

## Statement: PS10.02

Cabinet – 14<sup>th</sup> July 2020

Re: Agenda item 10 – City Centre Development

Statement submitted by: Jo Davis, Avison Young

This submission has been prepared by Avison Young on behalf of Cubex & LaSalle in response to the Committee Report published ahead of next Wednesday's 14th July 2020 Bristol City Council (BCC) Cabinet Meeting. This note seeks to reflect in particular discussions that have taken place to date between BCC and Cubex & LaSalle on 9 June 2020.

My client welcomes the commissioning of a City Centre Development & Delivery Plan following the adoption of the City Centre Framework to provide a clear, holistic and visionary set of guidelines giving developers and investors more certainty in their approach when considering development in the city centre. However we are concerned about the lack of engagement undertaken between the Council and stakeholders since the document was last published in draft in March 2018. We would also challenge the evidence base to support the Aims set out in the Framework which potentially undermine the strategy.

Having reviewed the June 2020 version of the document we wish to make a number of comments:

My client cannot support **Aim 14 'Creating a balanced and mix of landuse'** and its visualisation in Figure 9 in its current form for the following reasons:

The report sets out that the purpose of **Aim 14** is to ensure the focus of any redevelopment in the Broadmead and St James Barton area is primarily on '*retail, leisure, workspace, culture and entertainment uses.*'

This Aim is then visualised in the area colour washed red on **figure 9 'mixed use development retail/leisure emphasis'** which currently equates to over 60% of the Framework Area.

This approach (Aim 14 & Figure 9) was not commercially viable at the drafting of the Framework Document in 2018 due to the challenges faced by the retail sector at that time. However, since 2018, we have seen the decline of the retail sector accelerate. Even before Covid-19 the scale of retail/leisure proposed in the Fig. 9 of the Framework was commercial unrealistic. Covid 19 Lockdown has only intensified the demise of town centre retailing. The Centre for Retail Research April 2020 predicts 20 000 stores will not trade gain post Covid19; Retail Economics stated pre-Covid-19 there were 306 655 retail store in the UK so this equates to 6.5% contraction in retail units. These figure exclude food retail and food and beverage. This underscores urgency to create a flexible and pro-investor City Centre Framework to accelerate the repurposing of our city centre. Without a positive and pro-active introduction of new landuses targeting residential led regeneration blocks the Private Sector will be unable to invest in and contribute to the ambitions of Framework on public realm,

movement and open space and the City Centre Development & Delivery Plan the Framework is seeking to support.

This appears to be a missed opportunity for the Framework to champion a radical regenerative approach to ensure a framework predicated on a resilient and balanced city centre, with a reinvented primary role.

More concerning, is the Framework acknowledges there is no evidence base to support this approach (**Aim 14 & fig 9**). The final sentence in the first paragraph on Aim 14 which states '*a retail and leisure study will inform the future approach*'. This directly implies that the Framework has no evidence base to inform on the nature and mix of land uses across the city centre. It is our view the current approach will not only prohibit investment in key development block in the city centre coming forward but potentially undermine and dilute ability for city centre to create a targeted, albeit contracted resilience Shopping Quarter. We would wish to see the outputs of (and engage in the preparation of the Retail & Leisure Study) to ensure the Framework has a robust evidence base to inform any future redevelopment proposals.

Under 'Aim 17: Building retention and reuse' (p.26, June 2020) the Framework has been updated to include the following paragraph:

*The existing Primark and Debenhams buildings are distinctive elements of the street scene on Horsefair/ Bond Street and some of the more distinguished and recognisable structures to survive from the post war redevelopment scheme. If these buildings are considered for re-use or redevelopment, proposals should carefully consider how they contribute to the character of the area, including consideration of retention and re-use, extension or sensitive redevelopment which retains existing character features.*

It should be noted that the Primark and Debenhams buildings are not listed or locally listed. While their prominent location, scale and the way they define the part of Broadmead within which they are located is of note and does make the buildings 'stand out', it is not clear in what other way they are distinctive. In particular the buildings have never been recognised for architectural merit or previously highlighted in any BCC Policy documents as buildings of merit. There is no justification behind the aspiration to retain these buildings and indeed no clear indication of what the 'existing character features' of these buildings are.

In addition, the buildings were specifically designed to host department stores, with very deep floor plates and layouts to suit that purpose and use. We are concerned that setting an ambition for retention and re-use of these buildings in the Framework does not consider the potential complexities of doing so. Bristol, and for that matter the majority of towns and cities across the country, now has a significant over supply of retail accommodation following structural change to the sector over many years. The rate of decline will in all likelihood be further exacerbated as the long term impacts of Covid-19 take effect. Large floorplate department store buildings (now 70 years old in the case of Debenhams) have little prospect of remaining in full retail use and adaptation of bespoke buildings of this nature to alternative use presents significant challenges.

This Aim is an assumption which is not backed by feasibility work or an investigation of the actual potential for the buildings to be re-used. Indeed this introduces early risk and investor uncertainty into what should be a positive discussion about the regeneration of key and prominent city centre sites. The ambition should instead be to promote the highest quality of design approaches to ensure that, should retention be unviable or unrealistic, buildings of equal or arguably greater architectural merit

are erected in place of the post-war blocks. It is essential this Framework positively seeks to channel investment, redevelopment, and the potential to stimulate wider regeneration, should be encouraged provided such proposals are compliant with the Council's other policy framework aspirations".

The above is particularly true in the context of the introductory note in Section 1 of the updated Framework which states: *'There is a need to be flexible and adaptable response to economic, environmental, social and technological changes, and ensure that the success of the city centre is shared and inclusive to all people across the whole city'*.

We urge the Cabinet to take the above comments into consideration and to seek a further review of the Framework, ideally informed by a further round of stakeholder engagement before final adoption. This is to be a key document to inform the regeneration of the heart of Bristol and it ought to be as forward thinking as possible if it is to encourage new development, growth and positive change.

With the above in mind, the Framework should also reflect on and include the Government's latest changes to the planning system due to come into force from September announced by the Prime Minister in his 30th June 2020 'Build, Build, Build' speech including:

- Providing further flexibility for more types of commercial premises to be repurposed through reform of the Use Classes Order. This would for instance mean that a building used for retail could be able to be permanently used as a café or office without requiring a planning application and local authority approval. This would be directly relevant to both the Primark and Debenhams buildings and many more premises within the city centre.
- Allowing a wider range of commercial buildings to change to residential use without the need for a planning application.

These changes could positively impact upon the ambitions of the Framework but may also assist in a speedier delivery of change and therefore the Council should consider what impact the relaxation of planning powers may have on the make-up of the city centre before adopting the Framework as currently written.