

**WARD:** Lawrence Hill**SITE ADDRESS:** Soapworks Broad Plain Bristol BS2 0JP

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**APPLICATION NO:** 1. 20/01150/F Full Planning  
2. 20/04633/LA Listed Building Consent (Alter/Extend)**DETERMINATION DEADLINE:** 30 November 2020  
1 December 2020

**1. Proposed redevelopment of the site, including demolition works and refurbishment of listed Soap Pan building to provide mixed use development comprising: 243 residential dwellings (Class C3); 2,790 sqm GIA of new flexible retail, leisure and commercial space (Class A1, A2, A3, A4 and D2); 15,467 sqm GIA business space together with associated plant space, amenity space, parking and vehicular servicing arrangements, public realm, landscaping and associated works (Option A). With the option of provision of an aparthotel rather than flats fronting Russ Street, resulting in 168 residential dwellings (Class C3); 5,824 sqm GIA aparthotel (Class C1); 2,445 sqm GIA of new flexible retail, leisure and commercial space (Class A1, A2, A3, A4 and D2); 15,467 sqm GIA business space (Class B1) (Option B).**

**&**

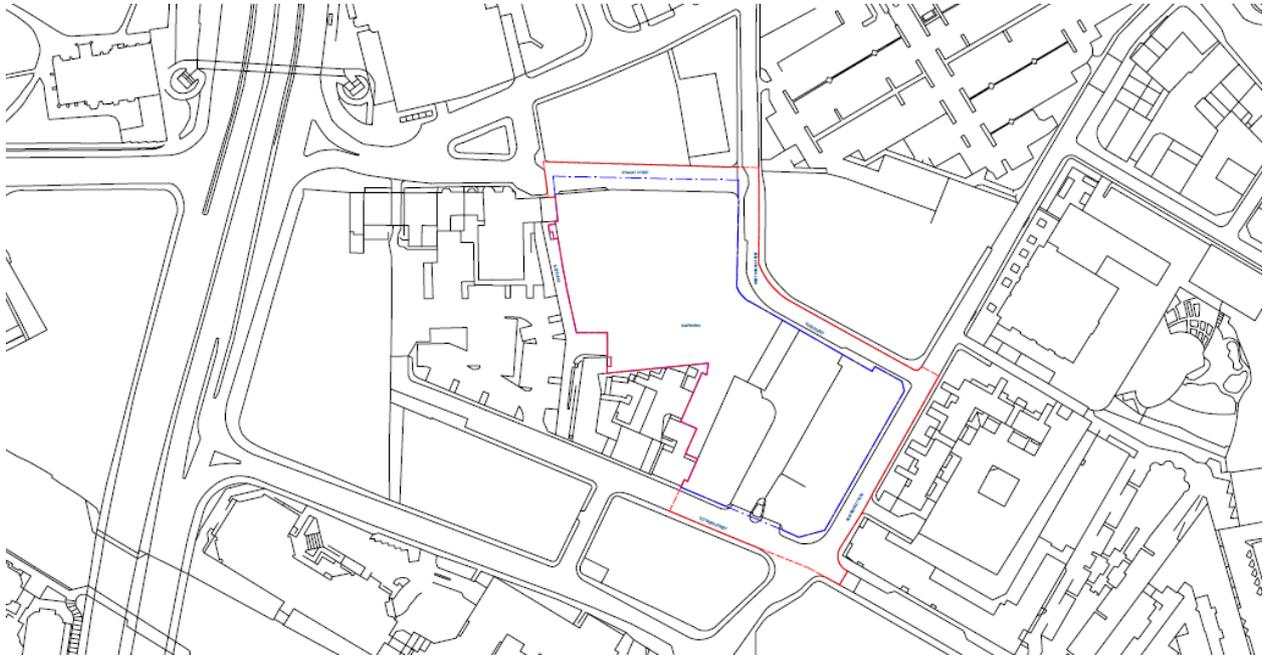
**2. External, internal alterations, conservation and repair of the Grade II listed 'Soap Pan' building ('Building 1'); Demolition works to attached buildings forming part of the Soapworks complex (part-'Building 2', 'Building 3', part-'Building 4', 'Building 5' and 'Building 6'); Alterations and conservation of the retained facade of 'Building 2' (north elevation fronting Straight Street); and Alterations, conservation and repair of the part-retained facade of 'Building 4' (west elevation fronting Sles Lane).**

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**RECOMMENDATION:** Refer to the Secretary of State**AGENT:** Cushman & Wakefield  
Rivergate House  
70 Redcliff Street  
Bristol, BS1 6AL**APPLICANT:** Soapworks Development S.a.r.l.  
And Soapworks Development ...  
C/o Agent

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***The following plan is for illustrative purposes only, and cannot be guaranteed to be up to date.*****LOCATION PLAN:** See next page



**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP****SUMMARY**

This report refers to application for full planning permission and listed building consent for a significant scale mixed use development in a central location, on part of the site previously occupied by the Gardiner Haskins department store, adjacent to the Temple Quarter Enterprise Zone. The applicant is seeking planning permission for a development to include build-to-rent residential accommodation, offices and employment floorspace, and ground floor commercial space, along with a significant element of new public realm. The proposal includes the provision of a 20 storey tower, and given the scale and nature of the proposal, would be transformative of the character of the area.

Whilst the proposal would provide significant benefits, there are a number of concerns with the proposal. Most significant is the impact on heritage assets, both in terms of the removal of historic fabric and the setting of the buildings. In addition, compromises have been made in respect of residential amenity and the fact that the development will be car free. In addition, the proposal is on a site which is subject to flooding, and as such there is a need to provide flood compensation or mitigation as part of the development.

In respect of public responses to the scheme, there is a mixture of responses. Whilst a number of concerns have been raised about the impact on residential amenity, the scale of the development and this impact on the historic buildings, there is also support for the economic and social benefits that the development will bring. There is also some support for the design of the proposal.

As such, in coming to a decision on the application, Members will need to balance the benefits of the development against the undoubted harm that would result from the proposal. In this regard, it is noted that the proposal will provide much needed housing, including affordable housing, will preserve the primary heritage asset on the site, and will deliver significant improvements to the public realm and residential routes. Ultimately, the site is currently an underused site within a sustainable location, and given the benefits of the development it is recommended by officers that the scheme can be supported.

**SITE DESCRIPTION**

This application relates to the site of the former Gardiner Haskins Home Centre, and the service yard and car park immediately to the south east of it, located in Central Bristol. It is bounded by Straight Street to the north, Sles Lane to the west, New Thomas Street, Russ Street and New Kingsley Street to the east, and Old Bread Street to the south. The site shares a party wall along Sles Lane with the terraced buildings on Broad Plain, as well as a party walls with Christopher Thomas Court on the south and west. Overall, the site covers an area of just short of a hectare.

The store itself was vacated in 2019, with the retail floorspace being consolidated in the northern building. Gardiner Haskins have occupied the site for retail since the late 1950s. Prior to this the site was occupied for industry, primarily for making soap. It appears that the site was in use for soap making since the early 19th Century, although the iconic Soapworks building (Soap Pan building) dates from 1882. There are also the remnants of another factory building of a similar age in the north west corner of the site, although this has been much altered, and is notable for the modernist curtain walling frontage on Straight Street, which appears to have been constructed in the 1950s/1960s. The main store frontage on Straight Street dates from the early part of the 20th century, with the infill element (recognisable from the saw tooth roof) dates from a period between 1912 and 1919.

The buildings on site benefit from statutory grade II listing. It is noted that only the Soap Pan building is referred to directly in the statutory listing description, although the other structures on site benefit from listing by virtue of being attached to the Soap Pan building. It is also notable that there are a number of other listed buildings in the area, including the original part of Christopher Thomas Court to

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

the south of the site, the terrace of buildings immediately to the east of the site, and the retained Gardiner Haskins building to the north. These buildings are all listed at grade II. The north west part of the site (excluding the car park) is also within the Old Market Conservation Area.

The application site is within an area that has undergone significant levels of change in recent years. This has resulted in the introduction of significant levels of residential uses in the area, whereas previously the site was characterised by industrial/commercial uses. This is illustrated by the fact that immediately to the south of the site are three new large scale blocks, all of which are close to completion, two of which are residential and one office. To the east, and south west there are also residential blocks that have been completed in the last 20 years. Immediately to the west of the site is a car park, although this has extant permission for an office development. There is also a school, and the retained Gardiner Haskins retail offer close to the site.

The site is at the boundary between the Temple Quarter Enterprise Zone and the Old Market Neighbourhood Planning Area. The site is covered by the Neighbourhood Plan, although it does not include any site specific guidance (albeit, the car park is identified as having long term development potential). The large blocks currently under development referred to above are located within the Enterprise Zone.

As well as the above designations the application site is within the Bristol Air Quality Management Area. A very small part of the site is also identified as being within Flood Zone 2, as identified by the Environment Agency. However, the latest flood modelling suggests that large areas of the site (mostly the car park area) is at high risk of flooding, and therefore should be treated as being within Flood Zone 3.

## RELEVANT HISTORY

It is noted that there have been a number of planning permissions historically that relate to the retail use of the site. This includes listed building consent for internal alterations to the buildings on the site, advertisement consents and temporary use of the car parks. These applications do not relate to the current application on the site.

There have been two previous pre-application submissions for the mixed use redevelopment of the site. The first submission (ref. 18/04209/PREAPP) was submitted with the intention of setting out the development parameters of the site, and was included as part of the marketing of the site. Whilst this was largely silent on quantum, it did set out a range of uses and scale that was considered appropriate as part of the development.

This pre-application was followed by a further submission under reference no. 19/03492/PREAPP. This was submitted by the current applicant and was largely for the same development as currently proposed.

## APPLICATION

This report covers two applications, one for full planning permission and one for listed building consent, for the redevelopment of the site for a mix of residential, employment and commercial development. The application is also designed to allow some flexibility in the floorspace, to allow part of the residential element to be used as aparthotel.

The proposal is divided into three blocks, as follows:

### \* Block A

Block A takes up the northern part of the site, including the frontage of the site facing Straight Street. This includes the curtilage listed former shop. It is proposed to demolish most of this building, apart

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

from much of the Straight Street elevation and parts of the western elevation fronting Sles Lane. It is proposed to incorporate these facades into a new building of 6/7 stories (which is two stories taller than the existing building).

It is proposed to use this largely as commercial floorspace. This includes around 15,000 sq m of open plan employment floorspace (B1 uses). In addition to this it is proposed to provide a mixture of retail (to the south) and food beverage uses (to the north) on the ground floor.

**\* Block B**

This block is located to the east of the site, located where the existing car park and service yard is. This element of the site contains the principle residential element of the scheme. The proposal would be between ground plus 5 stories, up to ground plus 19 stories, with the tallest element being in the south east corner of the site.

The ground floor of the proposal would be a mixture of retail, food and beverage, and servicing for the residential scheme. The commercial units largely surround a new public route through the centre of the site, running north to south through the site. This is accessed via a tunnel to the south of the site. The main entrance to the residential element is in the south east corner of the site, which would provide access to all of the proposed flats. Also included on the ground floor is a cycle store, with provision for 257 cycle parking spaces. The proposed building would be clad in brick.

The proposal would provide 243 flats, which includes 36 studios, 131 x 1 bedroom units, 72 x 2 bedroom and 4 x 3 bedroom units.

As stated above, there is an alternative proposal for the site, which would allow the northern wing of the building B to be used as an Aparthotel. In effect, this would not require any external alterations to the building, but instead would require some changes to the internal arrangements. As such, it is considered reasonable to deal with these alternatives as part of a single application, although it will require additional conditions/clauses within a section 106 agreement, to ensure that the implications of alternative uses are addressed.

In terms of the residential element of the site, this will reduce the number of flats from 243 to 168 units.

**\* Building C**

Building C is the Soap Pan building, and as such is the principle heritage asset on the site. It is proposed to remove the attached buildings to the north of the building, so that the entire building will be revealed. The external fabric will be refurbished, and new windows introduced into the north elevation of the building. It is proposed to use the building as open plan offices on the upper floors, with food and beverage offer on the ground floor.

The proposal would also provide around 2000 sq m of new public realm. This is centred around the retained Soap Pan building, essentially providing a new pedestrian square at the centre of the site. It is not proposed to provide on site car parking, although the proposed plans indicate 4 on street parking spaces, as well as servicing bays. These will be designated for disabled users.

**Amendments to the Plans**

It is noted that a number of amendments have been made to the plans during the course of the application. Whilst the proposed changes have not resulted in significant changes to the form of the proposal, the most substantial changes were as follows:

\* As originally submitted the proposal for block B included the Aparthotel and 166 residential units.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

The scheme was altered to allow for additional residential units instead of the Aparthotel (albeit with the option of reinstating the Aparthotel).

- \* Various alterations to the design of the proposal include the dropping of the 'shoulder' height of elements of the scheme, to give the tower a more slender appearance, and to improve the relationship with the Soap Pan building. This includes setting back the top two stories of building A.
- \* Changes to the materiality of the proposals, to make the tower element more distinct, and also to provide a clearer visual indicator of the route through the site from the south.
- \* The reduction in size of the ground floor pavilion building to provide additional public space and improve the setting of the Soap Pan building.
- \* The provision of an additional residential core, as well as additional balconies and roof top amenity. This results in 52% of units having access to a balcony, including Juliette balconies (only approximately 14% in the original proposal had access to a balcony).

**PRE APPLICATION COMMUNITY INVOLVEMENT****i) PROCESS**

The application was accompanied by a report of Community Involvement, which outlines the measures taken to engage with local communities prior to the submission of the application. The following measures were identified:

- \* The applicant states that a number of meetings were held with stakeholder groups during 2019. This included key Councillors and Officer of the Council, Old Market Community Association, Plan-El, Bristol Civic Society, Bristol Industrial Archaeology Society, Destination Bristol, Bristol Cycling Campaign, as well as representatives of local business and charities.
- \* A public exhibition was held in July 2019, and informal street stall set up, as well as the proposals being advertised in the press.
- \* A project website was set up, providing details of the proposals, and inviting feedback through the 'Give My View' platform. It is reported that there were 3,704 visits to the website resulting in 3,757 individual users providing feedback.
- \* A second round of consultation was carried out towards the end of 2019 and beginning of 2020. This included further meetings with the parties referred to above, as well as over 2000 leaflets being sent out to nearby residential properties.
- \* The second round of consultations resulted in 2,240 individual users providing feedback through the website.

The reported results of the consultation is as follows:

- \* 79% of respondents to the original consultation and 83% to the second consultation were in support of the scheme.
- \* Strongest support for retail/food and drink and residential elements of the proposal.
- \* Respect for the heritage of the site and the provision of usable open space seen as important in the design of the proposals.
- \* In terms of housing, the highest priority is considered to be the provision of affordable housing on the site.
- \* Specific responses included requests for the provision of a grocery store in the area, concerns about the height of elements of the scheme and concerns about the provision of car parking within the proposal.

**ii) Fundamental Outcomes**

As part of the statement the applicants have responded to the issues raised as follows:

- \* The provision of 20% affordable housing provision in the development.
- \* The proposal has been designed to sensitively restore the Soap Pan building and the new build element has been designed to respect the historic setting of the site.
- \* The proposal will provide space for independent retailers and food and drink provision.
- \* The proposal will link to the Bristol Heat Network and is committed to meeting BREEAM excellent.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

- \* The proposal will provide a range of flexible employment space.
- \* Accessible open space is at the centre of the development.
- \* Given the central location the scheme has been designed to encourage cycling and walking, rather than the use of the private car.
- \* Space will be made available for a Grocery store, although this will be dependent on an operator to express an interest in the space available.
- \* The open space will be accessible, provide a range of spaces, including green space.

Comments on the Community Involvement Statement have been received from the Neighbourhood Planning Network Administrator, as follows:

The Community Involvement exercise has been poor; the developer has carried out the consultation in such a way that he has failed to be open and honest about options, and what is open for change. The CIS does not set out what comments were made and how the design has been changed to take account of those comments, 'and if not, why not... ' The developer has consulted the local NPN groups and the Civic Society, but their comments receive only passing references in the CIS, nor does the CIS contain any response to these comments. It became apparent that consultation was held when the design was already advanced in preparation; this was not explicit at the meetings with the consultees. The vast majority of the CIS refers to general public consultation, which, while useful at the later stages of CI does not amount to Community Involvement as described in the BCC CI Guidelines. The applicant has therefore failed to take account of any community input in the development of the design, in contravention of the SCI.

**RESPONSE TO PUBLICITY AND CONSULTATION**

The application was advertised by the erection of site notices around the site, an advert in the local press, and by writing to 329 neighbouring properties. The application was re-advertised following the submission of amended plans in September 2020, and again in November 2020.

In relation to the original submission a total of representations were received. This includes 10 objections raising the following concerns:

Mix of Uses on the site (see key issue A):

- \* The proposal disregards the need for additional family accommodation in the area.
- \* The provision of retail space within the development may impact on the retail economy at Old Market.
- \* The Aparthotel would bring limited value to the area, and it would be preferable for more residential to be provided.

Impact on Heritage (see key issue C):

- \* The proposal would obliterate views of retained Soap Pan building.
- \* The original shop complements the historic character of the area, and should not be demolished to facilitate the development.

Impact on Character and Appearance of the Area (see key issue D)

- \* The proposal would be of a height and scale that would be harmful to the character of the area.
- \* The proposed development would be homogenous, impersonal and not of a human scale.
- \* The scale of the development would result in surrounding streets being a dark canyon.

Impact on Residential Amenity (see key issue E)

- \* The proposal would lead to a significant loss of daylight from neighbouring properties, which has already been significantly impacted by neighbouring development.
- \* The proposal would lead to the loss of privacy for neighbouring properties.
- \* The proposal would lead to the loss of views from neighbouring properties.
- \* Construction work would add to existing proposals caused by other development in the area, and

**Development Control Committee A – 31 March 2021**

**Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

would cause addition noise, disturbance, dust and traffic disruption.

\* Much of the open space will be private, and would not be of value to the wider community.

Amenity for the Proposed Development (see key issue F)

\* The proposal will create an unpleasant residential environment for the proposed residents.

Highway Impacts (see key issue G)

\* Parking in the area is already problematic, and the lack of car parking would further exacerbate this issue.

\* Additional traffic adjacent to Hannah Moore School would potentially lead to an increase in incidents.

Other Issues

\* The engagement with existing residents has been poor.

\* The proposal would devalue neighbouring properties (Officer comment: Impact on property values is not a material planning issue, and therefore cannot be given weight in the decision on this application).

\* The proposal will impact on the Party Wall of neighbouring properties, and should not be permitted until there is clarity to the works required (Officer comment: This issue is covered by other legislation, and will require the applicant to enter into a Party Wall agreement with the neighbours of the site affected).

In addition, a total of 10 supporting comments have been received, with the following points made:

\* The proposal is a sensitive redevelopment of an underused plot.

\* The footfall associated with the development will help support other business in the area.

\* The amount of jobs created for the area would be a significant benefit – the developer should be required to employ local people/companies in the construction works.

\* The flexible employment space is and residential development would meet local need.

\* The open space is well designed and will provide safe space for the community.

\* The applicant has engaged well with local charities in the area.

It is also noted that 2 neutral comments were received, raising no comments on the proposals.

Following the first round of consultation, a further 16 objections have been received. These largely confirm that the amendments to the scheme would not overcome previous objections to the proposals. However, the additional following comments have been made:

Mix of Uses on the site (see key issue A):

\* Given the change in work culture it is questioned whether or not large open plan offices are the best use for the site.

Affordable Housing (see key issue B)

\* Provision should be made for more affordable housing within the development.

Residential Amenity (see key issue E)

\* The proposal would be detrimental to the health of neighbouring properties, particularly in relation to additional air pollution.

\* Disabled person access will be effected by the development (Officer comment: It is presumed from the context of the comments that this relates to the impact on access to existing properties).

Sustainability (see key issue I)

\* The sustainability performance of the development is a disappointing, given the climate emergency.

\* The Council should ensure that the proposal meets the sustainability claims of the developer.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

Impact on Green Infrastructure (see key issue J)

\* The proposal would lead to the loss of trees.

**Other Issues**

\* Concern has been raised about hazardous materials at the site (Officer comment: it is not clear what this objections is referring to but there is no indication from the proposal that there were be any requirement to store or process hazardous substances on the site).

A further 9 supporting comments have also been received, emphasising the regeneration value of the proposal.

Finally, as a result of the third consultation 13 further supporting comments and 3 objections have been received. These largely echo comments received previously, particularly in relation to the regeneration value of the scheme, both economically and culturally, and the importance of this location as a link between Temple Meads and Cabot Circus/Old Market. The sustainability credentials of the proposed development are also supported.

One objector raised concerns about not being able to view the plans of the development, and they have been contacted to let them know where plans can be viewed. No further comments have been received since.

- Other Consultee Responses

**Bristol Civic Society** have made the following comments:

The public engagement on this application has been disappointing. Whilst the proposals were presented to stakeholders on the basis that nothing had been decided, it is evident that the scheme had already been presented to the Bristol Urban Design Forum and the City Council. The results of previous pre-application discussions were not disclosed and there is no evidence that the stakeholder comments influenced the development.

The Society supports the redevelopment of the site, and the public square connected to north/south and east/west routes is considered to be planning gain. The scheme has the potential to add to the economic and social regeneration of the area.

However, the Society object to the level of demolition, as well as the two storey extension to buildings 2 and 4. There is no reasoned justification for this level of intervention. In addition, it is considered that the 20 storey tower overdevelops the site. There is also a concern about the lack of clarity about the ground floor commercial uses, which could draw business from the Old Markey economy.

It is considered that the former showrooms are an integral part of the Grade II listed group of buildings. The two listed buildings on site have significance, distinctiveness, quality and value to the Conservation Area. A terrace of domestically scaled grade II listed buildings continues this group along Broad Plain.

It is not considered that the developer's heritage statement gives the appropriate weight to buildings 2 and 4. The developer's argument to support demolition is unconvincing when there is no exploration of any option to retain the original fabric. In principle the Society support the addition of the Mansard extension. However, this should be reduced by a storey and pulled back from the flank elevations to make an elegant and subservient addition to the buildings. The proposed glass replacement for the 1960s screen would appear too dominant. The proposals to demolish buildings 3, 5 and 6 is supported.

The Society give weight to the spatial framework established for the area by application no. 01/01606/P. This envisioned this area increasing in scale from the domestic scale to the north east to

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

a larger scale fronting the water. It is noted that other development in the area has breached this framework, and this has resulted in the environment of Avon Street being unfriendly, and dominated by large commercial buildings. As such, the Society object to the 20 storey tower, which would dominate the listed building, and the Old Bread Street/New Kingsley Road corner. The proposal would extend the hostile character and inhuman scale of the development to the south, and does not give consideration to the ration between building heights and street widths. The proposal would be at a density of 1,320 dwellings per hectare, which is considered to be hyper density, and does not respond to the Eastern and Lawrence Hill housing needs survey 2007.

The site already has a landmark building, in the former soapworks building, and any further development should be subservient to it.

The development should be designed to not inhibit the future development of the Gardiner Haskins car park.

The Society supports the new public realm, but would question how well used this would be, given other routes and public spaces in the area.

Given the reliance on a single core the applicant should take advice over a fire prevention strategy, to ensure that an adequate means of escape is provided.

The reliance on roof level of amenity, even if well maintained, have practical difficulties. They are weather dependent, particular in relation to wind, and are not attractive for use by families.

In relation to the submission of amended plans, it is noted that the Civic Society have confirmed that these have not overcome the principle concerns raised above. Whilst there is support for the replacement of the hotel with residential, an additional concern is raised about the high proportion of north facing, single aspect units in this wing of the building.

The **Old Market Community Association** have written to object to the application on the following grounds:

The proposal was subject to pre-application engagement with the Association. It is noted that as part of that engagement no reference was made to the results of previous pre-application discussions on the site, the Old Market Neighbourhood Development Plan, or any constraints related to the site.

The application presents confusing information about the extent of listing, with reference being made to only the Soap Pan building being listed, but the historic buildings report conceding that the rest of the building could be listed. It is also not clear how much of the interior of the Soap Pan building is retained. As such, it is considered that there is merit in having the listing reviewed by Historic England, as potentially the site may merit a higher listing. There is currently inadequate information to make a full assessment on these elements.

#### Building A

This part of the site has a substantial basement, and this could provide additional amenity (e.g. Cycle parking or plant).

In order to facilitate changes in the floor levels, it is proposed to change the position of a number of windows in the retained facades (19 of 29 on Straight Street and all of the windows on Sles Lane). It is also proposed to extend upwards by around 5 metres. These changes are considered to be more than 'slight' The double height mansard is considered to be overscaled, and the proposed changes would be harmful to the grade II listed buildings.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

In relation to the retention of more of the historic fabric, it is stated in the Historic Building Report that many options have been considered in consultation with the local community, BCC etc, however no evidence of these other options have been presented. No assessment is made of the sustainability benefits of retaining more of the existing fabric.

The large open plan floor plates of building A are more suited to large corporate operators, rather than providing flexible accommodation. As such, the proposal is contrary to policy C1.

**Building B**

One of the key concerns raised through the public consultation is the lack of car parking on the site, and is required by policy T3 of the Neighbourhood Plan. Given the sewer crossing the site has now been moved provision should be made for underground car parking below the development.

Most of the ground floor of the development facing New Kingsley Road and Russ Street would be taken up by bin stores and plant room. As required by policy the existing streets should be lined with active uses.

Additional cores should be provided to reduce the length of the corridors serving the residential units. This would better meet the aspirations of the Urban Living SPD, and would also address concerns about compliance with part B of the Building Regulations regarding fire safety.

The neighbourhood plan establishes an appropriate relationship between the width of the road and the acceptable height of any development adjacent to the road. This suggests an acceptable scale of development of 5 stories fronting Russ Street, and 4 stories facing Old Bread Street and New Kingsley Road. The proposed development significantly exceeds these parameters, and would be overbearing on Christopher Thomas Court. There is no justification for the 20 storey tower in the corner.

The building elevations of building B are 'corporate', lacking vitality and vigour, and do not respond in any meaningful way to the internal arrangement of the building. As such, the proposal does not accord with the design codes set out in the Neighbourhood Plan.

Concerns are raised about the practicality of children's play space on the roof of the buildings. In addition, the courtyard gardens should include substantial tree planting.

Policy C5 of the Neighbourhood plan seeks the provision of family housing to address the imbalance of accommodation in the area. The application does not provide convincing justification for the provision of just 5 family units.

**Building C**

The introduction of double height opening on the ground floor and changes in the roof height to provide insulation would be contrary to good conservation principles. There appears to be the opportunity to open up former rooflights to provide additional daylight to the top floor.

Alterations to the core at the western end of the building will result in the loss of original fabric. In addition, the provision of a single staircase requires a fire suppression system which requires Building Regulations approval. It would be more prudent to provide an additional staircase, and to use the location of the existing lift as an additional core.

The lack of detailed drawings of the proposed works to the listed building is of significant concern.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

## Transport Impacts

The proposals fail to comply with policies T2 and T3 of the Neighbourhood Plan as they provide inadequate car parking for the development, and would result in the reduction of on street bays.

Financial contributions should be sought in support of the application should include a contribution to improvements to Broad Plain.

## SCI

The results of the community engagement has flagged up 3 key issues, supported by the Neighbourhood Plan, which the development fails to address: lack of car parking; provision of additional green space and the provision of a grocery shop/small supermarket.

**Bristol Cycle Campaign** have commented that given the importance of the cycle infrastructure in meeting the transport requirements of the development, Bristol City Council should seek a financial contribution to fund cycle infrastructure close to the site.

**Bristol Walking Alliance** have made the following comments on the application:

Whilst the Alliance support the potential for a new route through the site but object to the current application because it is considered that the quality of the route will be compromised by the height of the surrounding buildings. The route will be in shadow for much of the day, not receiving the amount of sunlight recommended by the BRE guidelines for outdoor amenity space. The Environmental Wind Report also suggests that the proposed development would result in additional windiness, with the most effected spaces being the pedestrian routes.

It is also considered that improvements should be sought to Sles Lane, to the west of the site. This is acknowledged to be a route of significant pedestrian flows, and is identified in the Central Area Plan. There is an opportunity to widen this route, and provide active frontages, green spaces and tree planting.

**Destination Bristol** have made the following comments in support of the application:

The area is currently unwelcoming and unattractive and in need of regeneration. The developer has consulted local business and the community and the development of the site will provide new jobs homes, retail, and work space, as well as places to eat and drink. It is also encouraging to see that the development will be car free, and include plans to improve walking and cycling, as well as other measures to reduce carbon emission.

The **Conservation Advisory Panel** have objected to the application on the following grounds:

There was concern that the stakeholder process was inadequate.

The Heritage Assessment is incredibly weak. It is being used to justify the scheme and not inform it. As such there is limited understanding of the value of the site's heritage assets and the impact on surrounding heritage assets. Palmer & Neaverson in one of the few books mentioned by the author of the heritage report describes it as 'One of Bristol's most striking industrial buildings...'.  
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The Gardiner Haskins complex was the last of a long line of Bristol soap works and its history reflects impressive innovation and growth in the late-Victorian era of a consumption-based industry promoted by advertising and packaging followed by 20th century decline and acquisition by a rival (Lever Bros) that is so typical of the city's industrial history. The remaining complex - some of the listed buildings on Straight Street were also occupied by the firm - could play an important part in the regeneration of an area that has already suffered significant demolition and change. If handled sympathetically the site

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

could preserve something of the unique character of this area.

The proposal is over intensive development for the site and will adversely affect the character and appearance of the Old Market Conservation Area. Little opportunity has been taken to incorporate the site's existing buildings. The principal building within the site has been completely subsumed and no longer remains the principal anchor building. The approach to 'facadism' is completely wrong and is a regressive step in terms of the approach to development. It's a classic example of 'anywhere architecture' that does not relate to the quality of its context.

The 20 storey residential tower would dominate the site and the listed buildings causing harm to these heritage assets. The excessive height would extend the overbearing character of Avon Street. The height and scale would not be in accordance with the guidelines of the Old Market Quarter Building Code or even the SPD, Urban Living. The site already contains a landmark building in the Soapworks Building.

The Design and Access Statement refers to a Landscape Report but this could not be found. There is not any explanation of the rationale for the landscape design or a species schedule, these must be provided. The provision of children's play areas on first and sixth floor roof terraces was questioned in terms of safety and suitability.

This application proposal does not meet the requirements of relevant design and heritage Local Plan policies nor the requirements of the relevant paragraphs of the NPPF, consequently this application cannot be supported in its current form.

- National Amenity Societies and Statutory Consultees

**Historic England** have commented on the application as follows:

We see this site as a great opportunity to create a place which retains the legacy of its industrial heritage while delivering dynamic and exciting spaces in which people can live, work and visit. We do not consider that the proposed development, as submitted, would sustain the significance of heritage assets within the site or preserve or enhance the character and appearance of the Conservation Area.

We are concerned over the impact of the proposed development on the character and appearance of the Conservation Area and object to the proposed extent of demolition of designated heritage assets. As it stands, we object to the application.

The significance of the site and its component parts are appraised in a proportionate manner in the submitted Historic Building Report. We do differ slightly in our own assessment of the significance of individual elements of the site, as summarised in Appendix II. Buildings that have undergone material changes to suit their continued uses or are considered to hold less aesthetic/artistic heritage value does not necessarily render them to be of lower significance. During the pre-application stage, we advocated that historical, evidential and communal values should also be a consideration, together with innovation in construction types and how building uses and manufacturing processes contributed to the wider operating site.

We consider the significance of the site derives from the former industrial building components, their individual contributions to the soap manufacturing process, providing a narrative for the surviving elements of the site and in the case of Buildings 2 and 3, the technological/historic value of the relatively early steel-frame construction. Construction of the replacement buildings following the 1902 fire started less than ten years after the completion of the first steel-framed building in the country (Royal Insurance Building, Liverpool). The significance of the principal soap pan building would be severely eroded without the ancillary structures that served the industrial process, although for a limited number of decades after Lever Brothers took over the site in the early 20th century. There is a degree of aesthetic value, particularly in regard to the brick elevations of Buildings 2 and retained

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

aspects of Building 4 that contribute to heritage significance. Lever Brothers' architects adopted an industrial aesthetic of the time and this later styling is visually distinct from the 'Bristol Byzantine' of the 19th century soap pan building. This also contributes to the architectural evolution of the site and the consequences resulting from the loss of former buildings during the fire.

Group value and the industrial legacy of the site also contribute to significance of the historic building complex and that of the Conservation Area. The submitted assessment includes a more robust assessment of heritage values and concludes that the significance of Building 2 and 3 is moderate and that Buildings 4, 5 and 6 are of no/little significance. The Heritage Report also concludes that the proposed demolition of Buildings 2-6 would result in harm to heritage significance (to a less than substantial degree).

The list entry for the Soap Works describes the principal five-storey building and notes that this is a prominent townscape feature. We understand that you have deemed the adjoining 1912-19 factory and works building to the north to be curtilage listed to the principle building. However, we advise that consideration is given to Section 1(5)a of the Planning (Listed Buildings and Conservation Areas) Act 1990 which would prescribe these additional structures as part of the listed building. Therefore, as it stands, we base our advice on the presumption that all attached and pre-1948 structures are afforded statutory protection.

While this is a particularly complex industrial site, our statutory remit are those aspects of the development which includes substantial demolition of Grade II structures and secondly, the impact of the development upon the character and appearance of the Old Market Conservation Area. With this in mind, we would task your conservation specialist in considering the proposed material alterations to the Grade II Soap Works and the setting of other nearby Grade II buildings.

The potential to enliven the Straight Street elevation by lowering first floor openings would result in a degree of loss, but would also have some benefits. However, we oppose the proposed extent of demolition of Building 2 (leaving the Straight Street façade), Building 4 (leaving the rear façade) and all of Buildings 3, 5 and 6, without clear and convincing justification. Where the retention of the Straight Street and some elements of the west facades are proposed, we consider this to be tokenism and seek a design that better sustains the conservation of the historic buildings. The proposed height of the replacement buildings for Buildings 2, 3 and 4 would leave the retained historic facades without the context of the industrial narrative of the building group.

The justification offered for the demolition is summarised in Section 5.2 of the Historic Building Report. Challenges faced by options to convert Buildings 2-6 include fire/acoustic separation between floors, loading of the existing construction and light/ventilation across deep floor plates. As we have advocated as part of our pre-application advice, we would seek further work to be carried out on options for adapting the existing structures as part of the justification for demolition. Further detailed evidence of the issues facing the conversion of the existing building should also be submitted, so that we can consider whether or not this would amount to clear and convincing justification.

The proposed master-planning for the site would seek to reinstate the extended historic route of New Thomas Street to provide a new north-south connection linking Old Market and Temple Meads. Where the existing connectivity is rather weak, particularly for pedestrians, this is a positive opportunity for the site as an activity hub at the intersection of two principle routes. While we fully support this aspiration, the form of development along the Old Bread Street elevation would visually interrupt this route, with only a covered access being proposed under the block. This appears quite defensive in the proposed Old Bread Street elevation. We advocate that a full break in the building mass is needed here to create a successful and legible north-south route.

With regard to the impact upon the character and appearance of the Conservation Area, the photographic and map evidence presented in the Historic Building Report highlights the physical and architectural primacy of the Soap Works buildings within the wider cityscape. It was clearly conceived

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

as a landmark building in the late 19th century, and its strident verticality remains very much evident today, despite the loss of its ventilation towers and the number of taller buildings being constructed along the north side of the Floating Harbour. We advise that for the preservation and enhancement of the character of the Conservation Area, the primacy and legibility/visibility of this great industrial survival is preserved, creating the focus for the new development. Also, the wider group of associated industrial buildings contribute positively to this particular character area of the Conservation Area. While part of the very different characteristics of Old Market, the industrial aesthetic of the site contributes to the significance of the Conservation Area and should be preserved or enhanced.

The proposed development, by virtue of the massing and height of Block B and replaced massing of Buildings 2 and 3, would unduly dominate the architectural and visual primacy of the Soap Works, which would no longer be considered as the focal building and centrepiece. If the development is to be heritage-led, the retained and enhanced prominence of the listed building must be the key driver. While we are concerned over the impact of Block B upon the setting of the Conservation Area, we believe that the south-east corner of the site can accommodate a higher building, but not to the extent that it dominates the Soap Works.

With this in mind, the height, design and massing of Block B should also be guided by the council's Urban Living SPD and in particular Part 3, which relates to the visual quality of tall buildings. Q3.1d advocates that 'The capacity of an area to accommodate a tall building is heavily influenced by an area's underlying character. This should be understood at the scale of the city, neighbourhood, and street.' Where the proposed height of Block B would be excessively higher than the ambient height of existing and consented buildings, we do not consider that this responds positively to the character of the setting of the Conservation Area.

The principle of development of the site, the re-purposing of the soap pan building and re-establishing the historic urban grain of the site, knitting it back into the surrounding city has potential to deliver heritage benefits for designated assets and the Conservation Area. However, where these benefits are weighed against the harm resulting from the proposed extent of demolition and impact from Block B, we do not consider that the harm is outweighed. The degree of harm is towards the upper end of less than substantial. Heritage significance is harmed to the extent that we object to the demolition and loss of Grade II structures, and concerned over the height and massing of Block B. The retention of Buildings 2-6 with sensible modifications would allow us to withdraw our objection.

Central to our consultation advice is the requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 in Section 66(1) for the local authority to "have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses". Section 72 of the act refers to the council's need to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in the exercise of their duties. When considering the current proposals, in line with Para 189 of the NPPF, the significance of the asset's setting requires consideration. Para 193 states that in considering the impact of proposed development on significance great weight should be given to the asset's conservation and that the more important the asset the greater the weight should be. Para 194 goes on to say that clear and convincing justification is needed if there is loss or harm.

Following the submission of amendments and further information, HE have confirmed that the proposed amendments do very little in improving the setting of the Grade II building and taking the opportunity for good place-making. The loss of a high proportion of the historic industrial buildings on the site and the density and height of the proposed development have not been addressed or resolved. We therefore maintain our objection to the application.

Historic England objects to the LBC application on heritage grounds and retains strong concerns over the impacts of the proposed development on the character and appearance of the Conservation Area. We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 194 and 200. In determining this application you should bear in mind the statutory duty of

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

The **Association of Industrial Archaeology** have commented on the application as follows:

The Association acknowledges the need to reuse these industrial buildings and regenerate the whole area. However, the demolition of buildings 2 to 6 (apart from the facades of buildings 2 and 4), will compromise the integrity of the soapworks buildings and how they developed. The whole site is important from an industrial archaeology perspective. As such, efforts should be made to retain more of the buildings on the site, in particular buildings 2 and 4 are not without merit.

In addition, the new build element will result in buildings that will become the dominant ones on the site. The existing Gardiner Haskins building should remain dominant, and therefore the Association object to the application.

The **Victorian Society** have objected to the application on the following grounds:

The principle cause for concern is the scale of block B, which impacts on the setting of both the Conservation Area and numerous listed assets. The construction of this large development, rising to 20 storeys would clearly have an adverse impact on all of these heritage assets, by overshadowing them and obscuring the prominence of the soap works complex. The former soap works building itself was built with pretensions to be a landmark, taking inspiration from the Uffizi Palace. Although aspects of its original design, such as the characterful corner turrets, have been long since lost, the building still dominates the site, and should continue to do so going forward. As such, although we do not object to the principle of developing the area to the south east of the site, we stress the need to keep a respectful scale, and no development here should rise above the roof line of the Former Soap Works building.

The same applies to the proposed 'Block A' which occupies a similarly sensitive position within the conservation area and setting of several listed buildings. The CGIs and plans of the proposed building make it clear that it would visually compete with the Former Soap Works in terms of height, as well as greatly overshadowing the listed buildings to the west, and this therefore needs to be reduced by at least one storey. We also feel that a more delicate architectural treatments of the roof extension is required to further reduce the potential impact.

Moving on to the design, we are concerned that the proposed 'Block B' is generally bland and takes little inspiration from the soap works complex. The efforts that have been made in other areas of the site to replicate the character, have not been made here, and a serious revision to the design approach is needed.

Finally, regarding the former soap works itself, we view the general treatment to be acceptable in principle, with the exception of the proposed enlarged openings on the northern elevation which appear incongruous and unnecessary. Additionally, we feel that an opportunity has been missed to reinstate the highly characterful corner towers, a key aspect of the original design, and a feature which would help to entrench the building's landmark status within this area of Bristol.

As such, the proposal is considered to be contrary to paragraph 200 of the NPPF. Rather than better revealing the significance of these heritage assets the construction of both new blocks would have an adverse impact, dominating the site, and obscuring the significance of the soap works complex within the Old Market Conservation Area. They would become the dominant features on the site, rather than the original buildings. This harm to both the conservation area and the Grade II former soap works must moreover be weighed against the potential public benefits of the scheme in accordance with

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

paragraph 196 of the NPPF.

The **Council for British Archaeology** have objected to the application for the following reasons:

The CBA objects to the proposed scheme as it would cause a high and unjustified degree of harm to the Listed former Gardiner Haskins soapworks, its curtilage listed buildings, the setting of neighbouring listed buildings and the character and appearance of the Old Market Conservation Area.

The CBA strongly recommends that an iterative heritage strategy is developed, utilising the tangible and intangible heritage of this ex-industrial site and its archaeology. This should be required by your Local Planning Authority in order to enhance and conserve the considerable heritage value of the site and to maximise the considerable social value that the re-development of this site has the potential to deliver.

### Significance

The principal building on site, the Grade II Listed former Gardiner Haskins Soapworks (List number 1202607) may contain the most heritage significance, but the group value of the other buildings on site, with their historically interrelated functions are central to the listed building's significance, as well as the site's, significance. All pre-1948 structures within the site meet the criteria to be considered as curtilage listed. Curtilage listed buildings, structures and objects are afforded the same protection, and restrictions imposed, as a listed building with its own listing entry; the entire site should therefore be considered as listed at Grade II within the planning process.

In order to meet the requirements of the relevant legislation the degree of demolition should minimise harm to the evidential value of the multi-phased development of the industrial ranges, which illustrate innovations in building design and shifts in use resulting from technological progression – a key significance of industrial sites. Industrial sites, by dint of employing a large workforce and occupying prominent, often landmark buildings within a locality, carry substantial communal value, which not only enhances their significance but also presents many opportunities for including considerable public benefit through their re-development.

The pursuit of social value for the Lawrence Hill ward of Bristol, which this application contains, could be greatly enhanced by incorporating a heritage based strand to the re-development of this industrial site. Enhancing and better revealing significance need not be solely considered as visual enhancement, but rather as encompassing experiential opportunities for the local community to interact with their local industrial heritage.

The CBA have read and agree with the comments of Historic England regarding the unjustified degree of demolition and the opportunity to make better re-use of existing buildings on site. These opportunities should be explored and treated preferentially in order to satisfy the requirements of paragraphs 193 and 194 of the NPPF. The CBA also agree that the proposed new build components are over-scaled and would result in unjustified harm to the character and appearance of the Old Market Conservation Area as well as the setting of multiple Grade II listed buildings.

The CBA notes with interest the inclusion of a 'Social Value Strategy' with this application. We thoroughly support this approach to re-development of urban areas, however we believe it could be improved upon by considering potential social value earlier than the construction phase of a development. There is a wealth of research and findings concerning the positive social impact for local communities from heritage-led regeneration, in terms of both place shaping and wellbeing, generated by participation.

The former Gardiner Haskins soapworks is a physically dominant feature within the locality, and as such a local landmark. Its significance within the locality is noted in the associated documentation as

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

a last surviving remnant of this area of Bristol's industrial past. The re-use of redundant sites can create a sense of resilience of place that can renew a sense of pride of place.

The archaeological desk based assessment (DBA), drawn up by RSK, suggests that there is likely to be post-medieval and modern archaeological deposits found on site during any permitted ground works. The CBA suggests that genuine community participation in excavating the site could be a catalyst for other creative community responses to the heritage value associated with the former soapworks. Community involvement at an early stage can lead to continued involvement throughout the lifecycle of the project, as defined by Social Value Portal.

The CBA recommend that the potential for social value, through the redevelopment of this site, can be vastly increased through the production of a heritage strategy which involves interaction between the local community and the tangible and intangible heritage of the soapworks site much earlier than at the construction phase. The opportunity for using heritage and archaeology as part of a place-shaping strategy should enable the re-development of this site to achieve genuine public benefits, as required by the NPPF.

Whilst the CBA support the re-development of the former Gardiner Haskins soapworks we believe the current scheme would result in a high degree of unjustified harm the designated proposal site, its setting, the setting of neighbouring Grade II Listed buildings and the Old Market Conservation Area. The CBA recommend this application be either withdrawn and revised or otherwise refused by your Authority.

**Transport Development Management** have commented as follows:

There are many successful precedents in this area for a high density, mixed use, car free development and so we do not have an objection to the principle of this type of development in this location.

To the north are Broad Plain and Unity St. There has been significant change to these streets associated with the New Hawkins St development. Furthermore, Bristol City Council is presently developing proposals to reduce traffic on Broad Plain and improve cycling facilities. One option would see Unity St made one way eastbound thereby freeing up substantial space to the south of the Broad Plain Triangle for public realm. The other option would see the Broad Plain Triangle made in to a gyratory system with the Broad Plain junction with Temple Way closed. This would enable all vehicles to enter and leave from the east via Unity Street. Whilst this option would also see substantial public realm improvements, the amount of land freed would be less.

There is also a key cycle route (National Cycle Network Route 4) in the vicinity of the site, passing through the underpass under Temple Way, via Broad Plain, to Straight Street and then on to the Bristol to Bath Railway Path.

To the south, the ND6 development includes detailed highway works for the block surrounded by Avon St, New Kingsley Road, Old Bread St and Providence Place. These have a direct impact on this development and so should be considered when finalising the Old Bread St and New Kingsley Road highway works.

The site benefits from excellent accessibility being close to a number of main shopping areas, city centre services and a wide range of public transport. Whilst there is a need for a number of localised improvements, the site is well-suited to high density urban living.

The site is on the crossroads of significant north-south and east-west pedestrian and cycle links. We would recommend considering whether the site could make even better use of this excellent accessibility and permeability.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

The development proposes to widen footways around the site with the exception of Straight St and New Thomas St where the building line remains as existing. This will lead to a substantially better pedestrian experience as the area has a number of very narrow footways and blind corners.

The network around the site should be built with cyclists in mind and ideally additional things like cycle parking and other facilities should be provided along the route.

The TA notes that there are Sheffield stands located near the site as follows:

Straight Street 12

New Thomas Street 4

Glass Wharf 28

Linear Park 4

Temple Back E 28

The site is within easy reach of a large number of high frequency bus routes on Old Market ((five minutes / 350m walk) and Temple Way (two minutes / 160m walk). Temple Meads is located 480m (six minutes) from the site.

The site does not provide any car parking on site however the TA identifies eight car club vehicles within 500m of the site. The TA also notes that there are three EV charging facilities within 600m of the site. The proposal includes 3 disabled bays on New Kingsley Road. The site would be serviced from four loading bays on Old Bread St, New Kingsley Road, Russ St and New Thomas St.

Whilst we would have preferred to see an element of on-site car parking and servicing to cater for disabled bays, EV car charging, car clubs and loading, we accept that the constrained nature of the site mean that this has not been possible. Instead the developer has identified a range of on street facilities that will allow the site to be serviced.

The application has submitted revised plans, to replace the Aparthotel with further residential flats. The Design and Access Statement, Transport Statement and Travel Plan have all been updated. As such there are now two options being considered:

**Option A:**

\* 250 residential dwellings (Class C3) – now reduced to 243;

\* 3,610sqm GIA of new flexible retail, leisure and commercial space (Class A1, A2, A3, A4 and D2);

\* 15,503 sqm GIA business space (Class B1).

**Option B:**

\* 166 residential dwellings (Class C3);

\* 6,258sqm GIA aparthotel (Class C1);

\* 3,208sqm GIA of new flexible retail, leisure and commercial space (Class A1, A2, A3, A4 and D2);

\* 15,503sqm GIA business space (Class B1).

The Transport Assessment reviews its modelling of the impact of the development. It uses the same modes shares as previously used and the same rates per sqm for different use classes, however, because of the change in area of different uses, this results in some change in predicted movements.

**AM peak hour**

Option B is predicted to generate 1,080 additional two-way trips. Option A is predicted to generate 1,108 additional two way trips, an increase of 28 trips.

**PM peak hour**

Option B is predicted to generate 796 additional two-way trips. Option A is predicted to generate 889 additional two way trips, an increase of 93 trips.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

The TA suggests a strong shift away from private car and towards walking, cycling and public transport. These high levels of non-car mode share are considered plausible for a car free development in a highly sustainable and accessible location in the city centre. Nonetheless we consider that a range of measures will be required to ensure that these targets are met including local improvements and Travel Plan measures.

The development would be expected to have a substantial net positive impact (compared to previous use) on the surrounding highway network congestion and hence road safety and air quality. Servicing will be important for the car trips that will be generated by servicing vehicles, taxis/ private hire, deliveries, as well as drop off.

This increase in walking and public transport trips in Option A, on top of the large numbers associated with Option B, reinforces the importance of improving the public realm around the site to encourage walking and access to public transport. As such, the previously requested contributions to the public realm are considered to even more important than with the previous scheme.

The TA includes an assessment of collision data for the area bounded by Temple Way/ Avon St/ Chimney Steps cycle link/ Midland Road/ Old Market. It found there had been 40 collisions of which 5 were serious and 35 slight (Oct14 – Sep 19). Collisions involved: 1 motorcycle, 27 cyclists, 8 pedestrians, 4 children and 3 OAPs and were distributed throughout the area although there was a concentration on Old Market and Midland Rd. There were no collisions immediately adjacent to the site. These figures reflect the large variety of users of the highway network in the vicinity of this site and the importance of continuing to improve pedestrian and cycle facilities in the area.

The developer has reworked the cycle parking calculations to take account of the new floor areas. The total number of cycling spaces across the development goes from 415 for previous proposal (Option B) to 515 for current proposal (Option A). This is considered satisfactory and the new cycle parking should be conditioned.

Short stay cycle parking would be in the form of 28 Sheffield stands (56 spaces) on Straight St.

An updated Travel Plan has been submitted (reference : Soapworks Framework Travel Plan, OSW-ARP-XX-XX-RP-TR-00012, Revision P05, 14 August 2020). This later version should be secured by condition.

**Block A**

Block A has flexible commercial units on the Lower Ground Floor with access on to the new courtyard and Ground Floor with access from Straight St. The cycle store is accessed from the western end via a ramp. Service access is from New Thomas St.

Will the escape stair on Sless Lane be removed?

It is not quite clear what has happens in the NE corner where there is currently a curved wall. Does the development move back in to the site here?

The height difference of about 1.5m between the office and New Thomas St could be problematic. We will not consider raising the footway so level differences will need to be adjusted within the site.

**Block B**

Block B contains an aparthotel on the north side with residential units in the southern block. Three commercial units are proposed, accessed from Old Bread St and from the courtyard.

The flexible ground floor use is expanded to use the space that was previously part of the aparthotel.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

It no longer needs services and stair core associated with aparthotel.

Option A also has an extra pedestrian access and fire escape at the northern end of New Kingsley Road façade.

The cycle and bin stores have been expanded to meet the new needs of the residential development.

The access arrangements for options A and B are largely the same but there is an extra pedestrian access from the courtyard for option A. The uses fronting Old Bread St are largely unchanged.

### Block C

Block C is in the soap pan building. It would contain food/ drink on ground floor, commercial on 1st floor, and B1 office on remaining floors. Access to café would be from courtyard on north and east sides. Service access would be from NW corner. Cycle parking for employees of this building is provided in Block A. In line with pre-app advice, the developer is not proposing to use the existing service access from Sles Lane but will instead transfer the servicing between Block C and A to use New Thomas St loading bay.

The doors on to public highways (other than fire exits and utility rooms) cannot open outwards. They should be replaced with inward opening doors or shutters/ sliding doors.

This development removes the large service yard on Old Bread St. This has two consequences: Old Bread St could potentially be locally narrowed and servicing for the remaining store will need to be considered (from Unity St or New Thomas St?). Old Bread Street is estimated to be about 8.3m wide outside the site so there should not be a problem with the proposed layout which means putting car parking and loading bays on the development side of the street. This replaces the area which is currently kept clear to allow large vehicles to access the service yard. The removal of the need for large vehicles to access the service yard could mean that other changes could be made to Old Bread St such as localised narrowing or provision of additional car parking or possibly additional Sheffield stands.

A raised table is proposed as part of the ND6/7 works at the junction of Anvil St/ Old Bread St/ New Kingsley Road. The proposed layout should show this and consider how it will integrate with it. We would also want to see a clear desire line for pedestrians crossing through the site such that they have dropped kerbs either side of Old Bread St. We would expect that the natural desire line is to use New Kingsley Road rather than Providence Place to reach Valentines Bridge.

### Car Parking

There is a large public car park immediately to the east of the site which charges £3 for one hour and £16 for 7-12 hours.

The TA carried out a survey of the availability of on street car parking near the site. It surveyed 112 parking spaces every 30 minutes between 0700 and 2200. It found that the average “parking stress” was 68% with a peak of 73% at 1500. This would suggest that whilst car parking in the area is well used there is not a shortage of spaces.

In line with Council policy for car free developments and to protect the impact on those using the Residents Parking bays and the Pay & Display bays, residents of the new development will not be eligible for parking permits and so advice I044A should be applied.

A revised General Arrangement has been submitted showing the proposed parking restrictions around the whole site, and is supported.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

There will be a need for this development to dovetail with neighbouring schemes including the ND6/7 works and the Broad Plain works. Our recommendation is that on Old Bread St, New Kingsley Road, Russ St and New Thomas St the works should be carried out as s278 Highway Works. We consider that a contribution to the wider Broad Plain and Unity St works would be more appropriate as, whilst this development will benefit substantially from them, they are not yet defined enough to allow these to be incorporated in to the s278 works. We consider that a contribution of £150,000 towards the Broad Plain and Unity St works would be appropriate. This would go towards the works to upgrade the public realm in the vicinity of the Broad Plain Triangle, improve the pedestrian and cycle environment in the underpass and towards the provision of a segregated cycle route along Broad Plain and Unity St.

In addition, Travel Plan audit and management fees of £5,335 for business space, £5,335 for aparthotel, £5,335 for residential dwellings, £3,735 for flexible retail, leisure and commercial space, should be secured.

The following should also be secured by condition:

- \* Construction Management Plan
- \* Approval of Road works
- \* Highway to be adopted
- \* Agreement in Principle for works adjacent to the highway
- \* Completion of pedestrian/Cyclist access
- \* Completion of cycle parking
- \* Travel Plans

The **Environment Agency** has commented as follows:

The application fails to demonstrate that the proposed development will not increase flood risk elsewhere. We advised that the applicant should either quantitatively demonstrate that this increase in built footprint does not increase flood risk elsewhere (i.e. using a hydraulic model) or provide appropriate compensatory storage on a level for level, volume for volume basis to address any adverse impacts.

We note the FRA acknowledges the proposed storage mitigation does not provide compensation on a level-for-level / volume-for-volume basis. In the absence of a compensation solution that operates on a level-for-level / volume-for-volume basis, we do not have confidence that adverse flood risk impacts will be avoided elsewhere and hence are unable to remove our objection. This is in line with national planning policy.

Furthermore, as discussed above, the measures put forward are mitigation as opposed to compensation. We generally resist the use of voids due to the difficulties in securing ongoing maintenance. It is also important to note the site may be impacted by considerable, hazardous flood depths in excess of 1 metre which are likely to remain on the site.

However, it is noted that additional flood modelling, as well changes to the ground floor level, of the proposed building have been submitted, following these comments. The Environment Agency have confirmed that, given the flood depths involved, and the fact that the site is at the edge of the flood zone, in principle this demonstrated that an appropriate flood mitigation scheme can be provided at the site. Members will be made aware of the final comments on the revised submission prior to the meeting.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

- Other consultee comments

The **Council's Conservation Area** has commented as follows:

The Grade II Listed Soapworks building is a tall landmark structure within the Old Market Conservation Area. It is surrounded by lower-scale Victorian and early 20th century industrial buildings. The collected industrial buildings that reduce down to a domestic scale along Broad Plain with an attractive and informal terrace of Georgian properties on Broad Plain.

The main structure of the Listed site complex is the tall brick-built mill-type structure that has been altered progressively since its mid-Victorian origins, but continues to have an assertive and attractive appearance on the skyline from numerous aspects. It has an elaborate skyline evoking Tuscan fortifications and, previously, was more ornamental. The buildings attached to it, stretching between it and Straight Street are all part of an incremental, but unified, development as a soap factory, and are integral to the significance of the main building significance. Collectively the buildings contribute to the special character of the Conservation Area through their traditional industrial character and as a well preserved collection of historic industrial structures; their materiality, scale and massing are all significant in this respect.

The landmark soap works building is visible from within the Old Market Conservation Area and further afield, meaning that its setting is extensive. The architectural, historic and landscape and legibility make it part of an important legible historic landscape.

Development would also be within the setting of Grade II Listed buildings immediately to the North and facing onto Broad Plain. These latter buildings are an important remnant of Eighteenth Century domestic development of Bristol. The current Gardiner Haskins Building to the immediate north matches those on the south of Straight Street in scale, period and bold architectural treatment, contributing to the overall group value.

The development proposals have failed to address key issues during the pre-application processes. Development scale is excessive, the massing clumsy and overbearing, and the impact on the Listed buildings significant and negative. Development would rob the principle Listed building of the landmark status that is a key aspect of its significance. The Soap Works building would not be the centrepiece of a sustainable and sensitive development, but be obscured almost entirely with only glimpsed views from within and at close-quarters. The setting of the Grade II Listed building would be severely impaired from locations identified to the applicant as important. From what we can ascertain from the submission the landmark visibility of the Listed landmark building will be reduced only to a view across the currently open car park, and nowhere else outside of the site.

The demolition of all curtilage buildings, but for the façade on Straight Street and a small return portion has not been adequately justified. In line with our pre-application advice the proposals should be conservation-led, and seek to reuse and refurbish existing structures to ensure the development is both sensitive to its heritage setting, and have sustainable environmental credibility. The scale of demolition is not a responsible approach to development and poses permanent harm to the Curtilage Listed buildings and the special character of the Conservation Area.

The reformulation of the "retained" façade is a major intervention into the historic building. The existing openings would be altered to add further floors within the existing footprint. This was, again, identified as an issue in the approach adopted at pre-application stage and without amendment remains unjustified and unsupported.

It has been further demonstrated by the applicant's own assessment that the increased massing and scale of Block A will have a negative impact on the Conservation Area when experienced from Broad Plain. Here the row of Grade II Listed Georgian properties would become overshadowed, by an overbearing and over-scaled new development on this site. The additional two storeys on Block A,

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

and the proposed tower block, have a clear and harmful relationship with the Listed Buildings, their setting, and the special character of the Conservation Area.

The proposed architectural treatment of new elements is bland and un-contextual. The elevations fail to respond in a meaningful way to the local character and distinctiveness of the Conservation Area or city as a whole. The proposed lanes and alleys through development are narrow and will be uncomfortably tight, with little direct sunlight and poor contribution to the experience of the pedestrian. The overall design quality is poor and fails to respond or contribute to the heritage assets.

The development poses harm to the statutory protected heritage assets in the following ways

- \* Extensive demolition of curtilage Listed buildings of significance
- \* Significant reconfiguration of facade elements
- \* Excessive scale and massing and an overbearing impact on setting and character of Listed buildings and Conservation Area
- \* Loss of important landmark status of core Listed building by over-scaled curtain of new-build development
- \* Poor quality and un-contextual architectural treatment that fail to promote local distinctiveness

We assess that the scale of harm is consistent with the definition of “Substantial harm” under the definitions of the National Planning Policy Framework (NPPF) where such a serious impact on the significance of the collected asset that their significance was either “vitiating altogether or very much reduced.” We consider that the setting of the Listed buildings, significance of the listed building and curtilage protected structures, and the special character of the Conservation area would indeed be “very much reduced”.

The NPPF requires that there is clear and convincing justification for any degree of harm to heritage assets. The question that must be posed here is there another way in which the purported benefits can be delivered in a way that reduces the harm? The public benefits suggested by the document are not dependant in any way on the development form as proposed, and could be achieved with a more appropriate scheme. The document describes “heritage benefits” that conflict with basic conservation principles and do not constitute tangible public benefits of the scale suggested; Rather the proposed “townscape enhancements” are considered harmful.

In line with Historic England’s comments there should be a strong objection to the proposed development. We are required to place “great weight” in the conservation of designated heritage assets and their setting, including Listed Buildings and their setting, and the Conservation Area. The site includes designated buildings which are, by definition, of national significance and have statutory protection under the Planning (Listed Building and Conservation Areas) Act 1990. The NPPF requires that “Where a proposed development will lead to substantial harm to a designated heritage asset, local planning authorities should refuse consent”. The application fails to meet the requirements set out in the NPPF.

**City Design** have commented as follows:

In connection with the original submission, it is considered that the proposed building height is not justified and will pose harm to heritage assets. While the public realm benefits are noted, the scale of intervention, while greater than what is currently on site, is under-scaled for scheme of this intensity. The insular nature of the proposals also fails to provide meaningful improvements along Anvil Street. Concern remains around the daylight/sunlight access to the public realm for the majority of the year. The urban living assessment shows the scheme scoring poorly under all 4 heading areas.

The proposed architectural treatment of new elements is bland and un-contextual. The elevations fail to respond in a meaningful way to the local character and distinctiveness of the Conservation Area. The proposed lanes and alleys through development are narrow and will be uncomfortably tight, with

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

little direct sunlight and poor contribution to the pedestrian experience.

## Urban Living Assessment –

1. Height, scale and massing: The scheme proposes a height, scale and massing in excess of the parameters set out at pre-application stage. The quantum driven approach to the site undermines a number of key principles established through planning policy and UL SPD guidance resulting in sub-standard conditions for both existing residents of adjacent properties and new residents.
2. Response to context and heritage considerations: The proposals fail to respond appropriately to the transitional nature of the site, responding more to the emerging character of Avon and Anvil Street.
3. Principle of a tall building: While the potential for a 12 storey building had been previously identified on the site, there is little narrative or justification provided to support a tall building of the scale now proposed.
4. Provision of and access to private open space: The scheme proposes a very intense use of the site, and while providing new public realm to serve all users (not just residential) and private communal amenity space for residents, there is very limited access to private amenity space. Where balconies are provided they tend to be located on the north side of the block in heavily shaded areas. The general amenity of these areas is questioned beyond limited periods during the summer, and given the lack of public open space in the vicinity challenges the liveability of the scheme for residents.
5. Internal configuration and quality of dwellings: The composition of the residential element follows a standard 'double-stacked' approach, resulting in the majority of units being single aspect, lacking in sunlight and natural ventilation. The number of units served from a single core and single entrance also reduces opportunities for neighbours to get to know each other and foster a sense of community.

## Landscape / public realm -

6. While there is broad support for aspects of the internal landscape/public realm treatment, the scale and massing is likely to minimise enjoyment of the new spaces and pedestrian routes at ground level. The limited information provided in relation to sunlight incidence does little to counter this view.
7. The capacity of the exterior public realm – footways - is not proportional to the increased amount of footfall likely to arise from the development.
8. The lack of close by play facilities and the questionable suitability of a roof terrace to locate them remains a problem; the comments of the Civic Society in this regard are relevant.
9. The proposals lack sufficient detail relating to surface treatments and finishes within the open spaces, planting details and street furniture proposals: - these are sufficiently important within the scheme to be required as a package within this submission.

The additional views close to the development site illustrate the dominant, overbearing nature of the architectural proposals.

## Public Art

No clear Public Art Plan submitted nor detailed consideration of, or commitment to, an embedded approach to culture in the scheme. Specific mention to public art provision referenced in context of public realm e.g ' Soapworks Square.' Overlapping concerns with wider CDG team around the 'publicness' and 'usability' of this amenity space as a location for public art, as a result of extremely limited sunlight in winter months. There is no indication of scale of financial commitment against vast cultural opportunities this site offers.

Following the submission of further information and amendments to the design the further additional comments have been received:

The additional core is welcomed, in that it reduces the number of units per core. However there is a missed opportunity; the location and configuration does not improve the % of dual aspect units. There

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

is particular concern with regard to the 3 bed single aspect units, with a small balcony space located off the bedrooms- this is unlikely to be practical for families.

It is considered that the internal configuration could be revised to make better use of the additional core, in response to UL liveability recommendations.

The additional residential lobbies are noted.

However the treatment of the main residential entrance at the base of the building remains unconvincing. There are also concerns over the microclimate of this area, particular wind effects from the tall building.

The location of the bin store along the main pedestrian route through the site is unfortunate. There is an opportunity to enliven this frontage by flipping the bin and cycle store and taking opportunity to activate this route through the use of bike supper lobby.

The revised architectural treatment of massing above pedestrian link is noted, and helps break up the building mass. However remain unconvinced that this fully mitigates the legibility of route cutting through the building at street level, instead of a fully expressed street-link.

**Air Quality** has commented as follows:-

The proposed development is located in a central location within the Bristol air quality management area. It is however located away from the immediate roadside of the busiest roads within the area and as a result it is considered that the air quality at the development site is acceptable for the proposed residential use without mitigation.

The development is predicted to reduce vehicle flows in the area and will be connected to the district heat network being developed. Connection to the heat network will negate the need for on-site combustion plant to be installed at the site and as a result, increased emissions from these two potential sources of air pollution will not occur and are therefore not significant. Should changes be made to the development, which lead to the requirement of on-site combustion plant, an application and assessment of emissions may be required.

Construction phase impacts have been considered in relation to the potential release of dust to the atmosphere. The air quality assessment identified the required level of dust mitigation and must be conditioned in a DMP/CEMP in order to ensure emissions of dust from the site are effectively managed.

**Sustainable Cities Team** has commented as follows:-

Heating and hot water: The proposal to provide heat and hot water across the scheme complies with BCS14 and is supported. I recommend that connection is confirmed via the 106 agreement.

The secondary system should be designed and installed in accordance with the CIBSE Code of Practice and BCC Connection Pack (parts 1 and 2). I would like to request further details on the secondary system and the measures that will be taken to reduce unwanted heat gain from distribution pipework and in particular measures to minimise the length of lateral pipe-runs.

PV: The inclusion of the 771m<sup>2</sup> PV system is noted and supported. The Energy Statement shows a 7.6% and 5.9% reduction in residual emissions (for options 1 and 2 respectively), against a requirement of 20%.

The applicant should confirm whether it is possible to increase the size of the PV array. If not the shortfall between the residual emission reduction (for the appropriate option) and the 20% policy

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

requirement should be addressed through an Allowable Solutions payment, secured via the 106 agreement.

Further details of the PV system will be required prior to commencement. This can be secured by condition if required.

Overheating assessment: The results of the overheating assessment against the 2020 weather file (using CIBSE TM59 methodology) are noted. However, I am unclear about the results of the assessment under the 2050 and 2080 scenarios, and this requires further clarification.

EV charging: Please provide details of the EV charging to be provided in the disabled parking spaces. We recommend that charge points should have a minimum power output of 7kW and be designed to facilitate 'smart' and 'V2G' charging.

Broadband: Details of broadband provision, and how the scheme will meet the requirements set out in the Broadband and Connectivity Practice Note should be provided.

**Highways England** has commented as follows:-

No Objections.

**Flood Risk Manager** has commented as follows:-

The drainage strategy proposed is good, implementing many SuDS measures, reducing existing run off rates and eventually discharging to a watercourse, fed through the storm sewer connection.

**Avon Fire & Rescue Service** has commented as follows:-

The additional residential and commercial developments will require additional hydrants to be installed and appropriately-sized water mains to be provided for fire-fighting purposes. This additional infrastructure is required as a direct result of the developments and so the costs will need to be borne by developer.

Avon Fire & Rescue Service has calculated the cost of installation and five years maintenance of a Fire Hydrant to be £1,500 per hydrant, with two being required in this case.

Importantly, these fire-fighting water supplies must be installed at the same time as each phase of the developments is built so that they are immediately available should an incident occur and the Fire & Rescue Service be called.

**Bristol Waste Company** has commented as follows:-

We would urge at this stage of the planning process that the developers refer to the Planning Guidance for Waste and Recycling produced by Bristol Waste Company. Provision should be made for collection vehicles to safely pull in and make collections from New Kingsley Road without hindrance to traffic flows.

**Arboricultural Team** has commented as follows:-

I have reviewed the arboricultural report and Landscape plans. The proposed site has 3 existing trees; all of which will be retained. T01 has not been identified within the arboricultural report is located within the centre of the site; tree protection fencing has been specified to protect the tree during the development process. T02 & T03 Norway maple are BCC highways trees located on the eastern edge of the proposed development at the junction of Russ Street and New Thomas Street. Air spade excavations and root pruning have been specified to reduce the encroaching root system from the

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

development site along with re-surfacing over the trees root protection area.

The proposed tree planting consists of 9 Amelanchier Lamarckii and 1 Ulmus 'New Horiszon' at ground level and 2 Amelanchier Lamarckii on the roof terrace adjacent to New Kingsley Road. No additional compensation is required.

No objections, but should planning permission be granted the following conditions should be attached:

1. Prior to commencement of development foundation design should be submitted.
2. No work of any kind shall take place on the site until the protective fences have been erected around the retained trees.
3. Prior to the commencement of development, a pre-commencement site meeting shall be held and attended by the developer's arboricultural consultant and the designated site foreman to discuss details of the working procedures.
4. The Planting proposals hereby approved shall be carried out no later than during the first planting season following construction.

**Contaminated Land Environmental Protection** has commented as follows:-

With respect to contaminated land risk assessment and the proposed development we are satisfied that further assessment and remedial actions are not currently required.

Some imported soils will be required and there is also the potential for unexpected issues to be discovered during the course of the development. Therefore the following two conditions are recommended to be applied to any future planning consent:

1. Imported Soils

For each phase any topsoil (natural or manufactured) or subsoil to be imported shall be assessed for chemical or other potential contaminants in accordance with a scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority in advance of its importation.

2. Reporting of Unexpected Contamination

In the event that contamination is found at any time that had not previously been identified when carrying out the approved development, it must be reported immediately to the Local Planning Authority.

**Crime Reduction Unit** has commented as follows:-

- Where a Design and Access Statement is required CABE does recommend that the statement includes a section that shows that security and safety have been considered and demonstrates how this will be achieved. The DAS provided with this application does not make reference to security and safety.
- The plans do suggest that a courtyard will be created which could be considered to be a 'crowded place'. As such the force Counter Terrorism Security Advisor would need to see evidence that measure are in place to protect the public.
- The site is designed with a high level of permeability, we find that too much permeability of a development makes controlling crime very difficult, as it allows easy intrusion around the development by potential offenders. All planned routes should be needed, well used by

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

generating adequate footfall at all times, well overlooked and well integrated. If areas lack natural surveillance then consideration should be given to cctv. Any system should be able to provide 'identification' quality on at least one point, identification is defined in the surveillance commissioners' document, The CCTV Buyers Toolkit.

- The undercroft formed by building B lacks surveillance, this can result in anti-social behaviour and inappropriate loitering, consideration should be given to the use of cctv to provide formal surveillance.
- Audio and visual access control will need to be used in building B, there should also be a facility to capture (record) images in colour of people using the door entry panel and store for those for at least 30 days.
- Compartmentalisation should be used to prevent unlawful free movement throughout the building through the use of an access control system.
- Communal mail boxes should meet TS 009.

**Pollution Control** has commented as follows:-

I would confirm that I have looked at the above application and have no objection to it.

I do have some concerns regarding the proposed commercial uses at the development, particularly A3 and A4, and would therefore ask for the following conditions should the application be approved:

1. Construction Management Plan
2. Sound insulation of residential properties from external noise

All recommendations detailed in the Noise Assessments submitted with the application with regards to sound insulation and ventilation of residential properties shall be implemented in full.

3. Noise from plant & equipment

No commencement of use shall take place until an assessment to show that the rating level of any plant & equipment, as part of this development, will be at least 5 dB below the background level has been submitted to and approved in writing by the Council.

4. Details of Extraction/Ventilation System (A3 & A4 use)
5. Odour Management Plan (A3 & A4 use)
6. Artificial light (external)

No commencement of use of the development shall take place until a report detailing the lighting scheme and predicted light levels at neighbouring residential properties has been submitted to and approved in writing by the Council.

7. Noise from plant & equipment affecting residential

Activities relating to the collection of refuse and recyclables and the tipping of empty bottles into external receptacles shall only take

**Development Control Committee A – 31 March 2021**

**Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

8. Deliveries (commercial uses only)

Activities relating to deliveries shall only take place between 08.00 and 20.00.

9. Opening hours

The use of any A1, A2, A3 or A4 use shall not be carried out outside the hours of 08:00 to 23:00 Monday to Sunday

10. Outside seating /external terraces

Any outside seating area associated with any A3, A4 or B1 use shall not be used by customers outside the hours of 08.00 to 22:00 Monday to Sundays.

11. A4 use

Any A4 use at the development shall be limited to a maximum of 800 m2

**Nature Conservation Officer** has commented as follows:-

Ecologically this is a relatively simple development. It does however provide ample opportunity for ecological enhancements and biodiversity net gain within the city centre. As such, it is recommended that the following conditions are attached to any approval:

1. A landscape planting scheme should be submitted and approved in writing by the local planning authority.
2. Prior to the commencement of development hereby approved, including all site clearance, an ecological mitigation and enhancement strategy, will be prepared by a suitably qualified ecological consultant, and shall be submitted to and approved in writing by the Local Planning Authority.
3. Prior to commencement of development, a method statement provided by a qualified ecological consultant shall be submitted to and approved in writing by the Local Planning Authority for the creation of living roofs on site which include wildflowers and do not employ a significant area of Sedum (Stonecrop).
4. No demolition of structures suitable for nesting birds, shall take place between 1st March and 30th September inclusive in any year without the prior written approval of the local planning authority.

In addition, advice notes should be added in relation to bats, cotoneaster, nectar-rich planting, and living roofs.

**Archaeology Team** has commented as follows:-

Within the submitted assessment they have not considered the recent results of the archaeological work that Cotswold Archaeology have undertaken in the area. These have identified rich archaeological evidence for the early brick making activities in the area. This industry played a significant role in the development of Bristol in the 18th century and the impacts of the proposed development on this significance will need to be assessed.

In order to understand this impact fieldwork prior to determination may be required. It is not enough at this stage to assume that we can just condition a watching brief and building recording.

Whilst further information has been submitted during the course of the application, this is not considered adequate. Whilst it would be preferable for further assessments to be carried out at this

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

stage, in order to limit the scope of any archaeological works, in the absence of the further assessment a full archaeological assessment prior to development should be conditioned.

**Landscape** has commented as follows:-

The masterplan proposal incorporates a number of public realm benefits that are supported; increased permeability n-s through the site linking New Thomas Street to Old Bread Street; an e-w link to the north of the Soap Works building linking Russ Street to Sless Lane; provision of new urban spaces within these links that vary in scale, shape and orientation to open, reveal or conceal the Soap Works building; incorporation of structural tree and islands of vegetation to break up and soften the hard landscape; bold ramped access and steps from Russ Street into the new square; public realm improvement on New Kingsley Road; varied building roof scape treatments to provide for residential needs.

While broadly supportive of these elements a couple are called into question: -

- The height of the development could affect the microclimate and shade could reduce the attractiveness of the internal spaces.
- The degree to which the arcade access from Bread Street into the n-s link invites public use. The view also begs the question of how this gateway will be managed on a 24 hour basis.
- The suitability of a roof terrace to provide children's playing facilities.

Views assessment

These comments should be read in conjunction with those of the Senior Historic Environment Officer regarding impacts on heritage assets. Generally there is agreement regarding conclusions relating to visual effects arising from the proposals; most have a slight adverse effect; the higher value 'moderate adverse' given to viewpoint 8 is correct given the complete occlusion of the soap pan building gable elevation. In the case of the view location in Castle Park, there is a concern that a viewpoint slightly to the east and at a higher level - might reveal a greater effect though probably only moderate adverse at worst. With regard to these wider views there are no significant disputes in relation to the conclusion reached in the TVIA.

## RELEVANT POLICIES

Planning (Listed Buildings & Conservation Areas) Act 1990

National Planning Policy Framework – February 2019

Bristol Local Plan comprising Core Strategy (Adopted June 2011), Site Allocations 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 2016 and Lawrence Weston Neighbourhood Development Plan 2017 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) IS THE PROPOSAL ACCEPTABLE IN LAND USE TERMS?

Whilst the application site lies directly adjacent to the Temple Quarter Enterprise Zone, it is currently unallocated in the development plan. It is, however, within the Old Market Neighbourhood Planning Area, and as a consequence the Old Market Quarter Neighbourhood Development Plan forms part of the adopted development plan for the site. Within that document the site is similarly not allocated, although the car park to the south east of the site is identified as a Long Term Development Site, as

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

well as there being numerous other policies that are relevant to the decision on this application.

The application site was last used for retail and associated storage (A1 use). Whilst it is proposed to retain an element of retail as part of active uses at ground floor level at the site, the proposal involves a substantial redevelopment of the site, largely based on providing mixed use residential (build to rent) and employment floorspace. This will see the loss of around 10,000 sqm of retail floorspace from the site. The aim of planning policies on retail is direct retail provision to designated centres, and in this case both Old Market and Cabot Circus are within walking distance of the application site. In particular, the Old Market neighbourhood plan seeks to boost the viability of the designated Old Market frontage. Whilst BCS7 of the core strategy offers some protection to retail units where they serve a specific local need, given the location close to large retail centres it is not considered that there is justification for seeking to retain the existing quantum of retail floorspace on the site.

The proposal will introduce some replacement retail floorspace on the site as part of flexible ground floor use. It should be noted that changes to the use class legislation mean that any new application would have to be assessed on the basis of the more flexible 'E' use classes, but given the application was submitted prior to the change in legislation, it has to be assessed on the basis of the former use classes (A1, A2, A3, A4 etc). Similarly, whilst the site is within the City Centre as identified, given that it is not designated for retail use officers would normally seek to control any additional retail so that it would not draw business away from designated centres. However, in this case, given the proposal would result in a significant reduction in retail floorspace it is not considered that any such control would be justified. It is also noted that the desire for a larger format superstore/grocery store in the area has been expressed. However, planning legislation does not allow the control of the type of shop, only the general use class.

In relation to residential development, section 5 of the National Planning Policy Framework (NPPF) outlines that housing applications should be considered in the context of the presumption in favour of sustainable development. The Local Planning Authority (LPA) should deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

Policy BCS5 (Housing Provision) of the Core Strategy outlines that delivery of housing to meet the Council's housing targets will primarily be focused on previously developed sites. The strategy by which the Council will allow development of open space is set out within the Site Allocations & Development Management Policies (SADMP) Local Plan. Policy BCS18 (Housing Type) of the Core Strategy states that all new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities. Policy DM1 (Presumption in Favour of Sustainable Development) of the SADMP outlines that the city's approach to development proposals will generally be positive and reflective of the presumption in favour of sustainable development as referenced throughout the NPPF.

On 19 January 2021, the government published the results of its 2020 Housing Delivery Test, which aims to measure how effectively each local authority is delivering housing against NPPF requirement to demonstrate a five-year supply of deliverable housing sites plus five per cent land supply buffer as standard. Bristol was found to be delivering only 72% of the housing requirement. The penalties for this will be that Bristol will have to provide a "buffer" of sites for 20% more homes than are needed to meet their five-year target, will be required to produce a Housing Action Plan, and the presumption in favour of development in the NPPF will apply.

In view of the fact that the LPA is not able to demonstrate a five year housing land supply, paragraph 11(d) of the NPPF is engaged, and the tilted balance applies. There are two aspects to understanding whether planning permission as prescribed by Paragraph 11(d) should be granted and whether policies which are most important to determining the application are out of date:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed [6]; or

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole

It is noted that in respect of paragraph i. heritage assets, including listed buildings and conservation areas are included as 'assets of particular importance', and therefore the tilted balance does not apply where these are harmfully impacted by the development.

Notwithstanding this, the application site is a previously developed site, considered to be a sustainable location for development, with good access to shops, services and public access routes. Given the car park is not allocated for other uses, and the identified need to bring forward windfall housing development, the principle of provision of housing on the south east part of the site is considered acceptable.

The other significant element of the proposal is the provision of employment floorspace on site, largely in buildings A and C. This is described as B1 floorspace, which would allow a degree of flexibility, including offices, light industrial or research and development (again the application has to be decided on the basis of the previous use classes rather than the updated 'E' use classes).

It is noted that both policy BCAP1 of the Central Area Plan and policy C1 of the Old Market Neighbourhood Plan, encourage the provision of employment floorspace as part of mixed use development. Furthermore, policy BCS2 states that around 150,000 sqm of office floorspace will be provided within the Central Area Plan area. As such, the provision of flexible employment floorspace, including office space, accords with this policy.

It is noted that the submitted plans include some flexibility for the northern wing of building C, such that it can be used either as residential or an aparthotel. Whilst the format of aparthotel would allow some degree of extended facilities within rooms (kitchenette etc), it is clear in the submission that this would fall under use class C1. Hotel uses are encouraged within the Central Area Plan area by policy BCAP10, subject to providing active ground floors, and therefore in principle the proposal accords with policy. Given the degree of flexibility a condition will be required to ensure that when the development is constructed either one or other scheme is developed. However, for clarity, this would not impact on the external appearance of the building, and other issues, such as affordable housing would need to be specifically referenced in the section 106 agreement.

This proposal also includes commercial floorspace at ground floor, which could at its maximum provide just under 3,000 sq. m. of A3/A4 uses. Whilst these uses are allowed for by policy, by virtue of being within the Central Area Plan area, they also need to be considered against policy DM10. This policy permits such uses, subject to the development not harming the character of the area, residential amenity or public safety, either individually or as a result of the concentration of uses. These issues are dealt with specifically in the key issues below. However, in respect of the concentration of uses, whilst there is not a significant concentration currently, it is noted that there are a number of other developments ongoing in the area, many of which have flexibility in relation to the ground floor uses, such that it will be possible to provide a number of food and drink uses in the area. However, in each case the use of these ground floor units is constrained in the interests of residential amenity, and most on their own are relatively small. The new developments will lead to significant increase in residential density, and this provision of a mix of amenities is considered necessary to support a vibrant community. Therefore, subject to the impacts on amenity being controlled, it is not considered that resisting the ground floor uses in principle is justified.

It is considered that the application site represents a significant opportunity for a high density, mixed use development in a sustainable location. Given the site is not allocated, this is considered to be a windfall development, but clearly meets the locational criteria for the types of uses proposed. Therefore, the proposed development is supported in respect of the land uses proposed.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP****(B) IS THE PROPOSED DENSITY AND HOUSING MIX APPROPRIATE?**

The efficient use of land is integral to creating sustainable patterns of development and this is central to the focus on sustainable development in the NPPF. Indeed, the NPPF allows Local Planning Authorities to set their own approach to housing density to reflect local circumstances. Policy BCS20 of the Core Strategy sets a minimum development density of 50 dwellings per hectare. The overall density of the proposed development would be in excess of 550 dwellings per hectare. The site is located in the City Centre, as identified by the Urban Living SPD, where higher densities will be supported - the SPD identifies an optimum density of 200 dwellings per hectare. However, it is noted that very high densities such as this can prove challenging in respect of harmful impacts on amenity, character of the area and highway impacts, and this is considered in more detail in the key issues below. However, there is no maximum density set out in policy.

In addition, Policy BCS17 of the adopted Bristol Core Strategy (2011) requires affordable housing to be provided in residential developments of 15 dwellings or more at a percentage target of 40% in the Inner East area. Such residential developments should provide a mix of affordable housing units and reflect identified needs, site suitability and economic viability. However, in April 2018, the Council published an Affordable Housing practice note. This offers an additional 'Threshold' approach, which allows for an offer of 20% to be accepted in the Inner East and the Inner West areas, subject to conditions including that work starts within 18 months of the grant of permission and the tenure mix in accordance with the Council's policy.

In this case, the application is for 100% build to rent development. The NPPF states that where it is the intention that the landlord will manage the whole block, it will normally be expected that the tenure of the affordable housing would be affordable private rent (otherwise referred to as discount market rent).

It has been agreed with the applicant that 49 units would be provided as discount market rent for option A, and 34 for option B. This would represent 20% of the relevant proposed development. It is also noted that the proposed affordable housing units would represent a mix of size of units across the development, and would also be pepper potted through the development. As such, the housing enabling team are content with the affordable housing offer, subject to terms being agreed and being secured through a section 106 agreement. For clarity, the terms will include a review in 18 months, if the development has not been implemented.

Policy BCS18 also requires development to contribute to the mix of housing tenures, types and sizes in an area. In addition, policy BCAP3 requires the provision of family sized homes (which for flats requires three bedroomed flats), as part of any development within the City Centre. This is reiterated in the Old Market Neighbourhood Plan, which states that 'dwellings suitable for occupation by families and having at least three bedrooms will be encouraged'.

According to the 2011 Census figures the area around the application site is also dominated by smaller units of accommodation, although it is noted the Dings area, as well as the Lawrence Hill Ward generally, two bedroom units tend to be more prolific than single bedroom units. However, in the area immediately adjacent to the site, including Old Market itself, there is a significant over provision of single bedroom units.

Around 70% of the accommodation for option A is single bedroom or studio units (it is noted that the proportion is lower for option B). As such, it does not contribute positively to the overall housing mix in the area. However, this mix is reflective of the constraints of the site, and is similar to what has been accepted in other build to rent schemes in this area. The application does include the provision of family accommodation into the scheme, but this represents less than 2% of the development. In light of the mix of accommodation in the area the very small number of family units proposed is disappointing. It is noted that these type of high density proposals are not traditionally considered to be very attractive to families moving in. Whilst this is not in itself a reason not to include family

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

accommodation in the development, the failure to provide it must be weighed against the other benefits of the proposal.

(C) WOULD THE PROPOSED DEVELOPMENT PRESERVE OR ENHANCE DESIGNATED AND UNDESIGNATED HERITAGE ASSETS, BOTH ON THE SITE AND NEIGHBOURING THE SITE?

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) and in Barnwell Manor Wind Energy Ltd v East Northants District Council, English Heritage, National Trust and Secretary of State for Communities and Local Government [2014] EWCA Civ 137 it is made clear that where there is harm to a listed building or a conservation area the decision maker 'must give that harm considerable importance and weight' [48].

Section 16 of the national guidance within the National Planning Policy Framework (NPPF) 2018 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with any harm or loss requiring clear and convincing justification. Paragraph 195 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. Paragraph 196 states that where there is less than substantial harm, this harm should be weighed against the public benefits of the proposal. These tests are relevant here as it is considered that the proposal would be harmful to heritage assets.

Policy BCS22 of the Core Strategy requires development to safeguard or enhance heritage assets, which includes historic buildings, both nationally and locally listed, and conservation areas. In addition, policy B1 of the Old Market Neighbourhood Plan requires development to pay special regard to the historic and visual interest of heritage buildings.

In this case the proposals would impact on a number of heritage assets, including directly impacting the Grade II listed assets on site, and the setting of the Grade I listed Temple Mead Complex, St Mary Redcliffe Church and St Philip and St Jacob Church. In addition, the site is partly within the Old Market Conservation Area, and adjacent to grade II listed buildings on Broad Plain, and Christopher Thomas Court.

- On Site Heritage Assets

The main heritage asset on the site is the grade II former soap pan building. This building dates from c1882, although it is noted that there was a significant fire around 1902, which resulted in the need for the roof to be rebuilt, and the towers in each corner to be reduced in height. Internally, the building is largely structurally complete, although it appears that the upper floors have been altered post the 1902 fire and rebuilding. The building represents a significant local landmark, and an aid to wayfinding in the area, as well as having significance given its importance to the development of industry in Bristol.

With regards to the works to this building, it is intended to retain and refurbish this building, without significant intervention into the form and layout of the building. The removal of the building to the north will reveal the ground floor in this location, although it is not clear whether or not this element of the building would have been visible historic. The proposal would bring the building into active use, and also allow public access to the ground floor, which is considered to be heritage gain, and are supported.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

The other existing buildings on site, described by the applicant as buildings 2 to 6, all benefit from statutory protection given being attached to the principle asset. However, it is acknowledged by all parties that the value of these buildings are mixed. Most of the buildings date from the early 20<sup>th</sup> century, with the exception of building 4 (the north west corner of the site), and whilst this dates from the 19<sup>th</sup> century, it has been refaced with 1950s curtain walling. However, the buildings are considered to have group value. They demonstrate the evolution of industry on the site, as well as having an important public profile, given its place in the history of retail development in this part of Bristol.

Whilst it is proposed to retain the western façade of building 4, facing on to Sles Lane, and the northern façade of building 2 on Straight Street, the rest of the buildings are proposed to be removed and replaced. It is argued by the applicant that in order to convert the building to the needs of 20<sup>th</sup> century business would result in significant changes to the rest of the built, such that anything of significance internally would be lost. It is noted that a structural survey has been submitted with the application, which indicates that in large part the buildings are sound, although are suffering from lack of maintenance. The most significant concern appears to be that there are a number of level changes within the building, and as such significant levels of demolition would be required in order to meet the required vertical circulation space and servicing of a modern office space.

The response of both Historic England and the Council's conservation officer is that this approach lacks the flexibility required in dealing with historic buildings. Whilst it appears to be reasonable to consider that the optimum office development of the site would require significant levels of intervention in the existing fabric, a less optimum approach, or even a different use, would result in a less significant degree of intervention. Notwithstanding this, the building has a very deep plan, and the options for conversion without a significant degree of intervention appears to be limited.

As stated above, paragraph 194 of the NPPF states that any harm to heritage assets requires clear and convincing justification. In this case, that clear and convincing justification is only available on the basis that the optimum use of the building is a high quality office space. In any case, the proposal would result in a high degree of harm to the asset, albeit the asset is considered to be of lower significance than the main soap pan building. The Council's conservation officer contends that this constitutes a substantial degree of harm, although Historic England have concluded that this would constitute a higher degree of less than substantial harm (the importance of this is that substantial harm requires further assessment against paragraph 195 of the NPPF).

The Planning Policy Guidance makes clear that the level of harm attributed to a proposal will be a judgement for the decision maker. However, it does state that it is a high bar, with an example of substantial harm being 'whether the adverse impact seriously affects a key element of its special architectural or historic interest'. In this case, officers view is that the proposed retention of two facades of buildings 2 and 4 would allow the retention of some historic interest, particularly with regards to building 4, where the elevation appears to be the only historic element remaining. In addition, the greatest impact would be on the least significant buildings, with the soap pan building being retained in full. As such, officers are content that the level of harm is less than substantial, albeit of a high degree of less than substantial harm, and as such the test in paragraph 196 is the appropriate one.

The replacement building for building 2 to 6, building B, whilst incorporating two of the original facades, these would be subsumed within a larger bulk and massing. Most significantly, the proposed building would be two stories higher than the existing, and would also require alterations to the fenestration of the building fronting Straight Street, in order to meet the requirements of the new levels in the building. Whilst the proposal does detract from the heritage aspects of the site, it is considered to be an interesting building, with a clear design rationale. Overall, the proposed development is considered to result in a high degree of less than substantial harm, but the building that replaces it is of good design quality.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

- Impact on Setting of On Site Heritage Assets

In addition to the impact on heritage asset, it is noted that Historic England have also raised concerns about the impact on the setting of on site listed buildings, particularly the soap pan building. Currently the building has a high degree of visibility in the surrounding area, and acts as a landmark structure. However, it is noted that currently the developments being constructed to the south does impact on the level of visibility. However, the structures around the base of the building have a rather cluttered appearance, and mean that the public access to the building is very limited.

The proposed development would include the provision of a public square to the front of the building, and will significantly increase the access to the building. Further details of the landscape proposals have been provided following the original submission, and in general, are considered to be a high quality piece of public realm. It is noted that building would not have historically had this relationship with the public realm, given that it was historically an industrial building, and indeed it is not clear whether or not the northern elevation of the building was ever complete, i.e. would it have originally gone down to ground level, or would it have always been subsumed within other buildings. Notwithstanding this, the proposal would provide a new element of public realm, with the significant retained listed building at the heart of it, which will give a public presence to the building that it does not currently have.

However, the main part of the significance of the building previously comes from the fact that it was taller than the surrounding buildings, and had a characteristic roof form, which clearly marked it out from the background buildings surrounding the site. This will be lost as a result of the proposed development, with the listed building being significantly smaller than the surrounding buildings. Clearly, this is a sustainable development site and a development which does not increase the scale on the site, and would allow the existing views, would not make best use of the site. As such, officers have considered what are the key views of the building and how best these can be maintained.

The visual impact assessment submitted with the original proposal indicated that very limited views of the building were available from outside of the site. However, revisions have been submitted to the development in an attempt to improve this relationship. The most significant element of this is the top floors of buildings A and B have been set back to the north of the site. This allows for a greater span of views of the heritage asset from the north and east, particular of the characteristic roof form. However, the scale of the proposed buildings will still challenge the height of the listed building. In addition, the proposed change would not allow views of the building from the south. It is noted that any building to the south of the site is likely to have some impact on these views, but the proposal would remove any opportunity for glimpsed views from the south and east. Again, therefore, it has to be concluded that the proposal would be harmful to the setting of this building.

- Impacts on the conservation area

As stated above the western part of the site is located within the Old Market Conservation Area. The site marks out the southern boundary of the conservation area, with the conservation area appraisal particularly referencing the terrace of listed buildings along Broad Plain, and the Bristol Byzantine buildings that housed Gardiner Haskins, including those on the application site. It is considered that the increase in scale of the building facing Straight Street will detract from the groups of listed buildings on Broad Plain, by virtue of being a dominant scale in the street scene.

In addition, the new build element of the proposal would be visible in a number of significant views into and out of the Conservation Area. This part of the application site is a transitional area between the Conservation Area to the north and the more commercial style of architecture to the south. It is clear from the commentary provided from consultees that many see that it would be more appropriate if the scale of the proposed development followed the transitional nature of the site. However, with the exception of the retained facades, the scale and architecture is considered to be more reflective of the context of the style of architecture to the south, rather than the finer grain and smaller scale

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

development to the north. Notwithstanding this, it is considered that the proposed architecture of the development has improved from the original submission, and in that respect would not detract significantly from the Conservation Area. However, given the scale of the proposal, it is considered that it would give undue prominence to this new development, and overshadow the heritage assets. Again, therefore, it is considered that the proposal would result in less than substantial harm to the Conservation Area.

- Off-Site Assets

**TEMPLE MEADS STATION (grade I)**

The visual impact assessment submitted with the application confirms that no part of the development would be visible against the skyline when viewed from the east of the station. It also confirms that the proposal will not have a harmful impact on any significant views from elsewhere.

**ST. MARY REDCLFFE CHURCH (grade I)**

It is noted that in distant views from the east the proposal will be viewed in the same context as the spire. However, these views do suggest that the taller element of the proposal would be viewed as part of a cluster of taller buildings, clearly to the east of the spire. Giving the clustering of these buildings, the level of impact is reduced, such that the level of harm is considered to be of low degree.

**ST PHILIP AND ST JACOB CHURCH (grade I)**

The Visual Impact Assessment submitted with the application indicates that the proposed tower would be in conflict with the spire of the church from certain viewpoints, although the spire would remain as the dominant element. Again, therefore, there is considered to be a low degree of harm with regards to the impact on the setting of the church.

**OTHER GRADE II ASSETS**

It is considered that the proposal will directly impact on the setting of listed buildings on Broad Plain, as well as Christopher Thomas Court on Old Bread Street. As stated above, given the scale of the proposal, it would have an overbearing visual impact on these properties from certain viewpoints. As a consequence, there would be a degree of harm to the setting of these buildings.

Overall, officers in discussion with Historic England, are of the view that the level of harm would be a high degree of less than substantial harm. In this regard, it is considered that in order to make material changes to the level of harm could be achieved, but only with a significant reduction in the quantum of development. Any such reduction would impact on the ability of the scheme to provide the level of benefits that it is considered that the current proposal would. However, in order to approve a scheme with this level of harm, it is required that the development demonstrates public benefits that outweigh this level of harm.

- o Heritage gains

Whilst it is concluded that proposal will result in a degree of harm to the heritage assets, in accordance with paragraph 196 of the NPPF this harm should be weighed against the public benefits of any development. This can include, but is not limited to, heritage benefits. In this case, the following heritage gains should be acknowledged:

- The refurbishment and bringing to viable use of the soap pan building. It is noted that this building was, until quite recently, in use, however only for storage in association with retail, and the proposed commercial use is considered facilitate a higher degree of maintenance and a longer potential lifespan for the building.
- The proposal will also result in better public accessibility to the heritage assets, both internally

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

and externally.

- The provision of improvements to the immediate setting of the building. Whilst this needs to be balanced against the fact that the building would not have historically been seen in this context, it is material that the proposals will allow public space with the building at the centre, which will improve the profile of the building.

As such, it is acknowledged that the proposal will result in a high degree of harm to heritage assets, and in accordance with policy, this must be given great weight in the decision on the application. However, there are also heritage benefits to be provided from the development, and in particular the proposal to retain and refurbish the principle listed buildings on the site. This must be added to the other benefits of the development, as outlined in the following key issues, when reaching the decision on the application.

(D)            WOULD THE PROPOSED DEVELOPMENT HARM THE CHARACTER OR APPEARANCE OF THIS AREA?

Policy BCS21 of the Core Strategy promotes high quality design, requiring development to contribute positively to an area's character, promote accessibility and permeability, promote legibility, clearly define public and private space, deliver a safe, healthy and attractive environment and public realm, deliver public art, safeguard the amenity of existing development and future occupiers, promote diversity through the delivery of mixed developments and create buildings and spaces that are adaptable to change. The adopted development management policies reinforce this requirement, with reference to Local Character and Distinctiveness (DM26), Layout and Form (DM27), Public Realm (DM28) and the Design of New Buildings (DM29). The design policies in the Central Area Plan refer to issues that specifically relate the City Centre. Of particular relevance to this application is BCAP31, which requires active ground floor uses adjacent to the public realm.

In addition, policy B2 of the Old Market Neighbourhood Plan states that 'new buildings should be designed to be sympathetic to the height and design of neighbouring buildings, street width and frontage lines. Development proposals should also have regard to the Old Market Quarter Design Code'

As referred to above, the application site is considered to be a transitional area, between the large scale corporate architecture to the south, and the Conservation Area to the north. It is argued by the applicant that the proposed development takes its architectural cues from the Bristol Byzantine style of the buildings on the site. Whilst it is accepted that the materiality of the development does respond to the existing brick buildings, the scale, mass and detailing of the proposed development is more in line with the design of the corporate architecture to the south.

However, officers do note that through negotiations on the development significant improvements to the appearance of the architecture have been made. Whilst the tower is of significant scale, it has been accepted that there is scope for a taller building to the south east corner of the site, and in town scape terms this is the most appropriate location on the site, particularly given that it will contribute to legibility and wayfinding in the area. The revisions to the proposal have removed some of the bulk from the higher levels of the tower, to give it a more slender appearance. Also, changes to the base of the tower will make it more distinct, and better express the tower at street level. Similar, other changes to facades of the building better express the separate elements of the design. Other changes to the facades, notably the provision of a significant increase in the number of balconies, helps to provide more interest to the elevations, and reduces the flatness that was criticised in the original submission. Furthermore, the cycle store and bin store fronting New Kingsley Road has been re-arranged to allow for a greater degree of activity on this road frontage.

One of the key design elements of the proposal that was established at the outset was the provision of a new north/south route through the site. This is a long held aspiration of the Council, as it follows a natural desire line between Temple Meads and Cabots Circus. In this case, it is proposed to provide

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

this route as a high quality area of public realm running through the centre of the site. It is intended that this area of public realm will be lined by active uses, to provide for a vibrant heart to the site. It is noted that concerns have been raised about this area, in respect of the legibility and the access to daylight. In the original submission the 'tunnel' access to the public realm was considered rather mean and uninviting, and officers maintain the view that in legibility terms this would be better served by having a physical break in the building. However, it is acknowledged that a break in the building is not unproblematic, particularly given it would be difficult to avoid large, blank elevations facing into the break, which would in-itself be rather uninviting. The revised plans show the access being better articulated through the building, such that this will become a more obvious access point. Furthermore, the changes at high level will make this a more obvious, and inviting route when viewed from the north. With regards to the environmental quality of that area, an assessment has been carried out by the developer. Whilst this shows good levels of daylight in the public realm in high summer (around 10 hours at summer solstice), this will be significantly reduced at other times of the year, with less than 3 hours sunlight in winter. However, it is noted that the layout of the building would have the advantage that this area would be largely screened against wind. Therefore, it is likely that public realm with a more southerly aspect would provide a more pleasant area to linger, this in itself is not considered a reason to reject the application.

It is noted that the police architectural advisor has raised concerns that the proposed public square would be a target for terrorist activity, as it would encourage people to congregate in a relatively small area. To a degree, whilst free access to this area for pedestrians and cyclists is encouraged, the change in levels across the site would make any sort of vehicle access difficult. In addition, further details within the design can discourage anti-social activities. Should the application be approved it is recommended that a condition is added to provide a strategy for defending the public area.

With regards to the general design approach for the development, it is considered that the overall scale of the development is challenging, largely for reasons of impact on heritage assets. However, the design of the proposal does show a clear logic, and does reference the context, albeit this includes the emerging more corporate context to the south of the site. In addition, the revisions to the scheme have resulted in significant improvements to the design and architecture proposed.

#### Urban Living Assessment

The Urban Living Supplementary Planning Document establishes a set of criteria against which major developments are to be assessed, the aim being to create successful high density neighbourhoods. The guide is split into three sections, the first of which applies to all major developments, the second to residential developments and the last to tall buildings. All of the sections apply to at least elements of this development.

Council officers have undertaken the assessment for the whole development, although with a specific focus on elements that are particularly relevant to certain parts of the scheme. The results of this have informed the discussion in other parts of the report, so will not be repeated in detail here. However, it is worth noting that nature of the scheme is such that different parts of the scheme perform at different levels against the criteria, resulting in relatively moderate scores against some of the criteria.

As stated above, whilst it is acknowledged that the development will contribute to making this area a more vibrant community, the concerns have been raised about to what degree this is a contextual response, particularly in relation to the Conservation Area context to the north of the site and the transitional nature of the site.

Also, of concern is the nature and layout of the proposed accommodation. The SPD promotes development that better responds to the needs of local community, in particular the identified need for larger family units of accommodation set out in the Old Market Neighbourhood Plan. It also recommends 'double stacked' single aspect flats be avoided. As originally designed the proposal would only have had a single core for the residential units, with the applicant stating that this had the

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

benefit of being entirely blind to tenure. Whilst this would have allowed for some household mixing at the entrance, it would have been dominated by long corridors served entirely by artificial light. However, revisions to the application during the course of the application have resulted in the provision of two additional cores, and consequently, more dual aspect units. However, over 60% would still be single aspect, and more than 15% units would have a northerly aspect. It should be noted that whilst the number of family units are disappointing, the three bedroom units are all dual aspect, and have access to balconies facing both north and south. With regards to the provision of private amenity space, again the scheme performs relatively poorly, with only around 21% of units providing the level of amenity referred to in the policy. Notwithstanding this, many more units do have access to a balcony, albeit a relatively small one, and the scheme performs well against the requirements for communal open space. This includes the provision of children play space within the development.

Whilst these concerns are noted, the scheme performs no worse than other build to rent schemes currently being constructed in the area. Notably, the scheme performs much better against these criteria than the ND6 site, directly to the south of this application, which was also determined after the adoption of the SPD (albeit it was reported to committee shortly before the adoption).

Overall, however, these concerns are considered to be justified, and should be given due regard in the decision on the application. Again, however, in coming to a balanced view on the proposal, these concerns should be weighed against the benefits of the proposal. Whilst it is the view of officers that a less intensive scheme would be likely to achieve a more successful and contextual design, officers also accept that such a scheme would not achieve some of the benefits that the current proposals do. In particular, it is acknowledged that this is a sustainable development site in an area allocated for development, and providing high density development would meet other development plan aims, particularly in light of the current performance against the relevant housing delivery targets. Consequently, and acknowledging the significant weight that must be given the heritage issues, officers are satisfied that the design concerns are outweighed by other benefits of the scheme, and the design of the scheme can be supported.

(E)            **WOULD THE PROPOSAL UNACCEPTABLY AFFECT THE AMENITY OF THE AREA?**

Policy BCS21 of the Core Strategy, as well as requiring development to be of a high quality design, also requires new development to safeguard the amenities of existing residents. In addition, policy BCS23 also requires development to be designed so as not to have a detrimental impact on the surrounding environment.

- Residential Amenity

There are existing residential properties to the east and west of the development site that will be affected by the proposed development. Objections have been received to the development from residents on either side of the development. It is also noted that there is residential development currently under construction to the south of the site. Representatives of the developers for those sites have been consulted, but no comments have been received.

It is noted that concerns have been expressed by a number of parties about the level of disruption that has resulted from the existing development sites. However, whilst these concerns are understandable, this issue is covered by other legislation, and therefore a refusal on these grounds is not considered to be justified. However, the impacts of the construction work do need to be managed, particular in relation to ensuring that an acceptable access to residential properties is maintained and there would be no detriment to air quality, and therefore the requirement for a construction management plan secured by condition is recommended, should the application be approved.

The site is within an area of high density, relatively closely packed development. The separation distances between the front of developments is commonly around 14 to 15 metres (across Avon

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

Street the separation distances tend to be closer to 13 metres). The proposed development would be around 14 metres away from the building immediately to the south, across Old Bread Street, and 15 metres to the East, across New Kingsley Road. As such, the separation distances is characteristic of the area. As a result, there is a degree of intervisibility between units, but this is regarded reasonable, given the context of the area.

The application has been supported by a daylight and sunlight report, which assesses the impact of the development on nearby residential properties. With regards to the properties currently being constructed to the south there would clearly be no direct overshadowing of these properties. However, there would be some impact to the properties to the east and west. The assessment has been carried out in respect of the tests set out in the BRE guidance, which is specifically referenced in the Urban Living SPD. This tests the impact on overshadowing against the maximum Annual Probable Sunlight Hours (APSH). In order to meet the requirements of the guidance the resident should expect to receive 25% of the APSH, and at least 5% during the winter months. Of the windows tested of the properties to the east 100% met the requirements in Crown and Anchor House, and 13 of 16 in Kingsley House. It appears that the main living accommodation for Kingsley House is to the rear, facing away from the proposed development. As such, the windows impacted would be bedrooms, and the guidance suggests that less weight is given to bedrooms, as occupants tend to spend limited daylight hours in these rooms.

The building to the west of the site is Christopher Thomas Court. The main living accommodation for this development fronts the road, and therefore the impact of the development on direct sunlight to these rooms would be relatively limited. It is also noted that a number of units are already impacted by other developments in the area. The assessment suggest that there would be a degree of overshadowing beyond the BRE targets to two living areas in this development, one on the first floor and one on the second. In both cases the rooms are to the centre of the site, which get limited access to direct sunlight, and in these circumstances the actual impact of the development is relatively limited. Bedrooms on the ground floor, second and fifth floors would be similarly impacted. This includes a balcony serving the bedroom on the fifth floor. However, as stated above, the weight given to the consideration of bedrooms is lower, given the fact that most of the time spent in bedrooms is outside of daylight hours.

In terms of the impact on visual amenity and access to daylight, this is measured on the basis of how much of the sky is visible from the neighbouring developments. As such, this allows assessment of two factors, visible sky component (how much of the sky is visible from a window), and no sky line (from what proportion of an affected room no sky line is visible). In the assessment of the impact, it should be noted that the existing site adjacent to the residential development is a car park, and therefore any development on the site would result in significant impacts on outlook. The context is also relevant, given that the area is a high density residential area, and the Urban Living SPD allows for some degree of flexibility, on the basis of context.

Broadly speaking, all of the neighbouring residential developments will be affected to some degree in this regard. Crown and Anchor House and Kingsley House, to the east of the application site, would be most impacted. It is noted that a number of living room windows in Crown and Anchor House which would lose significant areas of visible sky. However, these windows tend to have deep recessed balconies, which by their nature limit the amount of sky that is visible. The living rooms that are served by these windows tend to also be served by other windows that are less impacted by the development, and as a result only one of six living rooms would lose more than 20% of the area of the rooms affected with views of the sky, and the impacted room would only be slightly in excess of the target value. With regards to Kingsley House, again a large proportion of windows would be affected to some degree, up to around 70%. However, again, it should be noted that affected rooms are largely bedrooms, and to a lesser degree circulation space, and indeed any development on the application site would impact on these rooms.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

Christopher Thomas Court, to the west of the site, appears to be less affected in this regard. The assessment suggests that less than a quarter of the windows would be affected by a noticeable reduction in daylight. Again, the most significant impacts on this blocks is to windows with deep recessed balconies. Overall, only three rooms fail all the tests, two bedrooms and one living area. Again, the living room already has limited outlook, such that the proportionate impact of the development is reduced.

With regards to buildings ND6 and ND7, to the south of the application site, these developments are not yet occupied. However, there would be impact on these properties, albeit the impacts on ND7 tend to be relatively marginal. With regards to ND6, whilst the assessment suggests that 70 windows would be affected by the development, given the relationship between the two sites it is considered reasonable to take an approach of comparing the proposal to a 'mirror image' of the other development. In comparing the two, 25 windows would be additionally affected in comparing the proposed development and the 'mirror image' development. In each case, the additional impact is relatively marginal, and as such, it is considered that the difference between the two schemes would be marginal.

Overall, in relation to the impact on access to daylight on neighbouring properties, it is clear that the proposal would have a noticeable impact in access to daylight and sunlight at neighbouring properties. However, the assessment has been carried out on the basis of comparison with a car park, and any development of the site would have an impact in this regard. Ultimately, it is suggested from the assessment that the scale of the development would need to be reduced by a significant degree in order to have a material impact on the level of daylight to those properties would require a very significant reduction in the scale of the development. Therefore, given the context of the site, the level of impact is not considered to be unreasonable, and can be balanced against the other impacts of the developments.

- Noise

The application site is in a transitional area, between more commercial properties to the north, and more residential to the south. The previous use of the building is retail, and whilst this would have resulted in a degree of noise and disturbance, the main access was to the north of the site, and therefore for much of the day the impacts on the nearby residential units would have been limited. However, the eastern part of the site was used for serving the development, and there would have been a degree of noise associated with this.

The proposal involves a significant area of floorspace proposed to be commercial, which could include retail uses, and food and drink uses, including those uses that contribute to the nighttime economy. It is noted that much of the commercial frontage is internal to the site, and therefore the impact on the neighbouring residential properties is likely to be limited. However, it would impact on the proposed residential properties, unless the impacts are controlled. It is noted that the Council's Pollution Control Officer is content with the proposal, subject to conditions controlling the hours of use (including hours of servicing), and restricting the floorspace of any A4 use (drinking establishment). In addition, details will be required of the ventilation and odour extraction for any proposed food and drink type uses, but given the speculative nature of these uses it is considered acceptable to deal with this by conditions. Therefore, subject to the relevant conditions, it is not considered that the commercial uses will have a harmful impact on the amenities of nearby residents.

**(F) WILL THE PROPOSED DEVELOPMENT RESULT IN AN ACCEPTABLE RESIDENTIAL ENVIRONMENT FOR THE NEW RESIDENTS?**

As well as protecting the amenities of existing residents, policy BCS21 also requires that development create a high-quality environment for future occupiers. Policy BCS18 also requires that proposed residential accommodation provides sufficient space for everyday activities. The Urban Living SPD expands on this further, by requiring that the individual residential units meet the nationally described

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

space standards, and also setting standards for access to open space and play space as part of the development.

As referred to in key issue C above, the layout of the proposal means that much of the residential accommodation is double stacked, served by a long internal corridors. It is accepted that the proposed dwellings would meet the space standards as set out in the Nationally Described Space Standards. However, the scheme is dominated by single aspect dwellings, albeit this has been improved in revised plans, where additional cores have been added. This does mean that some of the units have restricted access to daylight. The primary assessment for the quality of access to daylight is the Average Daylight Factor, and around 5% of the development would not meet the BRE targets in this respect. However, it is noted that this is largely because of the perimeter block layout, rather than this being a product of the northern aspect of some of the units. The northern aspect of the flats does have an impact on the other BRE test, the Annual Probable Sunlight Hours, where around 40% do not meet the target.

In regards to access to amenity, the majority of units are not provided with private amenity space, the proposal is well provided for in terms of communal open space, albeit a large proportion of it is at high level. The advantage of long corridors is that it ensures equitable access to the amenities, including the communal open space.

It is recognised that the proposal represents a high density development, and some compromises have been made with the layout, and as a result some of the units have better amenity quality than others. However, it is considered that significant improvements to the scheme have been made in this respect and as a mixed use development, with significant commercial floorspace, the proposal does provide a number of benefits for those living there. As such, it is considered that the proposal is acceptable in this regard.

(G) **WOULD THE PROPOSED DEVELOPMENT SATISFACTORILY ADDRESS TRANSPORT AND MOVEMENT ISSUES?**

Development Plan policies are designed to promote schemes that reflect the list of transport user priorities outlined in the Joint Local Transport Plan, which includes pedestrian as the highest priority and private cars as the lowest (BCS10). In addition, policy DM23 requires development to provide safe and adequate access to new developments.

The site is considered to be in a sustainable location, in close proximity to the city centre, and Temple Meads station. This is a focus for public transport, not only the railway, but also busses and ferries. The location of the site therefore means that the development would be accessible by multiple modes of transport, other than the private car, and this meets with the above policy aims. It is acknowledged that policy T3 of the Old Market neighbourhood plan states that car parking should be provided at a ratio of one space per two dwellings for any residential development more than 100 metres from Old Market. This would apply to this site.

The development would not provide any on site car parking, although pay and display and disabled parking spaces are indicated on the street. On street parking in the area is generally either controlled by a residents parking scheme or by pay and display bays. The site is directly opposite a public car park with additional capacity. The transport assessment also identifies scope for on street parking in the area, and it is noted that new residents would not be eligible for residential parking permits. Therefore, whilst the policy may indicate the need to provide on site car parking spaces, in order to refuse the application on this basis, officers would still need to demonstrate there is some degree of harm. Given that there is no scope for free car parking in the area it is unlikely that residents will bring cars to the area, and even if they do the impacts would be controlled by other mechanisms. The lack of car parking also has advantages in respect of the high quality of public realm, and improving the facilities for pedestrians and cyclists. As such, it is not considered that the proposal warrants refusal on these grounds.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

The transport assessment submitted with the application predicts a significant increase in the number of trips to and from the site as a result of the application. However it is predicted that over 70% of those trips will be by pedestrians or by public transport. Given the accessibility of the site and the fact that the residential is designed to be car free, it is considered that this prediction is plausible. Whilst it is considered that pedestrians are well provided for on site, in order to meet these targets will also put pressure on pedestrian and cycle provision in the surrounding streets. Given the other developments in the area, there has already been significant investment in the infrastructure to the south of the site. To the north of the site the Council has undertaken consultation on improvements to the public realm in Broad Plain to the north of the site. The applicant has agreed to a contribution of £150,000 to the Broad Plain improvement works, in line with the results of the consultation. This would need to be secured by section 106 agreement, should the development be approved.

The revised submission shows a total of 515 cycle parking spaces for option A and 415 for option B. These would largely be provided in an internal store in building B. In addition it is proposed to provide additional stands within the public realm. The proposal includes servicing areas on Old Bread Street, New Kingsley Road and Russ Street. This will include access to bin stores, the requirements for which have been designed in consultation with Bristol Waste Company. As such, the Council's Transport Development Management officer has confirmed that they are satisfied with the proposal. As such, there are no objections to the proposal on these grounds.

(H) WOULD THE PROPOSED DEVELOPMENT BE AT RISK FROM FLOODING, HAS A SEQUENTIAL APPROACH BEEN TAKEN TO LOCATING THE DEVELOPMENT, AND WOULD IT INCREASE THE RISK OF FLOODING ELSEWHERE?

At the time of submission the application site was shown as being within Flood Zone 1 in the flood plain models identified by the Environment Agency, being at low risk of flooding. However, the more recent modelling used to inform the 2020 update to the Strategic Flood Risk Assessment has updated the predictions, incorporating updated climate change allowances, suggests that the southern part of the site would be at high risk of flooding. This would impact on much of building B.

The NPPF and policy BCS16 require that a sequential approach is taken to the location of development, locating developments in areas with the lowest risk of flooding first. In this regard it is noted that discussions on the site pre-date the increased flood risk, so the assessment on this has changed since the application has been submitted. In addition, recent changes to the Housing Delivery test have increased the requirements for housing delivery within the city, and demonstrates that these targets cannot be met from allocated sites alone. It is also noted that much of the nearest allocated site (the Enterprise Zone which is directly adjacent to this site) is at least as high a risk of flooding as the application site, if not higher. It is certainly the case that this site is significantly underused and that there are no available sites as large as this one in a location with similar access to services and public access. As such, officers are content that there are no sequentially preferable sites which are available for a development of this nature.

In addition to the need for a sequential test, the relevant planning policies also require that applications demonstrate that the development will be safe from flooding in a design flood event, for the lifetime of the development, taking account of the impacts of climate change. For reference, the lifetime of the development in respect of residential is considered to be 100 years, the other uses would be 60 years. It is in this regard that the Environment Agency have raised an objection to the original proposal, on the basis that it had not been demonstrated that the proposal would be safe for its lifetime and it would not impact on flood levels elsewhere.

Given the existing site is in use as a car park, it is noted that any development in this area is likely to displace some flood water. Whilst consideration has been given to raising the whole site to protect it, this will make flooding worse elsewhere, so instead it is proposed to provide compensation on site for displaced flood water. This would be by provision of voids below the building. Whilst concerns have

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

been raised about the maintenance of the voids, it is noted that as a build to rent scheme, it would be under single management, and a maintenance scheme is proposed. Subject to the voids being acceptable it has been demonstrated that this will provide adequate compensation for the displaced floodwater.

In terms of the safety of users of the site, all of the residential properties would be at least 3 metres above the predicted flood level in 100 years' time (i.e. the end of the lifespan of the residential development). There would be potential for the ground floor commercial uses to flood, although these areas will be protected with flood resilient measures. It is noted that the Planning Practice guides suggests that such measures are only effective up to about 600mm. However, the floor levels of much of the commercial uses have been raised such that they are within the acceptable limits. There is a small element fronting Old Bread Street that is below that level, but this is considered as a sacrificial areas, and in each case there are higher levels with the units that would allow dry storage. In terms of safe access and egress, all of the residential units will have access to the norther entrance on New Kingsley Road, which is above the predicted flood level, and will allow access and egress to dry areas to the north. This will also allow emergency service access to the building. As such, safe access will be available to all residents of the development.

It is noted that at the time of writing the Environment Agency are still reviewing the details of the amendments to the scheme, although they have indicated that the revisions are acceptable in principle. Members will be updated on final comments at the meeting.

(I) WILL THE PROPOSED DEVELOPMENT MAKE AN ADEQUATE CONTRIBUTION TO THE SUSTIANABILITY AND CLIMATE CHANGE GOALS OF ADOPTED PLANNING POLICIES?

Policies BCS13, BCS14 and BCS15 of the adopted Core Strategy give guidance on sustainability standards to be achieved in any development, and what measures to be included to ensure that development meets the climate change goals of the development plan. Applicants are expected to demonstrate that a development would meet those standards by means of a sustainability statement. In addition, policy BCAP 20 requires development of this scale to reach BREEAM 'Excellent' standards, and BCAP21 requires that account is taken of the opportunity to connect to nearby heat networks.

It is noted that the Council are developing a heat network in the area of the site, providing the opportunity for this development to connect into it. It appears that day one connection is available, and the applicant has confirmed the intention to connect. As such, the proposal would accord with the heat hierarchy part of policy BCS14 and BCAP21, subject to the connection being secured.

With regards to BREEAM, the submission confirms that the proposal is targeting BREEAM 'Excellent' for the commercial parts of the development, which would accord with this part of the policy. For the residential element of the proposal it is proposed to target a three star rating against the BTR Homes Quality Mark. Negotiations are ongoing to assess whether or not a higher rating can be achieved, and this will be secured by condition.

In regard to reduction in CO2 emissions against the Building Control baseline, the development has taken a fabric first approach. This would result an energy saving of around 15%. However, the policy requires a 20% reduction through renewable technologies, and in this case the statement suggests a saving from PV panels of around 6 to 8%. Whilst consideration has been given to increasing the provision of PV on the development, it does not appear that there is scope to increase the performance significantly. As such, the applicant has offered a financial contribution to offset the short fall against the policy. The contribution offered is £242,011 for option A and £166,363 for option B. This is currently being considered by the Sustainable Cities team, and Members will be updated on this issue at the meeting.

(J) WILL THE PROPOSAL HAVE A HARMFUL IMPACT ON TREES, WILDLIFE AND

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP****ECOLOGY IN THE SURROUNDING AREA?**

Policy BCS9 of the Core Strategy states that 'Individual green assets should be retained wherever possible and integrated into new development'. It also states that 'Development should incorporate new and/or enhanced green infrastructure of an appropriate type, standard and size. Where on-site provision of green infrastructure is not possible, contributions will be sought to make appropriate provision for green infrastructure off site.'

The application site is within a densely developed urban area. As such, there are no existing trees on site, and limited scope for green assets. There are three trees directly adjacent to the site, including two street trees. However, an arboricultural impact assessment has been carried out, which confirms that the proposed development will not impact on the trees. In addition, the proposal includes the planting of 12 trees on site, and as such there would be a significant improvement in tree cover as a result of the application.

In relation to ecological impact of the development, an ecological assessment has been carried out, and officers are satisfied that the site has low potential for protected species, and the development provides significant opportunities for ecological enhancement. This will largely result from the additional soft landscaping on site, which can be secured by condition. As a result, the proposal is considered to provide enhancements of green assets on site, compared to the existing situation.

**(K) DOES THE PROPOSAL ADEQUATELY ADDRESS CONTAMINATED LAND ISSUES?**

Policies BCS23 and DM34 relate to the need for any development to address and mitigate contamination, and to ensure that it does not impact on future occupiers or neighbours of the site. A ground investigation has been submitted with the application, which demonstrates that the site is suitable for the type of development proposed. The contaminated land officer has recommended conditions relating to a watching brief, and the importation of top soil, and subject to such conditions the development is considered acceptable on these grounds.

**(L) BENEFITS OF DEVELOPMENT AND CONCLUSIONS**

The application represents a significant redevelopment of a current retail site, and results in a number of complex considerations. In particular, officers are concerned about the impact of the development on heritage assets, quality and design of the accommodation, and the impact on the site of flooding.

With regards to the impact of the proposal on heritage assets, officers have concluded that the proposal would result in a high level of less than significant harm. This will need to be given considerable weight when considering whether or not the proposal merits approval. In addition, as a high density build to rent proposal, certain compromises have also been made in respect to the layout and nature of the accommodation. The lack of on site parking is also a specific concern for the Old Market Community. However, it is considered that the proposal will provide significant benefits, and it is considered that the following issues merit consideration:

- The proposal would secure the long term maintenance of the grade II listed soap pan building. Furthermore, it would provide significant improvements to the public access to this building.
- It would deliver significant improvements in respect of pedestrian permeability through the area, including the provision of a north/south route between Temple Meads and Cabot Circus. Indeed, this area is considered to be a high quality area of public realm, fronted by active uses such that it is likely to be a vibrant contribution to the area.
- The proposal would deliver much needed housing, including the provision of 20% affordable housing, in a sustainable location, with good accessible to a wide range of modes of transport.
- The applicant has also sought to demonstrate the social value of the development. It is noted that this ward has high levels of deprivation, and the proposed development would bring new homes and jobs to this area. It is estimated that the proposal will provide between £96 million

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

and £199 million additional value to the area. It is noted from the consultation that the developer has worked with local charities and businesses to develop their social programme, to deliver these targets;

- The developer is committed to providing a sustainable development, including connection to the Local Heat Network.

At the time of writing, there is an outstanding objection from the Historic England on heritage grounds. Therefore, should it be resolved to approve the development, it will be necessary to refer the decision to the Secretary of State for potential call-in. However, officers are now of the view that the benefits of the development outweigh the harm identified, and can be supported.

**PLANNING OBLIGATIONS**

In order to offset the impact of the development it is considered that a package of planning obligations is required, as follows:

- The provision of 49 affordable housing units (Option A) or 34 affordable housing units (Option B) on site;
- A financial contribution of £14,405 (Option A) or £19,740 (Option B) towards monitoring of a travel plan;
- A contribution of £5,913 per required Traffic Regulation Order;
- A contribution of £150,000 towards Broad Plan and Unity Street Public Realm works;
- A contribution of £3,000 to fund the provision of 2 fire hydrants on the site;
- A contribution of £242,011 (Option A) and £166,363 (Option B) towards CO2 offsetting programmes (to be confirmed).

The applicant has agreed this package, and the Council's legal officers are current drafting a section 106 to secure these planning obligations.

**CONDITIONS**

There is a requirement for a complex suite of planning conditions to enable the delivery of the application and as Members will be aware that there is a requirement to agree the pre-commencement conditions with the applicant before the application is determined. As such, Officers are in discussions with the applicant with regard to a draft list of conditions, which cover the following issues:

- o Standard time limits and phasing of delivery of the proposal;
- o Highway works;
- o Construction Management Plans;
- o Contamination;
- o Materials;
- o Noise impacts – including controls over ground floor commercial uses;
- o Sustainable Drainage;
- o Retention of historic fabric and archaeology;
- o Public Art;
- o Flood protection and evacuation;
- o Travel Plans.

**COMMUNITY INFRASTRUCTURE LEVY**

The development will be liable for the Community Infrastructure Levy (CIL). However, given late changes to the floorspace the final CIL figures are currently being calculated. Members will be updated with the relevant CIL figures at the meeting.

**Development Control Committee A – 31 March 2021****Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP****EQUALITIES ASSESSMENT**

During the determination of this application due regard has been given to the impact of this scheme in relation to the Equalities Act 2010 in terms of its impact upon key equalities protected characteristics. These characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. There is no indication or evidence (including from consultation with relevant groups) that different groups have or would have different needs, experiences, issues and priorities in relation this particular proposed development. Overall, it is considered that this application would not have any significant adverse impact upon different groups or implications for the Equalities Act 2010.

It is noted that concerns have been raised that impacts on air quality and access during construction would have a discriminatory impact on some local residents. However, the assessment demonstrates that any impacts on air quality would be within acceptable limits. In addition, it will be necessary as part of any Construction Management Plan to demonstrate how access to the area can be maintained. As such, subject to the condition, the proposal is considered not to impact unacceptably on any groups with protected characteristics.

**RECOMMENDED****Application no. 20/01150/F****Recommendation - Refer to the Secretary of State**

That the application together with responses to the publicity and consultations, the committee report and members comments be referred to the Secretary of State for Housing, Communities and Local Government.

If the Secretary of State makes no comment within the 21 day period from receipt of notification, then:

A) The applicant be advised that the Local Planning Authority is disposed to grant planning permission, subject to the completion, within a period of six months from the date of this committee, or any other time as may be reasonably agreed with the Service Director, Planning and Sustainable Development and at the applicant's expense, of a planning agreement made under the terms of Section 106 of the Town and Country Planning Act 1990 (as amended), entered into by the applicant, Bristol City Council and any other interested parties to cover the following matters:

- The provision of 49 affordable housing units (Option A) or 34 affordable housing units (Option B) on site – to be reviewed after 18 months should the residential element not be implemented;
- A financial contribution of £14,405 (Option A) or £19,740 (Option B) towards monitoring of a travel plan;
- A contribution of £5,913 per required Traffic Regulation Order (TDM to confirm number);
- A contribution of £150,000 towards Broad Plan and Unity Street Public Realm works;
- A contribution of £3,000 to fund the provision of 2 fire hydrants on the site;
- A contribution of £242,011 (Option A) and £166,363 (Option B) towards CO2 offsetting programmes;
- Connection to the District Heat Network.

(B) That the Head of Legal Services be authorised to conclude the Planning Agreement to cover matters in recommendation (A).

(C) That on completion of the Section 106 Agreement, planning permission be granted, subject to the condition (final wording of which to be delegated to officers).

**Development Control Committee A – 31 March 2021**

**Application No. 20/01150/F & 20/04633/LA : Soapworks Broad Plain Bristol BS2 0JP**

**Application no. 20/04633/LA**

**Recommendation - Refer to the Secretary of State**

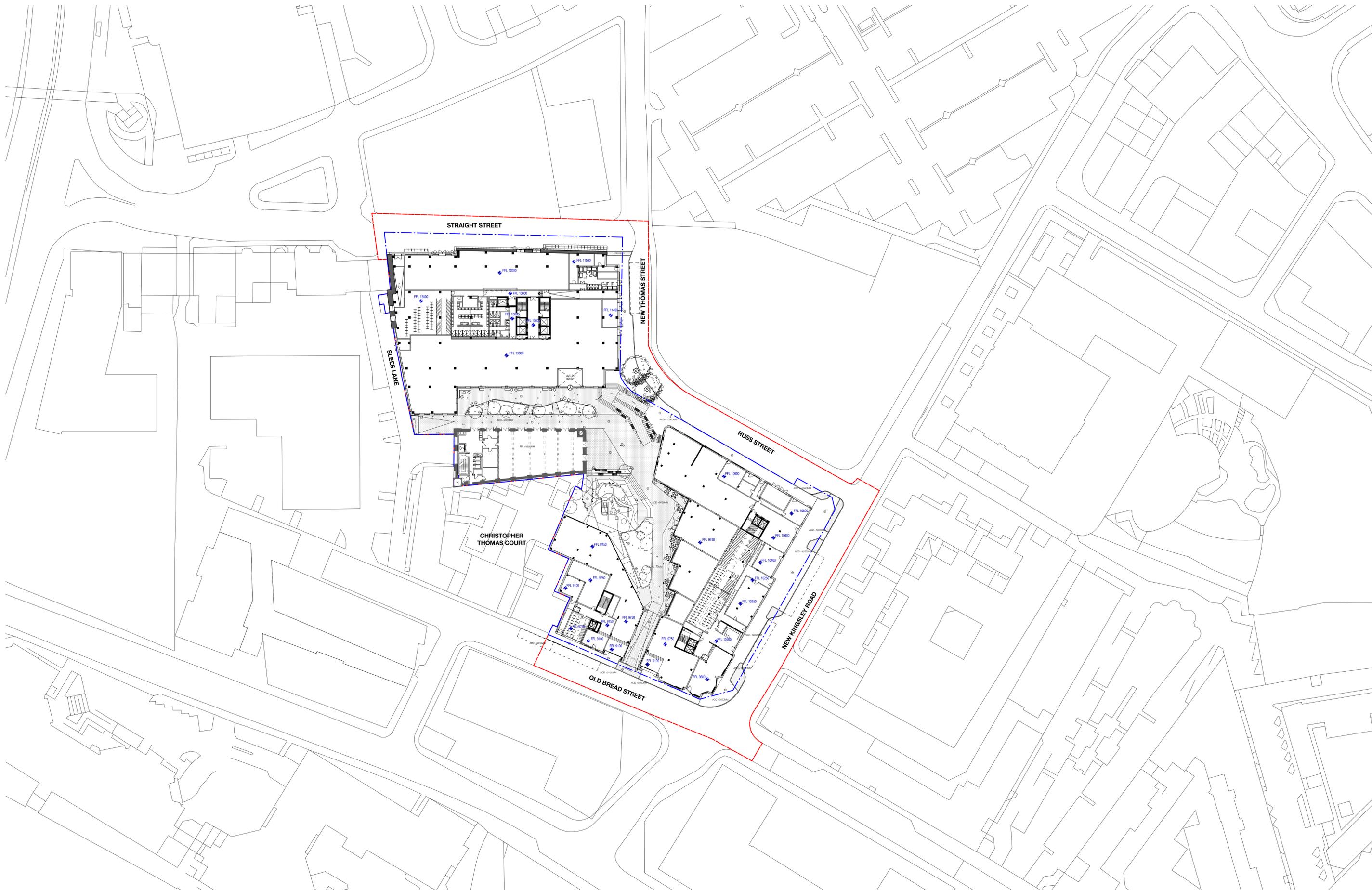
That the application together with responses to the publicity and consultations, the committee report and members comments be referred to the Secretary of State for Housing, Communities and Local Government.

If the Secretary of State makes no comment within the 21 day period from receipt of notification, then the following GRANT permission subject to relevant conditions drafted by officers.

## **Supporting Documents**

### **1. Soapworks Broad Plain**

1. Proposed site plan
2. Proposed site elevations
3. Proposed site elevations
4. Building A – Level 00
5. Building B – Level 02
6. Building B – Level 06
7. Building C – Floor plans
8. Building C - Elevations



#	Status	Description	Date
1	Stage 2+	For planning application	28.02.20
2	Stage 2+	Planning amendments	19.06.20
3	Stage 2+	Planning addendum	19.11.20
4	Stage 2+	Revised levels retail units Old Bread street (EA)	23.02.21

**Notes**  
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 Contractor must verify all dimensions on site before commencing work or preparing shop drawings.  
 Do not scale drawings.

**NOTES AND LEGEND**

- Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawing.
- Drawings are subject to completion of site investigation and approved inspectors review/comments on building regulations compliance assessment.
- Refer to Gillespies material for the Public Realm and terraces.
- For block A refer to drawings A-A2200 to A-A2220 typical levels floor plans and A-A3205 sections.
- For block B refer to drawings A-B2200 to A-B2220 typical levels floor plans and A-B3205 sections.
- For the listed building refer to drawings A-C2201 floor plans and A-C3025 sections.
- For the terraces access, refer to block A and block B plans, as listed on items 4 & 5.

       SITE BOUNDARY             BLOCK B  
       OWNERSHIP BOUNDARY

- ACCESS LEGEND**
- ▲ PEDESTRIAN ACCESS
  - ▲ BIKE ACCESS
  - ▲ FIRE ESCAPE
  - ▲ SERVICE ACCESS
  - ▲ TERRACE ACCESS

Project  
**The Old Soapworks**

Applicant  
**Soapworks Development S.a.r.l. and Soapworks Development II S.a.r.l. and Soapworks Development III S.a.r.l.**

Issuer  
**WOODS BAGOT**

Project number  
**440780**

Checked  
 VK

Approved  
 VK

Size check  
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Sheet size  
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Scale  
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Sheet title  
**Proposed Site Plan**

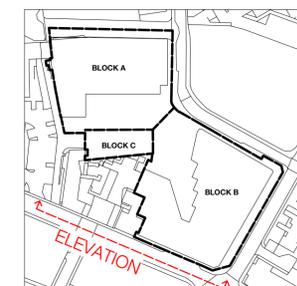
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Status  
**STAGE 2+**

Revision  
**4**



1 Site Elevation Old Bread Street  
SCALE 1 : 250



Recent revision history			Notes
#	Status	Description	Date
1	Stage 2+	For planning application	28.02.20
2	Stage 2+	Planning amendments	19.06.20
3	Stage 2+	Planning addendum	19.11.20

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Project  
The Old Soapworks

Applicant  
Soapworks Development S.a.r.l. and  
Soapworks Development II S.a.r.l. and  
Soapworks Development III S.a.r.l.

Issuer  
**WOODS  
BAGOT**

Project number  
440780  
Checked  
VK

Approved  
JC

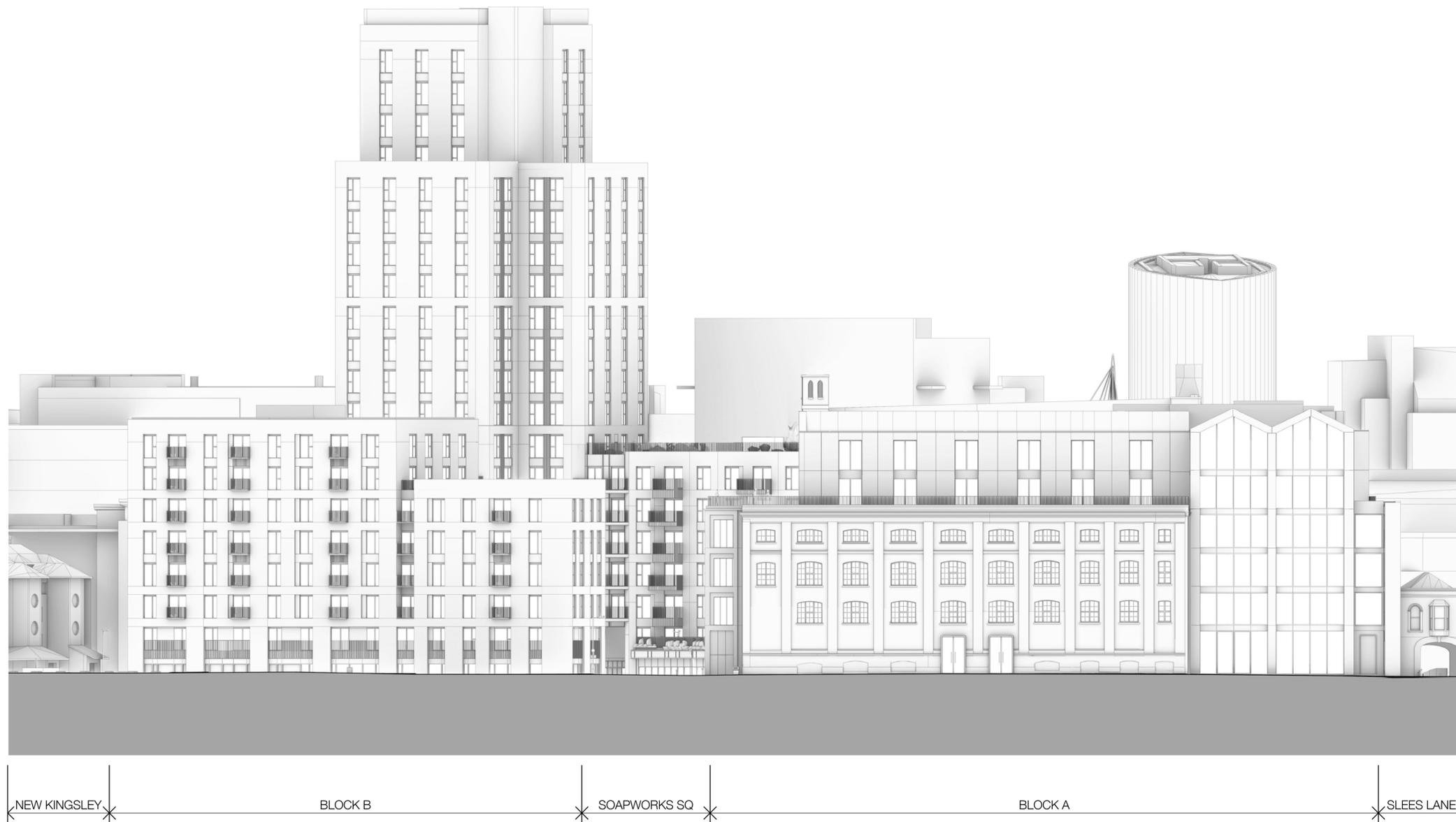
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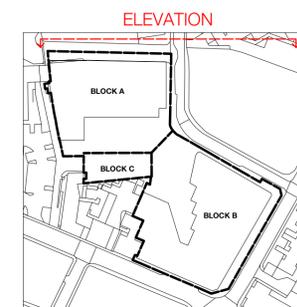
Sheet title  
Proposed Site Elevations SHT2

Sheet number  
A-1321  
Status  
STAGE 2+

Revision  
3



1 Site Elevation Straight Street  
SCALE 1 : 250



Recent revision history			Notes
#	Status	Description	Date
1	Stage 2+	For planning application	28.02.20
2	Stage 2+	Planning amendments	19.06.20
3	Stage 2+	Planning addendum	19.11.20

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Contractor must verify all dimensions on site before commencing work or preparing shop drawings.  
Do not scale drawings.

Project  
The Old Soapworks

Applicant  
Soapworks Development S.a.r.l. and  
Soapworks Development II S.a.r.l. and  
Soapworks Development III S.a.r.l.

Issuer  
**WOODS  
BAGOT**

Project number  
440780  
Checked  
VK

Size check  
25mm  
Approved  
JC  
Sheet size  
A1  
Scale  
As indicated

Sheet title  
Proposed Site Elevation SHT4  
Sheet number  
**A-1323**  
Status  
STAGE 2+  
Revision  
3

**GENERAL NOTES AND LEGENDS**

1. Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawing.
2. Drawings are subject to completion of site investigation and approved inspectors review/comments on building regulations compliance assessment.
3. For the Listed Building (Building C) refer to the following drawings:  
- A-C2201 Building C - FLOOR PLANS  
- A-C3205 Building C - SECTIONS
4. For the structures, refer to ARUP documentation.
5. For the servicing refer to HL documentation.

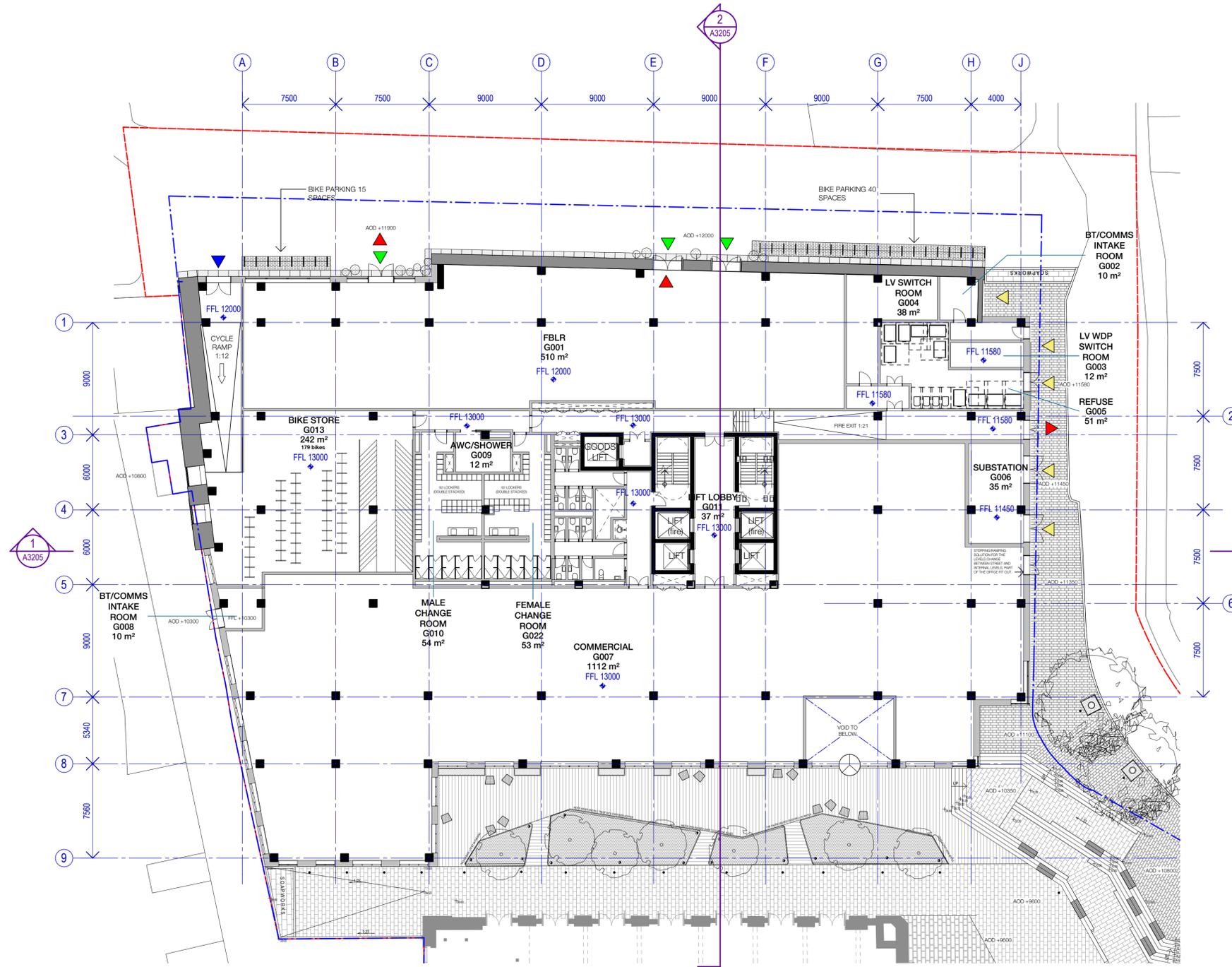
- RED BOUNDARY LINE
- OWNERSHIP LINE

**TYPICAL LEVELS**

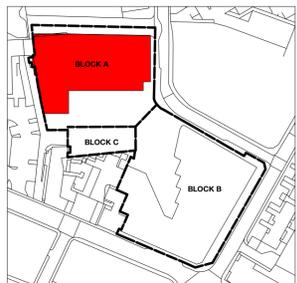
- LG
- GF
- L01 to 03
- L04
- L05
- ROOF

**ACCESS TYPES**

- ▲ PEDESTRIAN ACCESS
- ▲ BIKE ACCESS
- ▲ FIRE ESCAPE
- ▲ SERVICE ACCESS
- ▲ TERRACES ACCESS



1 BUILDING A - LEVEL 00  
SCALE 1 : 200



Recent revision history	Description	Date	Notes
1	Stage 2+ For Planning Application	26.02.20	Copyright © Woods Bagot 2018 All Rights Reserved
2	Stage 2+ Planning Amendments	19.06.20	No material may be reproduced without prior permission
3	Stage 2+ Planning addendum	19.11.20	Contractor must verify all dimensions on site before commencing work or preparing shop drawings.  Do not scale drawings.

Project  
**The Old Soapworks**

Applicant  
**Soapworks Development S.a.r.l. and Soapworks Development II S.a.r.l. and Soapworks Development III S.a.r.l.**

Issuer  
**WOODS BAGOT**

Project number  
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25mm

Sheet size  
A1

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Sheet title  
**Building A - LEVEL 00**

Sheet number  
**A-A2201**

Revision  
**3**

Status  
**STAGE 2+**

**NOTES AND LEGENDS**

- Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawing.
- Drawings are subject to completion of site investigation and approved inspectors review/comments on building regulations compliance assessment.
- Further coordination required with ARUP structures and HL MEP services. For all Plant rooms/MEP areas/risers, refer to HL documentation/schedules.
- For the Listed Building (Building C) refer to the following drawings:  
 - A-C2201 Building C - FLOOR PLANS  
 - A-C3205 Building C - SECTIONS
- Fire strategy, refer to HL documentation.

- RED BOUNDARY LINE
- OWNERSHIP LINE

**TYPICAL LEVELS RESIDENTIAL**

- GF
- L01
- L02
- L03-05
- L06
- L07
- L08-15
- L16-19
- L20 ROOF

**ACCESS TYPES**

- ▲ PEDESTRIAN ACCESS
- ▲ BIKE ACCESS
- ▲ FIRE ESCAPE
- ▲ SERVICE ACCESS
- ▲ TERRACES ACCESS



1 Building B -LEVEL 02  
SCALE 1 : 200



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1	Stage 2+	For Planning Application	28.02.20	Copyright © Woods Bagot 2018 All Rights Reserved
2	Stage 2+	Planning amendments	19.06.20	No material may be reproduced without prior permission
3	Stage 2+	Planning addendum	19.11.20	
4	Stage 2+	Revised units	11.12.20	Contractor must verify all dimensions on site before commencing work or preparing shop drawings.
5	Stage 2+	Revised GF and 3BED updates	08.01.21	Do not scale drawings.

Project  
**The Old Soapworks**

Applicant  
**Soapworks Development S.a.r.l. and Soapworks Development II S.a.r.l. and Soapworks Development III S.a.r.l.**

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**WOODS BAGOT**

Project number  
**440780**

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Size check  
25mm

Sheet size  
A1

Scale  
As indicated

Sheet title  
**Building B - LEVEL 02**

Sheet number  
**A-B2202**

Revision  
**5**

Status  
**STAGE 2+**

**NOTES AND LEGENDS**

1. Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawing.
2. Drawings are subject to completion of site investigation and approved inspectors review/comments on building regulations compliance assessment.
3. Further coordination required with ARUP structures and HL MEP services. For all Plant rooms/MEP areas/risers, refer to HL documentation/schedules.
4. For the Listed Building (Building C) refer to the following drawings:  
 - A-C2201 Building C - FLOOR PLANS  
 - A-C3205 Building C - SECTIONS
6. Fire strategy, refer to HL documentation.

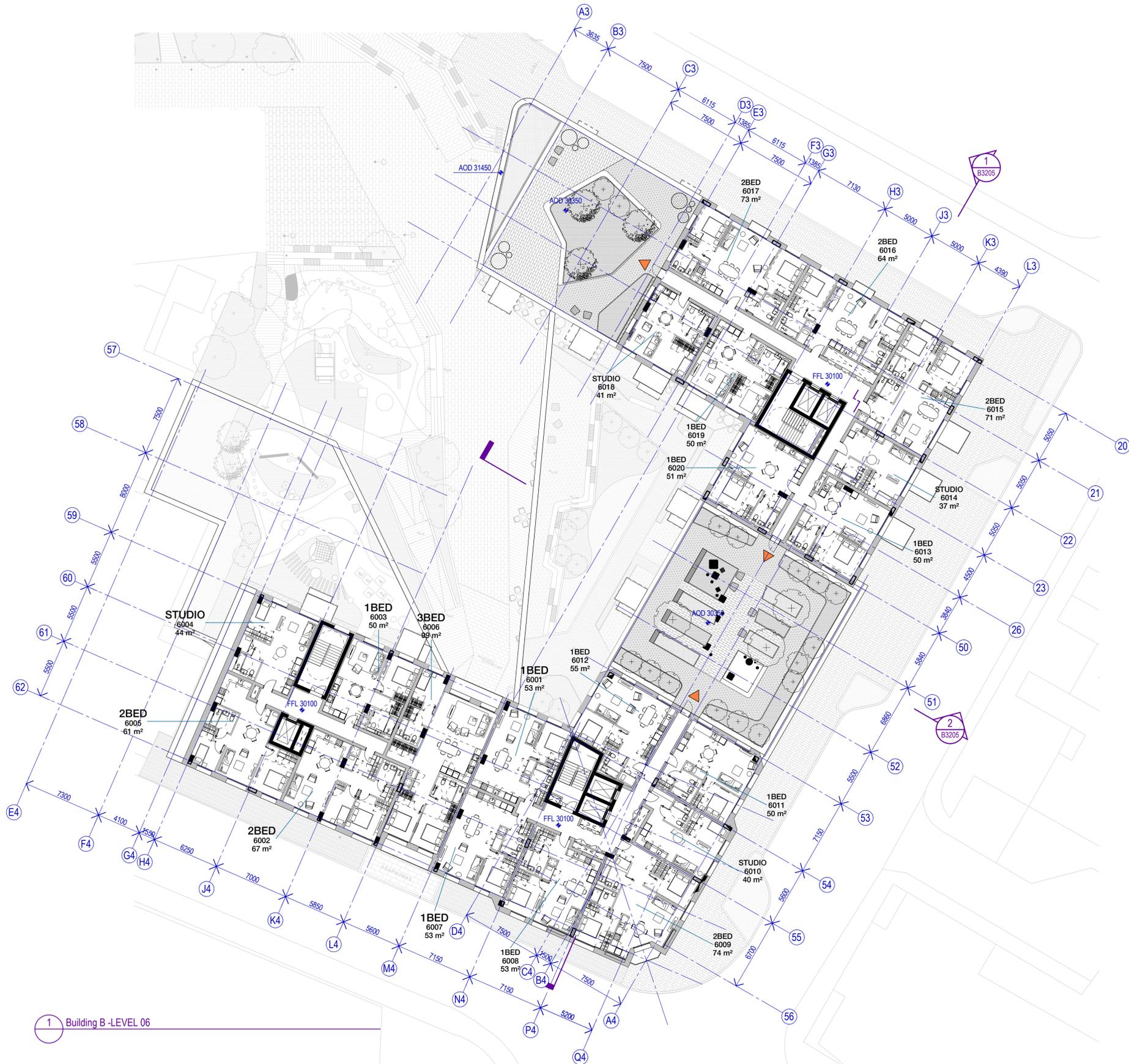
- RED BOUNDARY LINE
- OWNERSHIP LINE

**TYPICAL LEVELS RESIDENTIAL**

- GF
- L01
- L02
- L03-05
- L06
- L07
- L08-15
- L16-19
- L20 ROOF

**ACCESS TYPES**

- ▲ PEDESTRIAN ACCESS
- ▲ BIKE ACCESS
- ▲ FIRE ESCAPE
- ▲ SERVICE ACCESS
- ▲ TERRACES ACCESS



1 Building B -LEVEL 06



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1	Stage 2+	For Planning Application	26.02.20	Copyright © Woods Bagot 2018 All Rights Reserved
2	Stage 2+	Planning amendments	19.06.20	No material may be reproduced without prior permission
3	Stage 2+	Planning addendum	19.11.20	
4	Stage 2+	Revised units	11.12.20	Contractor must verify all dimensions on site before commencing work or preparing shop drawings.
5	Stage 2+	Revised GF and 3BED updates	08.01.21	Do not scale drawings.

Project  
The Old Soapworks

Applicant  
Soapworks Development S.a.r.l. and  
Soapworks Development II S.a.r.l. and  
Soapworks Development III S.a.r.l.

Issuer  
**WOODS BAGOT**

Project number  
440780

Checked  
VK

Approved  
VK

Size check  
25mm

Sheet size  
A1

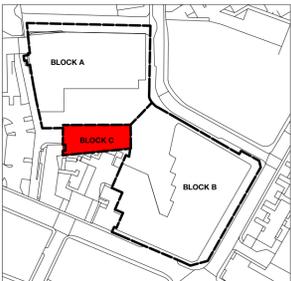
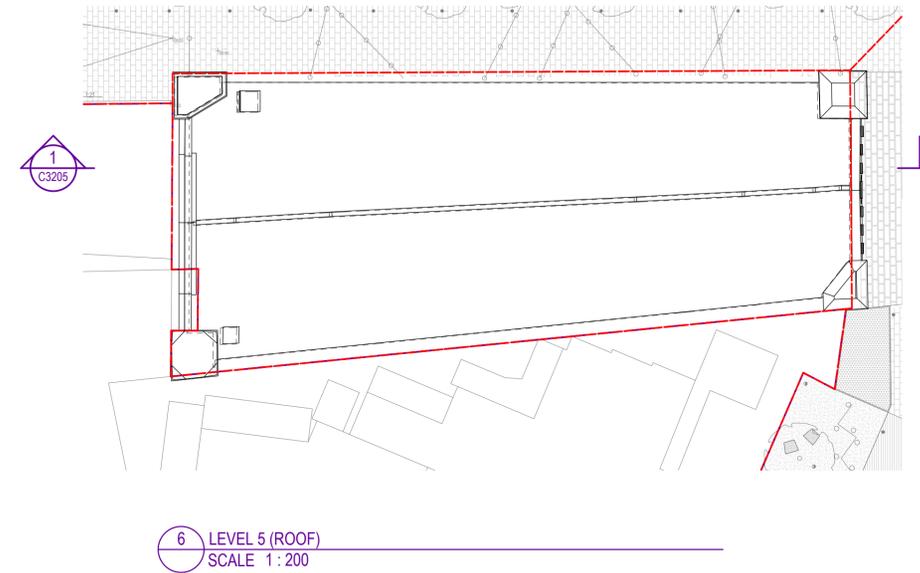
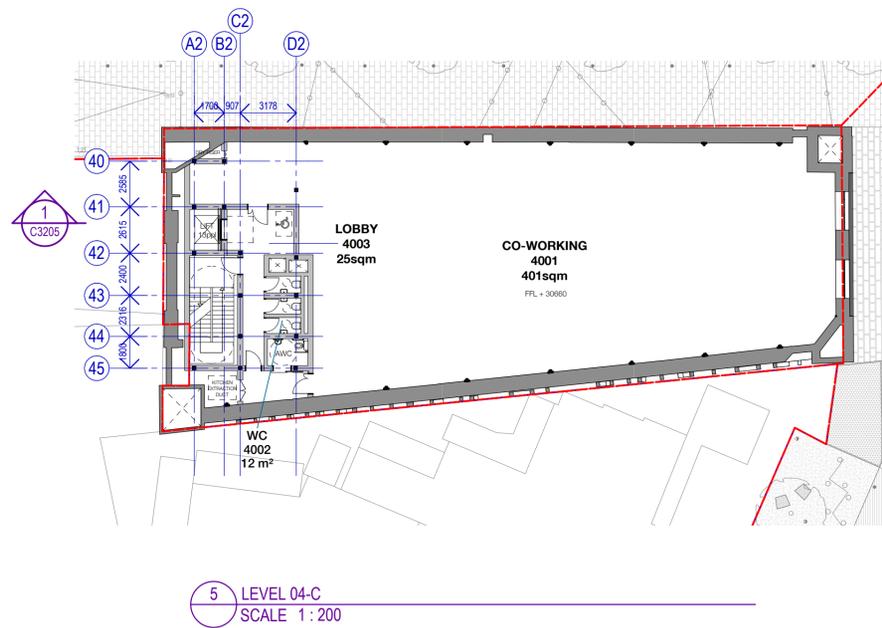
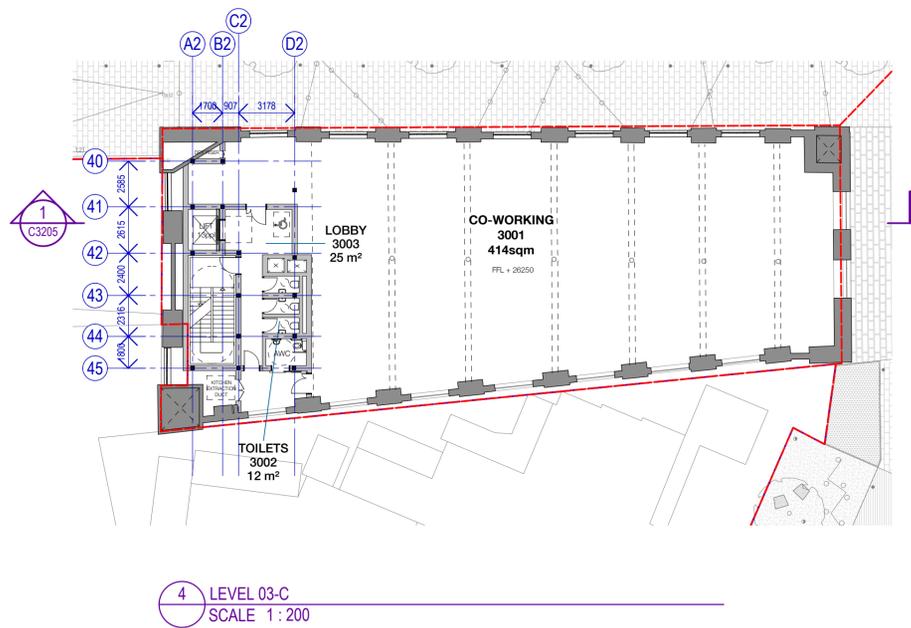
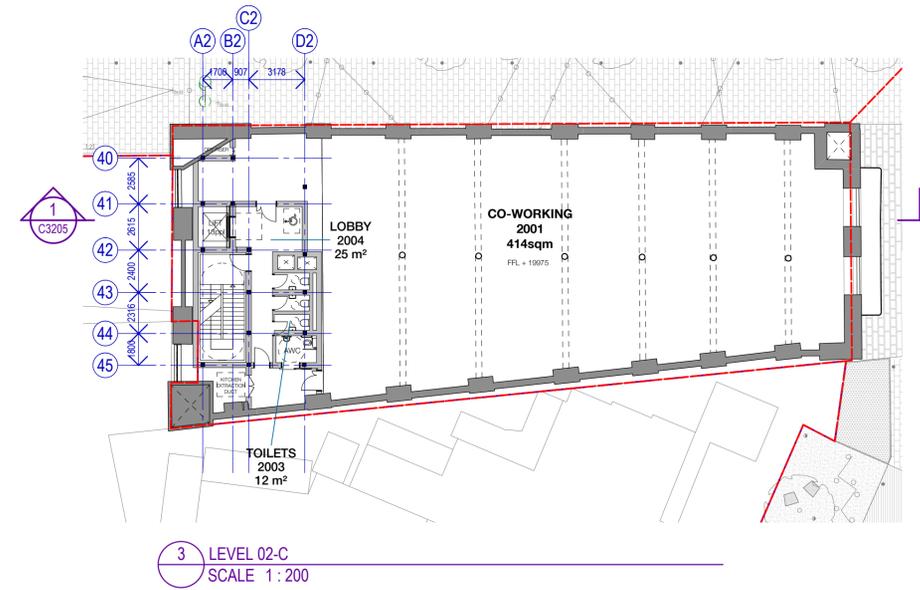
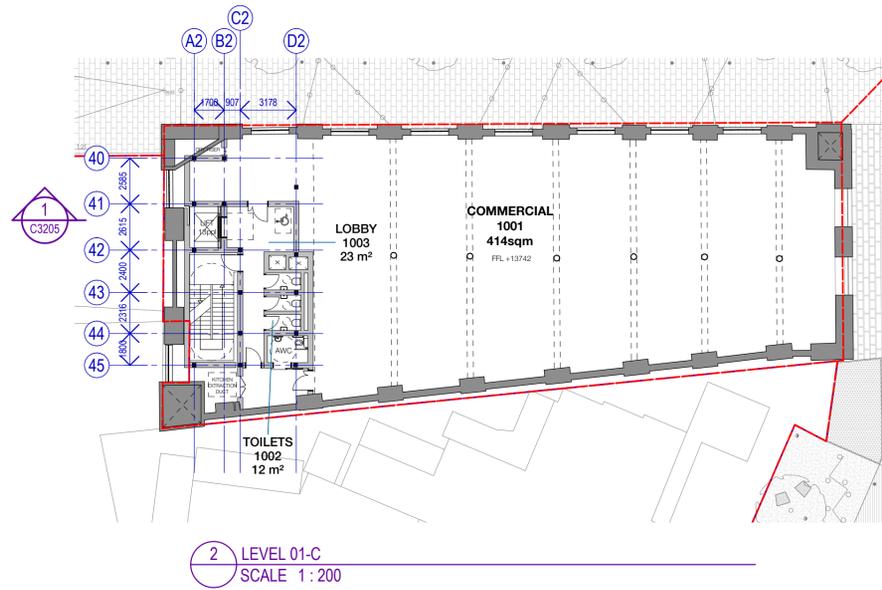
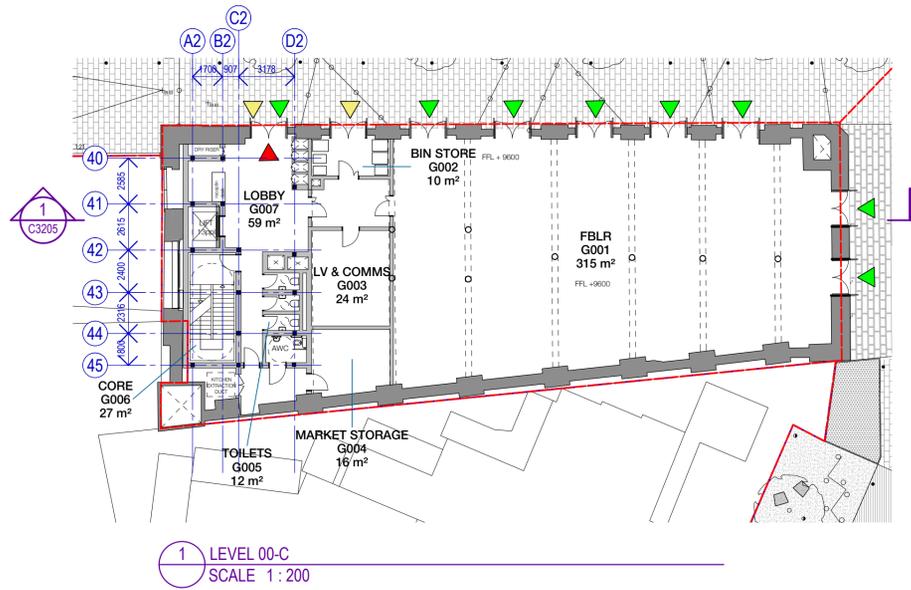
Scale  
As indicated

Sheet title  
Building B - LEVEL 06

Sheet number  
A-B2206

Revision  
5

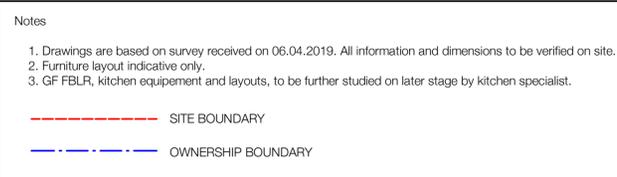
Status  
STAGE 2+



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2	Stage 2+	Planning amendments	19.06.20	Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

Notes

1. Drawings are based on survey received on 06.04.2019. All information and dimensions to be verified on site.
2. Furniture layout indicative only.
3. GF FBLR, kitchen equipment and layouts, to be further studied on later stage by kitchen specialist.



**ACCESS LEGEND**

- ▲ PEDESTRIAN ACCESS
- ▲ BIKE ACCESS
- ▲ FIRE ESCAPE
- ▲ SERVICE ACCESS
- ▲ TERRACE ACCESS

Project  
**The Old Soapworks**

Applicant  
**Soapworks Development S.a.r.l. and Soapworks Development II S.a.r.l. and Soapworks Development III S.a.r.l.**

Issuer  
**WOODS BAGOT**

Project number  
**440780**

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VK

Approved  
JC

Size check  
25mm

Sheet size  
A1

Scale  
As indicated

Sheet title  
**Building C - FLOOR PLANS**

Sheet number  
**A-C2201**

Revision  
**2**

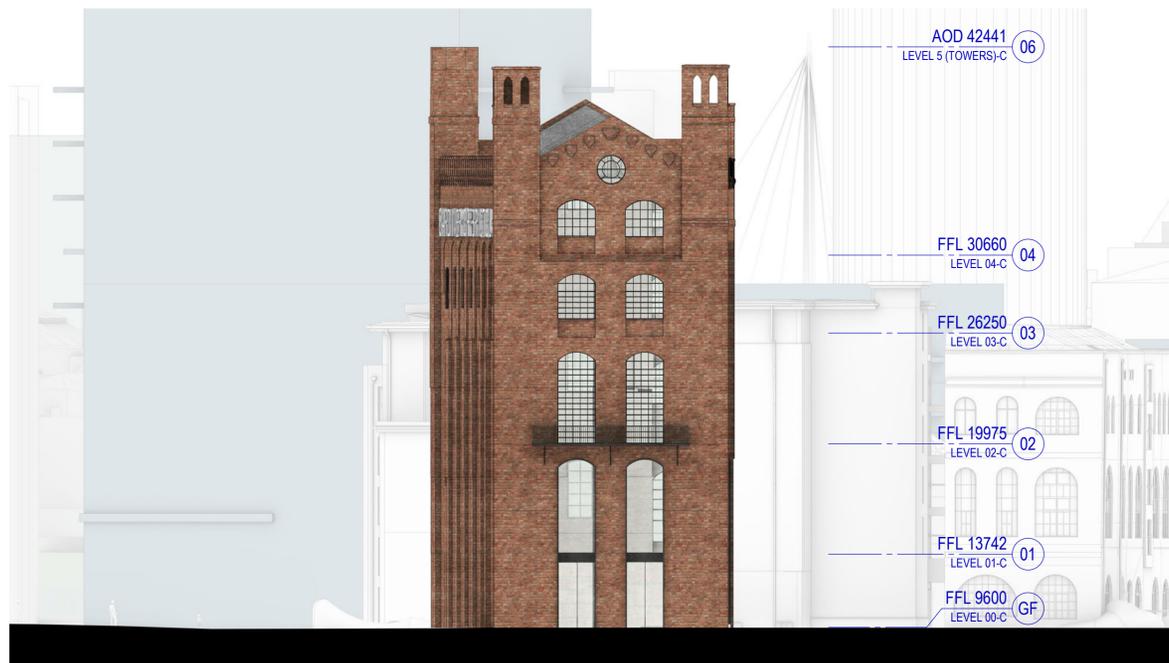
Status  
**STAGE 2+**



1 Building C - North Elevation  
SCALE 1 : 200



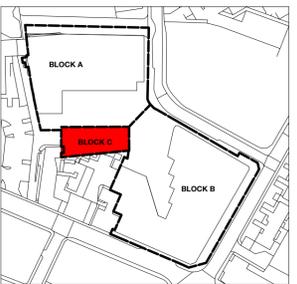
2 Building C - South Elevation  
SCALE 1 : 200



3 Building C - East Elevation  
SCALE 1 : 200



4 Building C - West Elevation  
SCALE 1 : 200



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# 1	Status 2+ For Planning Application	28.02.20	Copyright © Woods Bagot 2018 All Rights Reserved
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Project	Applicant	Project number	Size check	Sheet size	Scale	Issue	Sheet title	Sheet number	Revision
The Old Soapworks	Soapworks Development S.a.r.l. and Soapworks Development II S.a.r.l. and Soapworks Development III S.a.r.l.	440780	25mm	A1	As indicated	<b>WOODS BAGOT.</b>	Building C - Elevations	<b>A-C3202</b>	2
Checked: VK	Approved: JC	Status: STAGE 2+							