

WARD: Central **CONTACT OFFICER:** Paul Chick
SITE ADDRESS: The Bell 7 Prewett Street Bristol BS1 6PB

APPLICATION NO: 18/01890/F Full Planning

DETERMINATION DEADLINE: 19 December 2018

Demolition of existing buildings to provide residential dwellings (Use class C3), commercial retail space (Use Class A1) and community facilities (Use Classes D1/D2) with associated landscaping and works.

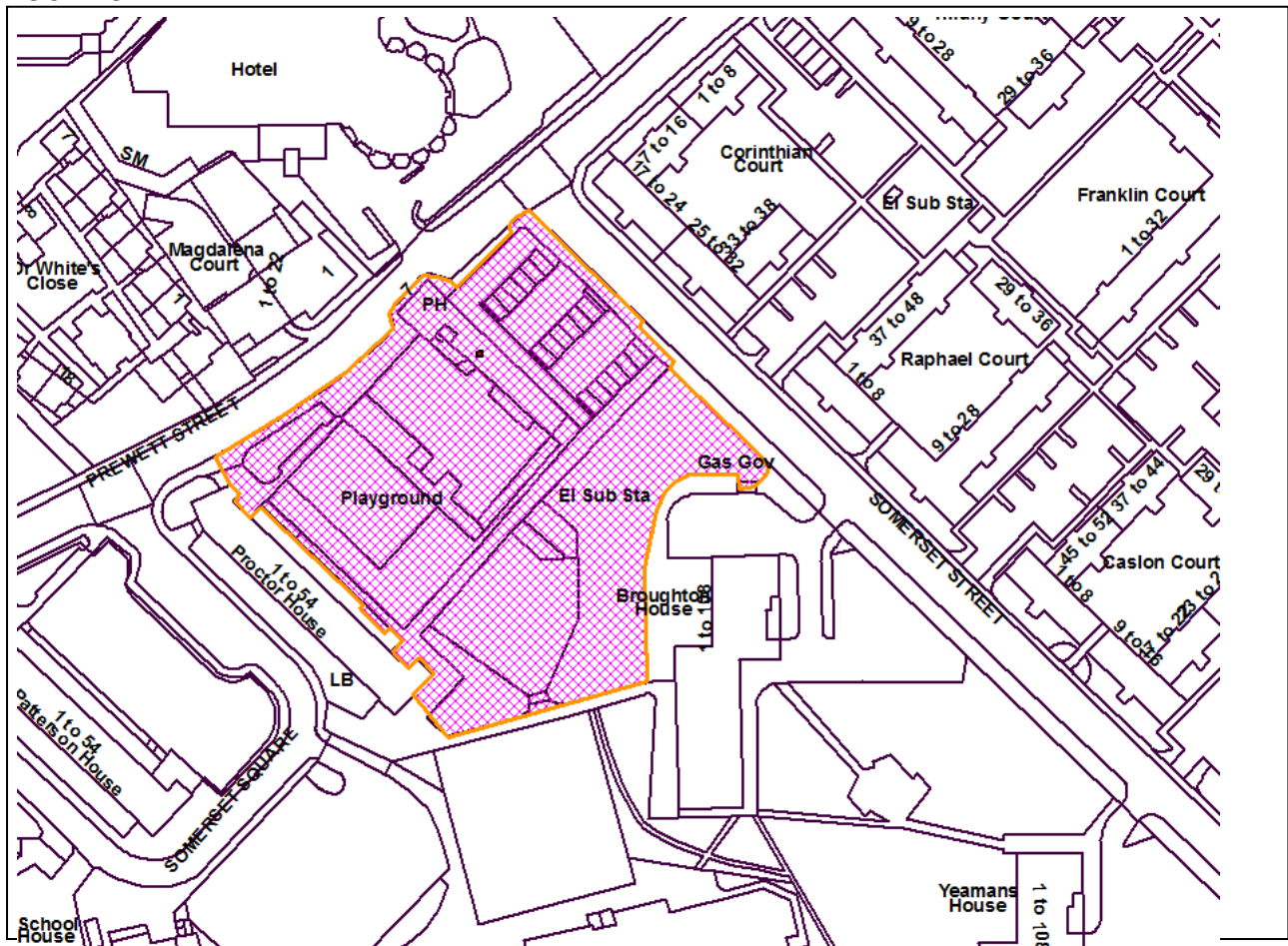
RECOMMENDATION: Refuse

AGENT: GVA
 St Catherine's Court
 Berkeley Place
 Bristol
 BS8 1BQ

APPLICANT: Urban Tranquility Developments
 Ltd
 C/o Agent

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

LOCATION PLAN:



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This application has been referred to Committee by the two ward councillors, Kye Dudd and Paul Smith on the following grounds:

“This is a major application which has high levels of housing including 20% affordable, retail and new community sports provision. This has high local interest and should be decided by elected members on a DC”.

Site Description:

The site is located at the corner of Prewett Street and Somerset Street, bound to the north by the Double Tree Hilton Hotel and car park/servicing area, and Magdalena Court, a 3 and 4 storey residential building. The site is bounded to the east by Proctor House, a 10 storey residential block, and to the west by the 4 storey Corinthian Court residential development. Broughton House, a 13 storey residential block, lies to the south.

The site is 0.59 hectares in size and comprises a number of existing buildings/structures as follows:

The former Bell Public House

The former Taviner’s Auction Rooms

18 vacant garages

Basketball area and equipped children’s play area

There are 23 trees on the site, 6 of which are categorised as ‘B’ which indicates they are desirable to retain and of good quality.

The site does not contain any statutory or locally listed buildings and is not located within or adjacent to a conservation area. However, the St Mary Redcliffe Church a Grade I listed building lies 150 metres to the north west of the site, within the Redcliffe Conservation Area.

The former Bell public house has been identified and proposed as a building worthy of ‘local listing’ but this has been rejected on several occasions by the listing panel.

Relevant History:

99/03574/F: Erection of 47, one and two bedroom flats, management suite and basement/off street parking. Submitted November 1999 and withdrawn July 2005.

02/01148/F: Erection of 88 flats, 2 shops and associated works. Submitted March 2002 and withdrawn June 2002.

08/00025/FB: Erection of kick wall and basketball facility, measuring 15m in length and between 1m and 3m in height. Approved 13/03/2008 and implemented.

17/04925/PREAPP: A pre application was submitted on 30/8/2017 for a development proposal comprising 188 residential units, a retail store, a multi-use community/recreation space and associated landscaping. The pre application was for a development that was essentially the same in nature to the planning application now being considered.

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The pre application advice given in January 2018 was that while the site is considered suitable for residential development, the proposed scheme was not considered acceptable. The proposed scale, bulk, massing, density and height of the main residential block was considered inappropriate for its setting and context with surrounding buildings and would have a harmful impact on adjoining residents. Further advice was given that while high density development in the city centre is supported, the site was not appropriate for either a tall building or the intensity of the scheme proposed. Instead, the applicant was advised that a high quality, high density-low-rise development of the site at a maximum of six storeys would be more appropriate, one that was integrated within the existing Redcliffe Estate and the community and that could make a positive contribution to local character and distinctiveness.

Application

Planning permission is sought for the comprehensive redevelopment of the site to provide residential buildings (Use Class C3), commercial space (Use Class A1) and community facilities (Use Classes D1/D2) with associated landscaping works.

The proposed development comprises the following main elements:

196 residential units (176 units within the main residential building and 20 units above a separate community/sports building).

The dwelling mix would be:

Main building: 94 x 1 Bed, 82 x 2 Bed

Community / Sports Building: 12 x 1 Bed, 8 x 2 Bed

39 of the residential units would be affordable housing (See Key Issue ...).

The main building would be up to 12 storeys in height on the corner of Prewett/Somerset Street. The community building would be the equivalent of 6 storeys, with the community / sports use being approximately 2 storeys in height from ground floor, with a further 4 storeys of residential accommodation above.

Retail unit (346 sq m): This would front onto Somerset Street.

Community / Sports space (694 sq m, ground floor): This would be built on the existing basketball recreation area. The applicant states that this area is currently underused and is often the location for anti-social behaviour. The new facility would provide a multi-functional sport and adaptable space. The applicant further states that the facility would be self-financing and proposed to be managed by a Charity Trust with local companies able to operate within the space.

Landscaping: replacement/upgrading of existing play space, new public landscaped area, community gardening space and enhanced children's equipped play area.

Cycle parking (350 spaces)

Car parking: outside proposed retail unit: 1 x retail delivery space, 2 x short-stay parking spaces.
Prewett Street Frontage: 1 x Disabled car park space and 1 x Car Club space.

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Pre Application Community Involvement

Process:

From April 2017 the applicants have regularly attended the Redcliffe Residents Action Group (RRAG)/ Redcliffe Forum meetings. In January 2018 a public consultation event took place at Faithspace, Prewett Street.

In the initial meeting with the RRAG at the outset of the design development, the RRAG made the following points:

- The importance locally of the existing footpath running through the site from Somerset Street to the basketball area and existing residential blocks
- The continual anti-social behaviour focussed around the existing basketball court
- The need for investment/removal of the vacant buildings which attract anti-social behaviour
- The need for clarity on the historic status of the former 'The Bell' public house

Approximately 60 people attended the public consultation event in January 2018 and the following main points were raised with the developer's representatives.

- Concerns with the general height and density of the development
- Concern with possible congestion with additional vehicles being introduced to the area
- Concern with car parking in the area and exacerbation of current car parking issues as a result of the proposal
- Concern with the design of the building and comments that the building is not attractive
- Concern regarding the removal of the 18th century pub
- Comments regarding loss of existing green space
- Positive feedback about the roof gardens
- Concerns regarding the viability of the proposed community building
- Impact of the development on general amenity of neighbouring properties
- Improvement of the current condition of the site welcome

Outcomes:

It is not clear from the statement of Community Involvement submitted with the application whether the comments received from the public had any influence over the final design of the scheme.

RESPONSE TO PUBLICITY AND CONSULTATION

PUBLIC RESPONSE

Site Notices were erected and an advert placed in the local press. In addition approximately 600 local addresses were notified of the proposals. In response 42 comments were received objecting to the proposals, including comments from the Bristol Civic Society, the Conservation Advisory Panel, the Redcliffe Residents' Action Group and St Mary Redcliffe Church set out below. Two comments were received in favour of the scheme and one neutral comment received for the local St Mary Redcliffe and Temple School.

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The Bristol Civic Society

Summary

The Society recognises that this site is a negative feature and welcomes redevelopment in principle but very much regrets that it cannot support the current scheme. The Society acknowledges the changes to the design between the pre-application enquiry and the planning application, but the scheme's mass is unchanged. The proposed new apartment block would overbear and overshadow Magdalena Court to the northwest and Corinthian Court to the northeast to create a major planning conflict. To achieve a high density the Society would prefer a development on a broader footprint built over the centre of the site that was taller, but not much taller, than Corinthian Court and Magdalena Court.

Demolition

The Society would regret the loss of the Bell public house but recognises that the building is statutorily unprotected. The former Taviner's Building is without architectural merit.

Change of use

A residential led scheme would conform to current planning policy. This is a highly sustainable site close to the city centre and to Temple Meads station. A market rental scheme would increase the area's accommodation mix. The scheme offers to provide 20% affordable housing.

Mass and height

The critical planning question is whether the addition of the proposed number of new homes to the city's housing stock outweighs the harm that the building mass would cause to the amenities of the residents of Magdalena Court and Corinthian Court. The new building would stand across Somerset Street parallel to Corinthian Court (permission 1999). The developer has not included a sun shadow diagram with the planning application. The Society anticipates that the diagram would show that the new building would block the sunlight from the Somerset Street four-storey terrace for a significant part of the day during most of the year. The proximity of a new building of this mass and height would substantially harm the amenity of the Corinthian Court residents. Similar considerations apply to the harm that the new building would cause to the amenity of the residents of the four-storey Magdalena Court (permission 1999) to the northwest. Because of the impact on a substantial number of neighbours of dense recently-constructed flatted accommodation, the Society cannot support this application. The Society contrasts this proposal with the spatial planning of Proctor House and Broughton House. Both earlier tall buildings are sited at an angle to each other and with a greater intervening space. The current scheme would stand parallel to its neighbours on three sides and would block the east aspect of the residents on all 9 floors of Broughton House and vice versa. The Society anticipates that a sun shadow diagram of the 5 floors amenity block to the south of the development would cast a shadow over the children's playground and the community garden for significant periods each day. The Society is not convinced that the development would not harm views into the site or views of St. Mary Redcliffe.

Design

The developer says that U-shaped plan has the advantage of producing an open courtyard facing south that would connect with the wider landscape. This small open area would produce a minimal

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planning gain when considered in the context of the projected number of new residents and the mass of the surrounding new building. The Council must satisfy itself that the continuing site management is strong enough to ensure that this open space will not quickly degrade. The Society is also cautious about welcoming roof top gardens unless there is a robust maintenance plan.

The quality of the design does not justify the height and mass of the principal building which the asymmetrical silhouette fails to mitigate. In the public realm the building's mass would overpower the space within which it would stand. Another consequence of the design's inadequacy is that only the corner flats are double aspect. Many of these single aspect flats would face north. An objection to the design which carries weight will appear in the emerging Urban Living Planning Advice, which will provide best practice advice on the design of residential schemes with higher densities to ensure good quality accommodation. The Society expects that this best practice advice will include a presumption against single aspect units, which, as with this proposal, often provides a limited outlook. The best practice advice of the current Policy DM29 states that new flats should be dual aspect wherever possible and specifically that single aspect units are not appropriate on northern elevations. The Society assumes that windows onto the centre light well would illuminate the access corridors.

The development would provide a stock of one and two-bedroom flats in a 60/40 ratio. A review of the census data for the central wards shows that approximately 77% of the housing stock is 1 or 2 bed units. Policy BCAP3 seeks a greater number of 3 bed flatted units, and as such it is felt that a higher proportion of three bed flats should be included within the scheme. The Society supports the Council's affordable housing policy.

Conclusion

The Council should not support this application for these reasons:

- The harmful impact that the development would cause to a substantial number of neighbours who occupy recently-constructed accommodation.
- The design fails to satisfy the Council's planning policy BCS21 - Quality Urban Design. The building mass would offer a majority of residents single aspect flats in a monoculture of small flatted accommodation.
- Harm to local and longer views particularly of St. Mary Redcliffe.
- The building would overshadow the outside amenity spaces which are vital for those who live in higher density dwellings.
- The unexplored possibility for the developer to achieve a high-density development with a broader footprint.

The Conservation Advisory Panel:

Whilst it is noted that this mid 18th century public house has been considered to be too heavily altered to warrant local listing, it is nonetheless an integral part of the historic street pattern and activity of this part of the area. The submitted heritage assessment is weak and takes no account of the wider townscape of the Redcliffe Estate (a high quality post war residential estate), the adverse impact of the proposal on the setting of the adjacent Redcliffe Conservation Area and associated

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listed heritage assets. The proposal would have a significant adverse impact on St. Mary Redcliffe when viewed from a range of surrounding locations within and beyond the city and from other Conservation Areas.

The archaeological desktop assessment is inadequate as it has not assessed the historic context of the immediate vicinity. The Panel was somewhat surprised to see the shadow study showed excessive northern sunlight, yet acknowledged that the impact on daylight and sunlight for about 56 adjacent residential properties is significant.

The Panel was concerned that the applicant had made no reference to the pre application process and the range of issues raised. Furthermore, the current scheme appeared to be larger in size and scale than the pre application scheme. The application proposal was considered to be wholly inappropriate for its context and would substantially harm the significance of relevant heritage assets with limited public benefit. As such this is considered contrary to relevant Local Plan policies and the requirements of para 133 of the NPPF.

Redcliffe Residents Action Group and Neighbourhood Forum

This is an important site, on a corner, at the centre of south Redcliffe - an area which has long been neglected in terms of maintenance and development to better meet the needs of local people.

How the site is developed will set the tone for future developments in an area that is likely to be under increased development pressure. Getting this right matters.

Redcliffe Residents Action Group & Neighbourhood Forum object to the proposed development. There are a number of issues that urgently need to be addressed:

1. The nature and scope of the "consultation" with the community. The consultation event at FaithSpace was the first time that any physical plans have been shown to the community. Previous presentations to the community by the developer have been limited to them coming along to two Redcliffe Residents Action Group & Neighbourhood Forum monthly meetings and short verbal updates about what stage the developer was at. We are concerned about the lack of engagement with residents beyond these very limited encounters. For example, little to no contact has been made with the residents of Corinthians Court and Magdalen Court.
2. There is a lack of supporting information to enable members of the community to make an informed decision about the proposals. There is no information about how the developers arrived at the proposed design, or why and how this is the best option, and on what criteria this was considered the best option. For example, was any consideration given to designs that complemented and worked with the context more? Why this design, why these heights and massings? There needs to be more information about why and how this was arrived at as the optimum solution for the site, and on what evidence base and how choices were arrived at. For example, why were there no other options shown with different levels of car-parking provided? Why no options with an enhanced outdoor ball court instead of just demolishing it?
3. The proposed blocks will impact severely on people living adjacent to the site, especially in terms of light and privacy.

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The proposed blocks will overwhelm the existing area - including local residents, local green spaces, and St Mary Redcliffe Church. The scale, massing, height, and density are all extreme, and not softened by any design quality.

The proposals appear to ignore current planning policy. For example, 'Future of Redcliffe' SPD 3 Townscape T5 "Building heights should respond to the predominant existing context of 3-6 storeys." Whilst there are several c10 storey slab blocks around the Site, they do not create a townscape character or sense of enclosure. The majority of surrounding buildings are of more normal 3-6 storey city scale and if new buildings are built up to the street frontages at those heights, it would help rebuild a scale suitable for the neighbourhood in a way that complements and completes it, rather than conflicts with it.

4. No car-parking provision is wholly unrealistic and will have a huge negative impact on the public realm and the lives of existing residents who will have to deal with the burden of additional cars that have not been properly provided for. Zero parking spaces for 195 apartments is unacceptable. There are no car share parking spaces, no disabled persons parking spaces, no electric charging spaces. These are all required by planning policy. And would be essential in an area that already suffers considerable pressure with on street parking.

People with changing mobility needs may need a car after they have bought a flat, or may have changing work situations. Some element of car-free development is to be welcomed, but 100% is bonkers. If this development fails to provide appropriate and realistic provision of parking spaces the burden of providing space will fall on existing residents and the public realm. The burden of provision should fall on the development itself.

5. The proposals for the "community" sports building on the outdoor ball court are incomplete and there is insufficient information available to enable residents and the community to give meaningful feedback.

Putting apartments over the "community" sports building would appear to counter intuitive. Significant structure would be required to support the apartments over a clear span sports space. There appears to be little thought given to the form or design of the sports hall and apartments. For example, this significant aspect of the scheme is omitted from the principle elevations in the documents submitted.

Noise issues would need to be robustly addressed. There needs to be detailed plans about levels of sound insulation, and should be a condition of planning. Complaints from future residents could jeopardise the use of the building as a "community" sports centre. Conditions in tenancies and ownership agreements would need to be in place prior to lettings/sales to ensure future residents cannot stop the sports and community use of the building.

Only very partial outline and sketch documents about the design and internal layout of the proposed "community" building have been shared or consulted on prior to the submission of full planning application. The information on this building at the "consultation" event was extremely limited and the community have been given very limited meaningful chance to provide feedback or local knowledge into the design or operation of the building. Currently it is a "community building" without the actual involvement of the local community in co-designing what it might look like, function, or operate. What is particularly worrying is that there remains no evidence of any young people in the area being involved or asked about the proposals.

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- Redcliffe has a below average access to green and outdoor space in Bristol. South Redcliffe is also in the top 1% of areas across the UK for indices of multiple deprivation. Any proposal to take assets and space away from young people in the area needs to be robust and well-evidenced. It remains unclear how young people would access the space - will it be free to access for local people, as the current space is?
- It is unclear if the space will be a genuine community asset, owned and managed by the community, and if so on what terms. During the consultation event one member of the developer team said the community building would be sold. Another member of the team said it would be retained by the developer.
- There remains no transparent proposal for how the space will be managed, by whom, and how community access will be maintained once the space has been built. Credit should be given to the developer for trying to find an operator to run the space. However, it is unclear what the relationship with the local community will be and what their remit will be.
- There is a very great danger that the community space will either be a community liability without sufficient resources or genuine community control to manage it effectively for the community, or end up being a privatised commercial space inaccessible to local young people - either because the young people cannot afford it, or the management decide they don't "fit".

The developer has said *"The facility will be self-financing and proposed to be managed by a Charity Trust with local companies able to operate within the space. This concept and the potential occupiers of the facility will be developed during the determination period of the application and secured via a legal agreement associated with the planning consent."*

We call on the council at the very minimum to:

- designate the "community building" part of the public realm;
- make planning consent for the whole scheme conditional upon the design, management, and operation plan, including legal agreements to ensure long term community benefit and access, are in place prior to full planning consent;
- make full noise insulation between the apartments and sports areas a condition of planning;
- make tenancy / sales conditional on preserving the use of the building for community and sports use for young people (ie complaints from future residents not be able to jeopardise its use).

6. As mentioned above, Redcliffe suffers from below average access to green space compared to the rest of Bristol. Any development in Redcliffe should make Redcliffe more green rather than less green. The proposed scheme would mean the loss of a number of mature trees. See images sent via email.

The development should increase green provision in Redcliffe - for example through the use of green walls, additional planting and proper landscaping. This may also help to improve the visual design quality of the scheme as well as its environmental quality.

7. The drawings are unscaled. All planning drawings should have a scale bar attached.

8. Fire escape Stair and lift cores are internal with no natural light or ventilation, and do not appear to terminate direct to outside air.

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9. Maximum travel distances from dead end apartments appear to be exceeded under fire escape conditions, corridors are narrow and airless with no natural light.
10. Apartments are single aspect (Except 6 per floor) with a face to face distance of 18m across the courtyard but internal corner apartments allow direct view into adjacent bedrooms.
11. The Main C shape block apartment drawings are all shown separately from the flats over hall drawings although they are adjacent to each other, so it is difficult to adequately see the relationship between the two.
12. Separation distances between the Existing Flats to Proctor House, Magdalane Court and Corinthian Court and the proposed main block are not explicitly stated on drawings. The distances between Broughton House and the sports hall are also not explicitly stated.
13. No detailed information is provided on the relationship between this building and the adjacent apartments on 4 sides, ie Proctor House, Magdalene Court Broughton House and Corinthian Court. With the CAD models available views should be provided from apartments at different levels on the adjacent sites to show the true impact on the existing residents.
14. Shading diagrams are required to show impact on adjacent developments.
15. Illustrations in D&A of reference buildings are not relevant to the reality of this 11 storey building, all illustrations relate to much smaller buildings. There should be clear illustrations of the impact of a giant building located at the back of footpath on adjacent 3 and 4 storey structures together with relationship studies with the existing adjacent apartment buildings.
16. Aerial shots fail to convey the dominance of this development over adjacent structures. In particular the dominant relationship on views towards St Mary Redcliff.
17. The elevational treatment could be that of a commercial office rather than a significant residential building, scale and proportion are not relevant to the location. And there has been no significant study of the proportions of buildings in the immediate locality.
18. In Urban design terms the site is ill conceived, in an area where linear blocks are the dominant form allowing pedestrian permeability and framed views, with green spaces which are publicly accessible. Inserting an open sided courtyard form of this scale would be alien. It restricts public access and through routes. It blocks views and dominates the skyline. Some discussion on public permeability and accessible routes through the site would have been helpful and was profoundly lacking from any of the public "consultation" exercises.
19. In pure design terms it would be sensible to step down from Proctor House the 10 storey block adjacent, to the lower apartments on Somerset Street, but bizarrely the building steps up in this direction which is counterintuitive.
20. In an area dominated by linear blocks running NW/SE surrounded by green space this development fills the available space with a building providing no publicly assessible amenity space.
21. A retail space is proposed without any justification of need or demand. What impact will this retail space have on the existing retail spaces on Redcliffe Hill and Prewitt Street?

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22. There are no accessibility M3 apartments indicated, it is a planning requirement to have a minimum number of M3 accessible apartments which need to have adjacent wheelchair access and disabled parking.
23. There are no internal communal spaces
24. There are no atrium or any life affirming spaces within the scheme.
25. Green spaces and terraces are private and will require maintenance.
26. Bin storage does not appear to comply with the Bristol Waste accessibility requirements.
27. Almost all apartments are single aspect, which is against Policy DM29
28. A significant area of the land is in Bristol City Council ownership and therefore public ownership. The scheme offers a very small proportion of social housing at 20%. The council policy for all sites is a minimum 40%. On publicly owned land this should be higher not lower. There are no significant additional or offsetting costs associated with this site to justify a reduced social housing number, so we cannot see how the reduced social housing contribution can be justified.

St Mary Redcliffe Church:

While St Mary Redcliffe Church recognises that the former Bell pub and Taviner's Buildings site needs development and recognises the pressing need for new housing in the city, it does not support this planning application for the following reasons:

The church is concerned about the design and scale of the building and its potential impact on views of St Mary Redcliffe Church. We raised this issue during a public consultation event, at which information about the impact of the development on some of the key views of the church seemed to be missing from the graphic displays presented for public view. We weren't convinced by the explanation we were given for this during the event and our concerns remain. We note that Bristol Civic Society is also, "not convinced that the development would not harm view into the site or views of St. Mary Redcliffe." We also refer to Historic England's detailed comments on the likely impact of the proposal on the church and its surrounds in its response to the planning application:

The proposed development utilises a vacant piece of land currently partially occupied by a derelict pub of probable 18th century origin. The proposed structure is a large building with a complex geometry and varied roofline. However, the scale of the building means that it will have a severe harmful impact upon the setting of St Mary Redcliffe. In views from Redcliffe Way the proposed building will be considerably in excess of the established building heights in the context of the church, rising above the height of its 14th century lady chapel in certain views, removing the ability of the viewer to experience its exceptional silhouette without encumbrance. A key view of the church spire from the Wells Road will be lost entirely; when travelling from the junction of the Bath and Wells Roads towards Temple Meads the spire of the church can be seen and appreciated, signposting the edge of the city.

The design of the building is a source of regret. The complexity of form puts it at odds with the geometric simplicity of existing large housing blocks at Redcliffe, and the assertive nature of its appearance presents a challenge to the Grade I listed church, which we firmly believe should retain

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its visual primacy in the townscape. This is not architecture that respects its surrounding context, and in this regard we suggest it fails the National policies of NPPF paragraph 58 on requiring good design.

However, fundamentally the proposed building is too big for the site. We recognise a building of some scale can be accommodated here, but it should not be visible above St Mary Redcliffe and not screen key views of its spire. We recommend the building is reduced in height significantly. Ideally the unlisted pub building should also be retained; although dilapidated its domestic scale is now an unusual feature in Redcliffe and it serves as a visual reminder of the area's prewar character.

The scale and mass of the proposed building means that it would be prominent in the wider townscape. There is clearly a negative impact on the character and appearance of the Redcliffe Conservation Area of which St Mary's forms the focal point, but there are also wider impacts on other conservation areas. The proposal would appear above the listed townhouses of Redcliffe Parade, part of the Redcliffe Conservation Area but visible from the City Docks and City & Queen Square Conservation Areas.

We concur with Historic England's view that local development "should not take place at the expense of disfiguring the setting of one of the defining buildings of Bristol," especially since this would be entirely at odds with policy BCAP40: Redcliffe Way in *Bristol Central Area Plan (2015)*, which lists a "significantly improved setting for St. Mary Redcliffe church" as a key objective for the area.

Apart from the likely negative impact of the development on views of the church and the character of the area, the church is also concerned about the likely negative impact of the development on the local community. The church is a member of Redcliffe Residents' Action Group and Neighbourhood Forum - a recent amalgamation of Redcliffe's two community groups, Redcliffe Neighbourhood Development Forum and Redcliffe Residents' Action Group - and has therefore been involved in a number of discussions with local residents about the development proposal. From our experience, there is great concern among local people about the impact on residences in the immediate vicinity of the proposed redevelopment. As Bristol Civic Society points out, the proposed new block would overshadow Magdalena Court to the northwest and Corinthian Court to the northeast, having a negative impact on those who live in the area. We are also concerned about the nature, rather than the amount, of engagement with the community leading up to the planning application. We noted the didactic rather than collaborative quality of this engagement and the fact that pertinent questions about the nature of the development appeared to be unwelcome. Consequently, we do not feel that the views of current residents have been taken into account and are concerned that some of the community-facing elements of the proposal do not fully reflect local need.

The church recognises that there is a pressing need for new homes in Bristol but is concerned that the development does not answer local housing needs. The affordable housing component of 20% is far from adequate in what one of the city's most deprived communities. We feel that the affordable dwellings should comprise at least the 40% that was, until recently, the city's target for residential developments in the city centre.

Apart from the issue of affordability we also feel that the developers have ignored local housing need by proposing a stock of one and two-bedroom flats in a ward in which 77% of the housing

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stock is one or two bed units. This is inconsistent with Policy BCAP3, which recognises the need for more family accommodation in this area of the city.

The main points of objection expressed by the public were as follows:

Highway Issues: The development would create demand for parking and would generate traffic, increasing congestion. Providing virtually no parking is unrealistic. This will lead to nuisance parking and parking overspill into the surrounding areas. No consideration has been given to the need for loading spaces to accommodate deliveries, just one loading space on Somerset Street is wholly inadequate.

Design: The building would be too large for its setting and of an inappropriate design.

Impact on Amenity: The building would overshadow neighbouring buildings and appear overbearing and menacing.

The building would harm views of St Mary Redcliffe Church.

The proposals do not include an adequate provision of affordable housing.

Loss of the basketball court: This is well used by local children and young people and should remain.

The community hall: No clear information has been provided on how this would be operated and managed in a sustainable way. There is concern that it would compete with the local community facility 'Faithspace' and would not be affordable to local people

The development would result in the unacceptable loss of mature trees and would harm the natural environment.

The historic public house 'The Bell' should be retained.

Other comments made were as follows:

No wind tunnelling had been done to assess what impact the new building would have.

There was no information on the provision of new services (GPs, dentists etc.)

There was no requirement for the new store.

The affordable housing units should not be segregated.

The proposed density of accommodation was too high (contrary to the Council's 'Urban Living' SPD)

The main building should be higher to provide more housing.

The two comments received in support of the proposals were from 'Shine', an organisation who provide multi-sports training and activities for schools across the south west. They commented that the approach to invest in a sports focused community facility was welcomed, and that they had been approached to run the facility. They also added that utilising this brownfield city site with new homes and much needed affordable housing was welcomed.

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CONSULTEES:

INTERNAL:

City Design Group:

Summary:

The proposed development located at a corner-site on Prewett Street and Somerset Street raises several serious urban design concerns. The over-intensity of the scheme fails to comply with Bristol City Council's policies. As the scheme does not achieve expected high standards of urban design, City Design Group (CDG) strongly objects to the proposed scheme.

We are required to place "great weight" on the conservation of all heritage assets and their setting: the more important the asset the greater the degree of care to protect its special interest and significance. Under the National Planning Policy Framework (NPPF) harm to the significance of heritage assets, such as Listed buildings and their setting, is the fundamental basis for assessing the appropriateness of new development where it impacts historic assets. The NPPF allows for harm to be offset by public benefits in certain circumstances. The applicants have made an inadequate or inaccurate assessment of the impact on those assets, and there is no identification of what proposed public benefits are intended to offset harm.

NPPF states that "As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification" and the current proposals lack adequate definition of what public benefits might be considered to outweigh that harm. In this instance the degree of harm posed to a national monument of the calibre of St Mary Redcliffe is not considered to be outweighed by public benefits. The negative impact on other Listed buildings, Conservation Areas, and non-designated heritage assets remains unjustified, and the overall urban design of the proposals is recognised by Urban Design Officers as poor. In failing to comply with National and Local policies designed to protect the historic environment the application should not be supported by this Local Authority.

Urban Design:

Assessed against Bristol Local Plan's Site Allocations and Development Management Policies (July 2014), detailed comments are as follows:

Local Character and Distinctiveness

The current proposal fails to respond appropriately to its context. General principles established under Policy DM26 are not followed, particularly with regard to vi. Responding appropriately to the height, scale, massing, shape, form and proportion of existing building, building lines and set-backs from the street, skylines and roofscapes. Although comprehensive sections and contextual elevations have not been submitted with the application, drawings such as Proposed Site Plan and visualisations from the Design and Access Statement (page 20) demonstrate to what extent this scheme sits uncomfortably alongside its neighbours. No consideration has been given to the impact on the mainly 3 to 4 storey-height residential buildings opposite the site on Prewett Street and on Somerset Street, Magdalena Court and Corinthian Court respectively.

[In response the applicant has commented that building up to the street edge was supported by the Bristol Urban Design Forum, and that the massing does respond to the scale of the post war blocks.

In a supplementary response to this, the City Design Group (CDG) comment that the scale and massing exceeds the post-war blocks and is sited in an inappropriately prominent location on the highest point on the ridge overlooking the historic St Mary Redcliffe church.]

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The Cumulative Verified Visual Montage 12b (LVIA), makes evident the total disregard the proposed scheme has to the design of the wider Redcliffe Estate, with its carefully considered plots, building scale and viewing corridors towards St Mary Redcliffe Church. The scheme fails to address the pre-application advice relating to the nature and intensity of the proposal, and the promotion of a high quality, high density, medium-rise development in order to address more appropriately Policy DM26 iv. Retaining, enhancing and creating important views into, out of and through the site.

Policy DM27: Layout and Form

The red line boundary provides a 0.58-hectare corner site and suggests almost 150m of frontage equally shared between Prewett Street and Somerset Street. However the area includes the existing children's playground and the community gardens, which are not developable. The scheme locates the new development on two areas which add up to approximately 0.25 hectares: the derelict buildings and car garages areas at the corner to the north; and the informal basketball area between Proctor and Broughton Houses to the south. On the corner, the proposal is for a thirteen-storey building with a 40m x 54m footprint; and to the south, set-back a second building with a 26m x 35m footprint incorporating 5 storeys of residential above a large sports hall structure.

[In response, the applicant comments that the density/site area rationale was set out in the pre application and not commented on by the City Design Group. Comment is also made that the playground / community garden area forms part of the site and contributes towards the amenity of the development.]

The CDG comment in response that it was made categorically clear at a pre application meeting that the intensity of the development was unsupportable, and that the scale of development should be no more than 6 storeys (this was minuted). The proposed building would reduce the existing open green recreation space by building over significant portions of it.]

Policy DM27 policy, 2.27.4 reads: It is expected that most new development will be configured as perimeter blocks with coherent and consistent building lines unless the local context or site constraints dictate otherwise...

The local context and site's constraints haven't been adequately considered in the design of the proposed block form. For instance, the proposals require the removal of 17 of the 23 trees in the site; 6 of them are category 'B'. Many of these trees, particularly those at the northern corner of the site, are important in contributing to the character of the well-planted green parkland setting of the Redcliffe Estate, especially when viewed from Prewett Street and along Somerset Street. Additionally, the risk of losing further 2 trees of significant size, due to the close proximity of the proposed community building to the south and the residential block to the north should be considered.

The non-designated heritage asset represented by the Eighteenth Century Bell public house is a rare fragment of the historic fabric of the Redcliffe area, and there is a potential to recognise this in some form within the design. Preserving and revealing its special interest should have informed the design of the northern block as an appropriate response to Policy DM27. This omission, without adequate justification, is regrettable. Likewise, the current siting of Proctor and Broughton Houses and their setting within the mature landscape should have informed the design of the southern block. As submitted, the shape and geometry of this block and its plot is inconsiderate to its context. As proposed, rather than becoming a welcoming addition to the established built form of the blocks

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and the open space between them, it adversely impacts on existing views and interrupts of the flow of established routes, awkwardly positioned without any evident intention of integration.

[In response, the applicant comments that retention of the Bell pub would make the scheme unviable. The existing space around the post war blocks largely lacks natural surveillance (perhaps evidenced by the introduction of fencing around Broughton House). The proposed buildings will frame and overlook outdoor spaces making them safer and encourage increased useage.]

The CDG comment in response that viability is not a relevant planning issue unless it relates to the provision of affordable housing. There has been no demonstration of the necessity to demolish the pub to realise the redevelopment of the area.

The post-war blocks directly overlook this area from the west and south. The degree of overlooking now proposed impacts on the amenity of existing residential properties.]

Streets and Spaces:

It is acknowledged that a corner-site would offer a great opportunity for additional development in this location. However, the design approach of the proposal in relation to the streets and existing routes and spaces, is questioned. The northern block is, fundamentally, an oversized single building that fails to respond to the urban grain of the surroundings, ignoring both the existence of the staggered building line on Prewett Street and the importance of the existing trees at the corner.

[In response the applicant comments that the current building lines along Prewett Street are fragmented and disjointed, creating a lack of cohesion to the streetscape. Building up to the edge of the site on Prewett and Somerset Street would reinforce the street pattern.]

The CDG comment in response that the Redcliffe estate is not designed to create streets. It is a weak argument to suggest the reinforcement of traditional street patterns where they are not characteristic of the area.]

The relationship of the building with Prewett Street and Somerset Street does not offer a positive interface to either frontage. Facing Somerset Street, the retail space façade would deliver very limited activity to the public realm. Whilst onto Prewett Street, more than 60% of the 54m-length façade is, effectively, a blank wall at pedestrian level as the apartments are raised up 1.5m above the street.

[In response the applicant comments that activity to the frontage will be promoted by people using the entrance points to the residential and retail elements, in addition to the use of balcony spaces above.]

Floor levels are raised above pavement level to protect resident's amenity whilst still retaining a visual and physical connection between inside and out on the ground storey.

The CDG comment in response that activity to the ground level of the development is supported, but is not dependant on the scale, design, or intensity of development. Elevations away from the street will lack active frontages and have the potential to increase antisocial behaviour in the surrounding areas.]

Similarly, to the existing east-west pedestrian route from Proctor House to Somerset Street; and to the north-south pedestrian route parallel to the children's playground, the proposal doesn't offer an active or engaging frontage. Given the height of the ground floor windows the proposed scheme

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effectively results in an extended blank facade along these two routes. This is considered unacceptable in design terms. The proposed residential block should better respond to the site providing an attractive pedestrian environment to new and existing residents.

[In response, the applicant comments that overlooking from properties along these routes will greatly increase the safety of those using them. In addition, the gym at the lower ground floor, and the main community space both directly look into the enhanced community garden space.]

The CDG comment in response that existing blocks surrounding the site all overlook the streets and open areas. There is no evidence that the proposed development will add to the security of the area, and there are several areas where the building's planform and design may increase the potential for poorly surveyed spaces.]

The community building fails to achieve adequate activity and interest at ground floor level. The large sports hall on the ground floor, by its nature, establishes a largely blank elevation; however, the discreet and almost 'obscured' entrances to the hall itself and to the residential block above it are understated.

[In response, the applicant comments that the scale/nature of the treatment of the community building façade and entrance is felt to be completely appropriate for a building of this typology.]

The CDG comment in response that the design and treatment is poor, uninspiring, and fails to enhance the local distinctiveness of the area or the city. The applicant might conclude that the sports hall typology, and its architectural treatment, is not appropriate in this location if its design cannot improve the character and visual amenity of it.]

Height, Scale and Massing

Policy DM27 states: The height, scale and massing of the proposed development should be appropriate to the immediate context, site constraints, character of adjoining streets and spaces, the setting, importance of the proposed development and the location within the townscape. For this proposal, it is considered the height, scale and massing is inappropriate for the following reasons:

With regard to the northern block, the scale of the building at ten to thirteen-storeys along Prewett Street; plus nine to thirteen storey along Somerset Street; would create a negative environmental impact when overbearing and overshadowing the neighbouring residential blocks (see pages 16 and 19 of the Daylighting/Sunlighting Assessment report for Magdalena and Corinthian Courts respectively).

[In response the applicant comments that the proposed main residential building has a similar massing to post war blocks and is set out with similar building face to building face distances.]

The CDG comment in response that this is incorrect; the post-war buildings are narrow slab blocks designed not to impact on key views of St Mary Redcliffe. The proposed structure is a deep, wide, tall tower that sits immediately across one of the viewing corridors that the original designers sought to celebrate. The post-war buildings have much more generous distances between tall blocks or are sited to remove direct views between flats.]

Locating the proposed building on the highest part of the Redcliffe ridge exacerbates the scale of the building and increases the adverse impact on a number of key views, particularly with regard to its relationship with St Mary Redcliffe Church.

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[In response the applicant comments that the highest part of the massing coincides with the corner of the block and entrance point, which is a conventional and well established arrangement and relationship.]

The CDG comment in response that the increase in height over the corner of the site exasperates the poor relationship with the Grade I Listed building. This coincides with the topographical highpoint of the Redcliffe ridge making the impact of the building height far greater than any of the surrounding blocks. This is a poorly considered location for a tall building. The applicant has provided no further evidence to convince us on these points.]

The quality and amenity value of the proposed raised courtyard should be further considered. Although the south facing 'U' shape form of the building footprint would allow sunlight to penetrate the space, the proportions of the space to the scale of the building raise design concerns particularly with the potential for an adverse micro-climate.

The degree of enclosure that would be created between the northern and southern blocks along the public pedestrian street, at just 5m wide, is not considered acceptable. The outlook of apartments on upper ground floor and first floor at this southern corner will be severely compromised. In fact, all the flats at the end of the south west wing will be affected by both the massing of the large sports hall and the residential block on the top of it, due to its height and proximity.

[In response, the applicant comments that all the proposed apartments meet daylight/sunlight amenity requirements, and apartments to that area of the main building are dual aspect and so are not limited in their outlook.]

The CDG comment in response that the comment made concerns outlook and amenity, not adequacy of daylight. The relationship between units in the proposed blocks is poor.]

Design of New Buildings:

The proposal departs from what is established within Policy DM29: New residential development should provide dual aspect where possible, particularly where one of the aspects is north-facing. Due to the depth of the proposed footprint and its shape, 74% of the proposed apartments, 130 out of the total 174 on the northern residential building are single aspect. This is unacceptable in design terms and raises significant concerns with the approach that has been taken. Furthermore, the internal layout and circulation are also compromised, with only one entrance and little opportunity to achieve natural light or ventilation within the proposed cores and circulation areas.

[In response the applicant comments that natural daylight is introduced to the cores at a number of levels by means of glazed doors and into roof terrace areas. Whilst there is one entrance (on the focal corner junction of Prewett / Somerset Street) the building has two internal cores and as such each core effectively serves a limited number of 6-7 apartments.]

With the extensive glazing to façade treatment the apartments will be well served with daylight levels, plus significant balcony/terrace provision.]

The CDG comment in response that the applicant's comment fails to understand the benefit of dual-aspect units and assumes it relates to the quantity and quality of light. Cross-ventilation and liability are neglected in the applicant's response. This point also ignores the highly damaging impact on existing homes around the proposed site.]

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The reasoning expressed in the description of the elevational treatment in the Design and Access Statement, pages 21 and 22, does not justify the design approach: the northern block is a bulky building that inappropriately sits at this corner. The attempts to reduce the visual scale of the building through the application of vertical and horizontal splits or the use of a variety of material treatments do little to alleviate the scale and negative impact of this proposal.

[In response the applicant comments that this is a very subjective comment, and that the building composition has 'base, middle and top' elements with a clear architectural rhythm, which establishes a relationship with the framed nature of post war blocks.

The CDG comment in response that design considerations cannot be limited to creating a “base, middle, and top” of a building; providing a building with these elements does not automatically qualify as an adequate or appropriate design solution. The erratically stacked massing and arbitrarily scattered balconies on the principal facades create a chaotic appearance without the “clear architectural rhythm” suggested. These do little to break-up the monolithic scale and massing of the main building.]

The way in which the proposed corner block relates to the ground floor and the skyline is challenging within this context. The over-sailing towards the corner along Prewett Street, which on a closer revision of the floor plans, overhangs the entire public pavement is unjustified. On the upper floors, the random stepping down of the form does not result in a well-thought and elegant sculptural design which the prominence of the building would demand.

[In response, the applicant comments that the design does create a visually interesting junction at ground floor level and a connection to roof level via the vertical form of balcony structures.

The CDG comment in response that this is subjective and they consider the design remains poor.]

Density:

It is acknowledged that density is only a measure. It is a product of design, not a determinant of it. However, it is important to consider the area on which this proposal is developed. When considering the real 0.25Ha developable area at this corner site rather than the 0.58Ha shown within the red line boundary, the resulting density is of 784 dwellings per hectare. The scheme therefore results in an overly high density figure compared with the surrounding neighbourhood (72dph). This type of development intensity brings into question the quality of the offer, especially in its physical, social and economic context.

[In response, the applicant comments that the density/site area rationale was set out in the pre application and not commented on by the City Design Group. Comment is also made that the playground / community garden area forms part of the site and contributes towards the amenity of the development.

The CDG comment in response that serious concern was raised at pre application stage over the scale and density of the proposals.]

Whilst there is some scope to increase density on this site any proposal will need to demonstrate excellent urban design quality and outstanding architecture in response to a highly sustainable location. As demonstrated in the comments above, the scheme has not risen to this challenge.

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Summary:

The submitted application does not comply with the Core Strategy Policy BCS21 or with the design considerations established in the Development Management Policies.

The intensity of the development is excessive resulting in the height, scale and bulk of both blocks having an adverse impact on its local context

Conservation:

The Conservation comments are included within Key Issue E.

Landscape Design:

As a result of the issues raised by the Urban Design Officer in relation to street layout and scale the scope within the public realm for landscape proposals to provide mitigation of adverse impacts along Prewett Street, Redcliffe Meads Lane and Somerset Street are limited. The proposals for incorporating small trees in planters will not compensate for loss of mature trees on the Prewett Street/Somerset Street boundaries and will do little to soften the scale of development in these views. The prevalence of mature trees within the public realm is a feature of this area and this aspect of the design illustrates a poor response to the site context. The loss of mature trees across the site raises issues of the adequacy of proposals to satisfy the requirements of the Bristol Tree Replacement Standard. Within the context of the comments above the objection to development raised by the Arboriculture consultant (Planning) are supported (see below).

The proposal to address the design of both the Community Garden and Children's Play area in association with input from local residents is welcome, but there is little information supplied within the submitted landscape strategy with regard to how this will be achieved or timescale for resolution. These aspects of scheme approval and implementation could be subject to condition requiring their submission prior to commencement of the development on site.

With regard to the courtyard and communal space proposals the comments made by the Wildlife Conservation Officer are supported; the proposals rely too much on the use of artificial grass surfaces and a far richer environment, both in terms of visual and wildlife benefit, could be achieved using green roof techniques. Further, and again as stated by the Wildlife Conservation Officer, images provided for the appearance of the development from street level are potentially misleading; such verdant growth will not be achieved and maintained at such an elevation without significant topsoil provision and intense maintenance – issues of cost, sustainability and climate cast doubt on such growth being achievable.

To conclude, the limitations of the landscape proposals arise from issues identified in areas of the concept and are detailed above. The advice contained within the combined CDG comments to refuse the application is therefore supported here.

Ecology

Only an ecological summary document appears to have been submitted. As advised for the pre-application 17/04925/PREAPP the full Preliminary Ecological Appraisal ecological survey report should have been submitted.

The Ecology Survey dated August 2017, which was carried out in July 2017, recommends that further bat surveys are undertaken. These further bat surveys do not seem to have been

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submitted. In accordance with central government guidance, and as advised for the pre-application 17/04925/PREAPP these bat surveys should be undertaken prior to the determination of a planning application and not conditioned.

Accordingly objections are raised to this planning application.

Further comments are submitted detailing recommended conditions in the event of the application being consented.

Tree Officer Comments:

Following review of the arboricultural report prepared by Andrew Day Arboricultural Consultancy and other supplied information in support of this application the following comments are made:

The proposals require the removal of 17 of the 23 trees on the site 6 of which are categorised as B using the BS5837 cascade chart for tree quality assessment. They also appear to be BCC assets. Of the 6 trees proposed for retention there are 2 of a significant size and they will require significant pruning due to the close proximity of the proposals and will likely require removal in the long term as a result of the proposals.

The collective loss of these trees will have a significant impact on, and will be to the significant detriment of, the visual amenity of the area.

Core Strategy policy BCS9 requires an appropriate type and amount of new or enhanced green infrastructure to be incorporated into new development. DM15 requires that the provision of additional and/or improved management of existing trees will be expected as part of the landscape treatment of new development. DM17 requires that all new development should integrate important existing trees. DM17 also requires that where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided, in accordance with the tree compensation standard. There are no such Bristol Tree Replacement Standard calculations presented within the report or any detailed tree planting proposals.

In summary I am opposed to the proposals on the grounds of excessive tree loss and insufficient supporting arboricultural information, and due to the lack of BTRS calculations and the lack of any detailed tree planting proposals.

Transport Development Management:

The application is unacceptable in its current form for the following reasons:

- The proposal worsens passenger transport facilities through the removal of a bus stop contrary to policies NPPF part 4, BCS10 and 13, DM23
- The application fails to demonstrate effective waste collection facilities contrary to BCS10 and 15 and DM23 and 32
- The proposals for cycle parking provision are inadequate contrary to NPPF part 4, BCS10 and 13, and DM23
- No additional car club provision is provided contrary to NPPF part 4, BCS10 and DM23
- The proposal has failed to demonstrate adequate loading and servicing facilities contrary to policies DM23 and BCS10

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· The proposed planting and buildouts shown in the highway create obstruction, create an excessive highway maintenance burden, do not create an acceptable public realm and are considered unsafe contrary to policy NPPF part 4, BCS10 and DM23 and DM27

Principle

The proposal is for the following:

- 196 dwellings - 1 bed (102) and 2-bed (94)
- 346 m2 retail
- Community building, gardening space and play area

The principle of residential use is acceptable.

Local Conditions

The site is located on a strategic pedestrian link between Redcliffe Hill major transport corridor, and Temple Meads Station and the Temple Quarter Enterprise Zone (TQEZ). It is comparatively well provided for by passenger transport facilities and employment, and nearby services and facilities. It is within the Redcliffe Residents Parking Scheme.

A bus stop serving the 506 service, the only route penetrating this part of Redcliffe, is sited on Somerset Street adjacent to the site. This serves this route in both directions and runs between Totterdown and Broadmead.

A number of accidents have been recorded in the wider vicinity of the site, but it is unlikely that the proposals will directly impact on any existing conditions.

Trip Generation

No trip rates have been submitted within the Transport Statement, as the development is proposed to be car-free.

A quick analysis of TRICS database would indicate that there would be over 1000 people movements per 12 hour day associated with the site.

The applicants have made assumptions from census data to estimate that 63% of journeys to work would be on foot, and an additional 4% by bicycle. Other commuters would be travelling by public transport or car sharing. This means that all commuters would be using the footways directly outside the building to make their journeys.

Further to this, the journey to work census data does not include those who are not in employment. In his catchment, this accounts for 40% of the occupants, many of whom will be reliant on walking, cycling and public transport.

It is therefore essential to ensure that there is an adequate provision for pedestrians and accessibility to passenger transport infrastructure and cycle routes.

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Impact

There is likely to be little impact on traffic arising from a car-free development, in terms of congestion and vehicular trip generation. However, the applicants have not adequately addressed the impact on the future residents of this site in terms of walking and cycling.

The footways proposed around the frontage of the site in Prewett Street have been widened to accommodate additional pedestrian movements. There is a pinchpoint to the frontage where the proposed buildout and planter are proposed. This should be removed.

Access / Visibility

No vehicular access is proposed. Pedestrian access to the main residential block is from Prewett Street, and an additional footpath from Prewett Street and Somerset Street provides for access to the community building and additional dwellings. It is essential that this footway is wide, well overlooked and appropriately lit for safe and convenient pedestrian access. The footways to the rear of the site and the community building / residential development have little natural surveillance at ground level and would be likely to be intimidating to walk along.

The retail unit fronts Somerset Street. It is proposed that all deliveries approach from Clarence Road, although this cannot be controlled.

Layout

Prewett Street

The removal of the building line created by the former pub is welcomed on transport grounds, as this opens up the area for a direct and well surveilled pedestrian route.

The widening of the footways to allow for increased pedestrian movement is welcomed. Widths are well over the minimum effective width around the frontages (varying between 2.5m and 3m) which will allow for the increase in pedestrian movements. Ideally 3m would be provided around each frontage.

The historic road alignment has been maintained. There is no requirement for this. This serves no purpose and is not favoured by the Highway Authority.

There is a proposal to install planted areas to the frontages to delineate the layby and another planter along the frontage on Prewett Street which narrows the footway unacceptably. No maintenance regime or commuted sum is identified or agreed for these and this cannot be accepted without such agreement.

The planter in Prewett Street and the associated buildout is not deemed necessary. The buildout merely serves to make it more difficult to access the parking bays to the frontage and removes potential loading space to the frontage. Ideally the kerbline would be straightened, a continuous 3m footway provided with disabled parking, loading and car club spaces provided. To reduce traffic speeds a series of speed tables or similar would be introduced in Prewett Street to reflect a change in environment and provide an improved public realm befitting a development this size.

The proposed layout is inadequate in its current form and does not provide a satisfactory public realm to provide for pedestrians or servicing requirements.

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Somerset Street

A layby for the retail unit in Somerset Street is shown. It is proposed that this is accessed from Clange Road only, but there is no means by which this activity could be controlled.

The back edge of the footway line should continue in line with the back edge of the footway to the south of the site in Somerset Street to allow for adequate pedestrian facilities for a development of this size.

Any balconies overhanging the highway would be subject to a highway licence agreement.

The existing bus stop would need to be retained and upgraded to include raised kerb and capacity for RTI. Any works on the public highway and highway to be offered for adoption would be secured by a Grampian condition and subsequent s278 agreement. Further to this a contribution to install a shelter for the bus stop would be sought.

Any areas for adoption which are not yet adopted highway will need to be shown on a plan.

A contribution for a Traffic Regulation Order will be required to make amendments to waiting restrictions – £5395 would be secured under the s278 agreement.

Car parking

No parking provision has been made other than an on-street parking bay for a disabled resident.

There is some concern expressed by local residents about the lack of parking provision, and impact on on-street spaces.

The Local Plan outlines maximum parking standards, and developments which fall under this maximum standard are not considered unacceptable, if it can be demonstrated that there will be no safety concerns associated with inadequate parking provision.

The site is within the Redcliffe Area Residents Parking Scheme. The surrounding parking bays are short stay pay and display or permit holders only during the day. This development would not be eligible for parking permits. Parking outside of the bays is prohibited and can be enforced. Therefore any parking on-street can be effectively controlled to reduce issues about safety.

The loss of the vehicular access onto Somerset Street will allow some replacement parking to be provided to mitigate the loss of parking associated with the proposed loading bay.

The site is very sustainably located and it would be possible to live in this area without a car. Furthermore, the intensive development in the Temple Quarter Area and current congestion would not lend itself to additional traffic arising from housing development.

As this is a car free development, residents of this development would not be eligible for parking permits and as such would not be able to take advantage of any on-street long stay parking.

However, there will be a potential impact on parking in the evenings, as residents without permits use the parking bays unrestricted. This will be an inconvenience to existing residents who currently use this parking. There is an opportunity to review and revise parking provision in the surrounding area, but this has not been fully addressed by the applicants.

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Car Club

The existing car club space has been retained and repositioned.

An additional car club car and space would be expected to be provided by a development of such a size, and free membership provided for the residents of the development. This would allow the existing residents to make use of the existing car club, and the future residents to have additional facilities, on which they would be highly reliant. The provision would be expected to be the subject of a condition, and the applicants should be aware that securing a car club car would be at their cost.

Currently the lack of provision of such a facility is unacceptable.

Cycle Parking

The applicants have proposed 288 spaces for residents and 32 spaces for visitors. Cycle parking would be accessed separately from the main residents' access. Visitors' cycle parking is accessed separately in a different storage area. A further 6 spaces are proposed outside the retail unit on a buildout.

The cycle parking proposed is all two tier stacking units. Bristol City Council's cycle parking guidance for developers requires all cycle parking to be Sheffield type stands as these are the simplest and most accessible cycle parking available. Two tier units are not suitable for smaller bicycles, or those with equipment such as child seats, panniers etc and can be difficult and cumbersome to operate.

However, it is acknowledged that in large developments, the number of cycle parking spaces required within the Local Plan can be very space hungry. Therefore, since the adoption of the latest minimum cycle parking standards, on all previous developments in the City Centre it has been allowable to provide an accessible space for each unit, with the shortfall made up of good quality two tier stacking units. Therefore there should be 196 accessible (Sheffield type stands) with the remaining spaces required provided as two tier units. The current arrangements are unsatisfactory and would not be permitted.

Loading

The proposed loading bay in Somerset Street displaces the existing bus stop. An alternative provision has not been made. This is unacceptable. The bus stop provision should be retained /relocated as outlined above, and enhanced to a suitable standard.

Additional loading facilities should be provided for the residential use. As a car-free scheme, residents will be much more reliant on deliveries. The lack of appropriate loading would result in parking inappropriately on footways or causing obstruction. Further provision within Prewett Street will be required.

No loading facilities have been demonstrated for the community use. This should be clarified.

Refuse collection and storage

Refuse will be stored within a central refuse storage area. Refuse is proposed to be collected from Somerset Street using the same loading bay as the retail unit.

The collection point from Somerset Street is too far away from this area to allow for collection.

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This will not only result in refuse containers being left on the highway after collection, but will also mean that the servicing bay in Somerset Street will be in use for lengthy time as refuse operatives have to travel to and from the area for collection. The result will be obstruction of the footpaths as refuse containers are presented for collection. This is not an acceptable arrangement for such a high quantity of refuse containers.

The refuse storage for the community building and accommodation is much too far for collection from the highway and is not acceptable, for the same reasons as above.

Refuse storage and collection must be resolved prior to any determination.

Further to this, a Servicing Management Plan would be expected to indicate hours for refuse collection, deliveries, and loading facilities for the residential use. Whilst the final plan could be secured fully by a condition, an indicative arrangement should be provided to ensure that adequate physical provision can be made prior to any approval. The current arrangements are unacceptable

Travel Planning

The Travel Plan is not in line with the Council's required template. It has been forwarded to the Travel Plan officer for comment.

Construction Management

A construction management plan would be secured by a condition on any approval and would be expected to cover highway network management issues thoroughly, particularly with regard to times of construction / deliveries.

Community Officer Comments:

Comments are restricted to the principle of providing new community facilities in this location.

Need for new community facilities:

I'm not aware of an acute need for more facilities to meet the needs of the local community. That is not to say that the local community would not like more/better/newer facilities. The area currently has some facilities, but the majority of these are relatively small and spread over several sites within the wider Redcliffe area. Generally speaking, the community facilities proposed in this application would be well in excess of the scale of facilities expected to serve the needs of the local community.

Demand for new community facilities:

I'm not aware of any major demand from local residents, but Prewett Street's central location means that there would very likely be a high demand for affordable community and/or community sports facilities from people who live outside the local area. The central location will simply drive demand, with people/organisations attracted to it because it is easy to get to. I cannot comment on the demand for sports facilities in this part of Bristol and would suggest that colleagues in Health/Sports are consulted on this aspect of the proposed scheme.

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Deprivation:

This part of Bristol still has relatively high levels of multiple deprivation. The area is densely populated and contains a large number of flats, whose occupants don't have much space and often rely on external community facilities to a greater degree than residents in houses with gardens or in lower density areas. This is one of the reasons why many of the BCC-owned blocks of flats were constructed with communal facilities, eg laundry rooms, communal gardens, common rooms, community halls, etc. Some of these existing facilities have been closed or changed into another use over the years, rather than preserved to provide 'community space' for nearby residents.

Continued use:

The main issue for me would be how the 'community use' of such a new facility could be safeguarded in perpetuity. For the facilities to be meaningful to the local community, they would need to be easy to book/hire, available at an affordable rent (comparable to other facilities in the area), fully accessible to disabled people, and managed by an organisation that is either a community organisation, or that fully understands how a true community organisation should function, in order to respond to changing, local needs. Many paid-for activities in community centres, eg yoga/fitness/sports classes, child care facilities, 'slimming world' type services, etc. are able to pay much higher hire fees than general, local community activities. Their access to affordable, centrally-located facilities is likely to price local activities out of the market, which would disadvantage the local community. To safeguard against this, I would recommend that the lettings policy for the new facilities makes special provision for local hirers/activities to ensure that the local community will always have access to the new facilities, for example, through priority booking.

Impact on existing, nearby community facilities:

Sometimes, 'more' can amount to 'less'. There is a risk that a large, new community facility could adversely affect the viability of existing facilities in the Redcliffe area. This would be especially true if the new facilities were offered at a low rent initially, in order to attract new users. If the owner of the new facilities could sustain low-cost lettings for an initial period, community facilities operated by other organisations could lose users and could easily close down - most community-based organisations barely make ends meet and would be unable to continue to operate if many of its users were attracted to new, cheaper facilities nearby. Communities would be severely impacted if prices at the new facilities were then increased after the initial period, after other facilities nearby had closed down.

Summary:

Additional community facilities in Bristol would normally be welcome, but the offer in this particular case seems unusual in its scale. It is extremely rare for new community facilities to be created in the current economic climate. I cannot help but question the unexpected and unusual nature of the proposed facilities and wonder if a smaller amount of space might suffice. Perhaps the local community would be better served by a larger amount of social housing and a smaller amount of 'community use'?

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Sports Development Team:

What sports would the new sports / community building be able to accommodate? For example, is the ceiling height suitable for badminton? What facilities are proposed inside it? A gym? A multi-purpose space? What type of floor etc.? Without this information we cannot comment whether the new facility is an improvement on the existing basketball “court” or not.

As a facility, it is somewhere between a MUGA and an informal play space. It is not included in the Council’s Sports and Active Recreation Strategy, but Sport England would still deem it a sports facility and expect the proposal to meet the criteria set out below.

These informal areas (the basketball court area) are a consideration under para 74 of the NPPF:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Para 74 is consistent with Sport England policy:

Sport England therefore considers that the proposal conflicts with our national policy on the loss of sports facilities. Should redevelopment be unavoidable, an equivalent (or better) replacement facility should be provided in a suitable location.

We have no information on how much the basketball court is currently used, therefore demand would be best estimated on population density. In general, due to the central location, there is a high population (that would increase with this proposed development). Supply of sports facilities in this area is dominated by St Mary Redcliffe School. In terms of outdoor provision on site they have two tennis courts and a small 3G pitch. They also have a sports hall and a swimming pool.

The issue is with accessibility of these facilities for / by the immediate local community. We do not monitor this and might need to ask the school for comment. If the school do not allow a good level of community use then there is an issue with facility provision in the immediate area.

To comment further requires more specific information on the proposed community facility.

Sustainable City Team:

Key Policies:

BCS13: Climate Change:

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All new development should be designed with the future climate in mind through climate change mitigation & adaptation techniques.

Mitigation

The proposals include good energy efficiency, connection to the heat network and solar PV, which is supported. Further information is required before the CO2 savings can be verified (see comments below under BCS14)

The proposals include a good level of cycle parking both for residents and visitors and users of the community facilities, which is supported.

The proposal for the development to be car-free is supported, as is the proposal to include a car-club bay within the development.

Adaptation

BCS13 requires development to include site layouts and approaches to design and construction which provide resilience to climate change.

Overheating ...

Surface water run-off

The proposal that pre-development run-off rates will not be exceeded is supported.

Green infrastructure

The proposal for green roofs is supported.

BCS 14: Sustainable energy:

Calculations

It is not clear that the calculations have been carried out in accordance with the planning policy as a number of conflicting statements appear to be included in the energy statement.

Heating systems

The development will connect into the district heat system in accordance with the BCS14 heat hierarchy.

Renewable Energy

As noted above, it is unclear whether sufficient PV has been provided to meet the 20% policy requirement.

BCS 15: Sustainable Construction:

The sustainability statement sets out an appropriate approach to waste & recycling, water use, materials specification and green infrastructure.

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Flexibility and adaptability

It's not currently clear how the proposals address the policy requirement for the development to be flexible and adaptable to future changes in use.

BREEAM

As a super major development in the central area, this development is required to achieve a BREEAM communities 'excellent' rating. A BREEAM communities pre-assessment has been submitted identifying that this should be possible.

Pollution Control Team

I've had a look at the application and the acoustic report submitted with it and would comment as follows:

The acoustic report deals mainly with the existing noise climate at the site and how the residential part of the development will be suitably insulated against noise. I would confirm that I am happy with the reports approach and recommendations.

The report mentions noise from the commercial and communal parts of the development and noise from plant rooms but says that it will be ensured during the design process that it will be suitably mitigated. I would therefore need to see conditions to provide further information regarding this mitigation and control over commercial activities. I would also ask for a Construction Management Plan with regards to the potential for noise and other nuisance from demolition and construction activities at the site.

Flood Risk Team:

The drainage strategy submitted is suitable in principle, however, more information regarding the proposed attenuation is required. This can be obtained by imposing a condition.

Land Contamination:

The accompanying desk study prepared by Hydrock identifies a number of areas of potential concerns that will need intrusive Phase 2 investigation. Geo-technically it will be important to establish whether or not any voids are present beneath the site in the Redcliffe sandstone.

The desk study also includes a basic assessment for unexploded ordnance and identifies this site as being high risk, therefore prior to any demolition, intrusive investigation and commencement of development a minimum of a further risk assessment is required.

Conditions are recommended to cover these matters.

Air Quality

There are no air quality related concerns associated with this development proposal. During the demolition and construction phases there is a potential for issue related to dust arise. As a result,

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there will be a requirement for a dust management/CEMP plan to be conditioned in order to ensure that these impacts are mitigated in line with Institute of Air Quality Management Guidance on the Assessment of Dust from Demolition and Construction (Institute of Air Quality Management (IAQM)), February 2014.

EXTERNAL:

Historic England

Summary

Historic England are of the view that the development would be highly damaging to the setting of the Church of St Mary Redcliffe, a Grade I listed building that is a defining image of the City. We object to the proposals and recommend that planning permission should be refused.

Historic England Advice

St Mary Redcliffe is of 12th century origin with successive phases of alteration through to the 20th century. It is one of the most spectacular examples of Perpendicular Gothic architecture in the country, a style characterised by vertical emphasis and proportion. It remains the tallest building in Bristol due to the height of its spire, which was rebuilt in 1871 over 400 years after the original spire had been destroyed in a lightning strike. Despite the scale of nearby postwar housing blocks, St Mary Redcliffe continues to dominate the surrounding townscape as it has for over 800 years. It is of exceptional architectural and historic importance, and its setting strongly contributes to its significance.

The parish of Redcliffe suffered terrible destruction during the Second World War, and while the church survived the onslaught much of the surrounding townscape was destroyed. The area was comprehensively rebuilt in the postwar era, incorporating several large blocks of public housing. These were designed with some sympathy to the setting of the church, preserving key views of the building without intrusion into its Gothic silhouette, partially due to their being set some distance away from the church to provide it with a visual buffer.

The proposed development utilises a vacant piece of land currently partially occupied by a derelict pub of probable 18th century origin. The proposed structure is a large building with a complex geometry and varied roofline. However, the scale of the building means that it will have a severe harmful impact upon the setting of St Mary Redcliffe. In views from Redcliffe Way the proposed building will be considerably in excess of the established building heights in the context of the church, rising above the height of its 14th century lady chapel in certain views, removing the ability of the viewer to experience its exceptional silhouette without encumbrance. A key view of the church spire from the Wells Road will be lost entirely; when travelling from the junction of the Bath and Wells Roads towards Temple Meads the spire of the church can be seen and appreciated, signposting the edge of the city.

The design of the building is a source of regret. The complexity of form puts it at odds with the geometric simplicity of existing large housing blocks at Redcliffe, and the assertive nature of its appearance presents a challenge to the Grade I listed church, which we firmly believe should retain its visual primacy in the townscape. This is not architecture that respects its surrounding context,

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and in this regard we suggest it fails the National policies of NPPF paragraph 58 on requiring good design.

However, fundamentally the proposed building is too big for the site. We recognise a building of some scale can be accommodated here, but it should not be visible above St Mary Redcliffe and not screen key views of its spire. We recommend the building is reduced in height significantly. Ideally the unlisted pub building should also be retained; although dilapidated its domestic scale is now an unusual feature in Redcliffe and it serves as a visual reminder of the area's prewar character.

The scale and mass of the proposed building means that it would be prominent in the wider townscape. There is clearly a negative impact on the character and appearance of the Redcliffe Conservation Area of which St Mary's forms the focal point, but there are also wider impacts on other conservation areas. The proposal would appear above the listed townhouses of Redcliffe Parade, part of the Redcliffe Conservation Area but visible from the City Docks and City & Queen Square Conservation Areas.

We have no doubt that there are wider public benefits associated with this proposal that it is not for Historic England to pass comment on. We of course support the regeneration of Redcliffe and the provision of affordable housing. But this should not take place at the expensive of disfiguring the setting of one of the defining buildings of Bristol. Heritage assets make a vital contribution to the character and distinctiveness of the City, and harming the setting of a building of this stature and significance would be a sleight not just on the Grade I listed church but on Bristol itself.

NPPF 132 reminds us that "great weight" should be given to the conservation of heritage assets when considering the impact of proposals, and that the more important the asset, the greater that weight should be. In this context, we respectfully remind you that this is a Grade I listed building, the very top of the table in terms of heritage assets.

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 your authority 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 in determining the application.

[The applicant's response to these comments, together with a further response from Historic England is appended to this report.]

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Crime Reduction Unit

Concerns for new development Bell/Auction rooms Redcliffe

Redcliffe is a deprived area with many people living there with mental health issues, drug and alcohol problems.

There is currently a very limited CCTV coverage in place by Bristol City Council cameras on the Redcliffe estate and the surrounding flats. The cameras within the block are not monitored correctly by an estates team or control. The area needs improved coverage: the CCTV currently in blocks in Redcliffe: Proctor; Patterson; Yeaman's; Eaman's and Broughton House, is currently only watched by residents and is not linked to a recorded system.

In the past, drug dealers have used the cameras to watch police and know when police are in the building.

The blocks currently attract drug dealing, there is a busy market from both south Bristol and the existing issues in Redcliffe.

There are lots of homeless people sleeping rough in the existing blocks. They gain access by tail-gating and using coded door systems. They have been found by Bristol City Council caretakers in all the surrounding blocks, they are getting in the bin rooms and on stairwells and we get lots of issues and complaints about this problem.

The Basketball Court

There have been a limited number of Anti-Social Behaviour reports concerning the basketball court. Cannabis has been smoked there but there have been no recent reports of any trouble.

Children use the court before and after school hours. Redcliffe is a deprived location and there are very limited free recreational areas for children. Currently the basketball court is the only leisure / recreational free space on the estate.

Who will the new community building be used by? i.e. existing children and young adults within Redcliffe or for the new residents of the development. How will access be gained? Will there be a cost for using the facilities to maintain the court/area.

The children's play area between the auction rooms and Proctor House is also very well used by young families.

Additional comments from the Beat manager who also patrols this area:-

I have spoken to the Council regarding this matter and they are more opposed to having the Basketball Court built on than anything else. They say they are concerned about losing community space which is important to the local residents.

Redcliffe is suffering from a large drugs problem. Both dealing from flats around the area, and users coming from all over Bristol to buy and use in the location.

The flats in Redcliffe have front and back access. The back access is not necessary and is used by drug dealers to deal the drugs and then the users sit on the stairwell and use as a place to inject. One main entrance is more than adequate. This would create a less appealing situation for the dealers.

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Many of the flats currently have CCTV cameras in the main entrance and the lifts. This is not recorded and it is not possible to playback and view. It is purely available for the tenants to view on their TV's. However, it is only used by the dealers who watch when Police are entering the buildings and it gives them time to discard/hide any drugs they have. This serves no benefit to the majority of the community who do not have any need to watch it. So I would advise no CCTV necessary in the flats themselves, unless we can view and record.

We currently have a few Council CCTV cameras in Redcliffe which can be viewed live from the Council CCTV control room which can be used for operations. Some of them however, could be in better locations. I would be considering asking the developer to invest in some new cameras and allow us to have a say in where they are placed around Redcliffe so we can use them to our advantage. This would act as a deterrent to some, and allow us to gather best evidence in other circumstances.

[A subsequent meeting was held between the applicants and the Police, however, there are no details of an offer being made by the developers to provide additional cameras.]

I recall there being a large cycle rack on the plans. We just need to make sure that a quiet dark spot (under cover) is not being created for ASB/drug dealing that is out of sight.

Other comments:

- The proposed height of the building 12 floors is far too high for this area I understand there is a high shortage of housing in Bristol but consideration must be given for the existing residents. Sunlight deprivation would be experienced in several buildings around this site. The supporting document regarding the sunlight BRE (Building Research Establishment) re the APSH (Annual Possible Sunlight Hours) shows that Magdalena Court and Corinthian Court were below the recommended amount. There are a large number of tenants who need sunshine to help with their mental health problems, additionally children living within these blocks that are unable to get out on a daily basis need good levels of sunlight. I therefore strongly recommend this building be no higher than six (6) floors high.

[Following a subsequent meeting with the applicants, the Police have withdrawn their objection to the height of the building.]

- As mentioned by both Police Officers, the children's play area is very important, additionally the children's play area needs to be updated and the basketball court should stay. However, the proposals include an indoor community/sports building on the site of the court. Will this be free? For the existing residents, my concern is that if the answer is NO, then it will not get used by the local residents. In fact, it would probably end up being an eyesore with graffiti and criminal damage as the ownership would not lie with the local community. I understand there are costs implications for the running and maintaining of the building, but the residents would not be able to use the facility if costly, so consideration must be given to how this is going to be managed if built.

[Following a subsequent meeting with the applicants, the Police are satisfied with the response given to questions on how the sports / community building would be used, who would use it, who would maintain it and the cost implications for the residents to use the facility. However, the details of the response have not been recorded.]

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- There are currently blocks of flats in the vicinity that have been poorly designed in terms of crime prevention. For example there are 'dog legs' in the accessways from the front to the rear of the blocks. Elderly residents, along with single mothers could easily become a victim not only in the night time hours but also during the day. Again, I would recommend just one entrance/exit to be designed into the building to reduce residents becoming a victim of crime and additionally to stop an offender escaping police officers after committing a crime.

[The applicants advised the Police that they would apply for the Secured by Design initiative run by the Avon and Somerset Constabulary. This promotes the inclusion of architectural crime prevention measures into new projects.]

- After reading through the objections there seemed to be a high demand for a car park. I would strongly suggest that this does not happen, this area has lots of transport available and creating an underground car park will just open up another crime generating place for the Local Police to patrol.
- With regards to the commercial retail space, there would be a requirement for strong security measures need to be put in place.

Bristol Waste

No comments made.

Sport England

General advice given, no direct comments made.

KEY ISSUES:

For information, any policies quoted in the report with the prefix BCS are from the Core Strategy, DM are from the Site Allocation and Development Management Plan, and BCAP are from the Central Area Plan.

A. IS THE PRINCIPLE OF THE DEVELOPMENT ACCEPTABLE?

BCAP47 'The Approach to Redcliffe' is an area-wide specific policy, which states that it south and west Redcliffe vacant and derelict sites should be redeveloped and seeks design enhancements where possible.

Part of the site is also identified in the Bristol Central Area Plan (BCAP March 2015) as suitable for housing or housing/pub development (reference SA612).

There is no objection in principle to a proposal to include a larger area in this development. Indeed, a proposal to redevelop this blighted site within close proximity to surrounding residential development for much needed housing is welcomed in principle. However, its acceptability will depend on compliance with all relevant Development Plan policies.

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The BCAP also states that regard should be had to additional considerations set out in SPD3: 'Future of Redcliffe'. SPD3 is supportive of development in South Redcliffe, and states that residential uses are sought along Prewett Street with secondary uses such as retail, education and community facilities.

B. IS THE TYPE, MIX AND AMOUNT OF HOUSING ACCEPTABLE?

i. Type and Mix of Housing

BCS18 states that new residential development should contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities, and help to redress any housing imbalance that exists.

BCAP3 states that throughout the city centre new homes will be expected to contain a proportion of family sized homes, including flats with three or more bedrooms. The policy goes on to state that in defining the proportion of family sized homes that will be sought, regard will be had to the existing housing profile of the area, including local housing requirements and the characteristics of the site, including its suitability for different housing types.

The proposed scheme consists of 106 one bedroom flats and 90 two bedroom flats. The site is located within the Redcliffe South Lower Super Output Area, within which some 44% of dwellings are one bedroom and 47% two bedroom. Given this existing concentration of smaller units, a development of the size proposed should include a proportion of 3 bedroom units to provide for a greater mix of households to help address the imbalance. (Advice to this effect was provided at the pre application stage.)

In terms of tenure, it is noted that within Redcliffe South just 9% of households are owned, whereas 89% are rented. Clearly, the development would introduce additional open market housing which would help to re-balance the existing tenure mix within the local area, however, this is not sufficient reason to override the requirement for a greater dwelling mix.

ii. Amount of Housing

BCS20 states that new development will maximise opportunities to re-use previously developed land.

The density of housing on the site would be 784 dwellings per hectare (dph). This has been calculated by removing the children's play area and community garden from the calculation as these are non-developable but were included within the red line application boundary. With the removal of these elements the size of the site is reduced from 0.58 Ha to 0.25 Ha of developable land. This very high figure contrasts markedly with the surrounding neighbourhood density of 72 dph. For comparison purposes, Wapping Wharf has been developed at a density of approximately 200 dwellings per hectare.

While the high density of the development represents an efficient use of land which is encouraged by BCS20, the policy does state that the appropriate density for any individual site should be informed by amongst other things: the characteristics of the site; the local context; the need to provide an appropriate mix of housing to meet demands; and the need to achieve high quality, well designed environments. The proposed development fails to take sufficient account of these matters and this is explored in more detail in several key issues below.

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C. IS THE AMOUNT OF AFFORDABLE HOUSING PROPOSED ACCEPTABLE?

BCS17 requires affordable housing in residential developments of 15 dwellings or more, and in central locations, a 40% target will be sought.

However, the Affordable Housing Practice Note (AHPN), April 2018, was introduced to provide interim measures to speed up the delivery of affordable housing, and to ensure the Council's measures for securing affordable housing were as effective as possible. The guidance introduced a 'threshold' approach, whereby schemes offering 20% on-site affordable housing in central locations would be accepted. The tenure mix expected would be 77% social rented and 23% intermediate affordable housing.

As submitted, the development proposed 20% affordable units which equated to 39 affordable homes. However, the tenure mix proposed was 50% social rent and 50% shared ownership. This was not considered acceptable and the applicants' were advised that for this tenure mix to be acceptable they would have to increase the amount of affordable housing to a minimum of 25%. The applicants' were further advised that for the current 20% level of affordable housing to be acceptable, the tenure mix would need to be revised to comply with the AHPN requirements.

In response, a revised offer has been proposed, retaining a provision of 20% (39 units), of which 30 would be social rented and 9 would be shared ownership, in accordance with the 77% social rented and 23% intermediate affordable housing requirement set out in the AHPN.

It is proposed that the affordable housing would be located across the two buildings, with 20 social rent apartments above the community / sports hall and the remaining 10 social rent units on the ground floor of the main building, together with the 9 shared ownership units on the first floor.

The proposed location of the affordable housing is totally unacceptable as it means that the scheme has not provided a fully integrated affordable housing offer and instead has isolated twenty of the social rented housing in a location above the proposed sports hall. The affordable housing quantum and tenure mix offered is acceptable and now complies with the Affordable Housing Practice Note.

D. IS THE DESIGN AND CHARACTER OF THE PROPOSAL ACCEPTABLE?

Planning Policy Context:

The National Planning Policy Framework (referred to hereafter as the NPPF) highlights that good design is a key aspect of sustainable development (para 124). Further to this, paragraph 127 (c) adds emphasis on requiring planning decisions to ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting. It is therefore clear that the NPPF considers the creation of high quality buildings and places to be fundamental to planning, and planning decisions.

The Planning Practice Guidance (PPG) provides further advice, emphasising the wide range of issues that should be considered when assessing design, including: the local character; safe, connected and efficient streets; greenspaces and public places; crime prevention; security

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measures; access and inclusion; efficient use of natural resources; and cohesive and vibrant neighbourhoods (paragraph 006).

Material to a number of these design issues is the density of the development and its resultant impact on the character of the area. Given the site represents previously developed land, policy BCS20 'Effective and Efficient Use of Land' is material, in that it encourages the redevelopment of sites so development achieves optimum efficiency and higher densities in and around the city centres. Importantly, the policy provides further guidance as to the appropriate density for any individual site, stating that it should be informed by a number of factors, including more design-orientated criteria such as: the characteristics of the site; the local context; and the need to achieve high quality and well-designed environments. This policy is compliant with the NPPF, of which section 11 is the most relevant. Specifically, paragraph 117 of the NPPF states:

Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

Paragraph 122 of the NPPF is also relevant, and supports the thrust of policy BCS20, the paragraph states that decisions should support development that makes efficient use of land, taking into account:

- a. *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b. *local market conditions and viability;*
- c. *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d. *the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e. *the importance of securing well-designed, attractive and healthy places.*

The Development Plan includes further relevant policies, largely design-orientated, all of which are compliant with the NPPF. For example, policy BCS21 'Quality Urban Design' which encourages developments to: contribute positively to an area's character and identity, creating or reinforcing local distinctiveness; promote accessibility and permeability; promote legibility through the provision of recognisable and understandable places, routes, intersections and points of reference; safeguard the amenity of existing development and create a high-quality environment for future occupiers; create buildings that adapt to changing conditions, including environmental conditions.

Similarly, as highlighted in the Urban Design comments above, policy DM26 'Local Character and Distinctiveness' requires development harmful to the character of the area to be resisted. The policy states that development proposals will be expected to have regard to the prevailing character and quality of the surrounding townscape, including the pattern, form and design of existing development. Further to this, the policy expects proposals to: respond appropriately to existing land forms and historic assets; respect the local pattern and grain of development; respond to the

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scale, character and function of streets and public spaces; retain, enhance and create important views into, out of and through the site; make appropriate use of landmarks and focal features; respond to the height, scale, massing, shape, form and proportion of existing buildings, building lines and set-backs from the street, skylines and roofscapes; and to reflect locally characteristic architectural styles, rhythms, patterns, features and themes.

Policy DM27 'Layout and Form' encourages the successful arrangement and form of buildings, structures and spaces. The policy requires a proposal's layout form to: clearly design public and private spaces; utilise active frontages to the public realm; utilise coherent and consistent building line and setback that relate to street alignment; respond to local climatic conditions including solar orientation; and to enable existing and proposed development to achieve appropriate levels of privacy, outlook and daylight. Importantly, the policy identifies the importance of the height, scale and massing of development to appropriately respond to the immediate context, site constraints, character of adjoining streets and spaces, the setting, public function and/or importance of the proposed development and the location within the townscape.

Policy DM28 'Public Realm' requires development to create or contribute to a safe, attractive, high quality, inclusive and legible public realm that contributes positively to local character and identity and encourages appropriate levels of activity and social interaction.

Policy DM29 'Design of New Buildings' is focussed on securing high standards of design quality for new buildings, and to a degree builds on the design principles set out within the discussed policies. The policy requires new buildings to be well organised with regard to internal layout and circulation, and to respond to the solar orientation of the building to support energy efficient design. As a number of other policies have set out, new development should support a high quality of amenity of existing and future occupiers, the policy also resists single aspect units, especially where they are solely north-facing. Further to this, the policy reiterates the importance of new buildings engaging positively with the public realm, and for new development to have appropriate scales and proportions. Unlike the previously discussed policy, this policy also requires development to incorporate green roofs, green walls and green decks that may be accessed and used where appropriate.

The Redcliffe Estate is now considered to represent a non-designated heritage asset, based on the Estate's strong urban design rationale of radial slabs of development within an open landscape setting. As such weights should be attributed to the conservation of its setting in accordance with policies BCS22 and DM31 of the Development Plan, as well as paragraph 197 of the NPPF.

The Central Area Plan regards tall buildings to be those of generally 9 storeys or more, although paragraph 8.24 of the Plan does state that those which significantly change the skyline within the city centre would be considered to be a tall building. The proposal is 12 storeys in height, and would significantly change the local skyline and the skyline of the city centre, and as such the proposal will be assessed against relevant tall building policy (BCS21, DM26, DM27, DM29 and DM30). Detailed guidance on the assessment of proposals is set out in the newly adopted SPD 'Urban Living', which sets out a range of standards designed to deliver high density, high quality homes that are also good places to live. The relevant aspects of the SPD are set out below.

Urban Living SPD:

Urban Living is defined in the SPD as the creation of compact, characterful and healthy urban areas where people can live, work and play with good access to high quality walking and cycling linkages

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and public transport. It advocates making the best use of urban land and building at optimal densities, mixing land uses, and delivery of high quality public realm.

The SPD states that opportunities exist to modestly increase densities within most parts of Bristol. Densities are optimised by balancing the efficient and effective use of land, with aspirations for a positive response to context, successful placemaking, and making quality homes.

The SPD sets out a series of questions to be considered by applicants throughout the design development of a scheme, with a traffic light system used to assess how well the scheme has addressed the question.

The questions concern design aspects of major developments, residential development and tall buildings (defined in the SPD as being at least 30 metres high or 10 or more storeys). Examples of questions include:

Has the scheme adopted an approach to urban intensification which is broadly consistent with its setting?

Does the scheme respond positively to either the existing context, or in areas undergoing significant change, an emerging context?

Is the tall building well located?

Does the scheme make a positive contribution to the long-range, mid-range and immediate views to it?

Does the scheme create a pleasant, healthy environment for future occupants?

Will the scheme be neighbourly, both at the construction phase and following occupation?

Clearly, as the SPD has only just been adopted it was not ready to be used in the way intended to inform emerging proposals for the site. However, the questions raised in the SPD are directly related to the policies set out in the Development Plan and are implicitly considered in the text below.

In addition a full assessment of the scheme against the questions set within the SPD has been prepared and will be issued as a separate paper.

Urban Design Issues:

i. Site Context and Heritage Asset(s)

The site is situated in the Redcliffe Estate in south Redcliffe, which is dominated by the post war development of several high rise residential tower blocks, including Proctor House (to the east of the site), and Broughton House to the south. The area has been appraised and considered in a number of supplementary planning documents (SPD) that are adopted by the Council; hence to understand the area it is important to reflect on how adopted policy documents have viewed the area. The Future of Redcliffe SPD notes that the area is dominated by the radical post-war redevelopment that, whilst removing the historic street pattern, did ensure that the remaining quality buildings now stand out as 'precious jewels', and this is certainly true in the case of St Mary Redcliffe Church, given its spire can be seen from many vantage points, despite the presence of

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the estate. This is largely thanks to these high rise blocks being slender, set well back from the street and being isolated in space and low building densities (page 15). Further to this it is perhaps worth noting that the former SPD1: 'Tall Buildings' (now replaced by SPD 'Urban Living'), identifies that the Redcliffe Estate in South Redcliffe should be seen in distinction to the poor quality post war development in the city, reflecting that the estate has a distinct character and layout which is likely thanks to the estate being designed by the City Architect (see page 13). The estate has also been recognised as a positive example of post war planning in independent publications to the Council, for example H. Barton et al's 'Shaping Neighbourhoods – For Local Health and Global Sustainability'.

The Redcliff Estate is a significant post-war development of social housing. It is now increasingly recognised as an exemplar of architecture and urban planning of the era, one that compares well with other national examples, as is discussed within an earlier paragraph of this section. It was designed with high regard for open space, light and well ventilated new homes, communal facilities, and careful consideration of the sensitive setting of St Mary Redcliffe.

Following research undertaken by the City Design Group due to a number of development proposals in the area, an improved understanding of the Estate's planning, prominent features, and character has led to the conclusion that the Redcliffe Estate must be considered as a non-designated heritage asset. The Conservation Advisory Panel (CAP) also recognise the Redcliffe Estate to have a non-designated heritage asset status, as their comments suggest.

From these appraisals it is clear that there is to a degree a consensus as to the success of the Redcliffe Estate as a high-rise post-war development, and it appears this is largely a result of the slender towers being set in a low density environment, in which the existing site is situated. This character has been retained as a result of development being avoided in close proximity to the existing high rise blocks. Where development has occurred, high density proposals have been avoided, and appropriately scaled buildings have been built, thereby providing the high rise blocks with breathing space that both provides a positive urban character and safeguards the amenity of residents.

The development should therefore respect this existing pattern and grain of development, especially considering its proximity to Proctor House and Broughton House.

ii. Local Character and Distinctiveness

As stated above, the Redcliffe Estate is now considered to be a non-designated heritage asset. The blocks together form an urban character that has been recognised to be a successful example of post-war planning of high rise residential development, and that this is largely due to the low density for which the blocks occupy. Aside from the post war blocks, newer development adjoining the site is at a much lower level, typically 4 storeys in height, such as Magdalena Court and Corinthian Court. With this in mind, it is clear that the scale, massing, pattern and grain of the existing area has not been accurately assessed meaning the character of the area, and site itself has not been understood in a manner that would conducive to a high quality design that responds sensitively to the character of the area.

The development's impact on the non-designated heritage asset must be considered. The concept of the Estate's strong urban design rationale of radial slabs development within an open landscape is compromised by the proposal. The height, massing and scale of the scheme does not respond

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adequately to the context and the urban grain of the Redcliffe Estate and shows no consideration to the character of this distinctive estate.

It is evident from the Cumulative Verified Visual Montage the disregard the proposed scheme has to the design of the wider Redcliffe Estate with its carefully considered plots, building scale and viewing corridors towards St Mary Redcliffe Church.

iii. Layout and Form

The red line boundary provides a 0.58-hectare corner site and suggests almost 150m of frontage equally shared between Prewett Street and Somerset Street. However the area includes the existing children's playground and the community gardens, which are not developable. The scheme locates the new development on two areas which add up to approximately 0.25 hectares: the derelict buildings and car garages areas at the corner to the north; and the informal basketball area between Proctor and Broughton Houses to the south. On the corner, the proposal is for a thirteen-storey building with a 40m x 54m footprint; and to the south, set-back a second building with a 26m x 35m footprint incorporating 5 storeys of residential above a large sports hall structure.

The local context and site constraints have not been adequately considered. For example, the proposals require the removal of 17 of the 23 trees on the site, many of which are important to in contributing to the character of the well-planted green parkland setting of the Redcliffe Estate.

A further non-designated heritage asset is represented by the Eighteenth Century Bell public house, a rare fragment of the historic fabric of the Redcliffe area, and there is potential to recognize this in some form within the design. Preserving and revealing its special interest could have informed the design of the northern block in accordance with DM27, and its omission should have been fully justified. Similarly, the siting of Proctor and Broughton Houses and their setting within the mature landscape should have informed the design of the southern block. As proposed, the shape and geometry of the block and its plot is inconsiderate to its context. Rather than being a welcome addition to the established built form of the blocks and open space between them, it adversely impacts on existing views and is awkwardly positioned without any evident intention of integration.

iv. Streets and Spaces

The corner site with Prewett Street and Somerset Street does offer an opportunity for additional development in this location. However, the proposed northern block is fundamentally an oversized building that fails to respond to the urban grain of the surroundings, ignoring both the staggered building line and the importance of the existing trees at the corner.

The building does not offer a positive interface to either frontage. Facing Somerset Street, the retail frontage would deliver limited activity to the public realm, while on Prewett Street more than half of its façade is effectively a blank wall at pedestrian level.

Similarly, to the existing east-west pedestrian route from Proctor House to Somerset Street; and to the north-south pedestrian route parallel to the children's playground, the proposal does not offer an active or engaging frontage. Given the height of the ground floor windows the proposed scheme effectively results in an extended blank facade along these two routes. This is considered unacceptable in design terms. The proposed residential block should provide an attractive pedestrian environment to new and existing residents.

The sports / community building fails to achieve adequate activity and interest at ground floor level. The sports hall establishes a largely blank elevation, and the discreet entrances to the hall itself and the residential block above it are understated.

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v. Height, Scale and Massing

It is considered the height, scale and massing is inappropriate for the following reasons.

With regards to the northern block, the scale of the building along Prewett Street and Somerset Street would create a negative environmental impact, overbearing and overshadowing the neighbouring residential blocks (see key issue ...)

Locating the building on the highest part of the Redcliffe ridge exacerbates the scale of the building and increases the adverse impact on a number of key views, particularly with regard to its relationship with St Mary Redcliffe Church.

The degree of enclosure that would be created between the northern and southern blocks along the public pedestrian street at just 5m wide is not acceptable. The outlook of apartments on upper ground floor and first floor at this southern corner would be severely compromised. In fact, all the flats at the end of the south west wing would be affected by both the massing of the large sports hall and the residential block above it, due to its height and proximity.

vi. Detailed Design

Policy DM29 states that new residential development should provide dual aspect where possible, particularly where one of the aspects is north facing. Due to the depth of the proposed footprint and its shape, 130 out of the total of 176 residential units in the north block are single aspect. This is unacceptable in design terms. Furthermore, the internal layout and circulation are also compromised, with only one entrance and little opportunity to achieve natural light or ventilation within the proposed cores and circulation areas.

The reasoning in the description of the elevational treatment in the Design and Access Statement does not justify the design approach. The northern block is very bulky and attempts to reduce the visual scale of the building through the use of vertical and horizontal splits or the use of a variety of material treatments do little to alleviate the size and negative impact of the proposal.

In terms of form, the building over-sails the entire public pavement along Prewett Street which is unjustified, while on the upper floors, the random stepping down of the form does not result in a well-thought out and elegant sculptural design which the prominence of the building would demand.
 Summary:

The proposed development does not comply with policy BCS21 'Quality Urban Design', or with the design considerations established in the Development Management policies.

The intensity of the development is excessive resulting in the height, scale and bulk of both blocks having an unacceptably adverse impact on its local context.

E. WOULD THE PROPOSALS HARM ANY HERITAGE ASSETS?

i. Heritage Assets

The heritage assets to be considered are:

Grade I listed: St Mary Redcliffe Church

Grade II listed: Properties along Colston Parade; Glass Cone north of Redcliffe Mead Lane; Redcliffe Parade; Cabot Tower.

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Conservation Areas: Setting of the Redcliffe Conservation Area; Setting of the City Docks Conservation Area

Non-designated heritage assets: The Bell public house; Post-war Housing Committee assets.

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.

Policy BCS22 further states that development proposals should safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including Conservation Areas. Policies DM30 and DM31 express that alterations to buildings should safeguard the amenity of the host premises and neighbouring occupiers, and preserve or enhance historic settings. Section 16 of the NPPF relates to conserving and enhancing the historic environment and is a material consideration.

St Mary Redcliffe church is of exceptional architectural and historic interest. It is of national significance and we are obliged to place the greatest weight possible on the conservation of the building and its setting. The setting is defined as anywhere where the building might be experienced and therefore the spire's landmark status on the skyline is a fundamental consideration in determining planning applications.

With regard to the application site itself key consideration will need to be given to views to the church spire from the Wells Road, where a broad panorama of the skyline opens up on the approach to the city and where St Mary Redcliffe is first sighted. In this panorama the spire has great prominence and has group value with other highly designated assets including the Cabot Tower, Bristol Cathedral, Wills Memorial Tower, Clifton Cathedral, and other University towers around St Michael's Hill.

Again at a distance from the application site the views from Grade II Listed Cabot Tower towards the application site have the potential to be impacted upon by development on the application site which is behind the church spire. The views here are partially impacted upon by Broughton House of the Redcliffe estate, but the wooded hillside of Totterdown forms an attractive backdrop behind the tower and chancel.

The Grade II Listed assets surrounding the application site also require great weight to be placed in the conservation of their setting. It is acknowledged that the setting of the Glass Cone to the north of the site has been removed, but the collection of protected properties on the south of the church yard, on Colston Parade, retain a strong and attractive church precinct character providing welcome enclosure to the south side of the churchyard. The alignment of Colston Parade focuses views towards the application site.

Redcliffe Conservation Area includes the properties on Colston Parade and therefore proposals that impact upon the setting of these buildings will consequently impact upon the setting of the Conservation Area. Development of the site has the potential to impact upon key views within both the Redcliffe and City Docks Conservation Areas, particularly where the spire of St Mary Redcliffe is the focus of these views. The prospects looking up-river from Prince Street Bridge, the corner of

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Queen Square, and along the harbour from the west are iconic views of Bristol, with the church spire and raised grade II Listed terraces of Redcliffe Parade a defining image of the City.

Non designated heritage assets are due weight within the planning process. The site incorporates the Eighteenth Century Bell public house. This is a rare fragment of the historic fabric of the Redcliffe area before its redevelopment in the Nineteenth and Twentieth Centuries.

Neglected in the Archaeology or Heritage statement is the identification of elements of the 1953-1962 developments of the Redcliffe estate and non-designated heritage assets. The failure to recognise these elements for their architectural or historic value is disappointing. There is clear social, communal, architectural and historic value in the main elements of the estate: This is demonstrated by their nomination as Local List buildings and the evidence supplied as part of those nominations. These buildings are awaiting appraisal by the independent panel for Local List status.

The Redcliff Estate was designed by the City Architect Albert Clarke and the layout of the blocks carefully considered maintaining and enhancing views of St Mary Redcliffe church at the heart of the community. Viewing corridors were established and development plots set out between them to preserve views. The scale of the development consciously stepped-down around the higher ground closer to the church to provide a suitable transition between new and historic areas. The plan incorporated a series of more intimate courtyard garden areas for residents and set the whole within a well-planted green parkland setting. Although designed with cars in mind the increase in reliance on vehicles and the intensification of the use of the school site have diminished some of the design intentions, but the estate remains a high quality well designed series of monuments of the post-war social and architectural movements.

The Proposals:

The proposed development of the corner site between Prewett Street and Somerset Street would involve erecting a thirteen-storey building on the highest part of the Redcliffe ridge. This structure would be of block-form with a yard at second floor level allowing light to penetrate into the building footprint at the upper levels. A second block of four storeys will be located on top of a large sports hall structure on the south side of the site which would give the approximate height of a six-storey building.

Development of the site would result in the complete loss of the Eighteenth Century Bell pub. The applicant's visual impact assessment (VIA) shows that, by virtue of its added elevation, the building would have a greater impact on the city skyline than the 1960 developments to the south, which intentionally step back from obscuring the spire of St Mary Redcliffe. VIA also indicates the scale and massing of the tallest block of development will impact on the setting of St Mary Redcliffe by intruding into views from the surrounding Conservation Areas and from Brandon Hill.

The architectural treatment of the building exterior is contemporary, but of average quality and little distinction; materials do not respond to the setting so close to the Listed buildings or CAs.

The proposals would have a serious, adverse impact on the setting of a highly designated Listed building: St Mary Redcliffe church. Key views of the landmark church spire would be either entirely lost, or significantly harmed by the proposed development. As a Grade I Listed building it enjoys the highest level of protection under national planning policy; we are required to place the greatest weight possible on the conservation of the church and its setting.

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The harm posed to the setting of the church spire from the Wells Road is negative and extreme. Although the impact on the setting from other angles is “less-than-substantial”, several views will have a very high degree of harm associated with development. The appearance of the new structure leering above the nave and chancel of the church from within the Conservation Areas is entirely inappropriate and visually damaging. The legibility and landmark status of one of Bristol’s most iconic buildings must be protected in any development of this site.

A high degree of negative impact would be felt upon the setting of Grade II Listed assets surrounding St Mary Redcliffe including those on Colston Parade, and Redcliffe Parades where the inappropriate scale and massing would worsen the impact of C20th development and introduce an unacceptably brutal new context. Particular harm is posed by development that would result in any new massing appearing above the prominent roofline of the Redcliffe terraces when viewed from within the City Docks Conservation Area.

Development would result in the complete erasure of a non-designated heritage asset: The Bell public house. This would pose substantial harm, albeit to a heritage asset of lower significance. Whilst its loss might be mitigated or outweighed by benefits of the development, its complete loss has not been adequately justified within the application and no demonstration provided as to why development that could better preserve and reveal its special interest is not achievable.

The proposals fail to recognise and respond to the positive and intentional design approach adopted in the masterplan for the post-war Redcliff Estate by its original architects; as such the proposals result in an overbearing, over-scaled massing that responds poorly to the grain and parkland setting of the estate and has resulted in unacceptable degree of harm to the setting of a nationally important building of the highest order.

Development that poses no harm to heritage assets is likely to be supportable. Development that poses any degree of harm under the definitions of national policy requires careful justification and tangible public benefits that might be considered in a balanced planning decision being made. The proposals will not lead to a total loss of significance of the designated assets, but will have a very severe negative effect on their setting. The complete loss of an undesignated heritage asset must also be considered.

The proposed development poses a high degree of less-than-substantial-harm through accumulative impact on surrounding heritage assets, and most specifically to the setting of the Grade I Listed church. Local Authorities are required to assess the application against paragraph 196 and 197 of the NPPF. We are therefore required to review and assess the public benefits of the scheme in coming to a balanced decision. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. It is the applicants’ responsibility to make that justification. It is important to note that the applicant has not adequately assessed the degree of harm on heritage assets and there is no clear justification of public benefits within any of the documentation that might be considered in this assessment.

In lieu of the omission of describing what tangible public benefits should be considered in balancing the degree of harm posed, the following comments are made.

While it is recognised that the number of residential units proposed supports the City in its much-needed provision of new housing, the quality of the proposed flats, the impact of the building upon neighbouring residents, and the poor external environment provided at ground level mean that

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these will be a poor addition to the City's housing stock (the impact on residential amenity is discussed in Key Issue F below). The community building is potentially a public benefit in its own right, but there appears to be a questionable case for its need or ongoing support of such a venue. As such this is not considered a 'tangible' public benefit under the definitions of the NPPF (see Key Issue H below).

The degree of harm posed to a national monument of the calibre of St Mary Redcliffe is not outweighed by tangible public benefits. The negative impact on other Listed buildings, Conservation Areas, and non-designated heritage assets remains unjustified, and the overall urban design of the proposals is poor.

In terms of non-designated assets, the concept of the Redcliffe Estate's strong urban design rationale of radial slabs development within an open landscape is compromised by the proposal. The height, massing and scale of the scheme does not respond adequately to the context and the urban grain of the Estate and shows no consideration to the character of this distinctive estate, as has been discussed throughout the above.

It is worth noting that of direct relevance to this issue is an appeal decision dated 1st November 2018 for the redevelopment of the Raj Mahal City restaurant on Clarence Road, Redcliffe, with a building of between 5 and 8 storeys containing 73 bedspaces (planning application ref: 17/05223/F). This site is also on the Redcliffe Estate and one of the reasons for refusal was the harm the development would have on the character and appearance of the estate.

The Inspector commented on this issue that due to the proposed building's height and bulk it would undermine the spacious settings of the existing blocks, and concluded that; *"the proposed development would be obtrusive and incongruous with its surroundings and would be detrimental to the setting of the non-designated heritage asset"* [Redcliffe Estate]. The appeal was accordingly dismissed.

In summary, the failure to address the pre-application feedback has resulted in a proposal that fails to conform with national or local planning policies designed to protect the historic environment including, but not limited to the NPPF, and policies BCS22, DM26, DM31.

F: IS THE PROPOSED LANDSCAPE DESIGN ACCEPTABLE?

The proposal would result in the loss of 17 of the 23 trees on the application site, 6 of which are category 'B'. Of the 6 trees proposed for retention, 2 are large in size and would require significant pruning due to their proximity to the proposed buildings and it is likely that their removal would be required at some time as a result of the proposals.

The applicants have agreed to provide a sum in accordance with the Bristol Tree Replacement standard as mitigation for the loss of the trees.

The loss of these trees will harm the visual amenity of the area and has to be assessed against Policy BCS9, which aims to protect, provide, enhance and expand the green infrastructure assets which contribute to the quality of life within and around Bristol. BCS9 states that individual green assets should be retained wherever possible and integrated into new development. Loss of green infrastructure will only be acceptable where it is allowed for as part of an adopted Development Plan Document or is necessary, on balance, to achieve the policy aims of the Core Strategy. When this is considered to apply, appropriate mitigation of the lost green infrastructure assets will be required.

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DM15 requires the provision of additional and/or improved management of existing trees as part of the landscape treatment of new development. DM17 states that all new development should integrate important existing trees, and where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided.

As a result of the scale and coverage of the proposed development, the opportunities to provide a landscape scheme to mitigate the impacts of the proposals are very limited. The proposals for small trees in planters do not mitigate for the loss of mature trees on the Prewett Street, Somerset Street boundaries and will have a minimal effect in attempting to soften the appearance of the development. The prevalence of mature trees within the public realm is a feature of the area and the landscape scheme illustrates a poor response to the site context.

The proposal to address the design of both the Community Garden and Children's Play Area in association with input from local residents is welcome, however, there is little information supplied on how this will be achieved or the timescale for resolution.

With regard to the courtyard and communal open space proposals, too much reliance is placed on the use of artificial grass surfaces and a far richer environment, both visually and in terms of wildlife benefit could be achieved using green roof techniques.

The images provided for the appearance of the development from street level are potentially misleading. Such verdant growth will not be achieved and maintained at such an elevation without significant topsoil provision and intense maintenance. Issues of cost, sustainability and climate cast doubt on such growth being achievable.

To conclude, the landscape proposals are not satisfactory and their limitations are a direct consequence of the over-intensive nature of the development. Whilst providing much needed housing would go towards achieving the policy aims of the Core Strategy, this is not accepted at any cost. The overall concept of the development is unacceptable in urban and landscape design terms as is the resultant loss of trees.

G. DO THE PROPOSALS PROTECT THE RESIDENTIAL AMENITY OF ADJOINING OCCUPIERS?

Policy DM29 requires new development to ensure that existing and proposed development achieves appropriate levels of privacy, outlook and daylight.

The development would have the greatest impact on the occupiers of Corinthian Court and Magdalena Court, and to a lesser extent Proctor House, 33 Prewett Street and Broughton House given their proximity to the application site combined with the scale of the proposed development.

In support of the application a daylight and sunlight assessment report was submitted together with a shadow analysis. The report uses the guidelines within the widely accepted BRE (Building Research Establishment) guidebook 'Site layout planning for daylight and sunlight: a guide for good practice', to achieve objectivity. The methodology used concerns the potential for daylight at a particular point by assessing the proportion of the sky that is 'visible' from that point. Assessments are done based on the existing situation; a 'mirror image' of existing development if there is low rise or no development opposite a building (this is to create a more realistic scenario of what could be expected in central urban locations); and the proposed development.

The results of the report show that 56 dwellings located in Corinthian Court and Magdalena Court would experience a 'Major Adverse' impact from the development. More specifically, 40 of the 80 dwellings in Corinthian Court would experience this impact, together with 16 dwellings in

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Magdalena Court. 'Major Adverse' is defined as a situation where a large number of open space / windows are affected and the loss of skylight is substantially outside the guidelines.

Whilst it is acknowledged that the application site is currently low rise, with limited buildings and that any redevelopment is likely to have some impact on neighbouring buildings, the degree of harm predicted is unacceptable.

Moreover, it is considered that the development would create an unacceptably oppressive environment for the residents of Corinthian Court and Magdalena Court and to a lesser extent, Proctor House. The distances between the 12 storey new residential block and the front elevations of Corinthian Court, Magdalena Court and Proctor House are approximately 15 metres, 18 metres and 28 metres respectively. As a consequence, the new block would literally tower over Corinthian Court and Magdalena Court creating an oppressive, overbearing atmosphere. In the case of Proctor House, as the distance between the two buildings would be greater and the new building steps down, the impact would be less harmful. However, the new flats above the community building would impact on the southern end of Proctor House as the distance here would be just 12 metres.

In terms of privacy, all the elevations of the new buildings towards Somerset Street, Prewett Street and Proctor House contain numerous balconies. Again, with the distances involved the perception of a loss of privacy will be apparent to residents of Corinthian Court and Magdalena Court in particular.

For these reasons the development would have an unacceptably harmful impact on the amenity currently enjoyed by neighbouring residents.

H. WOULD THE PROPOSED DEVELOPMENT PROVIDE A SATISFACTORY LIVING ENVIRONMENT FOR FUTURE OCCUPIERS?

BCS18 makes reference to residential developments providing sufficient space for everyday activities and space which should be flexible and adaptable, by meeting appropriate space standards. Policy BCS21 also sets out that new development should create a high-quality environment for future occupiers.

All of the dwellings within the proposed development meet the nationally described space standards.

In terms of the living environment, the daylight and sunlight report assessed the daylight performance across a range of flats, assessing at least one dwelling per floor of both buildings across the site.

Interpolating the results across the site, the findings indicate that 20% of the dwellings did not achieve adequate levels of daylight using the BRE standards. This often occurred in dwellings having combined kitchen/living rooms set deep into the building. The overshadowing of the dwellings affected is caused by both adjacent buildings and the development itself, in particular the courtyard dwellings of the main residential building.

As a new build development on a relatively unconstrained site it is considered reasonable to expect new dwellings to achieve adequate levels of daylight to meet the BRE standards. Policy DM29 also states that new residential development should provide dual aspect where possible, especially where one of the aspects is north facing. Other than the corner units, all of the dwellings facing north are single aspect, and in total 130 of the 176 dwellings proposed are single-aspect, together with 12 of the 20 dwellings proposed above the community building.

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For these reasons the standard of accommodation proposed is not considered acceptable.

I: IS THE LOSS OF THE BASKETBALL COURT AND ITS REPLACEMENT WITH A COMMUNITY / SPORTS HALL ACCEPTABLE?

Policy DM5 states that proposals involving the loss of community facilities land or buildings will not be permitted unless it is demonstrated that:

- i. The loss of the existing community use would not create, or add to, a shortfall in the provision or quality of such uses within the locality or, where the use has ceased, that there is no need or demand for any other suitable community facility that is willing or able to make use of the building(s) or land; or
- ii. The building or land is no longer suitable to accommodate the current community use and cannot be retained or sensitively adapted to accommodate other community facilities; or
- iii. The community facility can be fully retained, enhanced or reinstated as part of any redevelopment of the building or land; or
- iv. Appropriate replacement community facilities are provided in a suitable alternative location.

The applicants have stated that the basketball court is causing concern in the local community as it attracts anti-social behaviour. However, this is not corroborated by comments received from the public in response to consultation. The Police have commented that there have been a limited number of anti-social behaviour reports and cannabis has been smoked there, but there have been no recent reports of any trouble. The court is used by children before and after school hours and is an actively used free community facility.

Referring to the new community / sports building, the Council's community officer has advised that there is not an acute shortage for more facilities to meet the needs of the community, but that is not to say that the local community would not like more, better or newer facilities.

The Sports Development Team has advised that it is not clear what the sports facility would be and that there is no known shortage of local sports facilities. However, they are supportive of the proposal in principle.

The main issue with this proposal is its viability. In short, how can the 'community use' of the new facility be safeguarded in perpetuity. For the facilities to be meaningful to the local community, they would need to be easy to book/hire, available at an affordable rent (comparable to other facilities in the area), fully accessible to disabled people, and managed by an organisation that is either a community organisation, or that fully understands how a true community organisation should function, in order to respond to changing, local needs. Many paid-for activities in community centres, e.g. yoga/fitness/sports classes, child care facilities, 'slimming world' type services, etc. are able to pay much higher hire fees than general, local community activities. Their access to affordable, centrally-located facilities such as this proposal is likely to price local activities out of the market, which would disadvantage the local community. To safeguard against this, the lettings policy must make special provision for local hirers/activities to ensure that the local community will always have access to the new facilities, for example, through priority booking.

There is a risk that a large, new community facility could adversely affect the viability of existing facilities in the Redcliffe area. This would be especially true if the new facilities were offered at a low rent initially, in order to attract new users. If the owner of the new facilities could sustain low-cost lettings for an initial period, community facilities operated by other organisations could lose users and could easily close down - most community-based organisations struggle financially and would be unable to continue to operate if many of its users were attracted to new, cheaper facilities nearby. Communities would be severely impacted if prices at the new facilities were then increased after the initial period, after other facilities nearby had closed down.

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In response to these concerns the applicants have advised as follows:

- The facility would be a double height 8,000 sq ft space that could be used in a multitude of different ways and which could respond to changing needs amongst the community and young people.
- There are no youth facilities in the Prewett Street area that are inclusive for young people. There is a youth worker employed from St. Mary Redcliffe Church that has a strong religious intent. The Faith Space facility does not provide youth facilities for local people. The sports pitches and swimming pool at St. Mary Redcliffe School are available for hire at full price.
- St. Mary Redcliffe School offer no concessionary rates for local people. This is prohibitive.
- There are very limited options for young people in the Prewett Street area.
- Strong interest has been shown from 'Shine', which is Bristol's largest independent sports provider of childcare provision and holiday clubs for children. They also provide apprenticeships in the sports industry. Shine would be a major tenant of the sports centre. Shine are committed to offer discounted rates to local young people who will register with proof of local address.
- Strong interest has been shown from Reid Football. Colin Reid is statistically the most successful football coach in the country. He has over 90 professional football players to his credit, ten of whom have played for the senior England team. Colin Reid along with Lawrence Ashworth run a very successful Btech Football course in Chingford, London. Reid Football are very interested in running a similar course at Prewett Street. This will be open to boys and girls from the age of 16 years old and will be UCAS accredited. This will enable young people who successfully complete the course to go on to University. Reid Football also work with SportsBridge who have strong links with Universities and Colleges in the USA. Shine and Reid Football would complement each other and will offer life changing opportunity for young people in the Prewett Street area.
- The facilities would also be available to wider parts of the community and throughout Bristol at full cost.

The applicant has also agreed to the following principles in the operation of the sports / community building (to be included in a Section 106 legal agreement):

- The facility will not be run at a profit
- Any profit there might be would go into a sink fund for maintenance
- There would be no liability to Bristol City council
- If the facility is not self-sufficient then the space would be converted for use as affordable homes
- There would be on-going discussions with the Council

Summary:

At first glance this appears as a very generous offer that would make a significant addition to community/sports facilities in the local area. However, its provision raises questions over its

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management to ensure it is a genuine community facility for local people, and its viability in the medium to long term. There would always be an element of risk that cannot be overcome and if the venture fails, the existing community facility, the basketball court, would be lost and not replaced.

On balance however, given the positive attributes of what is proposed, it is not felt that the uncertainty over the future of the facility and the possible eventual loss of a community facility should be a further reason to refuse the scheme.

J: WOULD THE PROPOSED DEVELOPMENT SATISFACTORILY ADDRESS TRANSPORT AND MOVEMENT ISSUES?

Policy BCS10 and DM23 seek to ensure that new development is accessible by sustainable transport methods such as walking, cycling and public transport. Development should also not give rise to unacceptable traffic conditions.

The site is in a sustainable location due to its proximity to the city centre, Temple Meads Station and several principle bus routes. It is located on a strategic pedestrian link between Redcliffe Hill major transport corridor, Temple Meads Station and the Temple Quarter Enterprise Zone. It is within the Redcliffe Residents Parking Scheme.

The development is proposed to be car free and this is considered acceptable as it does not raise any safety concerns. This is because any parking on-street can be effectively controlled (due to residents parking scheme) to reduce issues about safety.

Initial comments received from Transport Development Management were that the proposed layout was inadequate as it did not provide a satisfactory public realm to provide for pedestrians or servicing requirements. Specific points of objection were as follows:

- The proposal worsened passenger transport facilities through the removal of a bus stop
- No effective waste collection facilities are provided
- The cycle parking proposals are inadequate
- The loading and servicing facilities are inadequate, and
- The proposed planting and build-outs shown in the highway create obstruction, an excessive highway maintenance burden, do not create an acceptable public realm and are considered unsafe

In response to these comments amended plans were received (on 7th November 2018), however, several objections remain as set out below:

Public Transport: The applicants have agreed in principle to put in improved facilities for the bus stop on Somerset Street, but this is not shown on the revised plans, and conflicts with the proposed loading bay. The contribution to the bus shelter is not included within the heads of terms.

Refuse: The applicants rely on a waste management strategy, depending on the use of management operatives to deliver the bins to the refuse collectors at a set time. However, a development of this size must have adequately located refuse storage facilities and should not have to rely on a management strategy to move a significant number of refuse containers to and from the edge of the carriageway for collection by the refuse collection company. The resultant obstruction caused to the highway is considered unacceptable.

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Cycling: The lack of adequate cycling provision is not acceptable. There is no parking provision for the site, and the failure to provide easily accessible alternative facilities is not acceptable, and is contrary to all city centre development precedents.

Loading: The proposal has not taken into consideration the parking opposite, has not demonstrated that tracking into the bay can be achieved, and has not demonstrated that the capacity of the loading bay will be adequate. A development of 196 residential units with no parking will have a high demand for loading – as deliveries will be heavily relied upon. The planters cause an obstruction and maintenance liability, and are unnecessary.

Pedestrian provision: The proposals for the frontage do not demonstrate adequate facilities for pedestrians. The widening of the carriageway reduces conflict, but has the potential to increase traffic speeds. The development will bring considerable additional movements by pedestrians, cyclists and vehicles (whilst there will be no parking, there will still be vehicular movements to and from the site, over and above the existing use). The applicants' objections to the installation of a speed table or similar pedestrian improvements to the frontage of a development of this size and significance is unacceptable and fails to demonstrate an improved environment for pedestrians and cyclists, whilst failing to reduce the impact on road safety arising from the proposals. The proposals shown on the proposed site plan do not demonstrate an adequately wide footway to the frontage of the site; there are no dimensions shown. A minimum of 3m around the site frontage in Prewett Street and Somerset Street is required. The application therefore fails to demonstrate a safe environment and sufficient improvements to the public realm for pedestrians and cyclists, contrary to policy BCS10, BCS13 and DM23.

Additional issues are that:

The Travel Plan has not been approved. The applicants have agreed in principle to pay monitoring fees, and any measures arising from the s106, but there are no measures agreed. This is contrary to BCS10, BCS13, and DM23.

There is no disabled parking provision on site. A development of this size should provide a minimum of 6 disabled bays, and provision for this should be made within the site. This is contrary to policy DM23.

As the application stands, for all the above reasons as the development is unacceptable.

K: IS THE PROPOSED RETAIL STORE ACCEPTABLE IN THIS LOCATION?

The proposals include an A1 retail unit at ground floor in excess of 200 square metres outside an existing Primary Shopping Area. A unit of this size is defined as a 'larger scale' retail development in the Bristol Central Area Plan. Policy BCAP14 states that such proposals may be acceptable where they would not be harmful to the vitality, viability and retail function of identified shopping areas.

A retail impact assessment was submitted to assess these issues which concluded that the new store would not harm the vitality, viability or retail function of any identified shopping areas.

L: WOULD THE PROPOSAL SATISFACTORILY ADDRESS SUSTAINABILITY AND CLIMATE CHANGE ISSUES?

Policies BCS13 to BCS15 of the Bristol Development Framework Core Strategy forms a suite of planning policies relating to climate change and sustainability. It requires development to both mitigate and adapt to climate change. This includes new development to minimise its energy

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requirements, address issues of sustainable design and construction and also water management issues to reduce surface-water run-off.

In terms of compliance with these policies, the following comments are made:

BCS13: Climate Change. This policy requires development to include site layouts and approaches to design and construction which provide resilience to climate change. The assessment initially submitted indicated that dwellings would be likely to suffer overheating under future (2050) climatic conditions, and suggested that overheating can be mitigated by the following building adaptations:

- Introduction of blinds
- Strategic planting on communal terraces
- External shutters to reduce solar gain; and
- Additional mechanical cooling

This was not considered suitable, however, further revisions were submitted detailing additional ventilation which would mitigate the risk of overheating in future climate (2050) scenarios and the proposals are now considered acceptable.

BCS14 concerns sustainable energy, and requires that sufficient renewable energy generation is provided in new developments to reduce carbon dioxide emissions from residual energy use by at least 20%. The energy statement submitted with the application demonstrates that this would be achieved, with a 21% reduction in carbon dioxide emissions below residual emissions.

BCS15 concerns sustainable design and construction. The submitted sustainability statement sets out an appropriate approach to waste and recycling, water use, materials specification and green infrastructure.

The water management and drainage proposals are also considered satisfactory.

M: DOES THE PROPOSED DEVELOPMENT SATISFACTORILY ADDRESS NATURE CONSERVATION CONCERNS?

An Ecological Summary document was submitted with the application and not a full Preliminary Ecological Appraisal which the applicants were advised at pre application stage should have been submitted.

The Ecological Summary dated August 2017, and which was carried out in July 2017, recommends that further bat surveys are undertaken. These further bat surveys have not been submitted. In accordance with central government guidance, and as advised at pre-application stage, bat surveys should be undertaken prior to the determination of a planning application and not conditioned.

As a result the proposal does not comply with policy DM19 which requires that development likely to have any impact upon habitat, species or features which contribute to nature conservation is expected to be informed by an appropriate survey and assessment of impacts.

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N: Equalities Assessment

During the determination of this application due regard has been given to the impact of this scheme in relation to the Equalities Act 2010 in terms of its impact upon key equalities protected characteristics. These characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. There is no indication or evidence that different groups have or would have different needs, experiences, issues and priorities in relation to this particular proposed development. Overall, it is considered that neither the approval nor refusal of this application would have any significant adverse impact upon different groups or implications for the Equalities Act 2010.

PLANNING BALANCE

Whilst the principle of the proposed use is acceptable, the proposal is not, and cannot be considered to represent a sustainable form of development. The remaining paragraphs will briefly outline the planning balancing exercise.

Paragraph 8 of the NPPF outlines the three objectives of the planning system that together achieve sustainable development: economic, social and environmental. Officers recognise the development would provide a contribution to Bristol's stock of much needed housing, and positive weight is attributed to this provision. Similarly, positive weight is afforded to the development in recognition that the site represents previously developed land. Officers are also aware of the economic benefits the development would represent, as well as the additional short term economic benefits that the construction of the development would fulfil.

However, as this report demonstrates, the development would result in a number of adverse social and environmental impacts meaning the development cannot be considered to be sustainable development as outlined in paragraph 10 of the NPPF and policy DM1. The proposal fails to respond to the pattern, layout, scale and massing of existing development in the area, and as a result materially harms the character of the area having an unacceptable quality of design, and a harmful impact on the Grade 1 listed St Mary Redcliffe Church and other designated and non-designated heritage assets. As paragraph 124 of the NPPF recognises, good design is a key aspect of sustainable development, and this is also evident in paragraph 8 of the NPPF where a well-designed built environment is considered to be a central facet to both the social and environmental objectives of sustainable development. The development is also considered to have an overbearing presence and overshadowing impact on the residential amenity of the nearby neighbouring occupiers, contrary to the social and environmental objectives of sustainable development.

Overall, the identified adverse impacts of permitting this development would individually, as well as cumulatively, act to significantly and demonstrably outweigh the identified benefits of this development when assessed against policies in the Council's Development Plan and the NPPF when taken as a whole. Accordingly, the application is recommended to be refused.

Notwithstanding this, officers have worked proactively with the applicant and their team in order to seek solutions to issues, such as policy compliant affordable housing provision, the proposed management of the community/sports hall and addressing sustainability concerns. However, the proposal's poor design quality, harmful impact on heritage assets, poor dwelling mix and detrimental impact on neighbours, issues that were all raised with the applicant at the pre application stage, have not been overcome within this application. As stated, the application is recommended for refusal.

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REASONS FOR REFUSAL:

1. Urban Design

The proposed development, by reason of its siting, scale, massing, urban form and architectural detailing fails to contribute positively to the urban character and identity of the area and as such fails to create or reinforce local distinctiveness. The proposed development is therefore contrary to policies BCS2, BCS20 and BCS21 of the Core Strategy (2011); policies DM26, DM27 and DM29 of the Site Allocations and Development Management Policies (2014); policy BCAP47 of the Bristol Central Area Plan (2015) and the provisions of the National Planning Policy Framework.

2. Heritage Assets

The proposed development, by reason of its siting, scale, massing, urban-form, detailed design and architectural detailing represents harm to both designated and non-designated heritage assets. This includes the Grade I listed St Mary Redcliffe Church, Grade II listed assets surrounding St Mary Redcliffe, including those on Colston Parade and Redcliffe Parade, and the character and appearance of the City Docks Conservation Area. The non-designated assets harmed by this development include the Redcliffe Estate and the complete loss of the Bell public house. There is a lack of robust justification for the proposed works, or evidence suggesting that wider public benefits will be secured such that would outweigh the identified harm to the heritage assets identified above. The application is subsequently contrary to guidance contained within Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; Section 16 of the National Planning Policy Framework (2018); policy BCS2, BCS22 of the Core Strategy (2011); and policy DM31 of the Site Allocations and Development Management Policies (2014).

3. Landscaping and loss of trees

The proposed development includes the provision of a substandard landscaping scheme which would result in a public realm of reduced quality. The development also includes the loss of mature trees that currently make a significant contribution to the character and appearance of the area. As such the proposals are contrary to policies BCS9 and BCS21 of the Core Strategy (2011); and policies DM15, DM17 and DM28 of the Site Allocations and Development Management Policies (2014).

4. Residential Amenity

The proposed development, by reason of its siting, scale, massing and urban form would prejudice the levels of daylight currently experienced by the existing residents of both Corinthian Court and Magdalena Court. In addition the proposed development would appear as an overbearing, oppressive structure for these residents. As such the proposals would materially harm the amenities of existing residents contrary to policy BCS21 of the Core Strategy (2011); policies DM27 and DM29 and the provisions of the National Planning Policy Framework.

5. Living Conditions

The proposed development, by reason of its design to incorporate large numbers of single aspect dwellings, in addition to creating a number of dwellings that fail to meet BRE daylight standards, has failed to provide adequate living conditions for future residents. As such the proposals are contrary to policy BCS21 of the Core Strategy (2011); policies DM29 of the Site Allocations and

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Development Management Policies (2014) and the provisions of the National Planning Policy Framework.

6. Dwelling Mix

The proposed development consists entirely of one and two bedroom flats and in so doing fails to provide any family sized homes. As such the proposals are contrary to policy BCS18 of the Core Strategy (2011); and policy BCAP3 of the Bristol Central Area Plan (2015).

7. Transport and Movement

The proposed development is unacceptable for the following reasons:

- The proposal does not include improved facilities for the bus stop on Somerset Street and it conflicts with the proposed loading bay
- No effective waste collection facilities are provided
- The cycle parking proposals are inadequate
- The loading and servicing facilities are inadequate, and
- The facilities provided for pedestrians and cyclists are inadequate and would not create an acceptable public realm
- The travel plan has not been approved
- There is no disabled parking on site. 6 disabled bays are required.

For these reasons the proposals are contrary to policies BCS10 and BCS13 of the Core Strategy (2011); and policies DM23 of the Site Allocations and Development Management Policies (2014).

8. Nature Conservation

In the absence of an up-to-date bat survey, the proposed development fails to comply with policy DM19 of the Site Allocations and Development Management Policies (2014) which requires that development likely to have any impact upon habitat, species or features which contribute to nature conservation is expected to be informed by an appropriate survey and assessment of impacts.



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Jo Davis
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Berkeley Place
Bristol, BS8 1BQ

AHC/ND/9727

5 November 2018

Dear Jo,

**RE: Proposed redevelopment scheme at 7 Prewett Street, Bristol , BS1
6PB: LPA Ref: 18/01890/F**

I am writing following my recent site visit to Prewett Street and the surrounding area in connection with the objections made by Historic England to the above planning application in their letter to Bristol City Council dated 25 May 2018.

That letter focused on Historic England's view that the proposed redevelopment of the site would be '*highly damaging*' to the setting of the Grade I listed Church of St Mary Redcliffe and it is therefore on this issue that my letter also concentrates.

For the detailed reasons set out in this letter, I cannot agree with Historic England's position that the proposed redevelopment would be '*highly damaging*' to the setting of the Grade I listed Church (or indeed to the setting of any other designated heritage asset) and I am instead firmly of the opinion that, if any degree of 'heritage harm' is caused by the proposed redevelopment, it falls towards the lower end of the spectrum of '*less than substantial harm*' as that term is defined and used in the NPPF and associated (N)PPG.

To begin though with the points where I do agree with the contents of Historic England's letter, I of course fully acknowledge the historic and architectural significance of the Church of St. Mary Redcliffe itself (its Grade I listing is clearly fully warranted), together with the importance that needs to be attached to safeguarding its setting and status *as 'a defining image of the city'*.

It is in this context that I carried out my own overview assessment of the impact of the redevelopment proposals on the setting of the church, and particularly on the significance of its spire as a landmark or 'way finder' feature, an aspect made much of in Historic England's letter.

There are, of course, some places in the immediate vicinity of the application site (as well as further afield) where existing views of the church spire will be partly or largely obscured by the proposed redevelopment in the limited gaps between the tall post-war tower blocks that lie to the south of the church or from Clarence Road, but none of these views is of any identified heritage value and they all lie outside the Redcliffe Conservation Area or any other conservation area.

It is stated in the Historic England letter that these public housing blocks were *'...designed with some sympathy to the setting of the church, preserving key views of the building without intrusion into its Gothic silhouette, partially due to their being set some distance away from the church to provide it with a visual buffer'*, but to date the only actual evidence I have seen to support this opinion is the similar statement in the comments of the City Design Group (3 May 2018) that *'The Redcliff Estate was designed by the City Architect Albert Clarke and the layout of the blocks carefully considered maintaining and enhancing views of St Mary Redcliffe church at the heart of the community. Viewing corridors were established and development plots set out between them to preserve views'*.

This may very well have been the case when the estate was laid out and built in the 1950s and extended in the early '60s, but it is just as (if not more) important to note in the context of the redevelopment proposals that the character and appearance of this area, together with the views across it, have changed significantly since over the last 60 years or so.

Certainly, it is hard to see how alteration to (or even partial loss) of these existing views across the estate could be used as a legitimate heritage-based justification for refusing planning permission for the redevelopment proposals.

Moving now to the 27 representative viewpoints included in the detailed Landscape Visual Impact Assessment (LVIA) prepared by Nicholas Pearson Associates in April 2018, a document strangely not even mentioned in the Historic England letter, it is very clear that no truly significant views of the spire are lost or even partially obscured as a direct result of the redevelopment proposals.

This is clearly key to preserving **the spire's undeniably important role as 'a defining image of the city', as referred to** by Historic England, and in this connection it is not helpful for Historic England to make comments such as the proposed redevelopment **'should not be visible above St Mary Redcliffe and not screen key views of its spire'** when the redevelopment is not in fact visible above it and it does not screen key views of its spire.

Likewise, the concern behind the Historic England comment that *'In views from Redcliffe Way the proposed building will be considerably in excess of the established building heights in the context of the church, rising above the height of its 14th century lady chapel in certain views* (unhelpfully, these are not specified), *removing the ability of the viewer to experience its exceptional silhouette without encumbrance'* is hard to follow given that the lady chapel is one of the lowest parts of the church and both the main body of the church and obviously the spire rise considerably above it. The proposed redevelopment site is, of course, also set back well behind the church.

Returning to the supposedly harmful impact of the proposed redevelopment on the church spire, Historic England would also do well to remember their own sensible and pragmatic advice, set out on p.7 of **'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning - Note 3** (2nd. edition December 2017), which I quote here *verbatim*: ***'Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development***

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competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view'.

In other words, the simple fact that a particular existing view may be altered or even lost as a result of a redevelopment proposal should not necessarily be equated with harm in heritage terms.

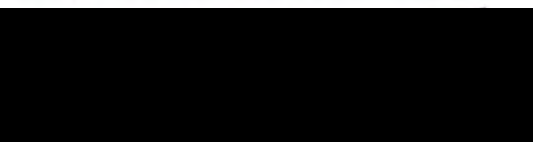
Finally, brief mention should be made here to Historic England's failure in their objection letter to make proper use of the recognized terminology used in the NPPF and (N)PPG for assessing the level of harm that a development proposal might be considered to cause to designated heritage assets.

The terms '*highly damaging*' and '*severe harmful impact*' used in the letter do not appear in either the NPPF or the (N)PPG, but Historic England, presumably aware that the degree of harm they believe is caused could not credibly be called '*substantial*', appear reluctant to use the correct term – '*less than substantial*' – and use the terms they have chosen in its place.

This is not mere semantics, but is important in that, when determining the planning application, Bristol City Council should be assessing the redevelopment proposals in the context of paragraph 196 not paragraph 195 of the recently reissued NPPF, as a reading of Historic England's letter might seem to suggest.

I hope you find this letter helpful in your continuing dialogue with the City Council over the application proposals.

Yours sincerely,



**Dr Nicholas Doggett, FSA, MCIfA, IHBC
Managing Director**

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SOUTH WEST OFFICE

Mr Paul Chick
Bristol City Council
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St George's Road
Bristol
BS1 5UY

Direct Dial: 0117 975 0717

Our ref: P00893650

8 November 2018

Dear Mr Chick

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990
THE BELL , 7 PREWETT STREET , BRISTOL , BS1 6PB
Application No. 18/01890/F**

Your conservation officer has forwarded me correspondence from the developer of the proposed building at Prewett Street, Redcliffe, responding to our advice of 25 May 2018. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

In my letter of 25 May I set out Historic England's objections to the proposals, citing the impact it would have on the setting of the Grade I listed St Mary Redcliffe Church, a building of international significance. I also referred to the poor quality design of the proposed building and its lack of contextual reference with its surroundings.

We remain of the view that the proposed building would have a seriously harmful impact on the setting of the Grade I listed church, particularly in the key approach from the Redcliffe Way bascule bridge where the proposed building would visually coalesce with the church.

Views from the Redcliffe bascule bridge are currently partially screened by vegetation on the roundabout. The roundabout will be removed in the near future, as required by policy BC40 of the Bristol Central Area Plan which sets out a plan for Redcliffe Way, including a "significantly improved setting for St. Mary Redcliffe church, (and) improved links between north and south Redcliffe through the removal of the existing roundabout". As Redcliffe Way is transformed and particularly when the roundabout or its trees are removed, the proposed building would loom behind the Lady Chapel of St Mary Redcliffe in this key view.

The proposed building would screen the spire of the church in views from the Bath & Wells road at the point it passes over the railway lines South of Temple Meads. These important views (12a and 12b in the applicant's landscape and visual impact



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assessment) create a sense of arrival in the city, where the spire is read alongside the Cabot Tower and Wills Memorial Tower. Views from the Bath & Wells Road will assume all the more importance as development begins in the Enterprise Zone around Temple Meads. From these positions you can appreciate the care with which the Redcliffe estate was laid out in the 1950s, its large slab blocks positioned to retain the visual primacy of the church spire in the streetscape.

In their response to my earlier letter, the applicant's heritage consultant questions whether the Redcliffe Estate was laid out in response to views of the church. In a speech given on 28 September 1959, City architect Albert H Clarke is quoted as saying "Relating new development to important old buildings is a particularly interesting problem, and the south side of Redcliffe Hill and its relationship to St Mary Redcliffe Church is an excellent example. Here, it was essential to relate layout and scale of new buildings to a superb and historic monument." A transcript of this speech can be found in the City archives, and some of Clarke's sketches can be seen here: http://maps.bristol.gov.uk/arcgis/rest/services/ext/kyp_new_contrib/FeatureServer/0/464499/attachments/328080

NPPF paragraph 193 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 (and the more important the asset, the greater the weight should be).

We agree that the harm is less than substantial, but NPPF 193 is clear: 'Great weight' should be given to the asset's conservation 'irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance'. In the context of this application, we are talking about a serious adverse visual impact on what is arguably the finest building in Bristol. The term "less than substantial harm" potentially downplays a very serious impact. Less than substantial harm does not equate to a less than substantial objection.

Paragraph 194 of the NPPF provides further advice, stating that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. A clear and convincing justification is an unequivocal demonstration that any wider public benefits associated with the proposal (of which we are sure there are many) cannot be delivered in a way that minimises harm or perhaps avoids it altogether.

We do not believe that a building of this scale, massing, and design is the only way to deliver the quantum of development required. The justification is neither clear nor convincing. Redistributing the massing and revising the design could deliver an altogether more subtle building which may provide an appropriate foil to the magnificence of St Mary Redcliffe. It is notable that the proposals do not appear to have been independently scrutinised by a Design Review Panel.



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In their response to my original letter, the applicant's heritage consultant expresses surprise that we do not refer to the Landscape and Visual Impact Assessment supplied. This document has, of course, been very useful in our assessment of the proposals. However the selected viewpoints have been carefully chosen to downplay the potential impacts; if viewpoint 9a were a few steps further back the proposed building would visually envelop the Lady Chapel. There is a similar scenario with viewpoint 9b, where a few steps to the right and the same would occur. Views towards the church from the east end of Redcliffe Bridge are conspicuous by their absence. It is difficult to replicate the kinetic experience of viewing a piece of townscape in a printed document, but the visualisations provided are a useful reference in confirming the serious detrimental impacts of the proposals.

Recommendation

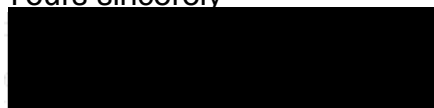
Historic England objects to the application on heritage grounds. We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 193 and 194.

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. You should also consider the statutory duty under section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

In respect of Policy BC40 of the Bristol Central Area plan, under section 38(6) of the Planning and Compulsory Purchase Act 2004 you are obliged to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please send us a copy of your report at the earliest opportunity, and be advised that we wish to register to speak at the planning committee meeting. 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



29 QUEEN SQUARE BRISTOL BS1 4ND

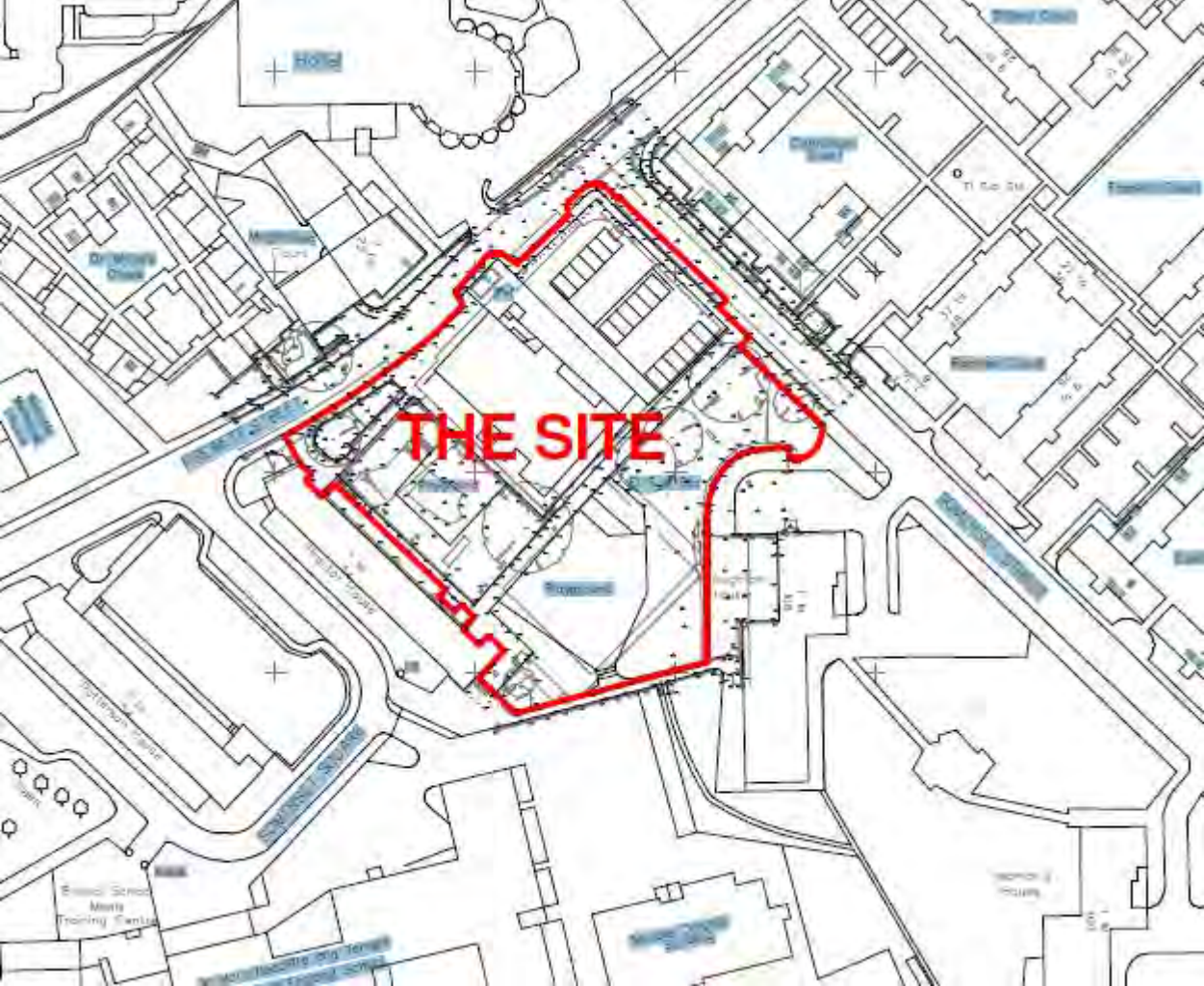
Telephone 0117 975 1308
HistoricEngland.org.uk



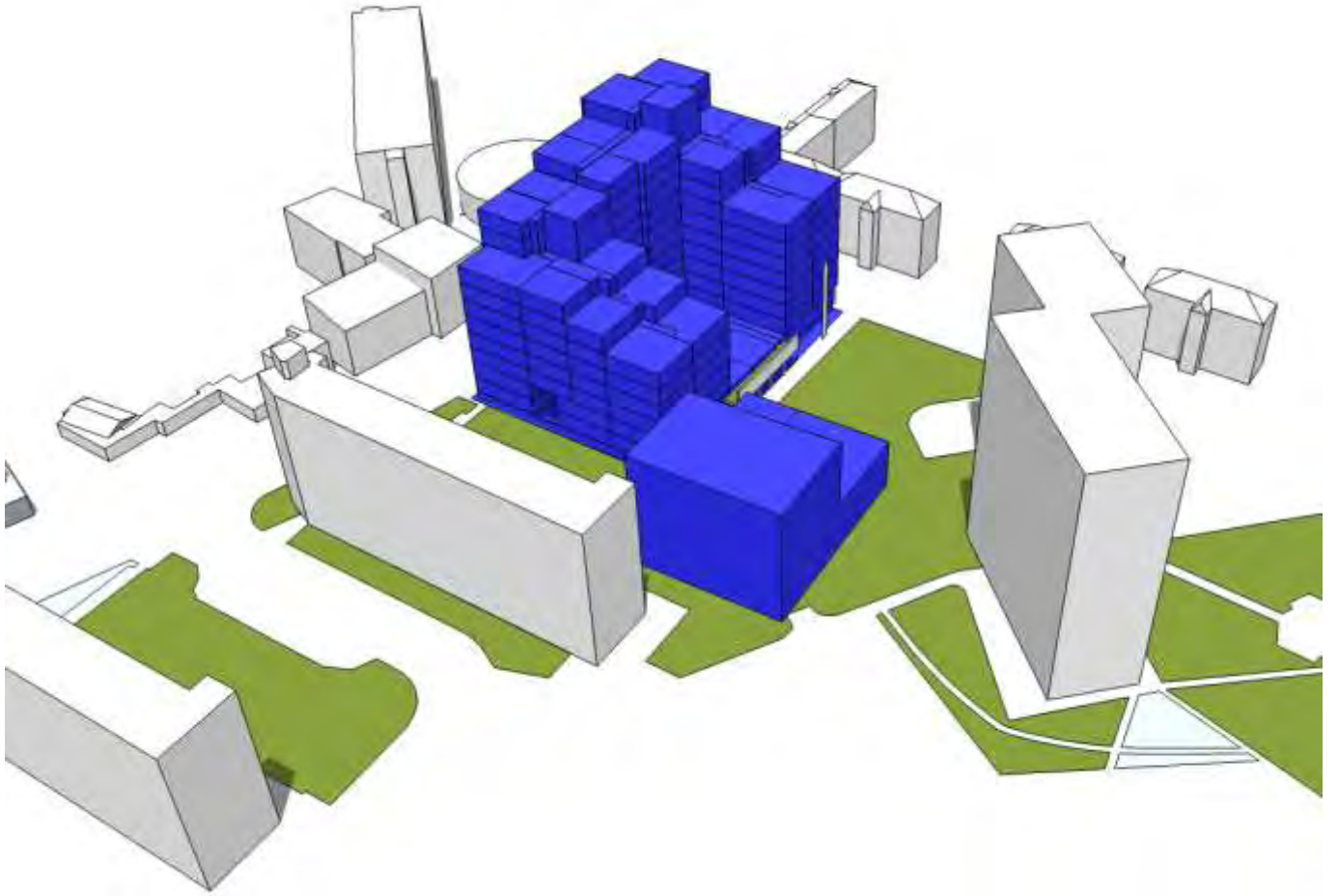
Supporting Documents

1. The Bell Prewett Street

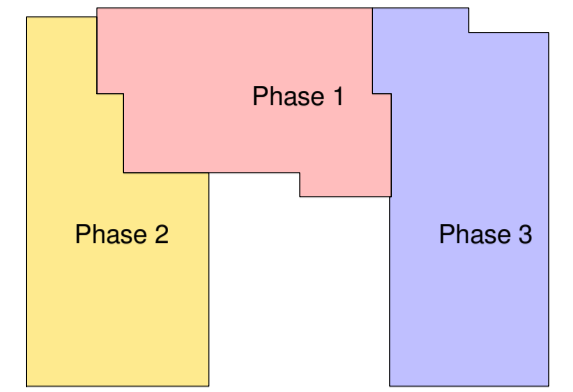
1. Location plan
2. Block plan
3. Typical floor plan main building
4. Ground floor community, sports building
5. Site section 1
6. Site section 2
7. Site section 3
8. Site section 4
9. 3D Somerset Street, Prewett Street
10. 3D South West
11. 3D Various images



BLOCK PLAN

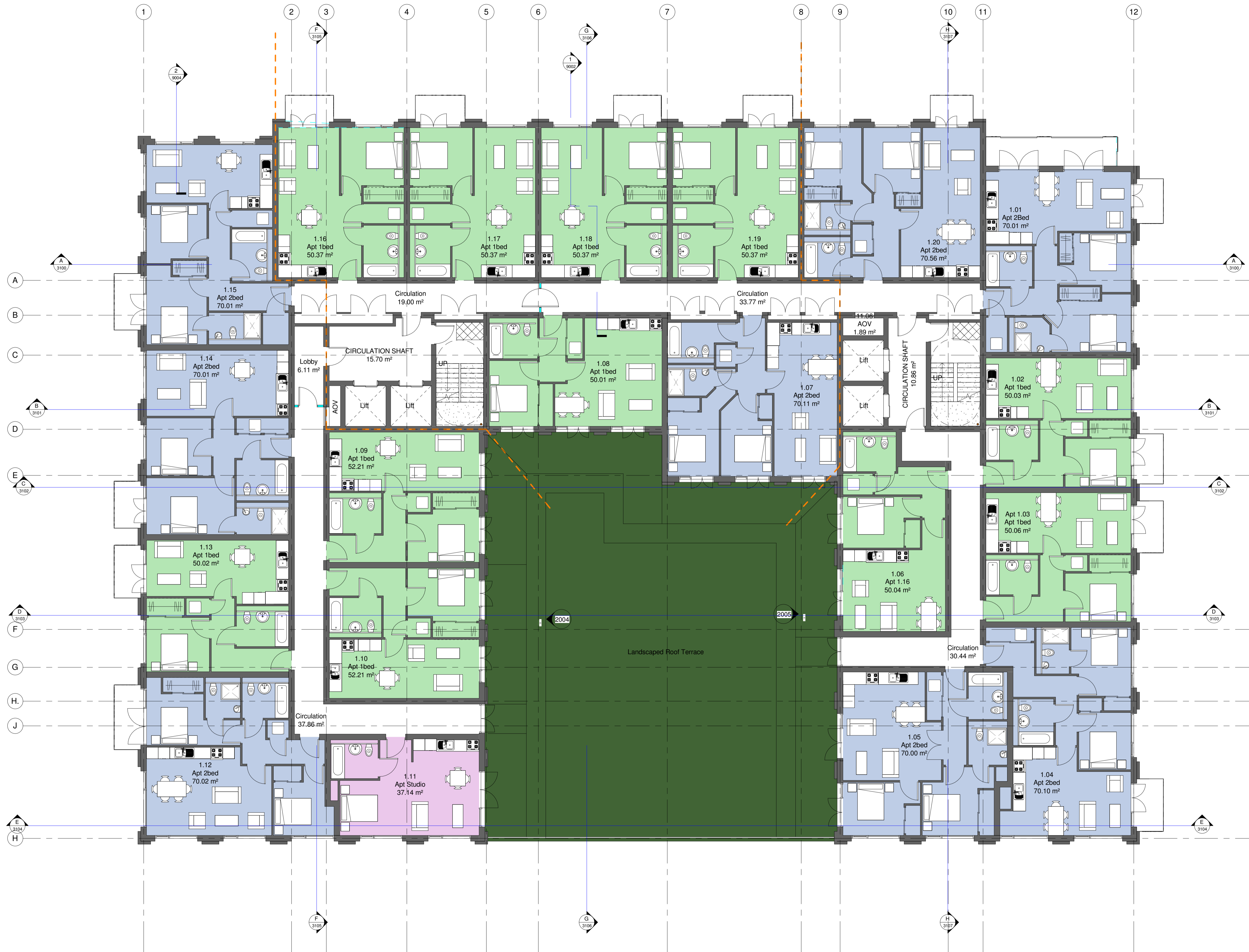


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Apartment Type Key Legend

- 2 bedroom apartment
- 1 bedroom apartment
- Studio apartment



PLANNING APPLICATION

No.	Revision Description	Date	By

THE BUSH CONSULTANCY

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BS4 3EH
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F +44(0)117 316 0571
info@thebushconsultancy.com
www.thebushconsultancy.com

Client:

Project:
Residential Development, Prewett Street

Drawing Title:
Residential Building - Level 1 - First

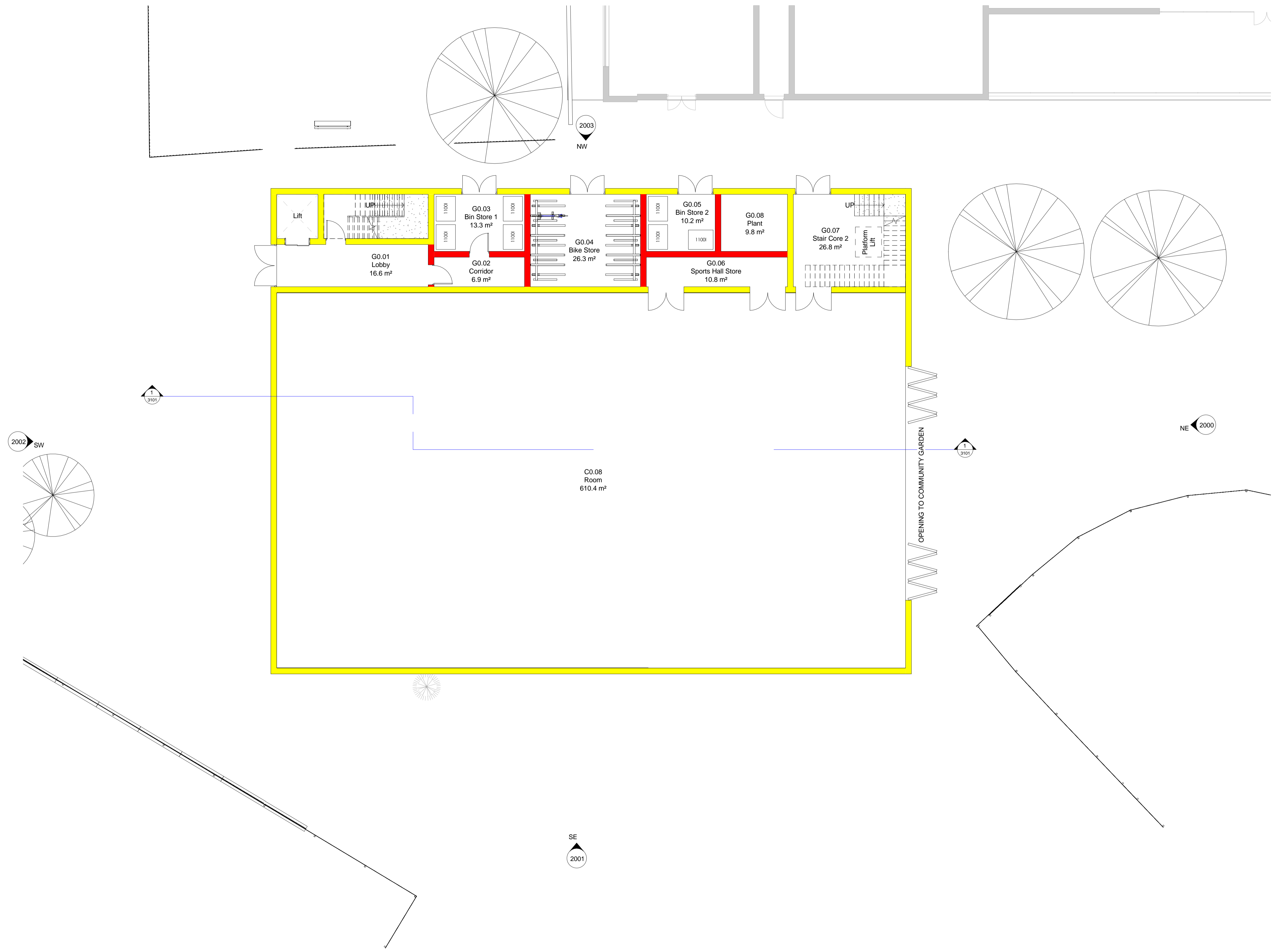
Purpose of Issue:

Status:

Scale : As indicated Original sheet size : A1

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Project	Originator	Zone	Level
3333 - TBC - 01 - 01 - DR - A - 0203			

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DRAFT PLANNING APPLICATION

No.	Revision Description	Date	By
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THE BUSH CONSULTANCY

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 BS4 3EH
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 F +44(0)117 316 0571
 info@thebushconsultancy.com
 www.thebushconsultancy.com

Client:

Project:
 Residential Development, Prewett Street

Drawing Title:
 GF 0 - Ground Floor

Purpose of Issue:

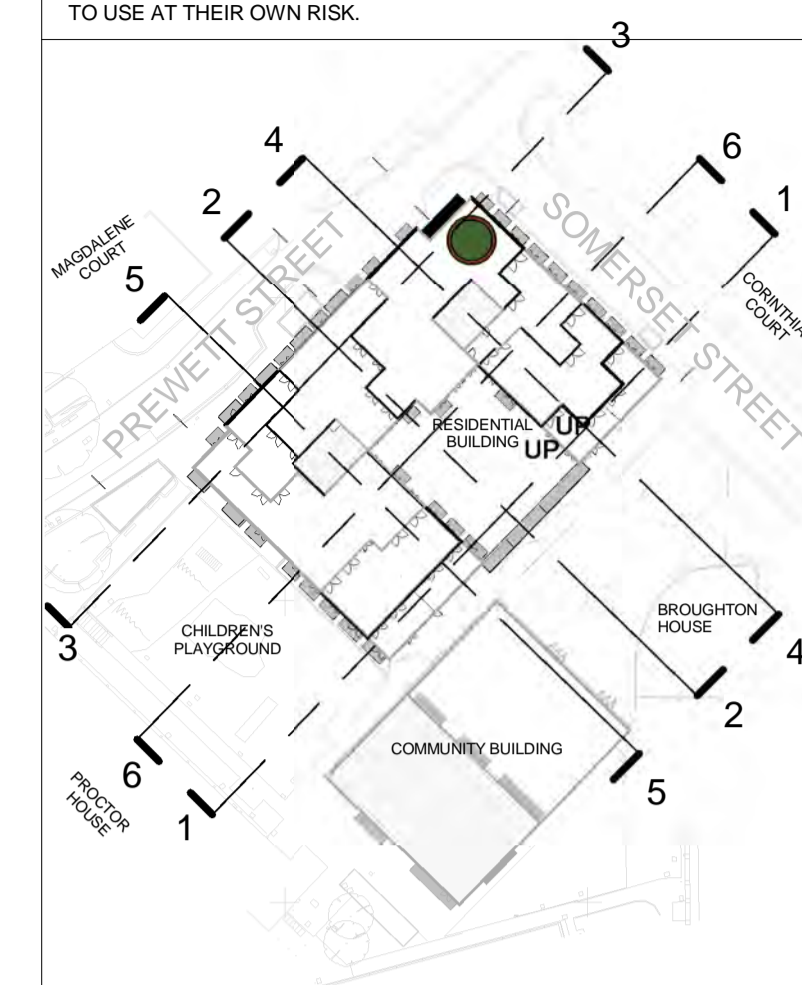
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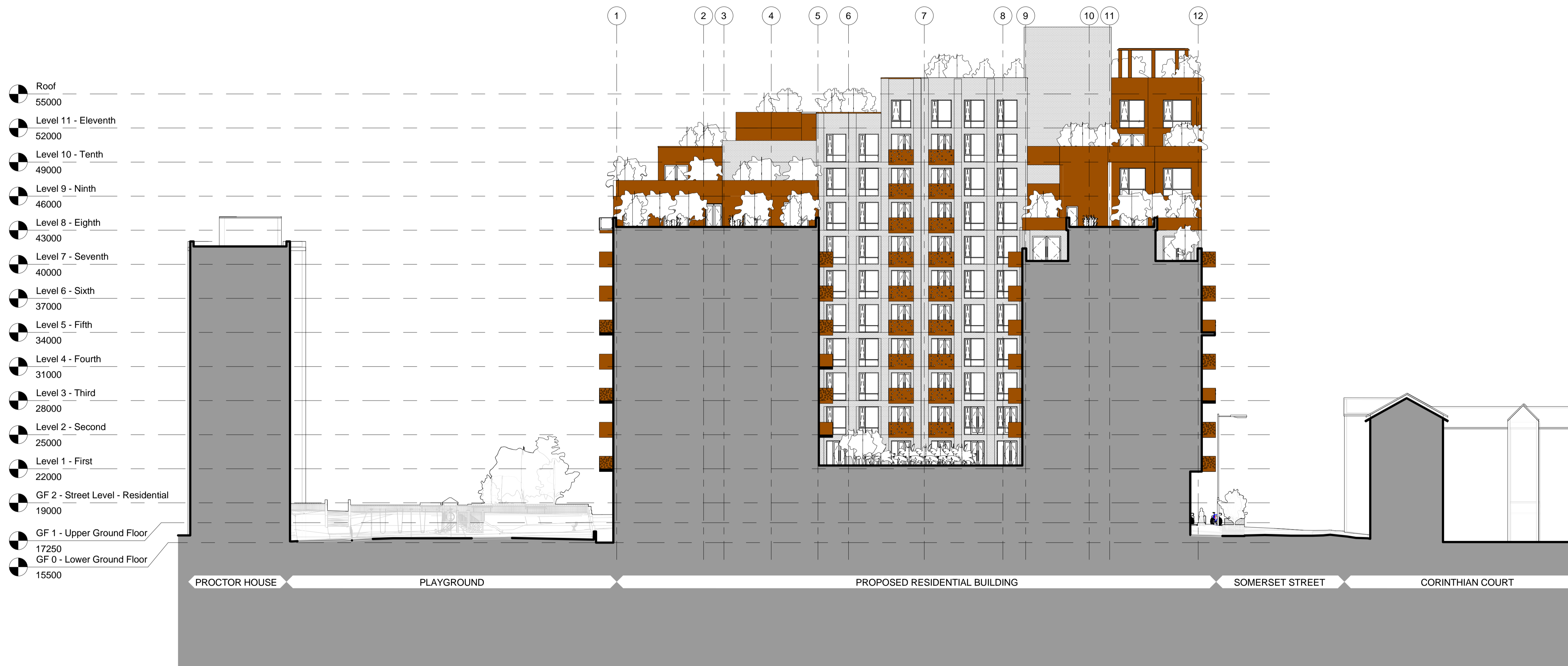
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3333	JM	MK	09/10/17

Project	Originator	Zone	Level	Type	Role	Number	Revision
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Key Plan
1 : 1000



Site Section 1 Through Proctor House / Playground / Main building 1st Floor Terrace / Somerset Street

PLANNING APPLICATION

No.	Revision Description	Date	By
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www.thebushconsultancy.com

Client:

Project:
Residential Development, Prewett Street

Drawing Title:
Residential Building - Site Section 1

Purpose of Issue:

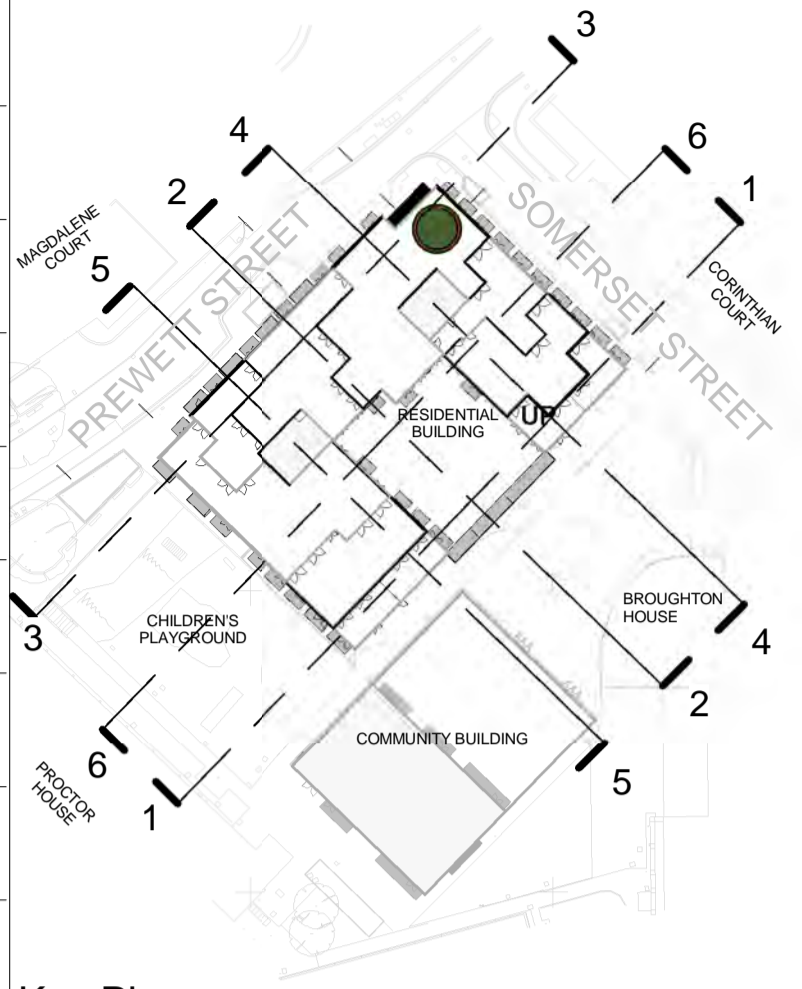
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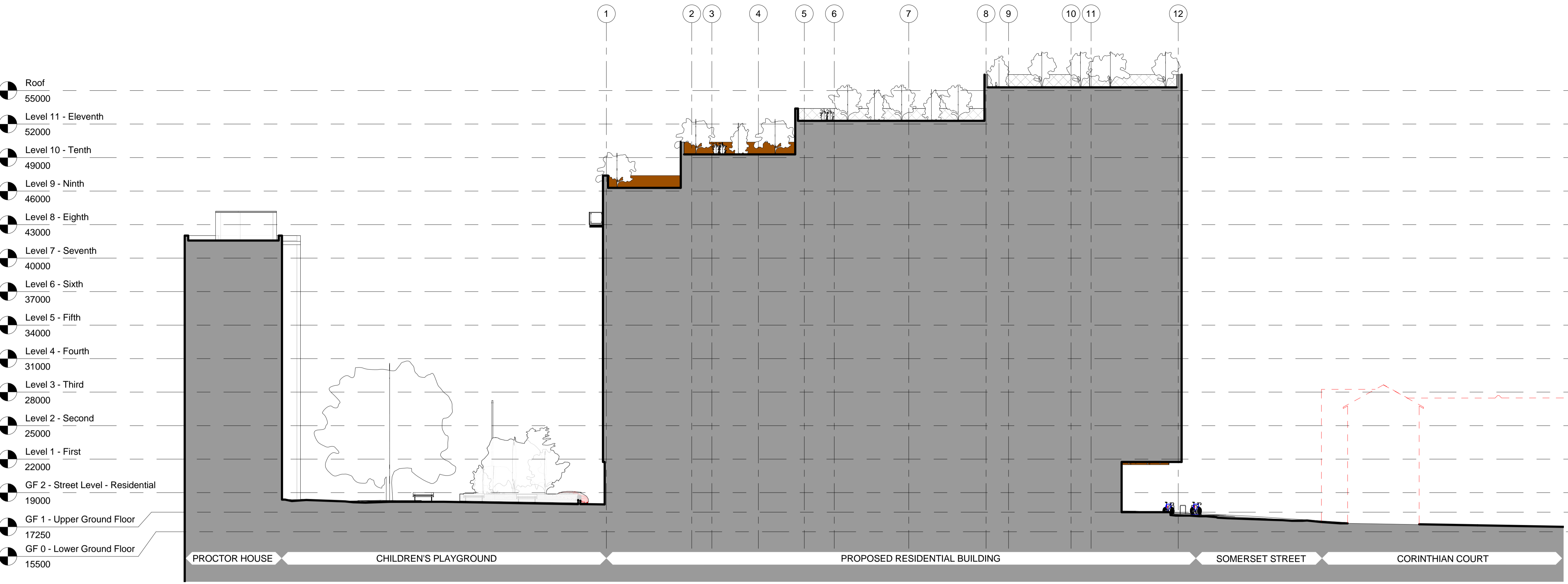
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3333	LOH	MK	12/01/17

Project	Originator	Zone	Level	Type	Role	Number	Revision
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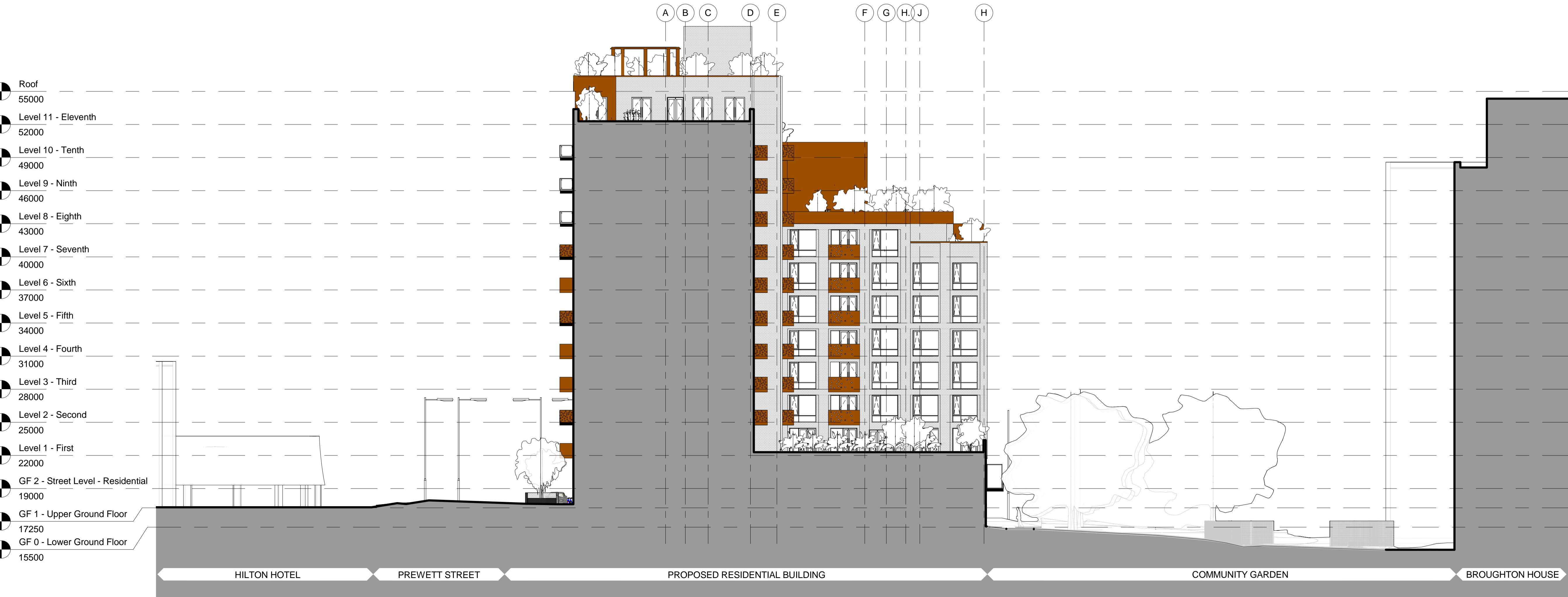
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Key Plan
1 : 1000



Site Section 3
1 : 200



Site Section 2
1 : 200

PLANNING APPLICATION

No.	Revision Description	Date	By

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Client:

Project:
Residential Development, Prewett Street

Drawing Title:
Residential Building - Site Section 2 & 3

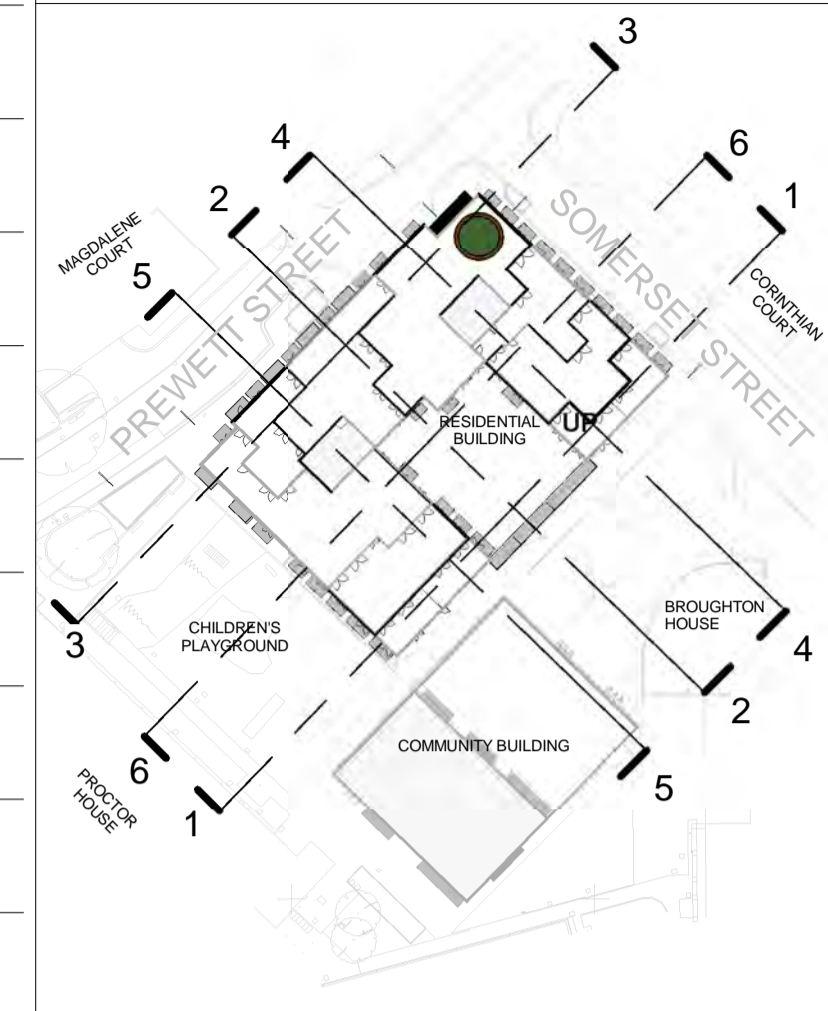
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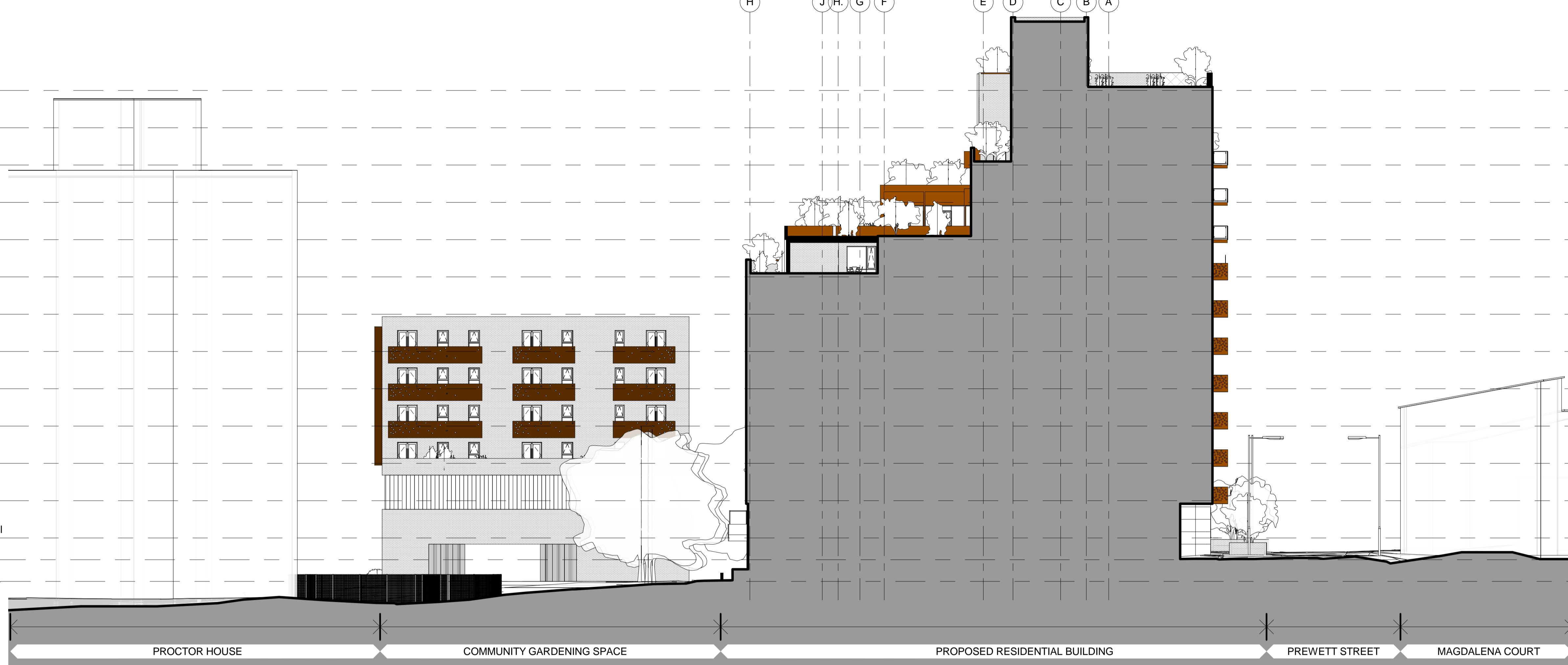
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3333	LOH	MK	12/13/17
Project	Originator	Zone	Level
3333 - TBC - 01 - XX - DR - A - 3109			

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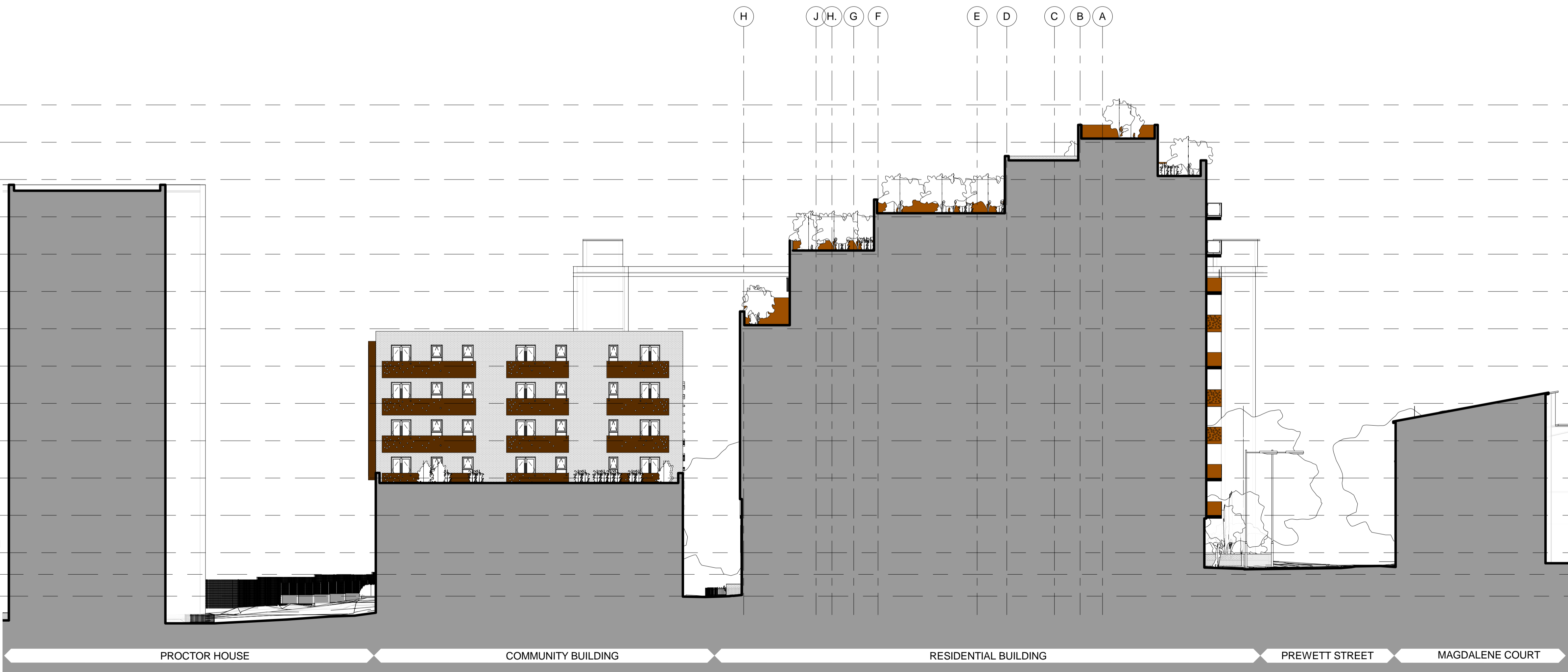
Key Plan
1: 1000

- Roof 55000
- Level 11 - Eleventh 52000
- Level 10 - Tenth 49000
- Level 9 - Ninth 46000
- Level 8 - Eighth 43000
- Level 7 - Seventh 40000
- Level 6 - Sixth 37000
- Level 5 - Fifth 34000
- Level 4 - Fourth 31000
- Level 3 - Third 28000
- Level 2 - Second 25000
- Level 1 - First 22000
- GF 2 - Street Level - Residential 19000
- GF 1 - Upper Ground Floor 17250
- GF 0 - Lower Ground Floor 15500



Site Section 4
1: 200

- Roof 55000
- Level 11 - Eleventh 52000
- Level 10 - Tenth 49000
- Level 9 - Ninth 46000
- Level 8 - Eighth 43000
- Level 7 - Seventh 40000
- Level 6 - Sixth 37000
- Level 5 - Fifth 34000
- Level 4 - Fourth 31000
- Level 3 - Third 28000
- Level 2 - Second 25000
- Level 1 - First 22000
- GF 2 - Street Level - Residential 19000
- GF 1 - Upper Ground Floor 17250
- GF 0 - Lower Ground Floor 15500



Site Section 5
1: 200

PLANNING APPLICATION

No.	Revision Description	Date	By
5.20	The Paintworks Bath Road Alms Vale Bristol BS4 3EH T +44(0)117 316 0570 F +44(0)117 316 0571 info@thebushconsultancy.com www.thebushconsultancy.com		

Client:

Project:
Residential Development, Prewett Street

Drawing Title:
Residential Building - Section 4 & 5

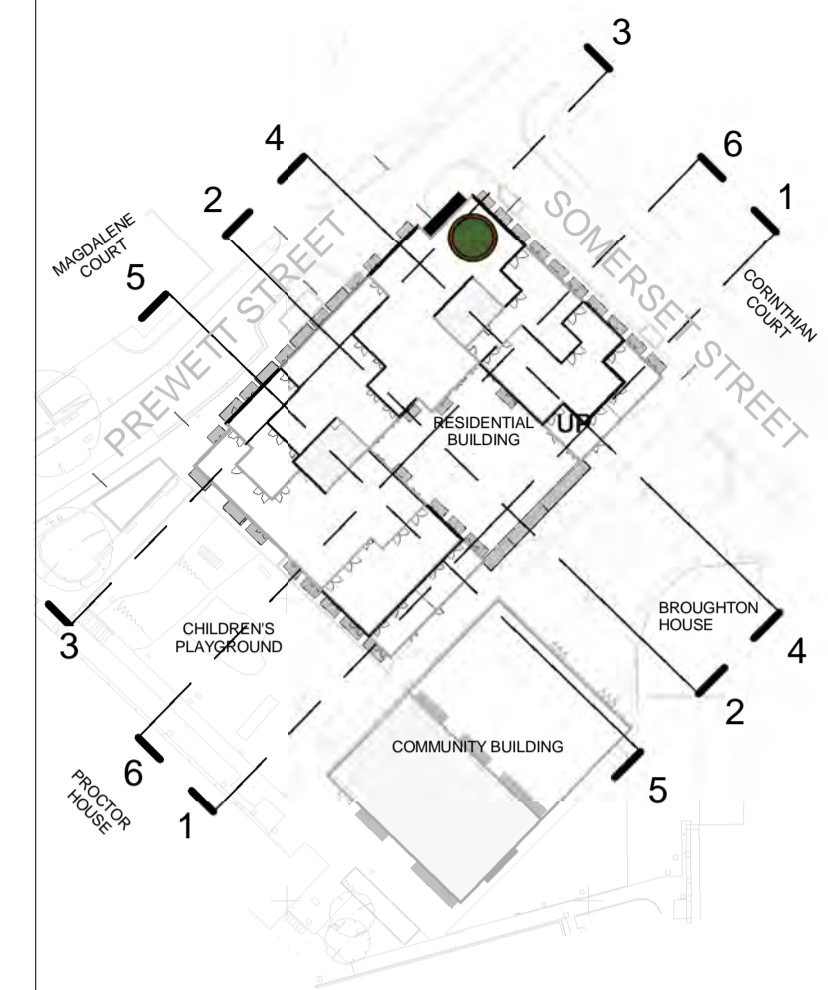
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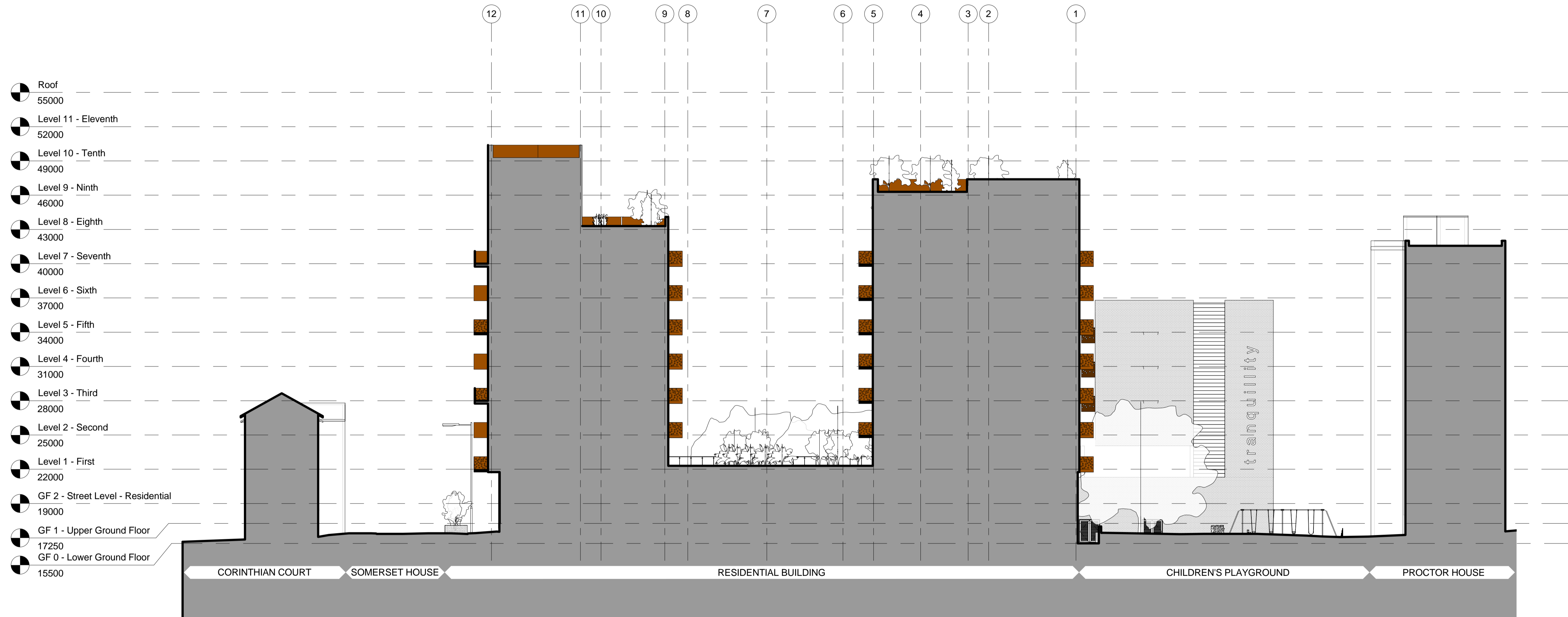
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Project	Originator	Zone	Level
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Key Plan
1 : 1000



Site Section 6
1 : 200

PLANNING APPLICATION

No.	Revision Description	Date	By
-----	----------------------	------	----

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 info@thebushconsultancy.com
 www.thebushconsultancy.com

Client:

Project:
Residential Development, Prewett Street

Drawing Title:
Residential Building - Section 6

Purpose of Issue:

Status:

Scale : As indicated Original sheet size : A1

TBC Internal Project ref: 3333	Drawn By: LOH	Checked By: MKC	Exported from model: 12/14/17
Project	Originator	Zone	Level
3333 - TBC - 01 - XX - DR - A - 3111			



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LANDSCAPING / GREEN ROOFS
TERRACED AREAS
POSSIBLE RENEWABLES LOCATION
NEW LANDSCAPING SEATING
HARD LANDSCAPING

LOADING / UNLOADING BAY/
2 no. CAR BAY
RETAIL FACADE MIXTURE OF GLAZING
TRANSPARENT AND OBSCURE
ENTRANCE TO RETAIL UNIT

ACCESSIBLE PARKING BAY
AND CAR CLUB BAY
BALCONY ARTICULATION PROVIDES
EMPHASIS TO CORNER
MAIN ENTRANCE

PLANNING APPLICATION

No.	Revision Description	Date	By
-----	----------------------	------	----


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 Bristol
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 F +44(0)117 316 0571
 info@thebushconsultancy.com
 www.thebushconsultancy.com

Client:

Project:
Residential Development, Prewett Street

Drawing Title:
Prewett Street

Purpose of Issue:

Status:

Scale : Original sheet size : A1

TBC Internal Project ref: 3333	Drawn By: JM	Checked By: MK	Exported from model: 10/10/17
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Project	Originator	Zone	Level	Type	Role	Number	Revision
3333 - TBC - 01 - XX - DR - A - 7001							



AERIAL VIEW FROM SOUTH WEST BROMPTON HOUSE

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PLANNING APPLICATION

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 www.thebushconsultancy.com

Client:

Project:
 Residential Development, Prewett Street

Drawing Title:
 Prewett Street

Purpose of Issue:

Status:

Scale : Original sheet size : A1

TBC Internal Project ref: 3333 Drawn By: JM Checked By: MK Exported from model: 11/02/17

Project	Originator	Zone	Level	Type	Role	Number	Revision
3333 - TBC - 01 - XX - DR - A - 7011							

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VIEW ALONG PREWETT STREET (EAST - WEST)



VIEW ALONG PREWETT STREET (WEST - EAST)



VIEW FROM SOUTH WEST OF BROUGHTON HOUSE



VIEW TOWARDS COMMUNITY BUILDING /
COMMUNITY GARDEN

PLANNING APPLICATION

No.	Revision Description	Date	By

THE BUSH CONSULTANCY

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www.thebushconsultancy.com

Client:

Project:
Residential Development, Prewett Street

Drawing Title:
Prewett Street

Purpose of Issue:

Status:

Scale : Original sheet size : A1

TBC Internal Project ref:	Drawn By:	Checked By:	Exported from model:
3333	JM	MK	10/10/17

Project	Originator	Zone	Level	Type	Role	Number	Revision
3333 -	TBC -	01 -	XX -	DR -	A -	7002	

3333 - TBC - 01 - XX - DR - A - 7002