

WARD: Central

SITE ADDRESS: The Marchioness Building Commercial Road Bristol BS1 6TG

APPLICATION NO: 19/01925/F Full Planning

DETERMINATION DEADLINE: 18 June 2019

Reinstatement of historic landing stage for use associated with Marchioness site (revision to 17/03268/F).

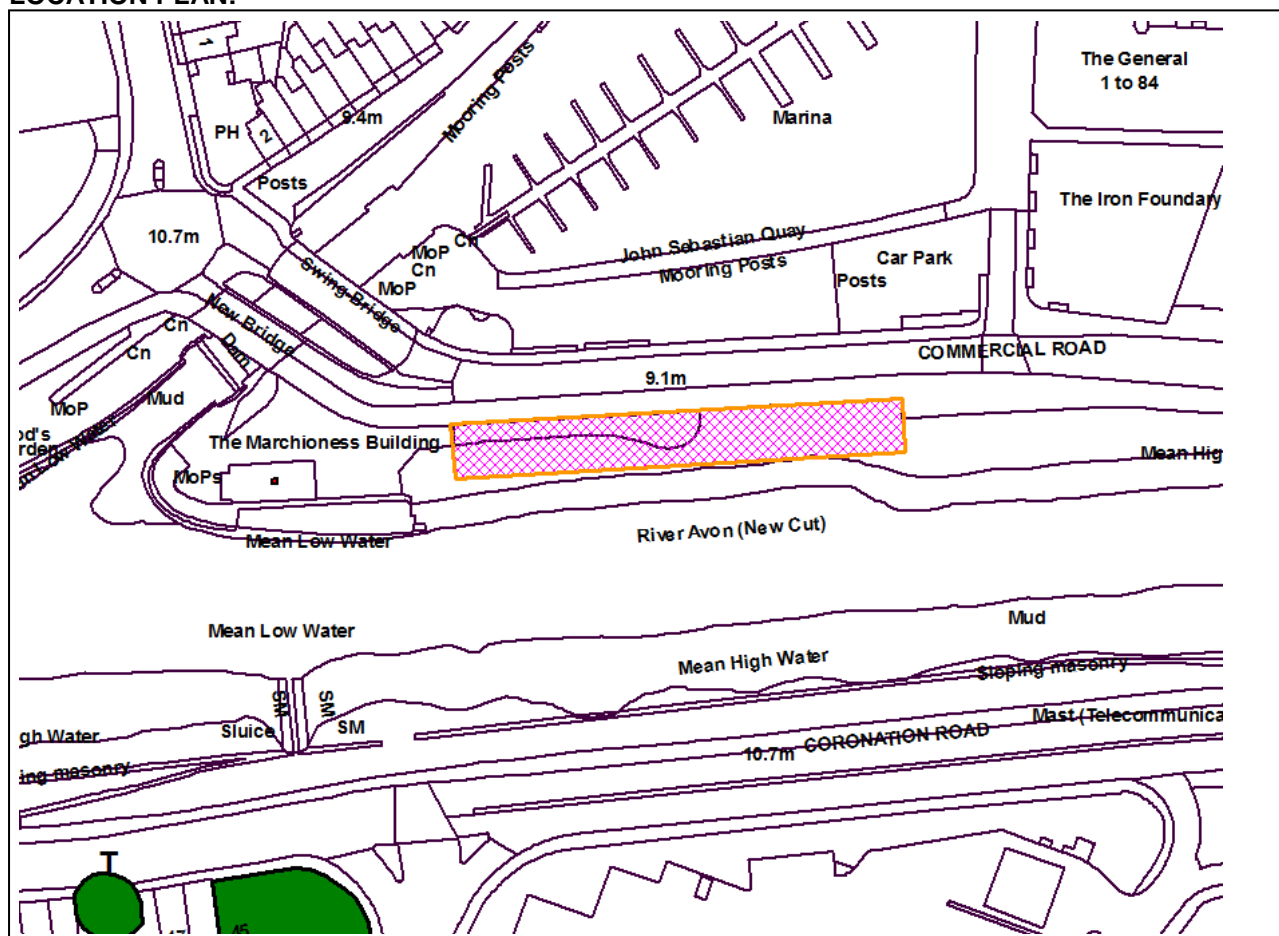
RECOMMENDATION: Refuse

AGENT: WYG Planning & Design
90 Victoria Street
Bristol
BS1 6DP

APPLICANT: Dr H & Mrs J Pratt
C/o Agent

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

LOCATION PLAN:



Development Control Committee B – 18 March 2020**Application No. 19/01925/F : The Marchioness Building Commercial Road Bristol BS1 6TG****SUMMARY**

Planning permission is sought for a 'reinstatement of a historic landing stage for use associated with the Marchioness Site.' This application follows a previous and almost identical application 17/03268/F that was refused under officer delegated powers in April 2018 due to adverse visual/heritage/green infrastructure impacts/, highways, flood risk and land instability grounds.

The application has been referred to Committee by Councillor Smith on the grounds that "the application aims to restore a derelict jetty on the new cut and as such I believe it should be supported on conservation grounds and also to enhance the riverside in this area."

The current application differs from the last (refused) application 17/03268/F only in the following regards:

- o Technical Assessments (Geotechnical Assessment and Flood Risk Assessment) provided
- o Additional plans and visualisations provided
- o Additional supporting documents provided in respect of background information.

This report contains a summary of changes compared to the previous application and the officer report for the previous refused application is appended to this report.

Twenty objections have been received to the proposals from third parties, including The Civic Society, Conservation Area Panel, Friends of Bathurst Basin and Friends of the Avon New Cut. The key objections include potential adverse impacts on Conservation and heritage assets, natural open space assets, impacts on the River Avon SNCI, uncertainties regarding the purpose of the structure and lack of information.

The City Design Group (Conservation and Landscape) have objected to the proposals with the support of Historic England. BCC Transport Development Management, the Flood Risk manager and the Environment Agency have also objected to the proposals.

Officers have considered the application changes and for the reasons set out in the report, consider the refusal reasons have not been overcome and as such refusal of the application is again recommended.

SITE DESCRIPTION

The redlined application site comprises a rectangular parcel of land between Commercial Road and the River Avon (New Cut), in the Redcliffe area of the city. The site incorporates grassed embankment and stretch of sloping private access road leading to the Marchioness site. The Marchioness site lies within the ownership of the applicant and comprises a small building known as the Marchioness building and land surrounding the building. The current use of the Marchioness building is unclear, although it is understood to have previously been in residential use. The hardstanding area surrounding the building is used as a commercial carpark.

Both the application site and the Marchioness site lie within the City Docks Conservation Area. The Marchioness building is unlisted. The walls surrounding the Marchioness site are Grade II listed as part of a wider listing comprising of the walls, quays and bollards to Bathurst Basin. The site lies within the setting of a number of listed buildings, including the Grade II listed General hospital and St Pauls Church tower on the south side of the river.

The site lies within the Central Area Plan boundary and lies adjacent to a proposed Quayside walkway on the Central Area Plan proposals map. The site lies adjacent to the River Avon (New Cut) Site of Nature Conservation Interest (SCNI) (identified on the Site Allocations and

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Development Management Policies Map (2014) .

Bathurst Basin lies close to the site to the north. The surrounding area includes residential and mixed use developments, carparking and commercial premises. The new Bathurst roadbridge and cycle track are recent additions to the local highway infrastructure as part of the Metrobus project.

RELEVANT PLANNING HISTORY

17/03268/F Reinstatement of historic landing stage for use associated with the Marchioness site. REFUSED due to adverse impacts on heritage assets, highway maintenance/operation/safety concerns, land stability and flood risk issues.

13/05648/FB The current application site partially overlaps with the application site identified under Land Between The A370 Long Ashton Bypass In North Somerset And Cater Road Roundabout (Cater Road Bristol) Revision to the route of the rapid transit scheme authorised by the Ashton Vale to Temple Meads and Bristol City Centre Rapid Transit Order (the Order). The development comprises construction of a new junction with Cumberland Road, a new bridge at Bathurst Basin, flood protection measures, demolition and reconstruction of walls, realignment of highway, crossings, traffic signals and temporary construction areas, bus stops and shelter. GRANTED subject to condition(s). The original Metrobus route was amended by way of planning application in 2014 to pass along Commercial Road. (Amended layout and associated works approved by planning committee in 2014, under application 13/05648/FB.) It is understood that the Metrobus works required compulsory purchase of land from the applicant by the Council, in order to provide the new Bathurst Basin roadbridge.

15/05276/CE (relating to Car Park, The Marchioness Building, Commercial Road) Application for a Lawful Development Certificate for an existing use of the application site as an unrestricted commuter car park. Certificate of lawfulness issued.

06/02971/LC -The Marchioness Building, Commercial Road Demolition of existing building. REFUSED

06/02972/P The Marchioness Building, Commercial Road -Outline planning application for proposed redevelopment of site to provide 24 residential units (Class C3). REFUSED

06/03501/Z The Marchioness Building, Commercial Road - Appeal on enforcement notice ref. 05/30616/OTHER against 'Long-term erection of scaffolding on land to north-east of Marchioness Building adjoining south side of swing-bridge'. Appeal dismissed.

05/03246/CE - The Marchioness Building, Commercial Road)Certificate of Lawfulness to allow for continuation of use as single dwelling house - Certificate of lawfulness issued.

APPLICATION

Planning permission is sought for 'reinstatement of a historic landing stage for use associated with Marchioness site.'

Six plans have been submitted in support of the application;

Site location plan

Proposed.Jetty detail

Plan and cross section with levels 11514-HYD-XX-XX-DR-D-0002 P01

Proposed elevations and borehole locations 11514-HYD-XX-XX-DR-G-1001 P2

Jetty existing

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Jetty Proposed

Supporting documents include;

Visualisations

Cross section data xyz

Planning and Heritage Statement

Geotechnical Assessment (Hydrock)

Flood Risk Assessment (Hydrock)

Background

The Planning Statement refers to the two landing stages or floating piers previously situated on the application site in the mid 19th Century that allowed shipping to moor up in the New Cut. The applicants contend the proposals are a reinstatement of a historic landing stage and have also justified the application on the grounds that;

"the principal purpose of the jetty is to provide for the improved stability of the riverbank, and that a secure access is required as the Council removed the original main access to facilitate the new Bathhurst Basin bridge as part of the Metrobus project."

Physical works

The proposal would involve installation of a level timber and steel platform, some 96m long x 9m deep, supported on piles embedded in the riverbank. The installation works would include excavation of the land, existing access road and riverbank under the structure, as shown on plans. The platform would run parallel with Commercial Road, with a ramp at the western end to allow access into the Marchioness site. The deck of the platform would be level with Commercial Road.

An indicative boundary treatment is shown on the plans between the structure and Commercial Road. Visualisations indicating the appearance of the fencing have been provided as supporting documents.

RESPONSE TO PUBLICITY AND CONSULTATION

The application has been advertised in the press and on site notice. Neighbour letters have been sent to nearby properties. 12 objections have been received, on grounds summarised below -

Bristol Civic Society -Objections raised

Bristol Civic Society objects to the proposed structure because it would spoil the natural appearance of the New Cut bank at this point to the detriment of the character of the Conservation Area. It is not at all clear what the structure would be used for from the application. Inappropriate uses such as car parking would exacerbate the harmful impact of the proposal on the Conservation Area.

Conservation Advisory Panel - Objections raised

The Panel could not find a clear description of the proposed use of this landing stage. There was concern that this large deck would have an adverse effect on the character and appearance of the conservation area. The application provided very little information on the proposed palette of materials.

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Friends of the Avon New Cut (FrANC) Objections raised on the following grounds ;

1. Size of the proposed jetty. FrANC pioneered trips by boat along the New Cut some years ago and we are very familiar with the difficulties of navigation here. The boats which are able to navigate the Cut cannot be very large as there is a constraint on the air draught and water draught at Ashton Road Bridge and tides seldom achieve the desired conditions except for very small boats. In addition the man-made river cut is narrow and when the Cut rejoins the River Avon it becomes twisty and increasingly shallow. Only boats of 20m. or less are likely to attempt the navigation, whereas the proposed jetty is nearly 100m. long, which is clearly much longer than necessary even in the unlikely event of many small boats sailing together.
 2. Design. If the proposal seeks to replicate the historic jetty it would be built as a pontoon style floating jetty, which makes it easier for passengers to join and leave vessels at different states of the tide. There is little point in replicating the jetty as it once was as the type of boat which once sailed from Marchioness Jetty can no longer negotiate Ashton Road Bridge which has been a fixed rather than swinging bridge since the 1950s.
 3. Damage to the natural environment. The New Cut has been populated with wildlife naturally from the date it was completed in 1809. The construction and presence of such a large fixed jetty would inevitably interfere with the river flow as well as causing contamination of the water and banks and the effect on wildlife could be considerable. The wildlife of the New Cut has been studied and recorded by FrANC over a period of some 15 years and is diverse and numerous including at least 2 rare plants. There are increasing numbers of fish as the water quality has steadily improved and increasing numbers of birds many of which feed on fish.
 4. Effect on the visual amenity of the New Cut. The Avon New Cut penetrates densely populated parts of the city and the green and natural appearance provides stress relief for city dwellers and a connection with the tidal ebb and flow. Since FrANC has publicised and assisted access for the public to the surroundings of the Cut it has become hugely popular for walking, relaxing and for studying the natural environment. The large structure of the proposed jetty would detract from the attraction of the waterway.
 5. Members of FrANC are concerned about the lack of attention paid to the walls of the Cut as in many places we have observed serious deterioration. If this fixed jetty is built it will become very difficult to inspect the walls of the Cut at the Marchioness site or to remedy any deterioration as it occurs. Damage to the walls may be caused by the construction works.
 6. it is not clear what purpose this proposed jetty will serve and we share public concern that it will be used as a car park which will disfigure the surrounding area and damage the visual amenity of the waterway.
- We urge the Planning Committee to reject this application.

Friends Of Bathurst Basin -Objections raised on the following grounds ;

Friends of Bathurst Basin is a community group set up in May 2019 to preserve, develop and enhance Bathurst Basin where people live, work and enjoy leisure activities.

We oppose the planning application sought by Dr and Mrs Hugh Pratt for the 'reinstatement of a historic landing stage for use associated with Marchioness site' for the following reasons:

- The two nineteenth century landing stages were floating piers. In what sense is the proposed fixed landing stage an historical re-instatement? As a fixed structure it has nothing in common with the historic jetty.
- There has been no marine traffic requiring jetty support on the New Cut for many years, nor is

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there any planned.

- The proposed marine jetty structure is not suitable for marine vessel mooring operations in a strongly tidal river - no bollards, no steps, no lighting etc.

- The proposed jetty is of considerable size - 9m by 96m. The applicant has failed to demonstrate why it is so large. It will not enhance the character and distinctiveness of this part of the Conservation Area.

- In their appeal, the applicants challenge one key reason for rejection - the 'potential use' of the jetty for car parking purposes. It is easy to understand the Council's suspicions. Why would one build a jetty of this size? Simply stating that 'jetty can only be used for purposes ancillary to the existing Marchioness site' does little to clarify what the intended use is. The applicant fails to specify what the 'ancillary purposes' would be. We strongly oppose the use of the jetty for more car parking.

Due to a lack of clarity as to the actual intent for this site, there is a lack of trust in this application. The applicants need to be far clearer about the real purpose of this asset and how it interfaces with plans for the Marchioness hut and surrounding area.

Other objections - (summarised)

Object to the potential use of the structure for car parking on visual and air quality grounds.

The potential use of the structure for carparking goes against the aim of creating a clean air zone in the city. Unless there are very specific restrictions which the council are prepared to enforce if necessary, I believe this application should be rejected.

The purpose of the structure is unclear from the application; the application fails to define the purpose or identify public benefit. There is no need to build the jetty as the access route to the Marchioness site can be repaired within the current wall boundary.

The application is fundamentally flawed due to insufficient information on use or purpose.

Materials are unclear - could lead to marine pollution.

The plans submitted for the Marine Replica jetty would require substantial removal of sediment, soil mud and vegetation to be dug out and deposited on the top bank to build the proposed jetty. (See maps of river cross section submitted by applicant) This would destroy much of the plants, insects and impact wild life. No estimate provided of the volume of mud and silt and top layer soil would need to be dug up and removed, but it would be substantial.

No offer to make a full EIA and analysis of all plants, insects and fish that would be impacted by the development and how to mitigate the risk exposure to destroy much of the ecology on site. The proposal no longer is compatible with Bristol City Council & Avon wildlife trust aims in respect of the ecological emergency facing Bristol.

Plans are insufficiently detailed regarding access between the platform and river; bollard mooring points, planned deck loading, lighting or life buoys.

The application fails to define what will happen to existing rotting jetty structures.

The application fails to define fail other site alternatives.

Provision of landing needs to be considered strategically in terms of the Cut and how to rejuvenate it as a prime asset.

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Lack of information on traffic volume of vessels and personnel and what the operating hours will be.

Potential damage of outlook and view for residents of the General Hospital.

The consultation exercise has not included residents of the General or Iron Foundry.

SUPPORT

Councillor Smith provided the following comment of support as part of this Committee referral request -

This application aims to restore a derelict jetty on the New Cut and as such I believe it should be supported on conservation grounds and also to enhance the riverside in this area.

Internal consultees (summarised by case officer).

BCC Conservation Officer - strong objections raised to the development.

The application has been discussed with the Conservation Officer as a surgery item. The Conservation Officer is concerned that the applicant has not adequately addressed the Council's reason for refusal on heritage grounds. The applicant has failed to amend the scheme in relation to the loss of visual open space and the incongruous appearance of the overscaled structure in this sensitive location. The proposals neither preserve or enhance the character and appearance of the Conservation Area. Refer also to previous comments;

Concerns raised as to the overall lack of detail accompanying the application, the proposals are not accepted as evidencing a 'reinstatement of historic landing stage' based on the level of detail provided, absence of condition or geotechnical survey or method statement, or clear evidence of previous historic structures.

A structure of this scale and design would be apparent in close and medium views within and towards the site from the City Docks Conservation Area. The proposed platform would conceal the grassed embankment and erode the contribution of the site to the wider character of the New Cut, which is identified as a natural green space in the Parks and Green Space Strategy. The structure would appear as an incongruous and alien feature on this part of the New Cut and would appear to facilitate vehicular movement and parking - queries raised as to whether the structure could or would be used as a carparking platform - the visual impact of carparking on this scale would be harmful to the character and appearance of this part of the CA. The proposals would appear to result in disturbance/loss of some historic fabric, again there is a lack of sufficient detail confirming this in terms of extent of retention of existing historic railings on and around the site. Overall, the submissions indicate that the structure would result in less than substantial harm to the designated heritage asset of the Conservation Area.

The structure would be installed in close proximity to the Grade II listed harbour walls surrounding the Marchioness site (included within the Bathurst Basin listing ; insufficient detail has been provided in terms of condition survey of these listed walls or impact assessment of installation of the structure; the proposals fail to provide certainty that historic fabric of the harbour wall would be physically unaffected.

Overall, assessment is that the proposals would adversely impact on the character and appearance of this part of the City Docks Conservation Area and fail to demonstrate acceptable impacts on the listed harbour walls.

Public benefit arising from the proposals has not been clearly demonstrated in the submissions.

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Landscape Officer- objections raised to the development.

This application is a resubmission of the previous application 17/03628/F. With regard to landscape and public realm impacts in relation to the conservation area setting, there is little additional visual content serving to justify a resubmission, the main addition being a text document rebutting the previous reasons for refusal.

Whilst some assurance has been provided in relation to the comment relating potential use for car parking, information justifying the development in relation to the scale, form and overall design of the landing is still absent; the visualisations provided in support of the proposal are too small, neither clear or convincing quality in regard to likely visual effect; if visual montages are used the methodology used to construct them should also be provided - detail of viewpoint locations, camera/lens format, focal length of image and presentation of images at a size that aids the appreciation of the image.

Though not detailed within the submission, reference is made to a new security palisade fence running the length of the applicants landholding provided under a MetroBus agreement. As the fence is shown in the visual montages accompanying the application it is right to refer to it in the context of this application. The fence is abutting the existing traditional Port of Bristol railing but exceeding it in height; as such it should itself be subject to planning approval. With regard to appearance, the fence would be out of keeping with the character of the City Docks Conservation Area and would not be supported.

To conclude, the proposal has not progressed the case for approval in a significant way over and above the previous refused application. Further, the associated fencing is harmful to the character of the conservation area and the proposal includes no obvious measures that would mitigate the harm caused in the form of public benefit. For this reason the application is not supported.

Transport Development Management - objections raised to the development.

In its current format the application has provided insufficient evidence to indicate the purpose, need for (considering the constraints on the size of vessels that would be able to use it) or end usage of the landing stage. As the existing site is used for car parking, if this is the intended usage, this would be in clear contravention of Policy BCAP29: Car and cycle parking of Bristol Central Area Plan - Policies - Adopted March 2015, not to mention Policy DM23: Transport Development Management of Bristol Local Plan - Site Allocations and Development Management Policies - Adopted July 2014 by virtue of the increased number of vehicle movements.

Furthermore, no clear technical assessment (Approval In Principle) or Construction Management Plan has been submitted as to how the landing stage will be constructed. This is unacceptable, particularly given the fact that it must not in any way rest on or use the adjacent retaining wall for support and is contrary to Policy DM37: Unstable Land of Bristol Local Plan - Site Allocations and Development Management Policies - Adopted July 2014. Due to its size a significant amount of construction materials, vehicles and plant will be required, which will undoubtedly require footway and carriageway closures. This will have a detrimental impact on the day to day operation of the AVTM Metrobus route and shared cycle/pedestrian route, which is unacceptable.

Finally whilst a site plan has been submitted it does not accurately represent the surrounding highway infrastructure and no plans have been provided showing the design of the landing stage or how it will interface with the existing carriageway and the private access road. With such a lack of detail it is impossible to properly assess the application to ensure that if permission were to be granted it would not significantly impact the safe operation of the adjacent adopted highway. Consequently Transport Development Management recommends that the application be refused.

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Nature Conservation - objections raised to the development

The two easternmost possible locations for siting the crane shown on the borehole location plan are located on the designated Site of Nature Conservation Interest (SNCI), River Avon (part of). I object to this planning application because these two locations are contrary to Policy DM19 in the Local Plan. Using only the westernmost location would address this objection.

The following additional comments apply if the comment above can be addressed.

This proposal adjoins the designated Site of Nature Conservation Interest (SNCI), River Avon (part of). As a planning condition prior to commencement of development, robust fencing, e.g. Heras with warning signs on, e.g. 'Keep out: Wildlife Protection Area', should be installed and maintained during the construction period to protect the SNCI which is located immediately to the south. The location of the SNCI can be seen on Bristol Pinpoint.

This proposal involves the removal of three trees. All species of wild birds, their eggs, nests and chicks are legally protected until the young have fledged. The suitable planning condition is recommended restricting clearance of vegetation or structures suitable for nesting birds between 1st March and 30th September inclusive in any year without the prior written approval of the local planning authority.

If external lighting is proposed then it should be designed to minimise light spill onto the River Avon (part of) Site of Nature Conservation Interest which is a key commuting route for bats, through the use of measures such as low level bollard lighting. If significant external lighting is proposed near the river then I recommend that you condition a lux contour plan as follows.

Arboriculture - objections raised to the development as per 17/03268/F -

The support tree survey is rather basic and does not fulfil the requirements of DM17. This document identifies the trees on a map and provides a basic assessment of the trees.

No tree protection has been specified or identified on an appropriate plan and no BTRS calculations have been provided to mitigation for the loss of Trees in line with this proposal. Trees 1-3 have been identified for removal through the Metrobus application. (TDM have confirmed this is incorrect).

The tree survey does not provide stem diameters so that mitigation can be applied.

The scant arboricultural documentation is insufficient and we require further information to ensure the trees on site have been considered appropriately.

We require:

- o A tree protection plan to identify trees to be retained or removed.
- o BTRS calculations for tree replacement on site.
- o Calculation of financial contribution for trees that cannot be replaced on site.
- o Arboricultural implications assessment and method statement for the protection of trees to be retained.
- o A high quality landscape plan containing tree locations, species, planting stock size (Minimum 12-14cm Girth) & maintenance schedule for watering and aftercare to ensure establishment of newly planted trees.

Ground Contamination /Pollution control –

The propose development whilst unlikely to pose a risk to future occupiers is located on the main river. We have concerns that piling could cause potential contamination of the watercourse from the construction activities. Therefore we recommend a Foundation Works Risk Assessment is

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undertaken prior to works commencing and the C1 condition is applied to any future planning consent, so that if encountered contamination will be dealt with. Condition wording provided.

BCC Flood Officer - objections raised to the development

It is not clear what the proposal is intended for, and therefore the assertion within the flood risk assessment that the proposed jetty is a water-compatible use (as defined by the National Planning Policy Framework) cannot be verified. Should the proposal have an operational use, e.g. storage or car parking, it presents an increased risk of debris entering the watercourse during times of flood, which consequentially could increase flood risk to third parties.

Furthermore, we do not consider the flood risk assessment to adequately demonstrate that the loss of channel cross section would not increase flood risk to third parties. Nor do we consider the conclusion of the flood risk assessment that the risk of debris blockage is low.

Should the planning authority be minded to approve the application, we consider it essential that we as Lead Local Flood Authority, and the Harbour Authority are notified. We also strongly advise that the advice of the Environment Agency is sought and duly considered.

28.10.19

I still maintain the position that the proposal does not constitute a water compatible use. I therefore maintain my objection on flood risk grounds as it is contrary to table 3 of the national flood risk and coastal change planning policy guidance.

I also note that the notes to table 3 state that "water-compatible uses, should be designed and constructed to remain operational and safe for users in times of flood". So even if deemed to be a water-compatible use, I believe that when being used as an access to the Marchioness Building, it is not safe for users in times of flood given the very significant flood depths and velocities that would occur during flood conditions.

Please also note my comments are limited and do not consider risk to third parties, risk of blockage, loss of conveyance etc. as being associated with main river the statutory flood risk consultation remit lies with the Environment Agency.

External Consultees (summarised by case officer) -

Environment Agency -objections raised to the development

We object to the proposed landing stage on flood risk grounds for the reasons outlined below: We have reviewed the submitted information including the Flood Risk Assessment (FRA) Hydrock Consultants Limited 25 March 2019 reference 11514-HYD-XX-XX-RP-D-5001.

We are concerned the proposed jetty is of considerable size (9m x 96m) and located adjoining the walls of the Tidal River Avon, a designated main river. Bristol City Council, who we understand to be the asset owner, should be consulted on this proposal. The jetty would prevent access to the walls to undertake remedial works or maintenance to this asset and in an emergency. We are aware Bristol City Council are currently undertaking condition assessments of the walls of the Floating Harbour and New Cut to identify areas of concern.

It is not identified who would be responsible for maintenance and upkeep of the jetty. The intended lifetime of the structure has not been confirmed. A robust assessment of the impact of the structure on loss of cross-sectional area and directing flood flows elsewhere has not been undertaken with assumptions made from selecting a survey section downstream of the site. Section 2.3 of the FRA states the proposed intention is to use the jetty as a pedestrian and

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vehicular access to the existing property. We advise the Highway Authority should be consulted by the local planning authority regarding the suitability of this proposed use.

Overcoming our objection

It may be possible for the applicant/agent to overcome our objection by submitting information addressing the matters raised in this letter, to our satisfaction. We require clarification on who is the asset owner of the river wall in this location. To overcome our objection we would want to be satisfied that the asset owner has no objections to the positioning of the jetty right against the river wall which could compromise access for maintenance and remedial works.

We require confirmation of the lifetime of the structure and its intended use.

A more robust assessment of the impacts of the structure on loss of cross-sectional area and directing flood flows elsewhere through a modelling exercise providing pre and post development runs for a range of return periods up to and including the extreme event. Please note a copy of the Bristol Central Area Flood Risk Assessment model can be requested by emailing flood.data@bristol.gov.uk. Though it would be worth seeing if the above points can be overcome before undertaking this exercise to avoid abortive work.

Other considerations; We note from the submitted information that boreholes have been undertaken on the site to inform the structural report. Please confirm that a Flood Risk Activity Permit was obtained for these works and provide supporting correspondence to this effect. Bristol City Council's Lead Local Flood Authority team should be consulted on the proposed development and Bristol Harbour Master.

Under the terms of the Environmental Permitting Regulations, the prior written permission of the Agency is required for any proposed works or structures in, under, over or within 16 metres of the top of the bank of the Tidal River Avon, designated a 'Main River'. The need for a Flood Risk Activity Permit is over and above the need for planning permission. Further information can be found on our .gov.uk website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. On the basis of the information provided, we are unlikely to issue such a permit at this time.

4.3.2020

We maintain our flood risk objection to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located.

The application is therefore contrary to the National Planning Policy Framework (NPPF) and its associated planning practice guidance (PPG). We recommend that planning permission is refused on this basis.

Reason

The PPG classifies development types according to their vulnerability to flood risk and provides guidance on which developments are appropriate within each Flood Zone. This site lies within Flood Zone 3b which is land defined by your Strategic Flood Risk Assessment as functional floodplain.

On the basis of the information provided, we do not consider the proposal can be classified as "water compatible" or "essential infrastructure" in accordance with table 2 of the Flood Zones and flood risk tables of the PPG. Tables 1 and 3 make it clear that the type of development as proposed is not compatible with this Flood Zone and therefore should not be permitted. Additionally, the structure would not remain operational during times of flood nor is it designed to float up and down

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with the tide.

We note the comments made by the Bristol City Council Flood Risk team as Lead Local Flood Authority. We also note the comments made by Arup regarding the uncertainty in the proposed design.

We do not consider the assessment provided in respect of flow restriction, blockage or debris collection and associated reduction in channel capacity is sufficiently robust, or would overcome our in principle objection. Additionally the proposal could restrict/prevent access for future maintenance activities on the New Cut required in the interest of flood risk management.

Note to local planning authority

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/ or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009.

Avon and Somerset Police

Sections 58 and 69 of the National Planning Policy Framework March 2012 both require crime and disorder and fear of crime to be considered in the design stage of a development.

Having reviewed this application along with the initial submission (17/03268/f), there has been absolutely no mention of any security measures which would be implemented.

In addition, due to the lack of detail for which the jetty is to be used, I am unable to assess the impact on crime and disorder in the vicinity of the proposed development.

For this reason I find this application unacceptable in its present form.

Historic England- Support the views offered by your conservation staff.

23/5/19

On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

3/10/19

Whilst I haven't continued the concerns expressed under the first application, the response to the latest case (19/01925/F) doesn't offer any specific comments, but equally doesn't give HEs acceptance of the proposal. I considered there to be more information submitted for the latest case (which was a concern previously), and given HEs remit, felt that the case could be handled adequately by your conservation specialists.

Whilst a specific judgement hasn't been offered from HE, we remain satisfied for the council to determine the case as they consider fit, and support the views offered by your conservation staff.

Arup - Further information required.

Arup have reviewed the Geotechnical report and additional information and identified the further information required to secure safe development. Comments incorporated into Key Issue 3.

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Harbour Authority

The Harbour master has confirmed that his previous comments remain applicable to the current application, as the New Cut and tidal levels are unchanged.

During assessment of the previous application the Harbour Authority confirmed restrictions within the New Cut waterway for use of sailing and leisure activities due to the high current flow and the difference in water level, "New Cut (below Mean High Water Springs) is part of the Competent Harbour Authority and due to the primary legislation of the Harbour, Docks and Piers Act 1847 any activities of this kind would be refused due to the safety of those carrying out any leisure activities on this stretch of water. Ultimately any precautions put in place to allow this type of activity would still be refused as the risk involved is so great that we could not allow it to take place as the Harbour Authority would be held responsible should it allow these activities to take place and something were to happen."

RELEVANT POLICIES

National Planning Policy Framework – February 2019

Bristol Local Plan comprising Core Strategy (Adopted June 2011), Site Allocation and Development Management Policies (Adopted July 2014) and (as appropriate) the Bristol Central Area Plan (Adopted March 2015) and (as appropriate) the Old Market Quarter Neighbourhood Development Plan 2015 and the Hengrove and Whitchurch Park Neighbourhood Development Plan 2019.

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

KEY ISSUES

(A) HAS REFUSAL REASON 1 (RELATING TO ADVERSE VISUAL IMPACT/ HARM TO HERITAGE AND NATURAL ASSETS) BEEN OVERCOME?

Previous refusal reason 1 reads as follows;

The application proposal would result in the unjustified visual loss of natural greenspace within the New Cut and loss of existing trees from the site that contribute to the character and appearance of the Conservation Area. In addition, the application fails to demonstrate that the overall scale, form and overall design of the landing stage would appear as a sympathetic form of development which would enhance or contribute positively to the character, appearance, identity and distinctiveness of the Conservation Area. The potential use of the landing stage for car parking purposes would be considered visually intrusive in this location. For the above reasons, the application fails to demonstrate that the proposals would preserve or enhance the character and appearance of the Conservation Area. The nature and degree of public benefits associated with the application proposals are considered insufficiently demonstrated.

As such, the proposals conflict with guidance contained within Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; S12 of the NPPF, policies BCS9, BCS11, BCS21 and BCS22 of the Bristol Development Framework Core Strategy 2011, and DM15, DM17, DM26, DM27, DM29 and DM31 of the Site Allocations and Development Management Policies 2014.

Key Issues A, B and F of the Officers report (17/03268/F) refer to the previous considerations in respect of loss of open space, heritage and tree impacts. The applicants have made no changes to the siting, scale, form, overall design of the proposed structure, or provided sufficient detail to assess and justify the tree loss from the site. Additional information including visualisations has

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been provided, including some confirmation of the boundary railings proposed between Commercial Road and the structure.

Officers have considered the justifications and further information provided but maintain objections on the grounds that the structure would result in adverse visual impact and harm to the heritage and natural assets at the site. The policy context to the assessment and rebuttal of the applicant's justifications are set out below.

Policy context

The heritage assets affected by the proposals are identified as the City Docks Conservation Area, the Grade II listed Bathurst Basin harbourwalls and the setting of the Grade II listed General Hospital, to the north east of the site.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the LPA to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area. 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 case of *R (Forge Field Society) v Sevenoaks DC* [2014] EWHC 1895 (Admin) ("*Forge Field*") has made it clear where there is harm to a listed building or a conservation area the decision maker "must give that harm considerable importance and weight".

Section 16 para 193 of the National Planning Policy Framework (NPPF) 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, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Para 194 instructs 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. Para 196 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

The adopted Bristol Core Strategy 2011 within Policy BCS22 and the adopted Site Allocations and Development Management Policies within Policy 31 seek to ensure that development proposals safeguard or enhance heritage assets in the city.

The City Docks Character appraisal divides the Conservation Area into four distinct areas. The site falls within Character Area 5: Bathurst Basin and adjoins Character Area 4 Cumberland Road and the New Cut. Identified strengths of these character areas include views up and down the New Cut and across to Bedminster and the preservation of traditional townscape details, such as railings and boundary treatments. The Character appraisal emphasises the need to resist unsympathetic applications which would harm the character or appearance of the Conservation Area. Trees and green spaces are identified as vital to the quality and diversity of the area and are noted as making a significant contribution to the sense of place and character; adding value to visual, and residential amenity. The significant wildlife value of the New Cut is also noted.

The design policies of the local plan, including BCS21, DM26, DM27, DM28 and DM29 emphasise the need for development to make a positive contribution to local distinctiveness by responding to and incorporating existing landforms, green infrastructure assets and historic assets and features. Development is expected to retain and enhance important views into out of and through a site and reflect the predominant boundary treatments in the area. The scale of development is expected to

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be appropriate to the immediate context, site constraints, character of adjoining streets and spaces, the setting and location within the townscape. Development is also expected to incorporate appropriate street furniture that enhances the quality, character and appearance of the public realm and traditional boundary treatments are expected to be retained. BCAP32 Quayside walkways maintains that development that would be harmful to the amenity/ accessibility of a Quayside Walkway will not be permitted.

Applicants justifications and response.

Justification - In respect of refusal reason 1, the Planning Statement (PS) contends that installation of the structure would not result in significant loss of vegetation or greenspace, as the river bank and its vegetation will still exist under the deck and will still be visible from across the river. In addition, the PS outlines that not all trees on the site would be removed, and that mitigation could be agreed through the application determination process.

Response - The submissions, including river cross section data, demonstrate that construction of the structure would involve removal of a significant area of river bank under the structure. As such, the proposal would clearly result in the visual and actual loss of natural greenspace and river bank within the New Cut. Given the extent of excavations, the tree survey and supporting information fail to demonstrate how the trees on the site can be retained and mitigation would only be agreed via the application process if the development were acceptable in other key respects. The open space of the riverbank and the trees currently make an important positive contribution to the character and appearance of the Conservation Area and the loss of these assets is therefore resisted, in accordance with local and national planning policies.

Justification - In further respect of refusal reason 1, the PS contends the structure would be appropriate in design, scale and impacts on the character and appearance of the Conservation Area. The applicants maintain the structure would be of a simple and traditional design consistent with the dockside location, given the diverse character of the City Docks Conservation Area and fact that a landing stage used to exist at the site. The boundary railing design is justified on the grounds that it was previously agreed as part of the Metrobus project.

Response - The site currently comprises an access road and open river bank. The site is not operational as a dockside and the river is not used by sailing or leisure rivercraft due to the high current flow and the significant tidal range. The platform level of the structure is shown over 3m above mean high water and 10m above mean low tide. At mean low tide the river would be over 10m distant from the river. As such, it is considered that a structure of this scale and design would appear visually and functionally incongruous and would appear intrusive within the undeveloped New Cut river context, with an adverse impact on the immediate setting within the Conservation Area. In addition, the structure would not replicate a historic landing stage that previously existed at the site and the application contains scant detail in terms of condition survey of the listed walls or historic structures at the site.

Review of the planning approvals relevant to the Metrobus project has found no evidence that the boundary railings formed part of a previous consent. Additional railings along the Commercial Road site boundary as shown on the visualisations would erode the sense of openness and visual amenity of the site, to the detriment of the quayside walkway and character and appearance of the Conservation Area.

Justification - In further respect of refusal reason 1, the PS maintains that the potential use of the structure for carparking purposes should not be a material consideration and it is unreasonable to withhold permission for the structure on this basis.

Response - The structure would replace the existing vehicular access road into the Marchioness site and would therefore be used by vehicles to enter and leave the Marchioness site. As such, and

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given the significant scale of the structure and lack of detail in terms of how parking would be controlled, it is considered reasonable to be concerned at the potential use of the structure for carparking purposes. The application fails to demonstrate how vehicular movements on the structure would be controlled or managed and officers remain concerned that the potential use of the structure for car parking purposes would be visually intrusive in this sensitive setting.

The City Design Group (Conservation and Landscape Officer) have objected to the proposals on the detailed grounds set out earlier within the report, concluding that the development would result in less than significant harm to the identified heritage assets and their assessment is supported by Historic England. The views of these specialist consultees have been given significant weight and overall officers maintain that for the reasons given, the application is not in accordance with national and local planning policies in respect of heritage assets, design and green infrastructure.

The nature and degree of public benefits associated with the proposals were previously considered insufficiently demonstrated and this NPPF requirement formed part of refusal reason 1. It is noted that the submissions have not addressed this concern. On the basis of the submissions it is again concluded that the development contains insufficient public benefit to outweigh the adverse impacts on the heritage assets set out above.

The application is therefore recommended for refusal on these grounds.

(B) HAS REFUSAL REASON 2 (RELATING TO IMPACT ON HIGHWAY MAINTENANCE, OPERATION AND HIGHWAY SAFETY) BEEN OVERCOME?

Previous refusal reason 2 reads as follows;

The application fails to provide sufficient construction, structural or operational detail demonstrating that the installation and use of the proposed landing stage would have acceptable impact on highway maintenance, operation and highway safety in the vicinity of the site. As such, the proposals would conflict with policies BCS10 of the Core Strategy (2011), DM23 Site Allocations and Development Management Policies (2014). The proposals would also provide potential for the landing stage to be used as a carparking area and this would be in conflict with Policy BCAP29 of Bristol Central Area Plan (March 2015).

Key issue D of the Officers report (17/03268/F) refers to the previous consideration in respect of highway matters. The applicant has aimed to address this refusal reason by provision of a Geotechnical Assessment (GA) from Hydrock. The applicants contend that if the recommendations of the GA were followed there would be little to no impact on highway maintenance, operation or highway safety in the vicinity of the site.

Policy Context

The NPPF expects that transport issues should be considered from the earliest stage of development proposals, so that the potential impacts of development on transport networks can be addressed and that any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree.

Policy BCS10 requires proposals to create places and streets where traffic and other activities are integrated and where buildings, spaces and the needs of people shape the area. Developments should be designed and located to ensure the provision of safe streets. Where vehicular access is sought to a site for essential operational parking or servicing, BCAP26 states that the council will work with the applicant to identify the most appropriate access point having regard to any proposals for pedestrianisation or traffic management.

The submissions addressing refusal reason 3 have been reviewed by Transport Development Management (TDM) who have maintained their objections due to the following issues;

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o It has not been sufficiently demonstrated through the submission of an Approval In Principle Structural Report that the landing stage can be safely constructed. This is essential as whilst the piles will be located away from the retaining wall the structural assessment indicates that there has been some movement within the access road. It is unclear whether remedial work is required. As such it is deemed to be contrary to Policy DM37: Unstable Land

o As the landing stage will be constructed directly up to the edge of the adopted highway it will be extremely difficult if not impossible to access the retaining wall which supports it. Access must be maintained at all times in order to undertake maintenance work, to ensure the structural integrity of the adopted highway as well as the New Cut itself. As such is deemed to be contrary to Policy BCS10: Transport and Access Improvements and Policy DM23: Transport Development Management.

o Should the access road be more intensively used, this would increase the risk of conflict between pedestrians, cyclists and vehicles on one of the key cycle routes into the city centre, which would be contrary to Policy DM23: Transport Development Management.

o Should the landing stage be used for parking this would be in clear contravention of Policy BCAP29: Car and cycle parking which does not permit any new car parks within the city centre.

As such, it is considered that the application has not fully overcome refusal reason 2 and is considered contrary to local plan policies and the NPPF. The application is therefore recommended for refusal on these grounds.

(C) HAS REFUSAL REASON 3 (RELATING TO GROUND STABILITY) BEEN OVERCOME?

Previous refusal reason 3 reads as follows;

Insufficient information has been provided to demonstrate the suitability of the site in land stability terms to accommodate a structure of the scale and form proposed, without harm to either the stability of the proposed development and adjoining highway or the safety of its future users or neighbouring uses/occupiers. As such the development is considered contrary to Policy DM37: Unstable Land (Site Allocations and Development Management policies 2014).

Key Issue E of the Officers report (17/03268/F) refers to the previous consideration in respect of ground stability. The applicant has sought to address this refusal reason by provision of a Geotechnical Assessment from Hydrock which was updated during the assessment and reviewed by Arup Engineering consultants.

Policy context

The NPPF confirms that where a site is affected by land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

Policy DM37 expects that on sites where there is reason to suspect unstable land and the risk of instability has the potential to materially affect either the proposed development or neighbouring uses/occupiers, development will only be permitted where:

- i. A desk-based study of available records has been carried out to assess the previous uses of the site and their potential for instability in relation to the proposed development; and
- ii. Where the study establishes that instability is likely but does not provide sufficient information to establish its precise extent or nature, site investigation and risk assessment are carried out to

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determine the standard of remediation required to make the site suitable for its intended use.

The policy confirms that the following information should be submitted with the application -

An assessment of previous uses within and adjoining the site and of any instability risks which could affect the proposed development;

Where instability is likely, a full site investigation and risk assessment should be provided, including the specification of remedial works required to ensure the safety of the development.

The development has the clear potential to impact the stability of the riverbank and adjacent highways infrastructure. Arup have prepared a Technical Advice Note (TAN) in response to the Geotechnical Assessment identifying the need for full site investigation and risk assessment, taking into account the historic structures that may remain insitu and the marginal stability of the river banks in this location. The risk assessment would be expected to address construction methodologies during both the temporary works and permanent condition, including the methodology for supporting the top part of the river bank at the edge of the driveway. The proximity and potential impacts on the Grade II listed Bathurst Basin floating harbour walls

Whilst Hydrock have provided some additional information in response to Arup's TAN recommendations, a full site investigation and risk assessment has not been provided. As such, the standard of remediation required to make the site suitable for its intended use is unknown.

The absence of a full site investigation and risk assessment fails to address refusal reason 3 and is considered contrary to policy DM37 ii) and the NPPF. The application is therefore recommended for refusal on these grounds.

(D) HAS REFUSAL REASON 4 (RELATING TO FLOOD RISK) BEEN OVERCOME?

Previous refusal reason 4 reads as follows;

The submitted Flood risk assessment fails to provide a suitable basis for assessment to be made of the flood risks arising from the proposed landing stage. The application details fail to demonstrate that the installation, construction and use of the landing stage would provide an acceptable response to the flood risks associated with this site, including ensuring public safety. The proposals are therefore considered contrary to local plan policies BCS13, BCS15 and BCS16 of the Core Strategy 2014, the NPPF and national planning practice guidance.

Key Issue F of the Officers report (17/03268/F) refers to the previous consideration in respect of flood risk. The site is identified as falling within the functional floodplain (Flood zone 3b), the highest flood risk category, taking into account the Council's Strategic Flood Risk Assessment. The applicant has sought to address this refusal reason by provision of a Flood Risk Assessment (FRA) from Hydrock and additional information. The revised FRA justifies the suitability of the development within the functional floodplain on the grounds that the structure is 'water-compatible development'. The FRA states

"it is required to be adjacent to or within a waterbody for operational reasons and would remain structurally sound when submerged under water. Therefore, the development is considered to be of low vulnerability to flooding and does not require a Sequential or Exception Test."

The FRA posits that the structure will not result in loss of flood plain storage or impede flow paths. In addition, given the operational requirement to meet the level of Commercial Road, it is argued that the structure does not worsen the situation from the current access arrangement.

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Policy context

The NPPF instructs that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Development should pass the Sequential and Exception Tests, dependent on the potential vulnerability of the site and of the development proposed.

Table 3: Flood risk vulnerability and flood zone 'compatibility' (NPPG (National Planning Policy Guidance 2014) confirms that only Water Compatible and Essential Infrastructure uses are appropriate development types within the functional floodplain/Flood Zone 3b.

In addition, the NPPG instructs that in Flood Zone 3b, these uses should be designed and constructed to:

- o remain operational and safe for users in times of flood;
- o result in no net loss of floodplain storage;
- o not impede water flows and not increase flood risk elsewhere

Local plan policy BCS13 requires development to minimise the risk and impact of flooding. Policy BCS15 requires development to minimise vulnerability to flooding. Policy BCS16 states that development in Bristol will follow a sequential approach to flood risk management, giving priority to the development of sites with the lowest risk of flooding.

Both BCC Flood risk manager and the Environment Agency (EA) have reviewed the FRA and have objected to the application due to the reasons outlined below.

Both consultees have advised that the development falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore unacceptable in principle as it is contrary to the National Planning Policy Framework (NPPF) and its associated planning practice guidance (PPG).

The Environment Agency have advised that the proposal cannot be classified as either "water compatible" or "essential infrastructure" in accordance with table 2 of the Flood Zones and flood risk tables of the PPG. Tables 1 and 3 make it clear that the type of development as proposed is not compatible with this Flood Zone and therefore should not be permitted. Additionally, the structure would not remain operational during times of flood nor is it designed to float up and down with the tide.

The applicant has sought to address the concerns of the EA and BCC Flood Risk Manager and provided further assessment in respect of flow restriction, blockage and debris collection and associated reduction in channel capacity. The EA have reviewed this information and confirmed that it is not sufficiently robust, and does not overcome the in principle objection. The EA have also advised that the proposal could restrict/prevent access for future maintenance activities on the New Cut required in the interest of flood risk management.

To conclude, the proposed development is considered unacceptable in principle as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located and fails to demonstrate that the installation, construction and use of the landing stage would provide an acceptable response to the flood risks associated with this site and flood risk management.

The application is therefore contrary to the National Planning Policy Framework (NPPF) and its associated planning practice guidance (PPG) and local plan policies BCS13, BCS15 and BCS16. The application has not overcome refusal reason 4 and is considered contrary to local plan policies

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and the NPPF in respect of flood risks. The application is therefore recommended for refusal on these grounds.

(F) ARE THERE ANY OTHER CONSIDERATIONS?**Nature Conservation**

The nature conservation officer has reviewed the submissions and objected to the application due to two of the potential locations for the crane shown on the borehole location plan as these are located on the designated Site of Nature Conservation Interest (SNCI), River Avon. Using only the westernmost location would address this objection. There are fundamental objections to the proposal as outlined above and significant uncertainty in the proposed design, given the need for significant site investigations and risk assessments. The applicant is advised to address the objection and other matters raised by the Nature conservation Officer in event of any resubmission.

CONCLUSION

When determining planning applications the NPPF and policy DM1 require a positive approach to be taken that reflects the presumption in favour of sustainable development. It is recognised that the applicant has provided Technical Assessments and additional visual and written information to support the proposals.

Notwithstanding, the scale and form of the structure remain unaltered from the previous refused application. No alternative options to the structure in terms of scale, form, design or siting appear to have been considered to overcome the previous refusal reasons.

The proposals have been reviewed by officers and specialist consultees and as outlined within the report, the development is considered fundamentally unsuitable for its sensitive location, given the site constraints. The applicant has stated that the principal purpose of the structure is to provide for the improved stability of the riverbank but has not supported this with full site investigations and risk assessment, as required under local plan policies.

In addition, there is no supporting evidence as to the scope of repairs needed to the existing access, or whether retention and repair of this access has been investigated.

Overall, the additional information provided with the application fails to overcome any of the previous refusal reasons and these issues individually and cumulatively weigh against the development and are not outweighed by any identified public benefits. The proposal is considered to conflict with the development plan as a whole and is therefore recommended to be refused.

EQUALITIES ASSESSMENT

During the determination of this application due regard has been given to the impact of the proposal in relation to the Equalities Act 2010 in terms of 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 proposal. 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.

Development Control Committee B – 18 March 2020**Application No. 19/01925/F : The Marchioness Building Commercial Road Bristol BS1 6TG****RECOMMENDED REFUSED**

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

Reason(s)

1. The proposal would result in the unjustified visual loss of natural greenspace within the New Cut and loss of existing trees from the site that contribute to the character and appearance of the Conservation Area. In addition, the application fails to demonstrate that the scale, form and overall design of the landing stage and boundary treatments would appear as a sympathetic form of development which would enhance or contribute positively to the character, appearance, identity and distinctiveness of the Conservation Area. The potential use of the landing stage for car parking purposes would be considered visually intrusive in this location. For the above reasons, the application fails to demonstrate that the proposals would preserve or enhance the character and appearance of the Conservation Area. The nature and degree of public benefits associated with the application proposals are considered insufficiently demonstrated.

As such, the proposals conflict with guidance contained within Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; S12 and S16 of the NPPF, policies BCS9, BCS11, BCS21 and BCS22 of the Bristol Development Framework Core Strategy 2011, and DM15, DM17, DM26, DM27, DM28, DM29 and DM31 of the Site Allocations and Development Management Policies 2014.

2. The application fails to provide sufficient construction, structural or operational detail demonstrating that the installation and use of the proposed landing stage would have acceptable impact on highway maintenance, operation and highway safety in the vicinity of the site. As such, the proposals would conflict with policies BCS10 of the Core Strategy (2011), DM23 Site Allocations and Development Management Policies (2014) and the NPPF. The proposals would also provide potential for the landing stage to be used as a carparking area and this would be in conflict with Policy BCAP29 of Bristol Central Area Plan (March 2015) and the NPPF.
3. Insufficient information has been provided to demonstrate the suitability of the site in land stability terms to accommodate a structure of the scale and form proposed, without harm to either the stability of the proposed development and adjoining highway or the safety of its future users or neighbouring uses/occupiers. As such the development is considered contrary to Policy DM37: Unstable Land (Site Allocations and Development Management policies 2014) and the NPPF.
4. The proposed development is considered unacceptable in principle as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located and fails to demonstrate that the installation, construction and use of the landing stage would provide an acceptable response to the flood risks associated with this site and ongoing flood risk management.
The proposals are therefore considered contrary to local plan policies BCS13, BCS15 and BCS16 of the Core Strategy 2014, the NPPF and national planning practice guidance.

Advice(s)

1. Refused Applications Deposited Plans/Documents

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

Site location plan, received 15 October 2019
Proposed jetty detail, received 23 April 2019

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Existing site layout and sections, received 18 May 2019

Proposal site layout and sections, received 18 May 2019

11514-HYD-XX-XX-DR-D-0002 P01 Plan & cross section with levels, received 23 April 2019

11514-HYD-XX-XX-DR-G-1001 P2 Proposed elevations & borehold locations, received 26 April 2019

Extension: Revised expiry date	15 September 2017
'Hold Date'	

Bristol City Council Development Management

Delegated Report and Decision

Application No: 17/03268/F **Registered:** 15 June 2017

Type of Application: Full Planning **Expiry Date:** 10 August 2017
Case Officer: Anna Schroeder

Site Address:

The Marchioness Site
Commercial Road
Bristol
BS1 6TG

Description of Development:

Reinstatement of historic landing stage for use associated with Marchioness site.

Ward: Central

Site Visit Date:

Date Photos Taken:

Consultation Expiry Dates:

Advert 26 Jul 2017
and/or Site 26 Jul 2017
Notice:

Neighbour: 19 Jul 2017

SITE DESCRIPTION

The redlined site is identified as land between the River Avon (New Cut) and Commercial Road, in the City Centre, close to Bathurst Basin. The site incorporates grassed embankment, tarmac turning area and stretch of sloping private access road leading to the gated entry to the Marchioness building and land within its boundaries. There is a level change of approximately 1.6m between the gated access to the Marchioness site (western site boundary) and road level of Commercial Road adjacent. A dropped kerb over the cycleway provides access to the turning area within the site from Commercial Road. The turning area and northern boundary of the site with Commercial Road are protected by historic railings. 9 trees are growing on the site, identified in the accompanying Tree Schedule.

A blue line identifies other land owned by the applicant adjoining the site; this includes the Marchioness building and land surrounding the building.

The site lies within the City Docks Conservation Area and Central Area Plan Boundary. The Bathurst Basin lies to the north of the site; the quay walls, steps and bollards surrounding Bathurst Basin are Grade II listed. The General Hospital lies nearby to the north east and is Grade II listed. The River Avon (New Cut) is designated as a site of Nature Conservation Interest (BC47) in the Local Plan. A quayside walkway is defined immediately to the north of the site in the

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The Marchioness Site Commercial Road Bristol BS1 6TG

Local Central Area Plan. The grassed embankment land forms part of the New Cut natural open space identified in the Council's Parks and Green spaces Strategy. (2008.)

The surroundings include residential development, offices, bars and restaurants. A new road bridge and cycle track have recently been installed running alongside Commercial Road and the existing road swingbridge, linking Commercial and Cumberland Roads.

RELEVANT HISTORY

The site partially overlaps with the application site identified under 13/05648/FB Land Between The A370 Long Ashton Bypass In North Somerset And Cater Road Roundabout Cater Road Bristol) Revision to the route of the rapid transit scheme authorised by the Ashton Vale to Temple Meads and Bristol City Centre Rapid Transit Order (the Order). The development comprises construction of a new junction with Cumberland Road, a new bridge at Bathurst Basin, flood protection measures, demolition and reconstruction of walls, realignment of highway, crossings, traffic signals and temporary construction areas, bus stops and shelter.

Status: GRANTED subject to condition(s)

15/05276/CE (relating to Car Park, The Marchioness Building, Commercial Road) Application for a Lawful Development Certificate for an existing use of the application site as an unrestricted commuter car park. Certificate of lawfulness BE ISSUED (14/12/2015)

06/02971/LC -The Marchioness Building, Commercial Road Demolition of existing building. REFUSED

06/02972/P The Marchioness Building, Commercial Road -Outline planning application for proposed redevelopment of site to provide 24 residential units (Class C3). REFUSED

06/03501/Z The Marchioness Building, Commercial Road - Appeal on enforcement notice ref. 05/30616/OTHER against 'Long-term erection of scaffolding on land to north-east of Marchioness Building adjoining south side of swing-bridge'. Appeal dismissed.

05/03246/CE - The Marchioness Building, Commercial Road)Certificate of Lawfulness to allow for continuation of use as single dwelling house - Certificate of lawfulness BE ISSUED (18/01/2006)

APPLICATION

Planning permission is sought for 'reinstatement of a historic landing stage for use associated with Marchioness site.'

Four plans have been submitted in support of the application;

Site location plan

Existing layout including Section B-B and C-C

Proposed layout including Section B-B and C-C

Jetty detail proposed.

The proposals would comprise installation of a level timber and steel landing stage structure; the Planning Statement confirms this will be 96m long. The structure would oversail the existing turning area and embankment, projecting some 9m south from the boundary with the cycle track to the north of the site. The drawings show the structure would be broadly level with Commercial Road and the cycle track, with upstand along the New Cut edge of the structure. All trees on the site are proposed removed.

Supporting information includes a Planning and Heritage Statement , Tree schedule, Views

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document, annotated photographs of views of the site, historic drawing titled 'Bristol Docks Landing Slip near Bathurst Basin', annotated historic press cutting showing Bathurst Basin and The New Cut 1862-1865, annotated overhead view.

RESPONSE TO PUBLICITY

The application has been advertised in the press and on site notice. Neighbour letters have been sent to nearby properties. Three representations have been received, including one comment in support, one objection and one neutral comment; these are summarised below ;

- Councillor Smith - I support this proposal to improve the stability of the waterfront and to reintroduce land stages in line with the Victorian history of the site.
- Conservation Advisory Panel have commented - The Panel is neutral. However, this application lacks clarity and requires further drawings and explanation before any assessment can be made on the quality, or otherwise, of the proposal.
- Neighbour objection raises the following matters ;
 - The application is difficult to understand this proposal as a conventional planning application.
 - The application submissions and drawings are insufficiently detailed - context is missing, dimensions are unclear, historic precedence for a single structure as proposed is not evidenced.
 - Interaction with the Metrobus proposals is unclear
 - The proposal is bigger than the nominal width of the Cut and it deserves context drawings and some indication of real purpose? A D and A statement even?
 - Is it to be a car park? Is it merely to support the residual access / car park after losses of territory to Metrobus ? And is shipping really to use it given Bathurst basin is closed and The Ashton Avenue swing bridge of 1906 was not repaired in an operable state by Metrobus last year?
 - The structure would have a profound effect on views over the Cut toward the General Hospital from Coronation Road , [see Loxton 1912, two boys tormenting a duck , or "entrance to Bathurst Basin from new cut"]
 - The structure would potentially impact upon views within the Conservation Area and several listed buildings nearby, including the Jail , the Bathurst basin complex, The general hospital redevelopment and Bedminster bridge. Not to mention the Louisiana and local listed pub the Velindra.
 - The proposal may be a means to an end such as holding up the river bank as stated, but it needs considerable clarification if it is to be seen to conserve and enhance the conservation area. Until then I too would be tempted to object. At present the application is incomplete and does not have an associated LA application, It is registered a full application, but really does not appear to be adequate even as an outline ap in its present form at the present date.

Internal consultees - summarised

BCC Conservation Officer - Surgery item. Concerns raised as to the overall lack of detail accompanying the application, the proposals are not accepted as evidencing a 'reinstatement of historic landing stage' based on the level of detail provided, absence of condition or geotechnical

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survey or method statement, or clear evidence of previous historic structures.

A structure of this scale and design would be apparent in close and medium views within and towards the site from the City Docks Conservation Area. ; the proposed platform would conceal the grassed embankment and erode the contribution of the site to the wider character of the New Cut, which is identified as a natural green space in the Parks and Green Space Strategy. The structure would appear as an incongruous and alien feature on this part of the New Cut and would appear to facilitate vehicular movement and parking - queries raised as to whether the structure could or would be used as a carparking platform - the visual impact of carparking on this scale would be harmful to the character and appearance of this part of the CA. The proposals would appear to result in disturbance/loss of some historic fabric, again there is a lack of sufficient detail confirming this in terms of extent of retention of existing historic railings on and around the site. Overall, the submissions indicate that the structure would result in less than substantial harm to the designated heritage asset of the Conservation Area.

The structure would be installed in close proximity to the Grade II listed harbour walls surrounding the Marchioness site (included within the Bathurst Basin listing ; insufficient detail has been provided in terms of condition survey of these listed walls or impact assessment of installation of the structure; the proposals fail to provide certainty that historic fabric of the harbour wall would be physically unaffected.

Overall, assessment is that the proposals would adversely impact on the character and appearance of this part of the City Docks Conservation Area and fail to demonstrate acceptable impacts on the listed harbour walls.

Public benefit arising from the proposals has not been clearly demonstrated in the submissions. These comments are expanded on in the Heritage section (Key Issue B) below.

Transport Development Management - summarised

In its current format the application has provided insufficient evidence to indicate the purpose, need for (considering the constraints on the size of vessels that would be able to use it) or end usage of the landing stage. As the existing site is used for car parking, if this is the intended usage, this would be in clear contravention of Policy BCAP29: Car and cycle parking of Bristol Central Area Plan - Policies - Adopted March 2015, not to mention Policy DM23: Transport Development Management of Bristol Local Plan - Site Allocations and Development Management Policies - Adopted July 2014 by virtue of the increased number of vehicle movements.

Furthermore, no clear technical assessment (Approval In Principle) or Construction Management Plan has been submitted as to how the landing stage will be constructed. This is unacceptable, particularly given the fact that it must not in any way rest on or use the adjacent retaining wall for support and is contrary to Policy DM37: Unstable Land of Bristol Local Plan - Site Allocations and Development Management Policies - Adopted July 2014. Due to its size a significant amount of construction materials, vehicles and plant will be required, which will undoubtedly require footway and carriageway closures. This will have a detrimental impact on the day to day operation of the AVTM Metrobus route and shared cycle/pedestrian route, which is unacceptable.

Finally whilst a site plan has been submitted it does not accurately represent the surrounding highway infrastructure and no plans have been provided showing the design of the landing stage or how it will interface with the existing carriageway and the private access road. With such a lack of detail it is impossible to properly assess the application to ensure that if permission were to be granted it would not significantly impact the safe operation of the adjacent adopted highway. Consequently Transport Development Management recommends that the application be refused.

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Transport comments are expanded upon in the Transport section (Key Issue D) below.

Nature Conservation -summarised

No objections raised ; conditions recommended; fencing required to protect the SNCI and nesting birds.

Arboriculture - summarised

The support tree survey is rather basic and does not fulfil the requirements of DM17. This document identifies the trees on a map and provides a basic assessment of the trees.

No tree protection has been specified or identified on an appropriate plan and no BTRS calculations have been provided to mitigation for the loss of Trees in line with this proposal. Trees 1-3 have been identified for removal through the Metrobus application. (TDM have confirmed this is incorrect).

The tree survey does not provide stem diameters so that mitigation can be applied.

The scant arboricultural documentation is insufficient and we require further information to ensure the trees on site have been considered appropriately.

We require:

- o A tree protection plan to identify trees to be retained or removed.
- o BTRS calculations for tree replacement on site.
- o Calculation of financial contribution for trees that cannot be replaced on site.
- o Arboricultural implications assessment and method statement for the protection of trees to be retained.
- o A high quality landscape plan containing tree locations, species, planting stock size (Minimum 12-14cm Girth) & maintenance schedule for watering and aftercare to ensure establishment of newly planted trees.

This additional information has not been sought from the applicant due to fundamental concerns with the visual impact of the proposals and heritage and transport grounds.

Ground Contamination /Pollution control - summarised

The propose development whilst unlikely to pose a risk to future occupiers is located on the main river. We have concerns that piling could cause potential contamination of the watercourse from the construction activities. Therefore we recommend a Foundation Works Risk Assessment is undertaken prior to works commencing and the C1 condition is applied to any future planning consent, so that if encountered contamination will be dealt with. Condition wording provided.

BCC Flood Officer -

The proposals will have minimal impact on surface water drainage matters, we therefore have no objection to or further comment on the proposals.

External Consultees

Historic England - Concerns raised on Heritage grounds due to insufficient information - comments incorporated into Key Issue B.

Environment Agency - Objections raised on floodrisk grounds and insufficient information -- comments incorporated into Key Issue E.

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Harbour Master - Summarised -

Concerns raised regarding other consents and permissions required from the Harbour Authority. The New Cut is currently not used for Navigation unless an application is made through the Harbour Authority. It would not be permitted for use of sailing and leisure activities due to the high current flow and the difference in water level. The New Cut (below Mean High Water Springs) is part of the Competent Harbour Authority and due to the primary legislation of the Harbour, Docks and Piers Act 1847 any activities of this kind would be refused due to the safety of those carrying out any leisure activities on this stretch of water. Ultimately any precautions put in place to allow this type of activity would still be refused as the risk involved is so great that we could not allow it to take place as the Harbour Authority would be held responsible should it allow these activities to take place and something were to happen.

RELEVANT POLICIES

National Planning Policy Framework – March 2012

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

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

A) IS THE APPLICATION ACCEPTABLE IN LAND USE TERMS?

The application form describes the proposed development as reinstatement of historic landing stage for use associated with the Marchioness Site. Assessment of the application in land use terms has involved consideration of the planning history of the adjacent red and blue lined sites, as well as consideration of whether the application contains sufficient clarity on the nature of the end use. In addition, the assessment has included considerations of the lawful use of the red and blue lined sites and questions over whether a change of use of land is proposed under the application.

The Marchioness building and surrounding land is identified on the location plan accompanying the certificate of lawfulness issued under 05/03246/CE for continuation of use as a single dwelling house. Land surrounding the Marchioness building is also identified on the location plan accompanying the certificate of lawfulness for use as an unrestricted commuter carpark issued under 15/05276/CE.

A platform approximately 96m x 9m is proposed installed to oversail the existing access road and grassed embankment land broadly level with Commercial Road. The platform has been assessed as a permanent structure, requiring steel or wood pile framework fixed within the existing sloping embankment. The proposed platform would permanently conceal the open embankment land, existing turning point and access road.

The current redlined application site includes the existing turning point and access road identified under both above certificates of lawfulness. It would appear from case officer site visit that this existing turning point off Commercial Road and sloping access road provide the sole access route for vehicles into the blue lined site surrounding the Marchioness building. Pedestrian access routes into the identified blue lined site would also appear to be via the existing turning point and sloping access road. Cars were parked on the land adjacent to the Marchioness building on all case officer visits to the site. The redlined site identified under the current application also includes open

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grassed embankment land that lies outside of the redlined certificate boundaries.

Given the above circumstances, clarification has been sought from the agent as to the intended use of the landing stage and association with the Marchioness site. In response the agent provided the following statement -

Use of Site

The planning application seeks permission only for the proposed structure, and not for any change of use of The Marchioness Site. Furthermore, granting planning permission for the structure would have no impact upon the previously issued lawful development certificate for car parking. That certificate clearly defines the area to which it relates and the current application, if approved, will not change the position. In terms of vehicular access, the applicant may bring vehicles on to the landing stage in connection with his current (and lawful use) of the site. This will not involve any increase in vehicular movements entering the site, as no change to the existing use is being proposed.

The statement provided indicates the applicant considers the structure as an ancillary facility, connected with the current lawful use of the Marchioness site (however it is noted that the Marchioness site falls outside of the redline site location plan).

The nature of the application has been considered on the basis of the application submissions and site visits. As outlined above, vehicular access for cars to the Marchioness site is currently only possible via the existing access road from Commercial Road; this access road is understood as serving both the Marchioness dwelling house and commuters using the carparking area within the application blue line. The drawings submitted indicate that the existing access gate into the Marchioness site would be retained and that the proposed landing stage would be generally level with Commercial Road. Were the current application approved, access for cars to the land surrounding the Marchioness building (within the application blue line) would appear to be hampered by the drop/difference in levels of approximately 1.6m between the western edge of the platform and the Marchioness site within the blue line.

In addition, the application contains scant detail as to proposed access arrangements or management of the landing stage, or details of any boundary fencing, gating or interface between Commercial Road and the landing stage. In these circumstances, given the direct and apparently unrestricted access to the landing stage for vehicles from Commercial Road, the proposals would appear to hold potential for use of the platform for carparking, ostensibly in association with the Marchioness Site. Transport Development Management have considered this issue within their comments and confirmed in principle objections to the provision of the landing stage due in part to the lack of clarity provided by the application and risk/ potential for the structure to be used as a carparking area, conflicting with national and local plan policies focused on reducing the need to travel by car.

The issue of whether the landing stage is intended to be used by waterbourne craft from the New Cut has also been considered, taking into account that a large boat is currently stored on dry land within the Marchioness site. The Harbour Authority have confirmed restrictions within the New Cut waterway for use of sailing and leisure activities due to the high current flow and the difference in water level, "New Cut (below Mean High Water Springs) is part of the Competent Harbour Authority and due to the primary legislation of the Harbour, Docks and Piers Act 1847 any activities of this kind would be refused due to the safety of those carrying out any leisure activities on this stretch of water. Ultimately any precautions put in place to allow this type of activity would still be refused as the risk involved is so great that we could not allow it to take place as the Harbour Authority would be held responsible should it allow these activities to take place and something were to happen."

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As such, it is considered reasonable for the LPA to conclude that there is little likelihood that the proposed landing stage would be used in association with any waterbourne activities associated with the New Cut and authorised by the Harbour Authority.

Loss of existing natural green space.

The landing stage would oversail and permanently obscure the green embankment falling within the redline, outside of the areas identified under either certificate of lawfulness associated with the Marchioness site. The visual loss of this natural green space has been considered against Core Strategy 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 confirms 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. Appropriate mitigation of the lost green infrastructure assets will be required.

BCS9 further confirms that open spaces which are important for recreation, leisure and community use, townscape and landscape quality and visual amenity will be protected and sets out criteria whereby some areas of open space may be released, through the development plan process.

DM17 provides further detail regarding development involving existing green infrastructure. The policy confirms that unidentified open space (other than Important Open Space designated on the accompanying SA and DM Policies Map) which would result in the loss of open space which is locally important for recreation, leisure and community use, townscape and visual amenity will not be permitted. DM22 is also pertinent, providing criteria based assessment relating to development adjacent to waterways.

Given that much of the land oversailed by the proposed platform is currently natural open space, concern is expressed that the application represents a permanent visual and legible loss of open natural space from the site and that this has not been allowed for within any development plan document. Furthermore, the loss of this area of open space has not been found as necessary, on balance, to achieve the policy aims of the Core Strategy; as outlined within this report. The New Cut open space is considered important for townscape and landscape quality and visual amenity, as detailed further under Key Issue B. As such, the principle of installation of the structure and resultant permanent visual loss of the existing open green area within the site represented by the proposals is considered contrary to policy BCS9 and DM17.

To conclude, the proposed landing stage is considered unacceptable in principle in this location due to the uncertainty surrounding the end use of the landing stage, significant risk/potential of the structure to be used for carparking purposes and permanent unjustified visual loss of existing green infrastructure contrary to local plan policies.

B) HERITAGE IMPACTS

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the LPA to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area. 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 case of *R (Forge Field Society) v Sevenoaks DC* [2014] EWHC 1895 (Admin) ("*Forge Field*") has made it clear where there is harm to a listed building or a conservation area the decision maker "must give that harm considerable importance and weight." [48].

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Section 12 of the national guidance within the National Planning Policy Framework (NPPF) 2012 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with any harm or loss requiring clear and convincing justification. The LPA should require applicants to describe the significance of the heritage asset (paragraph 128). Assessment of significance should be done in the light of the available evidence (paragraph 129). Paragraph 132 of the NPPF states that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Further, Para.133 states that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Para 134 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

In addition, the adopted Bristol Core Strategy 2011 within Policy BCS22 and the adopted Site Allocations and Development Management Policies within Policy 31 seek to ensure that development proposals safeguard or enhance heritage assets in the city.

These provisions are considered relevant to the proposals, due to concerns raised by the Conservation Officer and Historic England regarding the impact of the development on surrounding heritage assets. The heritage assets affected by the proposals are identified as the City Docks Conservation Area, the Grade II listed Bathurst basin harbourwalls and the setting of the Grade II listed General Hospital, to the north east of the site.

The Conservation Officer has been consulted on the proposals and expressed concerns. These include review of the submitted Heritage Statement as a general assessment of the proposals with regard to heritage impacts. Justifications for the landing stage are considered provided in broadbrush terms, however significant detail is absent from the Heritage analysis and submissions, as outlined below.

The application documents refer to the proposals as comprising reinstatement of one of the old landing stages that used to exist at the site. The submissions assert that 'the proposals will not harm the heritage importance of Grade II listed structures nearby but will complement them given the nature and form of the proposed development. It will also ensure that existing ground slippage issues are addressed. Condition survey of the harbour walls or remnants of the old landing stage referred to in the PAHS (1.2, 2.4) have not been provided or method statement outlining the nature of existing ground slippage issues or detailing how the development will address these. Concerns have also been expressed by the Conservation Officer that the submissions fail to evidence how the proposals replicate or reinstate any earlier landing stage that may have existed on the site. As such, assessment of the proposals has taken place on the basis of the application documents; indicating installation of a functional large platform supported on timber or steel piles oversailing the embankment and existing access road.

These concerns regarding the level of detail/ justifications within the application documents have been echoed in comments from Historic England;

Historic England Advice

Whilst the proposal to reinstate a landing stage in the vicinity of the Marchioness Building - where historically there have been stages or piers - appears beneficial, we are uncertain of the form this new stage will take. An historic plan has been provided as part of the submission, but it is not made clear if what is intended is an interpretation based on the historic drawing or a standard landing

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stage? We seek clarification on this point before forming a judgement.

Historic England were reconsulted following submission of additional details and have further advised "- With regards to a lack of detailed information - in particular clear architectural plans - highlighted in our response dated 12 July 2017, we do not accept "It will be designed as a traditional and simple structure, with a timber platform fixed to posts in the riverbank", as a satisfactory level/method of explanation for an application of this nature.

As such we do not consider it possible to determine the impact/degree of harm of the proposal as required by paragraphs 133 and 134 of the National Planning Policy Framework.

Recommendation

Historic England has concerns regarding the application on heritage grounds. In determining this application you should bear in mind the statutory duty of 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 addition to the above concerns (relating to the application documentation and insufficient justifications for the form of the development as a reinstatement of a historic structure) the Conservation Officer has expressed concern at the scale, functional appearance and visual impact of the landing stage. Based on the supporting information, the landing stage is considered an alien and incongruous feature within the New Cut - access to the platform for vehicles would appear to be unrestricted and the visual impact of carparking on the platform would have an adverse impact on the character/appearance of the area. Clarity regarding the impact on existing historic railings surrounding the site has not been provided; the loss of this characteristic detailing would erode the character and appearance of this part of the Conservation Area. Overall, the application fails to demonstrate the proposals would make a positive contribution to local distinctiveness and would erode the natural qualities of the grassed embankment, characteristic of the New Cut waterway. The Conservation Officer has objected to the proposals as causing less than substantial harm in terms of NPPF s.134, with public benefits of the proposals not clearly identified.

In summary, there is continued support on heritage grounds for the repair, preservation/conservation of the Grade II listed harbour walls and the distinctive Marchioness site, due to its contribution to the City Docks Conservation Area. The proposals have failed to evidence the nature of ground slippage in the vicinity of the site or clarify how the proposals would address these issues and preserve existing historic fabric of the harbour walls and railings. The proposals have failed to evidence the credentials of the structure as reinstatement of a historic landing stage.

The proposals would be visible at close quarters and in long and medium range views into the site from within the Conservation Area. The large functional platform proposed would erode the character of the existing natural embankment and appear as an alien incongruous feature in this location due to its scale, siting and functional appearance. The possibility of unrestricted use of the platform for carparking is also identified as causing visual harm to the Conservation Area. For the above reasons the proposed landing stage would fail to contribute positively to the character, appearance, identity and distinctiveness of the Conservation Area. There are insufficient public benefits identified to outweigh the degree of harm caused, and the proposal therefore conflicts with guidance contained within Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; S12 of the NPPF, policies BCS21 and BCS22 of the Bristol Development Framework Core Strategy 2011, and DM26, DM27, DM29 and DM31 of the Site Allocations and Development Management Policies 2014.

C) AMENITY

Amenity issues arising from the proposals have been considered in relation to the closest

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residential uses, identified as the Marchioness building and apartments within the General Hospital. The landing stage could affect the pattern of use associated with the Marchioness site, however given the existing lawful use of land surrounding the Marchioness building as an unrestricted commercial carparking area, objections to the proposals on the grounds of harm to amenity due to comings and goings from the landing stage and vehicular movements are considered unsustainable.

D)WOULD THE PROPOSAL PROVIDE AN ACCEPTABLE RESPONSE TO TRANSPORT AND HIGHWAYS MATTERS?

BCS10 requires proposals to create places and streets where traffic and other activities are integrated and where buildings, spaces and the needs of people shape the area. Where vehicular access is sought to a site for essential operational parking or servicing, BCAP26 states that the council will work with the applicant to identify the most appropriate access point having regard to any proposals for pedestrianisation or traffic management.

Transport Development Management have objected to the proposals, commenting as follows -

Principle

The application proposes to reinstate a landing stage within the New Cut for use associated with the Marchioness site. Historic maps confirm that two landing stages were sited close to the application site used for the berthing of vessels during the mid to late 1800's. As it is unclear from the submissions what the application landing stage will be used for or how it will be constructed Transport Development Management recommends that the proposal be refused.

Highway Network

The site is located on Commercial Road which forms part of the Ashton Vale to Temple Meads (AVTM) Metrobus route that when open will introduce faster and more regular bus services from Long Ashton Park and Ride to the City Centre. As part of the enabling works a new bridge with a 3.5m wide shared cycle/pedestrian route is currently being built over Bathurst Basin which will allow the existing bridge to become one way only. Prior to the work there were double yellow lines on both sides of the carriageway, which will be reinstated on completion, along with a no loading ban that operates Monday to Friday from 7am to 10pm and 4.30pm to 6.30pm. The site is within a 20mph zone and Redcliff Residents Parking Scheme. There have been no recorded accidents within the proximity of the site.

Purpose

No clear information has been provided as to the purpose of the landing stage other than to stabilise the remnants of the old landing stage. As no structural assessment has been conducted it is impossible to ascertain if this statement is accurate or that such a large structure (96m long x 9m wide) is required to stabilise such a narrow section of riverbank. Furthermore as only extremely small vessels are able to travel beneath Ashton Swing Bridge or leave Bathurst Basin, as all three bridges are unable to open, it is unclear why such a large structure is required in a location which would be inaccessible to most vessels. Currently the existing site is used for car parking. If it is the intention that the landing stage be ultimately used for parking this would be contrary to the Policy BCAP29: Car and cycle parking of Bristol Central Area Plan - Policies - Adopted March 2015 which states that "proposals for long-stay public car parking will only be acceptable where it would replace existing provision and would be appropriately located within the hierarchy of vehicular routes in the city centre."

In addition given that the landing stage would be accessed from Commercial Road, any additional vehicle movements associated with the intensification of the site would place pedestrians/cyclists using the new 3.5m shared route at risk, which would not be acceptable and would be contrary to Policy DM23: Transport Development Management of Bristol Local Plan - Site Allocations and

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Development Management Policies - Adopted July 2014 which states that "development should not give rise to unacceptable traffic conditions and will be expected to provide: safe and adequate access for all sections of the community within the development and onto the highway network." Not only would this impinge on the day to day operation of the AVTM Metrobus route but could place pedestrians and in particular cyclists at risk, whose number is only likely to increase as a result of the 3.5m shared route, which will connect to the existing segregated cycle routes on Redcliff Hill (A38) and Clarence Road (A370).

Access

The site plan submitted indicates that the existing access point, which is being reconstructed as part of the Metrobus works, will continue to be used. However, it is unclear how the landing stage will interface with this to ensure appropriate levels for drainage purposes as well as for vehicles/pedestrians accessing the existing private road that slopes downwards towards the Marchioness Building. This must be clarified. It has been implied that a number of trees will be removed as part of the Metrobus works. This is not the case.

Retaining Walls

Commercial Road is currently supported by a retaining wall. To ensure its structural integrity the landing stage must be constructed in such a way that it does not rest on or use the wall for any means of support. A full structural assessment (Approval In Principle) must be submitted prior to any approval being granted, to ensure that what is being proposed will not in any way undermine the strength of the retaining wall. This is particularly important given that Commercial Road will be more intensively used when the AVTM Metrobus service starts. The landing stage must also be designed so that existing drainage holes are not obstructed.

The failure to submit such information is contrary to Policy DM37: Unstable Land of Bristol Local Plan - Site Allocations and Development Management Policies - Adopted July 2014 which states that "on sites where there is reason to suspect unstable land and the risk of instability has the potential to materially affect either the proposed development or neighbouring uses/ occupiers, development will only be permitted where: i. a desk-based study of available records has been carried out to assess the previous uses of the site and their potential for instability in relation to the proposed development; and ii. Where the study establishes that instability is likely but does not provide sufficient information to establish its precise extent or nature, site investigation and risk assessment are carried out to determine the standard of remediation required to make the site suitable for its intended use. Where remediation measures are necessary, conditions or obligations may be applied to ensure that the development does not take place until appropriate works are completed".

Construction

The Planning and Heritage Statement indicates that the landing stage will be constructed from a combination of wood and metal, but does not clarify what surface treatment will be applied or whether safety barriers will be provided, which is unacceptable. Given that it is proposed to be 96m long x 9m wide and will need supporting columns that run down to the riverbed (deeper depending on the soil conditions) a significant amount of construction materials, vehicles and plant will be required. However, no clear information has been provided as to how the landing stage would be constructed and what impact this would have on the safe operation of the surrounding highway network.

This is particularly concerning given the fact that as stated Commercial Road forms part of the AVTM Metrobus route and any carriageway closures or restrictions would have a detrimental impact to its operation, not to mention that of the shared cycle/pedestrian route. This at a time when the council is trying to promote and increase public transport and alternatives to single person car journeys in response to increased traffic congestion, climate change and the harmful effects of vehicle emissions such as nitrogen dioxide, generated in particular by diesel vehicles.

As a result before any approval can be granted in addition to Approval In Principle a full and comprehensive Construction Management Plan must be submitted which clearly sets out and

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addresses each of the following issues:

- Number and type of vehicles accessing the site
- Deliveries, waste, cranes, equipment, plant, workers, visitors
- Size of construction vehicles
- Means by which reduction in the number of movements and parking on nearby streets can be achieved
- Programming
- Waste management
- Construction methodology
- Shared deliveries
- Car sharing
- Travel planning
- Local workforce
- Parking facilities for staff and visitors
- On-site facilities
- Swept paths showing access for the largest vehicles regularly accessing site and measures to ensure adequate space is available
- Arrangements to receive abnormal loads or unusually large vehicles
- Measures to protect vulnerable road users (cyclists and pedestrians)
- Arrangements for temporary facilities for any bus stops or routes
- Arrangements for turning of vehicles, to be within the site unless completely unavoidable
- Means of prevention of mud being carried onto the highway
- Hours of operation
- Any necessary temporary traffic management measures -carriageway restrictions removal of parking, changes to one way streets, hoarding licences, scaffolding licences (this list is not exhaustive)
- Routing plan of vehicles avoiding weight and size restrictions and reducing unsuitable traffic onto residential roads
- Waiting areas and means of communication for delivery vehicles if unavailable space within or near to site, identification of holding areas
- Means of communication of CTMP measures to staff, visitors and neighbouring residents and businesses

Recommendations

In its current format the application has provided insufficient evidence to indicate the purpose, need for (considering the constraints on the size of vessels that would be able to use it) or end usage of the landing stage. As the existing site is used for car parking, if this is the intended usage, this would be in clear contravention of Policy BCAP29: Car and cycle parking of Bristol Central Area Plan - Policies - Adopted March 2015, not to mention Policy DM23: Transport Development Management of Bristol Local Plan - Site Allocations and Development Management Policies - Adopted July 2014 by virtue of the increased number of vehicle movements.

Furthermore, no clear technical assessment (Approval In Principle) or Construction Management Plan has been submitted as to how the landing stage will be constructed. This is unacceptable, particularly given the fact that it must not in any way rest on or use the adjacent retaining wall for support and is contrary to Policy DM37: Unstable Land of Bristol Local Plan - Site Allocations and Development Management Policies - Adopted July 2014. Due to its size a significant amount of construction materials, vehicles and plant will be required, which will undoubtedly require footway and carriageway closures. This will have a detrimental impact on the day to day operation of the AVTM Metrobus route and shared cycle/pedestrian route, which is unacceptable.

Finally whilst a site plan has been submitted it does not accurately represent the surrounding highway infrastructure and no plans have been provided showing the design of the landing stage or how it will interface with the existing carriageway and the private access road. With such a lack of detail it is impossible to properly assess the application to ensure that if permission were to be

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granted it would not significantly impact the safe operation of the adjacent adopted highway. Consequently Transport Development Management recommends that the application be refused.

E) GROUND STABILITY/ CONTAMINATION

The Local Planning Authority (LPA) has an important role in minimising the risk and effects of land stability on property, infrastructure and the public (NPPF). Policy DM37 provides the detailed criteria applicants are expected to address where there is reason to suspect unstable land and where the risk of instability has the potential to materially affect development.

The submissions refer to problems with stability of the Marchioness site and ground slippage, however no ground condition desk study has been provided specifying that nature and extent of these issues in relation to the red-lined site or land adjacent to it. In addition, construction details and method are absent from the application. As such, it is unclear how the installation of the proposed landing stage would address ground slippage issues identified by the applicant.

The lack of information addressing the terms of DM37 has been highlighted as a concern by TDM in their comments outlined above, due to the proximity of the site to the highway and cycle/ pedestrian network. In addition, given the proximity of the Grade II listed harbour walls and sloping nature of the existing embankment, confirmation of any existing stability issues and clarity on proposed groundworks impacts required as part of the development are needed as part of the assessment process. This information has not been provided by the applicant and refusal of the proposal is therefore recommended due to conflict with policy DM37.

The land contamination officer has been consulted on the proposals and have raised concerns with potential river contamination risks associated with construction and installation; conditions are recommended to secure a foundation works risk assessment prior to works commencing and condition to ensure that if encountered, contamination will be dealt with.

F)- TREE IMPACTS

In accordance with policies BCS9, BCS11, DM15 and DM17, green infrastructure, including trees and ecology on development sites should be safeguarded and enhanced where possible. Where this is not possible, developer contributions should be taken to provide for mitigation of losses, in accordance with policy BCS11 and the Planning Obligations SPD.

The Tree schedule outlines removal of 4 category C trees from the site (T1 - T4) and suggests that 6 trees would be retained T5-T11. Notwithstanding, given the location of the trees identified as part of the Tree Schedule and dimensions and siting of the proposed landing stage, it would appear that all trees would need to be cleared from the site to allow for installation of the proposal.

The existing trees on the site are considered important for their contribution to the local streetscene and character and appearance of the site. The loss of all trees from the site has not been justified by the applicant against policies BCS9, BCS11, DM15 and DM17 and the tree officer has commented that the tree survey does not fulfil the requirements of DM17.

The Tree Officer has confirmed - No tree protection has been specified or identified on an appropriate plan and no BTRS calculations have been provided to mitigation for the loss of Trees in line with this proposal. The tree survey does not provide stem diameters so that mitigation can be applied.

We require:

- o A tree protection plan to identify trees to be retained or removed.

DEVELOPMENT CONTROL () DELEGATED
The Marchioness Site Commercial Road Bristol BS1 6TG

- o BTRS calculations for tree replacement on site.
- o Calculation of financial contribution for trees that cannot be replaced on site.
- o Arboricultural implications assessment and method statement for the protection of trees to be retained.
- o A high quality landscape plan containing tree locations, species, planting stock size (Minimum 12-14cm Girth) & maintenance schedule for watering and aftercare to ensure establishment of newly planted trees.

Overall, as outlined above, the application fails to demonstrate that the development is appropriate for this site. As such, the loss of trees resulting from the installation of the landing stage is not considered adequately justified. The additional information requested by the tree officer has not been sought from the applicant, due to the fundamental concerns with the visual impact of the proposals on heritage and transport grounds.

(F) IS THERE AN APPROPRIATE FLOOD RISK RESPONSE?

The site is located in Flood Risk Zone 3, identified as having a high probability of flooding. The applicant has provided a Flood Risk Assessment and further documentation to address concerns of the Environment Agency regarding the potential impacts arising from installation of the structure. The Flood Risk statement provided suggests that the development should be considered as a 'water compatible' development - defined by the applicant as a structure that is required to be adjacent to/over water for operational reasons and serve a purpose related to the use of the water.

As outlined above, the submissions fail to detail the exact anticipated use of the structure as a landing stage, for example the nature of the waterbourne craft that would use the platform and associated pattern of use. The Harbour Authority have confirmed that sailing and leisure activities within the New Cut are restricted due to the high current flow and the difference in water level. Given the proximity of the landing stage to the adjacent highway, apparent ease of access and existing use of the Marchioness site for unrestricted commuter carparking, it is not considered unreasonable for the LPA to raise concerns at the potential use of the platform for carparking purposes - queries are raised as to the flood risk vulnerability of this type of use.

The Environment Agency have been consulted on the application and following submission of further details addressing their concerns. The final formal comments of the Environment Agency to the LPA are outlined below -

We maintain our objection to the proposed landing stage, as submitted: We still have insufficient detail about the proposed landing stage and as such we cannot fully assess the associated flood risk. We require detailed drawings of the proposed landing stage including in-situ cross-sections with dimensions and levels in metres Above Ordnance Datum.

The planning application has been submitted with an inadequate Flood Risk Assessment (FRA). The FRA submitted with this application does not comply with the requirements set out in the Planning Practice Guidance and the National Planning Policy Framework. The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed landing stage.

In particular, the submitted FRA fails to:

1. Confirm levels of the proposed structure in metres Above Ordnance Datum in relation to surrounding ground levels. The FRA needs to address the loss of channel cross-sectional area which will be occupied by the proposed structure. For floating pontoons and structures in this location we would be looking for pile caps to be capped above the 1 in 200 year level including an allowance for climate change and freeboard.
2. Consider how people will be kept safe from flood hazards identified.
3. Consider the requirement for flood emergency planning including flood warning and evacuation

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of people for a range of flooding events up to and including the extreme event. That is use of the proposed landing stage, how would access be restricted during high flows/high tides.

We advise that the applicant make a Product 4 data request to our Enquiries Team, WessexEnquiries@environment-agency.gov.uk. This will provide maximum modelled tidal levels and depths for the applicants' site from Bristol City Council's Central Area Flood Risk Assessment 2011 model. This data should be considered within the FRA and be used to help inform a deck level for the proposed landing stage.

Under the terms of the Environmental Permitting Regulations, the prior written permission of the Agency is required for any proposed works or structures in, under, over or within 16 metres of the top of the bank of the Floating Harbour, designated a 'Main River'. The need for a Flood Risk Activity Permit is over and above the need for planning permission. Further information can be found on our .gov.uk website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Our objection will be maintained until an adequate FRA is received.

The LPA have been provided with details of further exchanges between the applicant and the Environment Agency on flood risk matters arising from the proposals, with confirmation from the EA that objection to the proposals is maintained due to insufficient information demonstrating that the structure would provide an acceptable response to flood risk issues arising from the location, form, design and potential use of the proposed landing stage. Insufficient information has been provided from the applicant regarding the nature of the proposed use and access arrangements to the platform by vehicles. Given the proximity to the Commercial Road highway it is feasible that vehicles would use the landing stage and that vehicular manouvres could occur closer to the New Cut waterway than the current arrangements. The application fails to demonstrate that the installation, construction and use of the platform would provide an acceptable response to the flood risks associated with this site, including ensuring public safety.

The proposals are therefore considered contrary to local plan policies BCS13, BCS15 and BCS16 of the Core Strategy 2014, the NPPF and national planning practice guidance.

G) IS THERE AN APPROPRIATE NATURE CONSERVATION RESPONSE?
 No objections have been raised to the proposals by the Nature Conservation officer

RECOMMENDED REFUSED

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

Reason(s)

1. The application proposal would result in the unjustified visual loss of natural greenspace within the New Cut and loss of existing trees from the site that contribute to the character and appearance of the Conservation Area. In addition, the application fails to demonstrate that the overall scale, form and overall design of the landing stage would appear as a sympathetic form of development which would enhance or contribute positively to the character, appearance, identity and distinctiveness of the Conservation Area. The potential use of the landing stage for carparking purposes would be considered visually intrusive in this location. For the above reasons, the application fails to demonstrate that the proposals would preserve or enhance the character and appearance of the Conservation Area. The nature and degree of public benefits associated with the application proposals are considered insufficiently demonstrated.

As such, the proposals conflict with guidance contained within Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; S12 of the NPPF, policies BCS9, BCS11, BCS21 and BCS22 of the Bristol Development Framework Core Strategy

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2011, and DM15, DM17, DM26, DM27, DM29 and DM31 of the Site Allocations and Development Management Policies 2014.

2. The application fails to provide sufficient construction, structural or operational detail demonstrating that the installation and use of the proposed landing stage would have acceptable impact on highway maintenance, operation and highway safety in the vicinity of the site. As such, the proposals would conflict with policies BCS10 of the Core Strategy (2011), DM23 Site Allocations and Development Management Policies (2014). The proposals would also provide potential for the landing stage to be used as a carparking area and this would be in conflict with Policy BCAP29 of Bristol Central Area Plan (March 2015).
3. Insufficient information has been provided to demonstrate the suitability of the site in land stability terms to accommodate a structure of the scale and form proposed, without harm to either the stability of the proposed development and adjoining highway or the safety of its future users or neighbouring uses/occupiers. As such the development is considered contrary to Policy DM37: Unstable Land (Site Allocations and Development Management policies 2014).
4. The submitted Flood risk assessment fails to provide a suitable basis for assessment to be made of the flood risks arising from the proposed landing stage. The application details fail to demonstrate that the installation, construction and use of the landing stage would provide an acceptable response to the flood risks associated with this site, including ensuring public safety. The proposals are therefore considered contrary to local plan policies BCS13, BCS15 and BCS16 of the Core Strategy 2014, the NPPF and national planning practice guidance.

Advice(s)

1. Refused Applications Deposited Plans/Documents

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

Views before, after and model on proposed jetty, received 29 August 2017

1 Existing layout and sections B-B, C-C, received 12 June 2017

2 Proposed layout and sections B-B, C-C, received 12 June 2017

Site location plan, received 12 June 2017

3 Jetty Detail Proposed, received 29 August 2017

Case Officer: Anna Schroeder

Authorisation: Paul Chick

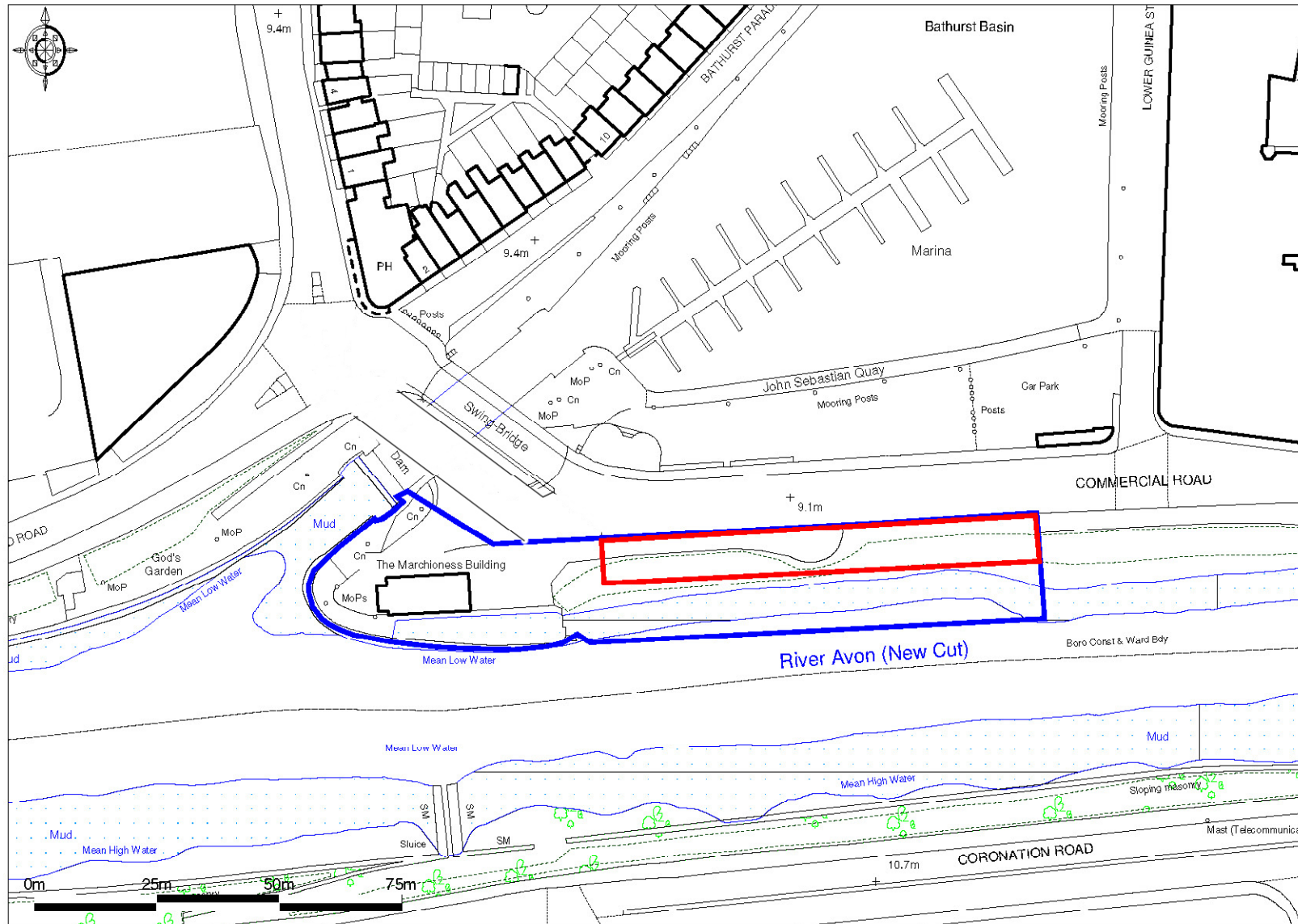
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Supporting Documents

6. The Marchioness Building, Commercial Road

1. Site location plan
2. Proposed jetty detail
3. Jetty existing
4. Jetty proposed
5. Proposed elevations
6. Visuals
7. Historic photograph

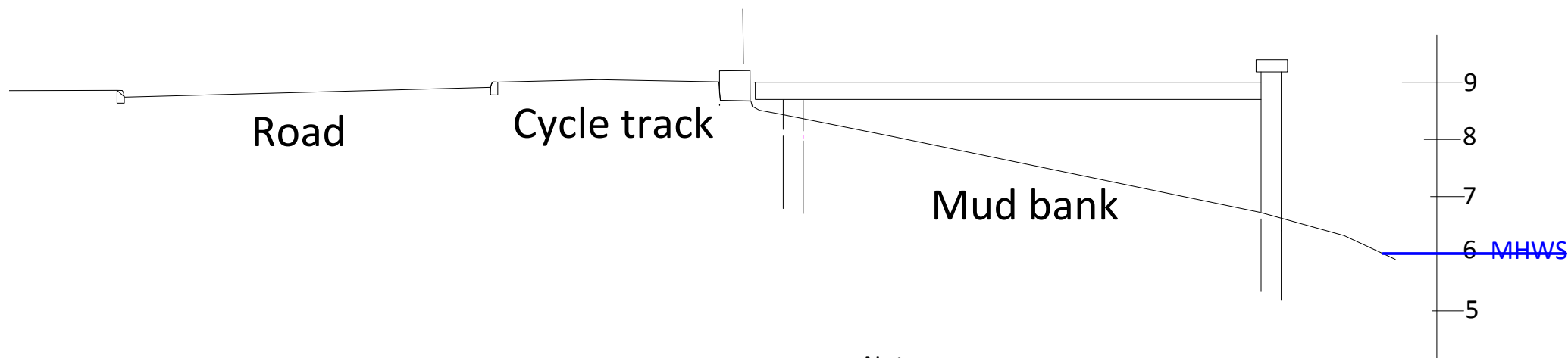
Site Location Plan



Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number 100022432. Plotted Scale - 1:1250

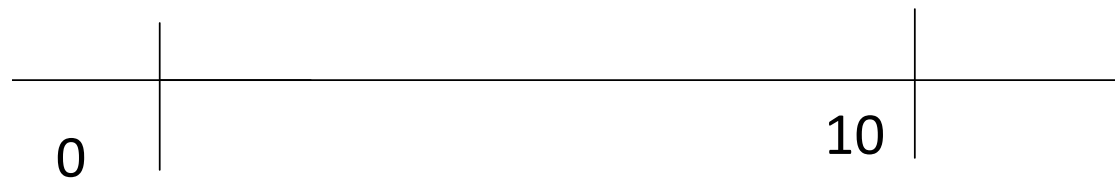


The Marchioness, Commercial
Road, Bristol, BS1 6TG
Scale 1:2500

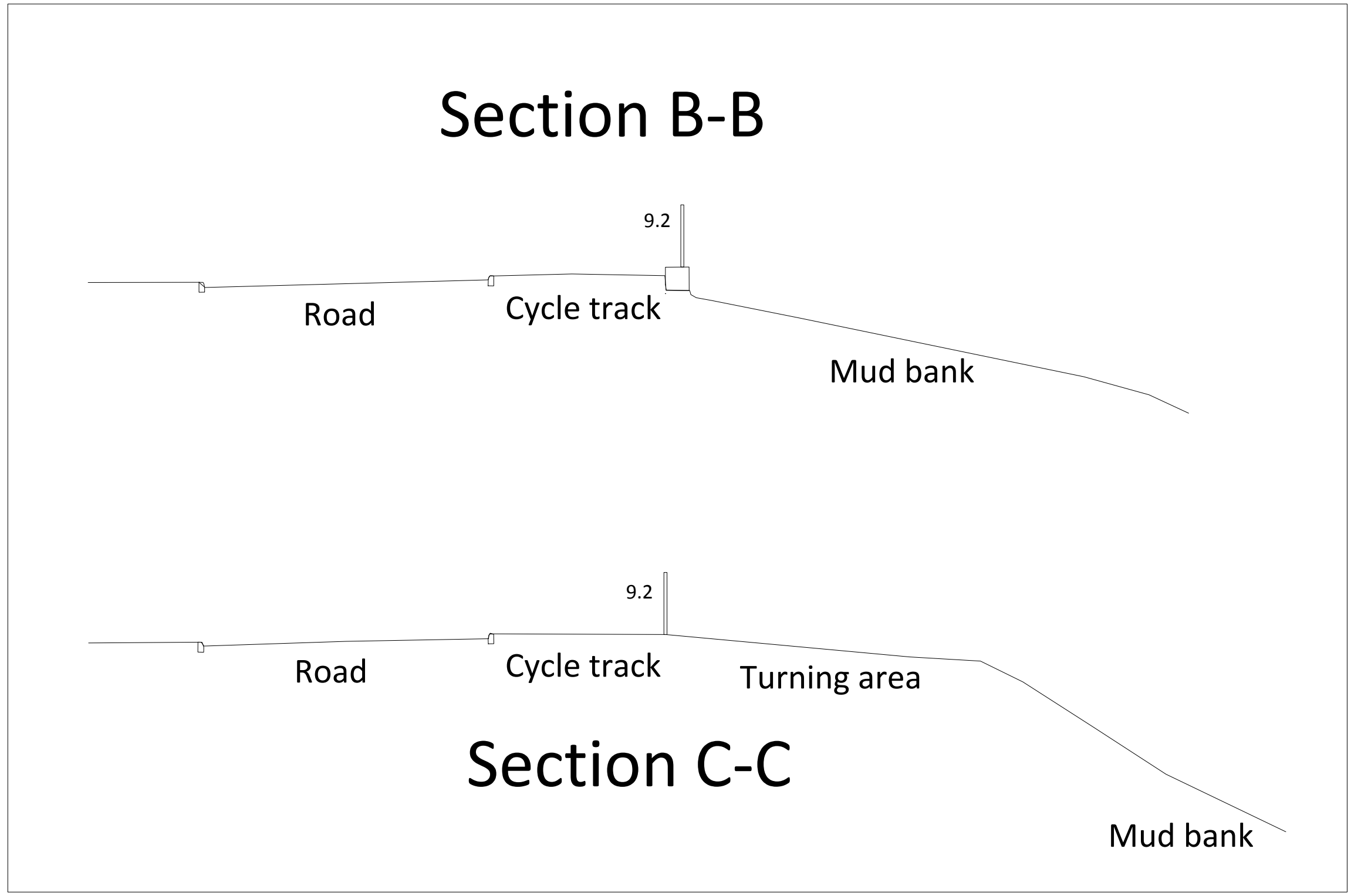


Note:

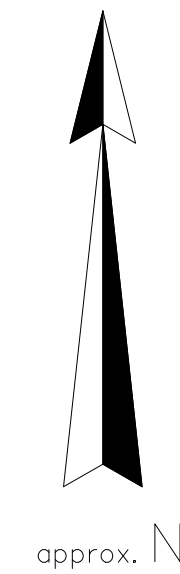
- 1) Piles either wood or steel painted brown.
- 2) MHWS Bristol = 8.9m
- 3) MHWS Marchioness = 6m



Scale 1:100



Updated
15 May 19 - Showing access points



Existing

See Inset

C

B

swing bridge

Existing gate
for pedestrian
and vehicular
access

T1

T2

T3

T5

T6

T7

T8

T9

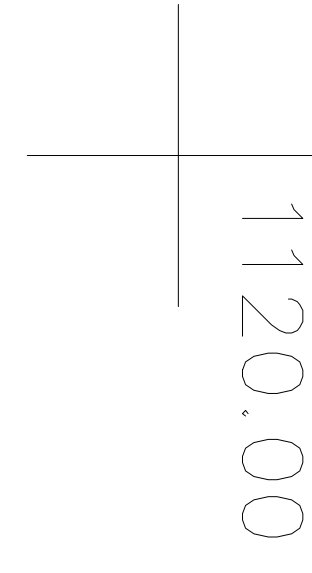
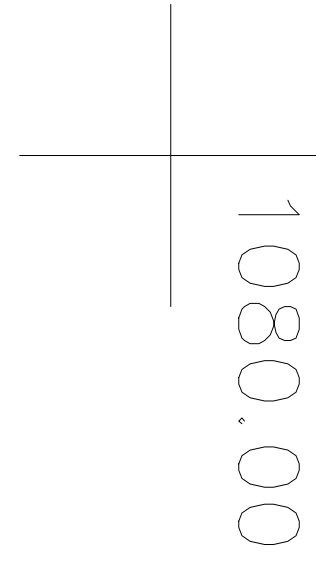
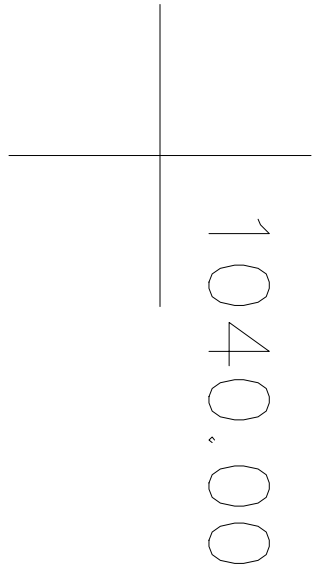
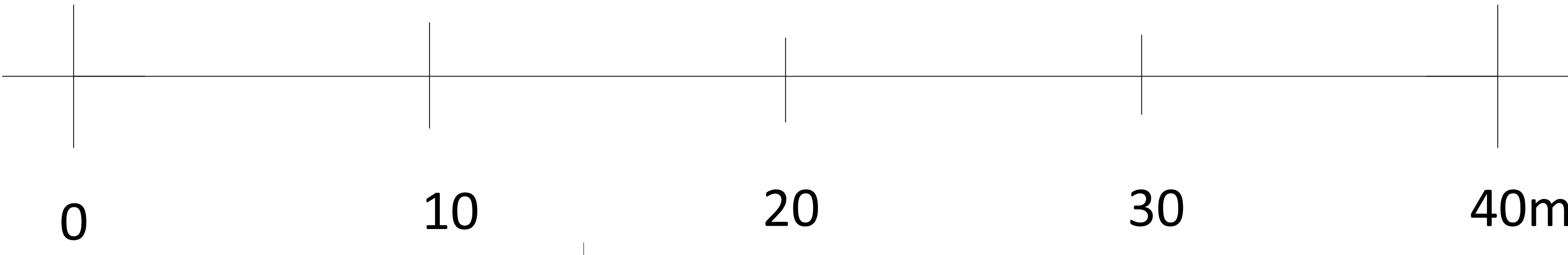
T10

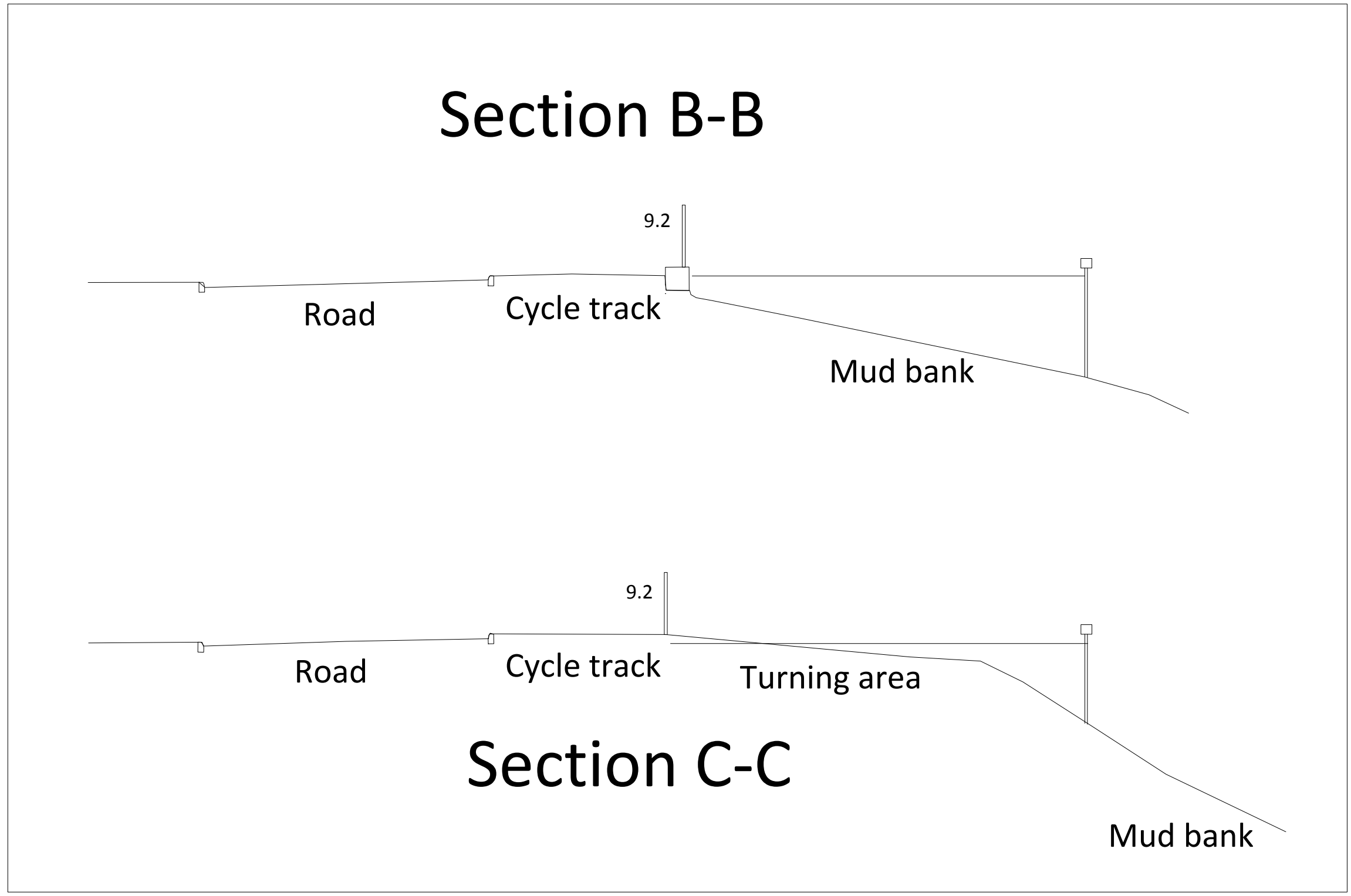
T11

C

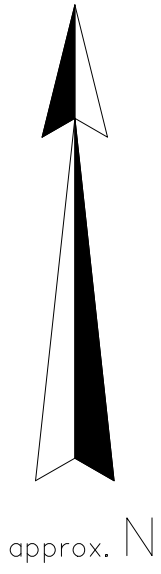
B

Approximate location of wooden piling





Updated
15 May 19 - Showing access points and
ramp from jetty into site



Proposal

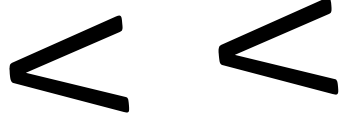
See Inset

C

B

swing bridge

Existing gate
for pedestrian
and vehicular
access. Gate
raised 1m to
match new
ground level.



T5

T6

T7

T8

T9

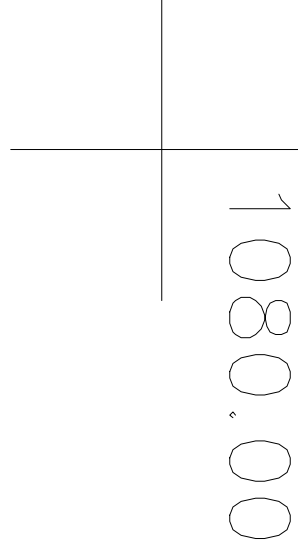
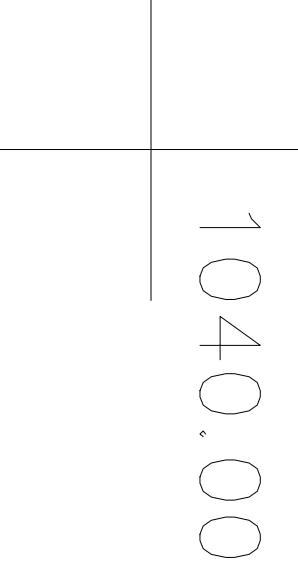
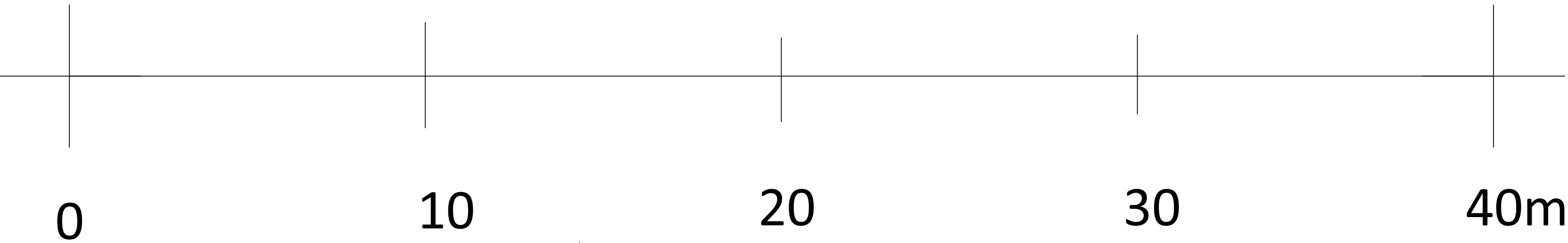
T10

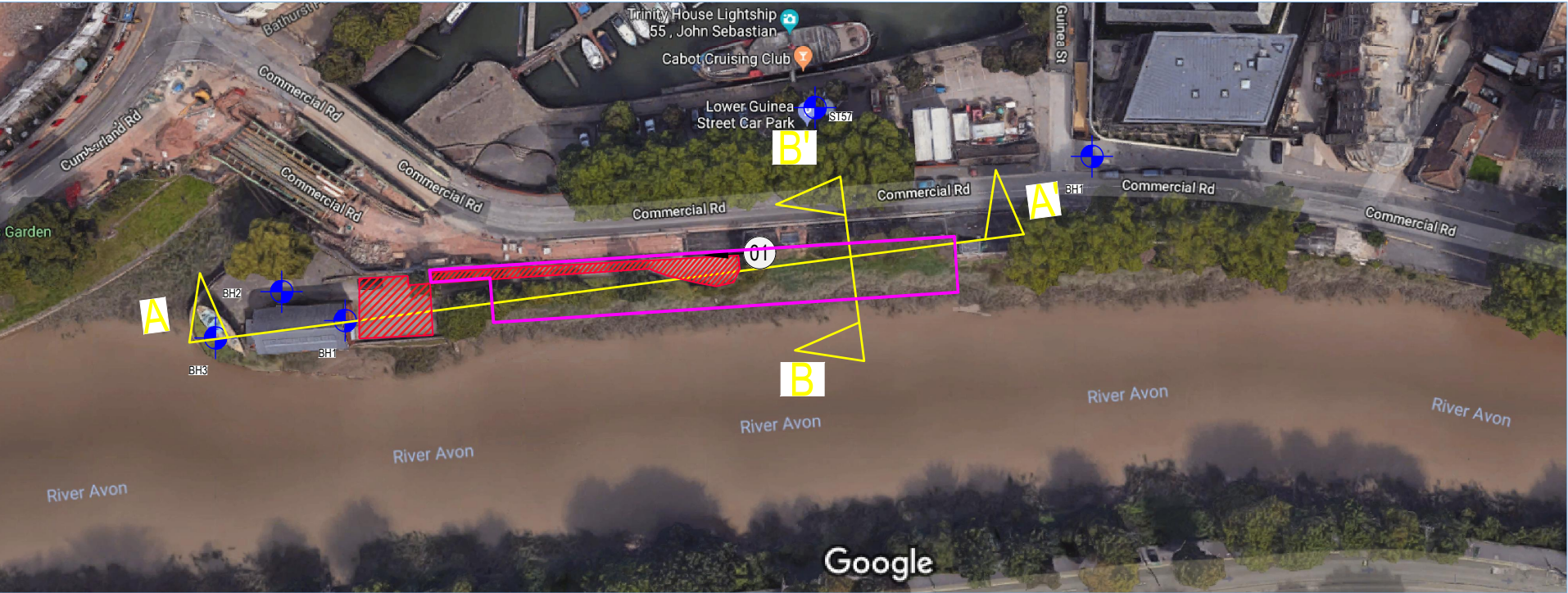
T11

C

B

Approximate location of wooden piling





BOREHOLE LOCATION PLAN
NOT TO SCALE



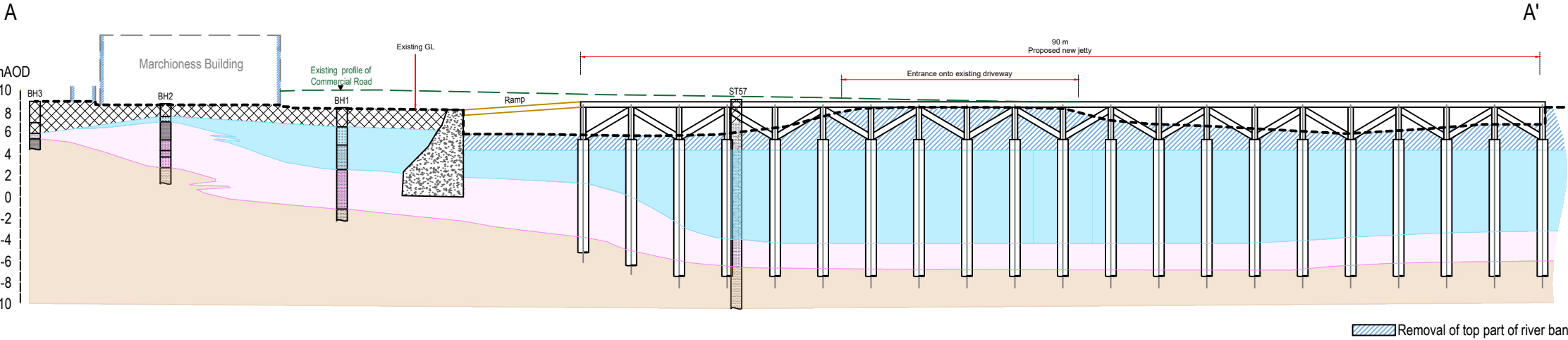
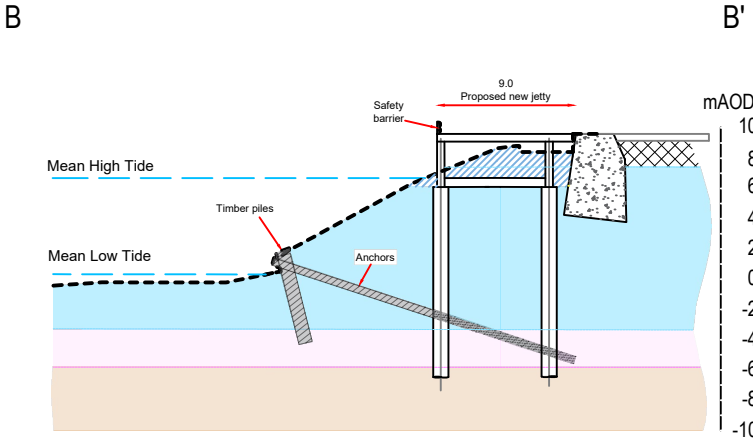
 Possible locations for siting crane.  Proposed jetty location.











PHOTO 01
Photograph showing existing access road / driveway and masonry retaining wall (looking west)



PROPOSED FRONT ELEVATION (A - A')
Scale 1:500



PROPOSED SIDE ELEVATION (B - B')
Scale 1:500

KEY	
	Historic or BGS borehole record
	Made Ground
	Masonry retaining wall
	Alluvium
	Residual Soils
	Sandstone
	Mudstone
	Photo location and reference

NOTES

1. All dimensions are to be checked on site before the commencement of works. Any discrepancies are to be reported to the Architect & Engineer for verification. Figured dimensions only are to be taken from this drawing.

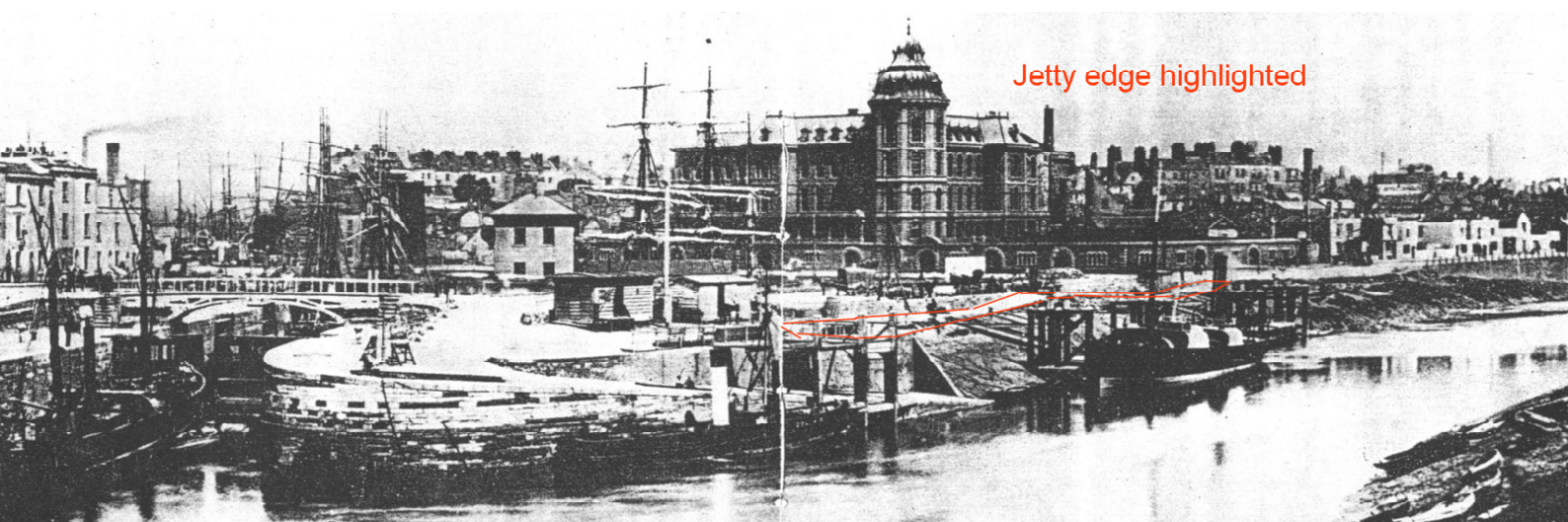
2. This drawing is to be read in conjunction with all relevant Engineers' and Service Engineers' drawings and specifications.

P2					
FINAL	24.04.19	LL	24.04.19	LL	24.04.19
SD					
P1					
FIRST ISSUE	19.03.19	LL	10.04.19	SC	-
BGS					
REV.					
REVISION NOTES/COMMENTS					
DRAWN BY	DATE	CHECKED BY	DATE	APPROVED BY	DATE

		Over Court Barns Over Lane Almondsbury, Bristol BS32 4DF TEL: 01454 619 533 FAX: 01454 614 125 E-Mail: bristol@hydrock.com or visit www.hydrock.com	
CLIENT		HUGH PRATT	
PROJECT		NEW CUT LANDING, COMMERCIAL ROAD	

TITLE			
CONCEPTUAL SITE MODEL			
HYDROCK PROJECT NO.		SCALE @ A3	
C-11514-C		1:500	
PURPOSE OF ISSUE			STATUS
SUITABLE FOR INFORMATION			S2
DRAWING NO. (PROJECT CODE-ORIGINATOR-ZONE-LEVEL-TYPE-ROLE-NUMBER)			REVISION
11514-HYD-XX-XX-DR-G-1001			P2





Jetty edge highlighted



(39) 1862-1865: Bathurst Basin and The New Cut: Coronation Road panorama; Bathurst Parade, Georgian houses replaced by tall dock warehouses of 1865; tall masted ships; a very flimsy footbridge, probably of cast-iron awaiting to-day's narrow road bridge (made to swing open—now fixed); the batcule bridge at the bottom of Guinea Street in the raised position; harbour master's house with four windows, clock on the corner, and a little garden, now the site of sand and gravel equipment. The "Dolphin" tug tied-up where the "Marchioness" came 40-50 years later, the dockside shed not yet

built (it had a useful clock until the 1950's); the General Hospital, an outstanding example of "Bristol Byzantine", winning an architectural competition for its designers, Gingell and Lysaght, dating from 1853, completed 1862. The basement of the Hospital was originally intended as dockside warehouses, giving, by their rents, a useful source of income. St. Mary Redcliffe spire of 1872 is not yet visible; the little bridge was probably one of those opened at the time of the 1831 riots to confine the mob to a small strip of land. Extensions to the hospital have changed its appearance, and the dome was a casualty in the blitz. [See "1950-1953", Plate 97].

