will highlight scope for any tall buildings
Outline planning applications	Discouraged	Discouraged

Outline planning applications are discouraged both within the current Tall Buildings SPD 1 and in the draft Urban Living SPD. This is consistent with the Historic England Advice Note 4 on tall buildings which states (P7):

Submitting a detailed planning application will require the applicant to provide sufficient information to enable the local planning authority to assess the impact and planning merits in taking a decision. Outline applications are only likely to be justified in exceptional cases where the impact on the character and distinctiveness of local areas and on heritage assets can be assessed without knowing the detailed form and finishes of the building. This is likely to be rare. If an outline application is sought in these circumstances it is important to ensure that the parameters for development are derived from a thorough urban design analysis that clearly demonstrates impact.

2. Relationship to the Local Plan

- Policy context for the SPD is not clear, referencing both current and emerging policy. Suggestions that SPD should not be adopted prior to completion of Local Plan Review.
- Housing targets were questioned - citing independent evidence that suggests the need will be higher.
- Reference to minimum density thresholds is unclear and premature where they reference emerging Local Plan review policy proposals.
- Setting of minimum density thresholds contrary to design-led, context based approach advocated elsewhere in the document.

- Optimum densities set out are not useful and do not provide sufficient scope for higher density schemes to come forward.
- Methodology for calculating net density, taking measurements from the middle of the road for tight urban sites, disputed.

Officers Comments

The SPD does not set an upper limit to density. However, schemes which propose densities significantly higher than those set out in the SPD, will require earlier engagement and a more collaborative approach with the Local Planning Authority to ensure all urban living objectives and other policy considerations are met.

The guidance acknowledges that measuring density 'can be complex on large schemes and may involve an element of judgement about whether open spaces, roads, parking and non-residential uses are an integral part of the development or serve a wider neighbourhood role'. However, what is important is that density is measured in a consistent way across the city. The methodology used is adapted from the Maccreanor Lavington methodology adopted in London.

In response to comments made, the following changes have been made to the SPD:

- In relation to the housing target figure (Page 10) the text has been changed to reflect Local Plan wording of 'at least 33,500'.
- Reference to the emerging local plan in relation to minimum density thresholds and optimum densities has been removed, and replaced with the wording from current adopted policy (Page 12);
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3. Assessment Criteria

- Amenity groups and members of public request stronger wording around these, while developers and agents maintain that these are introducing standards by the 'back-door' and should make clear that exceptions should be considered. Particular objection to private open space and play space requirements.
- Not enough emphasis on content and quality of Design and Access Statements.

Officers Comments

The assessment criteria are articulated as a series of questions to be used during the pre-application stage, accompanied by a series of recommendations as to the sort of design response we are looking for. Guidance is based on a range of best practice guides including the Urban Design Compendium, Building for Life 12 and the London Housing SPG. The criteria will be used to assess the applications NOT determine the applications. The Local Plan has a suite of policies that will continue to be used to determine applications.

The SPD adopts an approach that is based on the NPPF endorsed and industry backed 'Building for Life 12' traffic light system of assessment at the pre-application stage. Building for Life is credited with raising residential quality standards. The intention is to periodically review the use and effectiveness of the Urban Living SPD to ensure that it is similarly delivering quality schemes on the ground, and to update and strengthen the Urban Living SPD if that is considered necessary.

The Urban Living SPD advocates that the assessment criteria are set out and addressed in the schemes Design and Access Statement, with the objective of significantly improving the quality of these important documents.

A new 'Liveability in residential development' policy is being developed as part of the Local Plan Review. This is likely to require developers to take account of guidance set out in the Urban Living SPD in respect to the quantity and design of private and communal open space.

In response to comments made, the following changes have been made to the SPD:

- **Fig 3 (Page 23) has been retitled as 'City-wide context appraisal' and amended to improve the clarity of the plan, and to better communicate the impact townscape character is likely to have on the opportunity for urban intensification.**
- **Fig 4 (Page 25) Accessibility Criteria has been slightly amended to show that there is an expectation that doorstep play will be provided within 100m of a development as stated elsewhere in the document**
- **Fig 6 (Page 31) has replaced a diagram with an extract from an indicative masterplan which better communicates a number of the key principles relating to the design of blocks and streets**
- **A number of small text changes have been made to Pages 32-35 (Q1.6) relating to parking and servicing. The text clarifies the position on rear parking courts in a suburban context**
- **There has been a slight amendment to Q2.1 and Q2.2 (Pages 38-39) as a result of feedback from a trial use of the questions to assess a scheme**
- **A number of images have been substituted (Pages 41 & 45)**

4. Masterplans

- Most support the design-led, context based approach to optimising density, although some objection from developers and agents to the criteria proposed for when Masterplans are required. Most stating this is too onerous and difficult to prepare.
- Masterplans should be a requirement, not just recommended, where a proposal seeks to increase density.

Officers Comments

Current adopted policy (DM27) provides guidance on this issue stating that "Proposals should not prejudice the existing and future development potential of adjoining sites or the potential for the area to achieve a coherent, interconnected and integrated built form. Where such potential may reasonably exist, including on sites with different use or ownership, development will be expected to either progress with a comprehensive scheme or, by means of its layout and form, enable a co-

ordinated approach to be adopted towards the development of those sites in the future". The SPD builds on this guidance, and best practice, to recommend the production of masterplans.

5. Bedminster Green

- Concerned that Bedminster is identified for significant intensification, without sufficient community facilities to support this.
- SPD does not recognise the historic character of Bedminster.
- Not suitable for a cluster of tall buildings.

Officers Comments

Bedminster Green is identified in the SPD as a potential new character area. Figure 3 states that significant potential exists for intensification informed through an area wide framework (aka Spatial Framework). Fig 3 goes on to acknowledge that the area has existing contextual constraints. The SPD does not state that Bedminster Green is suitable for tall buildings. It is not within the scope of the document to say which areas are appropriate or inappropriate for tall buildings. Instead, the SPD advocates the preparation of Spatial Frameworks for areas of anticipated change such as Bedminster Green.

6. Other Comments

Additional Scrutiny

- Public consultation should be required prior to pre-application and SCI should be agreed by all parties.
- Management and maintenance needs to be understood from the outset.
- Should be no requirement to progress schemes through BUDF.

Affordable Housing

- Expectations for affordable housing should be re-emphasised and viability statements for previous schemes on sites made public.

Community Infrastructure

- Lack of emphasis on providing community facilities as part of higher density/ tall building schemes.

Community Involvement

- Strengthen the commitment to community engagement in high density developments
- SPD should set out what community engagement should entail.

Consultation on the Urban Living SPD

- SPD does not reflect the consultation responses on the previous draft.
- The consultation was not sufficiently publicised to have meaningful consultation.
- Should be called in for Full Council debate.

Context

- Reference to context is not robust enough.

General

- No mention of Neighbourhood Plans.
- Fig 2 and 3 are hard to read and need to be made clearer.
- Tall building guidance should be made separate to Urban Living.
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Heritage

- SPD should explicitly reference 'Our inherited city' and S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Housing typologies and density

- Too much focus on apartment living, need to recognise other forms of development, including lower density.

Officers Comments

The majority of these latter concerns are addressed in the SPD and officers do not believe there is a need to add further to the text . Some of the points of concerns lie outside the scope of the SPD, to clarify the SPD provides:

- Quality expectations for higher density development in the city, including tall buildings
- Guidance on making liveable higher density residential schemes
- Broad-brush city-wide character appraisal
- Questions to consider during design development/pre-app linked to traffic light assessment
- Best practice precedents
- Technical assessment guidance

It does NOT provide:

- Area/site guidance
- Locations appropriate for tall buildings
- Density thresholds for residential developments