

WARD: Central

SITE ADDRESS: Premier Inn The Haymarket Bristol BS1 3LR

APPLICATION NO: 23/02827/F Full Planning

DETERMINATION DEADLINE: 31 March 2024

Demolition and redevelopment to provide co-living units (sui generis) and student accommodation (sui generis), associated amenity spaces, ground floor uses (Class E), access, servicing, landscaping, public realm, and associated works. (Major)

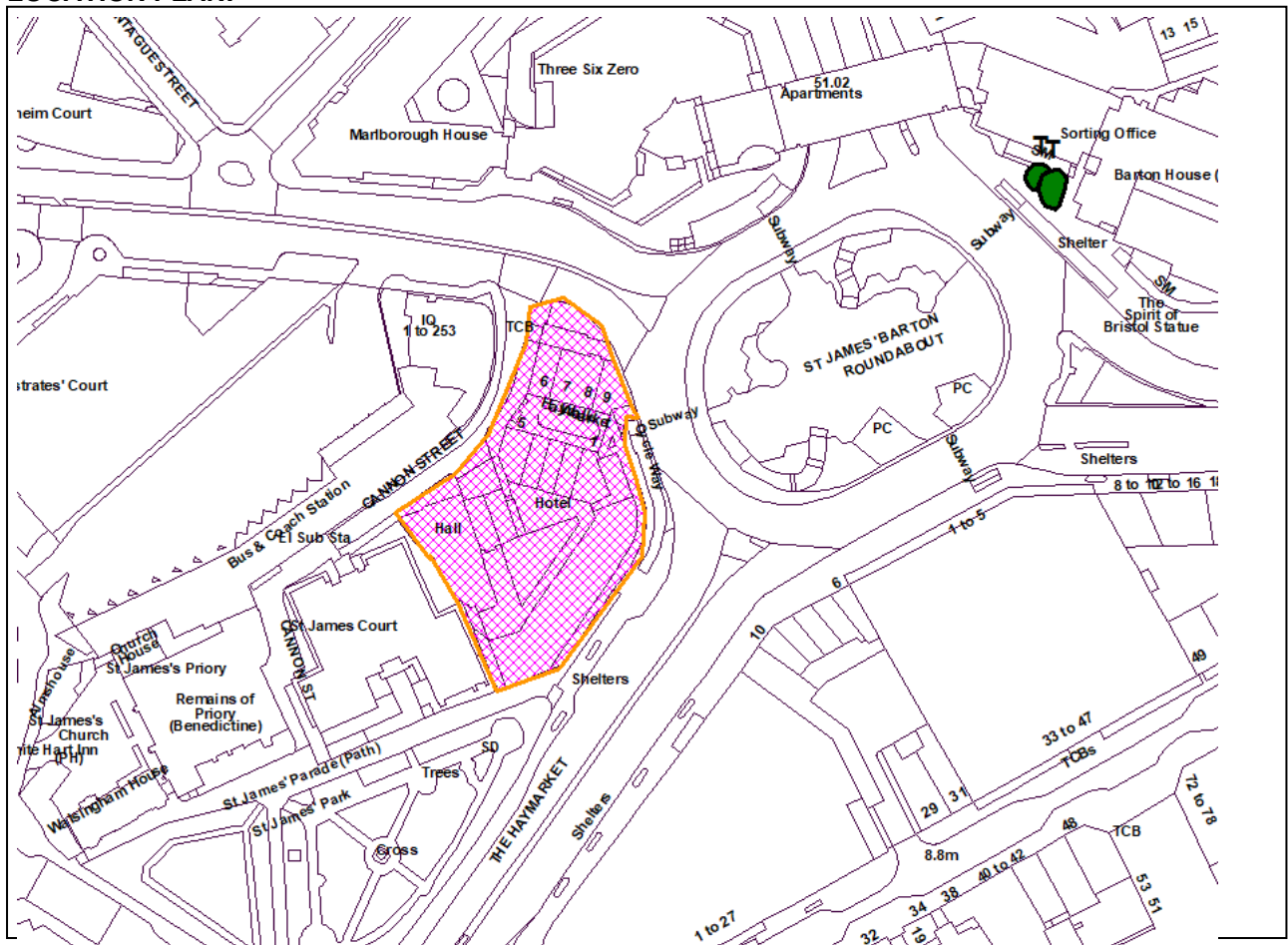
RECOMMENDATION: GRANT subject to Planning Agreement

AGENT: Savills (UK) Limited
Embassy House
Queens Avenue
Bristol
BS8 1SB

APPLICANT: Branna Ltd & Premier Inn Hotels Ltd.

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

LOCATION PLAN:



Development Control Committee A – 6 March 2024
Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR

SUMMARY

- 1.1 The application relates to the redevelopment of the Premier Inn Site, on the Haymarket in Central Bristol. The site is recognised as a significant development opportunity, current containing a dated building and public realm, in a sustainable location, well served by public transport and with good access to public services.
- 1.2 However, the site is also subject to a number of constraints. It is adjacent to a busy road, and is served by relatively hostile public realm. It is also adjacent to a conservation area, which contains a number of highly graded heritage assets.
- 1.3 The application is for the demolition of the existing Premier Inn building and the construction of two buildings, one containing 422 student bedrooms and the other 142 co-living bed spaces. The proposed buildings would be a maximum of 28 stories, a significant increase on the existing 18 storey building.
- 1.4 The application has attracted a significant amount of public interest, including concerns being raised by Historic England, the Bristol Civic Society and various local amenity societies. The concerns largely result from the height of the building, and the resultant impact on heritage assets, the sustainability of the proposal, given the proposal involves the loss of a large scale, apparently viable building, and the impacts of the proposal on the high concentration of students in this location. This has also led to the application being called to committee by the Ward Councillor, citing concerns regarding 'massing, height, density, lack of affordable housing, impact on local amenity and conservation area'.
- 1.5 These concerns have to be weighed against the benefits of making efficient use of a sustainable brownfield sites, including the provision of affordable housing, improvements in design and the public realm that will be secured through the development of the site, improvements to the area around the bus stops, the provision of a more efficient building and the economic benefits of the development. In reaching a decision on the application, therefore, these issues must be given weight and a balanced decision be reached.
- 1.6 In this respect, officers are of the view that the benefits would outweigh the harm, and have recommended the application for approval, subject to a section 106 and conditions.

2. SITE DESCRIPTION

- 2.1 The existing site is occupied by a 18 storey Premier Inn hotel, a Beefeater restaurant, Cannon Street car park, Loot vintage clothing store, and a number of small cafés/restaurants as well as vacant shop units. Loot Vintage and the cafés/restaurants are located within Haymarket Walk, a small outdoor shopping complex with basement. The environment around Haymarket Walk is currently of relatively low quality, which has in part resulted in a high degree of vacancies, and is generally rather unhostile. The Haymarket is also notable in this location for the high number of bus movements, and the bus stops form a critical element in the street scene and local infrastructure, providing access to Cabots Circus and Broadmead.
- 2.2 To the north of the site, across Marlborough Street, are further student accommodation buildings, the 360 office building and residential apartments at 51.02. To the north-east is Bristol bus and coach station.
- 2.3 On the other side of The Haymarket to the south, is Primark, with Debenhams to the east lining the St James Barton roundabout. To the east, on the other side of The Bearpit, is the Holiday Inn and further hotels, including another Premier Inn at Lewins Mead.

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

2.4 To the south-west, is St James' Park, and on the other side of St James Parade is St James' Priory, which is said to be the oldest church in Bristol and is grade I listed. This priory sits adjacent to St James' Court, a modern office building which incorporated the Victorian tower of the former Scottish Presbyterian Church.

2.5 The site itself does not contain any heritage assets, but as noted above the site is surrounded by heritage interests. The western boundary of the site directly adjoins the St. James Parade Conservation Area. This contains the grade I listed Priory referred to above, the Grade II* Church House, plus a number of other Grade II listed assets associated with the Church Precincts. It is also noted that a small area to the east of the site is shown as being at high risk from previous coal mining.

3. RELEVANT HISTORY

3.1 The recent planning history at the site largely relates to minor alterations to the existing buildings, advertisement consents and applications for telecoms equipment. These are not considered to be relevant to the consideration of this application.

3.2 In relation to the current proposals an application for EIA screening was submitted in 2023 (under reference 23/01593/SCR), to assess whether or not the application required an Environmental Statement. It was concluded that an ES was not required and a screening decision issued on 15th May 2023.

4. APPLICATION

4.1 The application is for full planning permission for a mixed development of proposed built student accommodation and clustered co-living accommodation. The PBSA would provide a total of 442 student rooms in a mixture of 201 studios and 241 cluster rooms. The co-living accommodation would provide for 142 bedspaces, as well as shared amenity provision.

4.2 The Scheme will deliver two blocks of accommodation: the PBSA is block 15-28 storeys and the Co-Living block is 18 storeys. These heights include the ground floor level. In addition, it is proposed to partially retain the existing basement to house plant and cycle storage. The ground floor will provide amenity for the proposed residents, as well as a public café, and a small kiosk in the public realm.

4.3 It is proposed to clad the buildings in precast concrete, with bronze coloured aluminium for the window frames and cladding. In addition, the top and base of the buildings are recessed, with a colonnaded ground floor, and high levels of glazing.

4.4 The scheme would be provided with a significant increase in public realm, when compared to the existing site. This includes a soft landscaped area to the south of the building, and a more hard landscaped area, providing a link through to the bus station to the north. Also proposed are two new pedestrian links through from the south and east of the site, to the north, which would replace the existing link through Haymarket Walk.

4.5 It is noted that the application was subject to prolonged pre-application discussion since 2020, which led to significant changes to the scheme being made prior to the application submission. However, further amendments have been made to the scheme since submission. These include the overall reduction in height of around 4 metres, achieved through the reduction in the floor to ceiling height of the development. The revisions have also added further articulation to the western elevation, and suggested a darker cladding material, so the appearance would be less stark.

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

4.6 In addition, there have been significant changes to the public realm and landscape strategy. The main result of this is the provision of additional space around the bus stops facing Haymarket, and changes to the ramped access. Changes have also been made around the servicing access and parking provision in this location.

5. PRE APPLICATION COMMUNITY INVOLVEMENT**5.1 Process**

5.1.1 A statement of community involvement has been submitted with the application. This sets out that there has been ongoing community engagement since April 2023, which has included key stakeholders including the Ward Councillors, the lead Member for housing, Bristol Civic Society, Business West, Visit West, BID City Centre and BID Broadmead. Key neighbours were also consulted, including the Bus Station and God's House Church.

5.1.2 The applicant states that 33 feedback forms were received as a result of this. It is suggested that the responses to the specific queries raised were largely positive, with specific feedback being provided on the following issues:

- Broad consensus that the existing environment around the Premier Inn is negative, with positive responses to the additional access routes and increased surveillance.
- With relation to the proposed height a slight majority expressed an objection to the proposed height (55% to 45%).
- Views on the design of the building were mixed.
- Good familiarity with the co-living model was reported, with many, mostly young people, supporting the proposal. Many expressed concern about the over-saturation of student accommodation in the area, and a desire for additional affordable housing to be provided.
- Few highway concerns were expressed, although issues with parking, cycle parking and the quality of the road crossings were expressed.
- One person expressed a concern about how the development would support the community.
- One person raised a concern about the wind tunnelling effect.
- The Civic Society raised the issue that the existing building should be retained given the potential sustainability benefits of doing so.

5.2 Outcomes

5.2.1 The Statement of Community Involvement outlines the response to the concerns raised through the Community Involvement process. In large part this is in the form of setting out how the additional information submitted at application stage, including the provision of visual impact assessment, wind assessment, sustainability assessments, daylight and sunlight assessments rebut the concerns raised through the process.

5.2.2 In terms of design, the statement sets out how the scheme has responded to advice provided by Design West, who act as an independent design advisory panel.

6. RESPONSE TO PUBLICITY AND CONSULTATION

6.1 The application was advertised by the erection of a site notice, and advert in a local newspaper, and by writing to 507 neighbouring properties. Whilst some issues have been raised about when certain parties were notified about the application, for confirmation the final round of consultation has taken place since the most recent set of amended plans were received. A total of 135 representations have been received from individuals, including 74 objections to the proposal.

6.2 The objections have raised the following issues:

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

- 6.2.1 Land Use Issues (see key issue B)
- The proposal contributes to a high concentration of students in this location, and will therefore be vacant for large parts of the year, and will contribute little to the local community.
 - The proposals makes a limited contribution to the provision of affordable housing.
 - The proposal will lead to the loss of jobs from the existing Premier Inn.
- 6.2.2 Impact on Heritage Assets (see key issue C)
- The proposal would be harmful to the setting of St. James Priory, John Wesley's new room, Kingsdown Conservation Area and Redcliffe Conservation Area, as well as other nearby Conservation Areas.
- 6.2.3 Impact on the Character of the Area (see key issue D)
- The proposal is out of character with the area, is overscaled and ugly, and will be harmful to the appearance of this part of Bristol. It will change the skyline, mask the topography and impact on views in this part of Bristol for the worst.
 - The proposal will be harmful to views from neighbouring areas.
 - The level of information submitted with the application is poor, and it is particularly missing large scaled cross sections to demonstrate the impact on topography.
 - The proposal would set a precedent for other tall buildings in the area.
- 6.2.4 Sustainability (see key issue E)
- Tall buildings do not tend to be very sustainable, particularly if there is a need for sealed windows/air conditioning etc. The proposals also do not take into account the embodied carbon within the existing building. The submitted assessment uses the targets for the incorrect building type.
 - The proposal does not commit to meeting BREEAM 'Excellent' as required by the policy.
- 6.2.5 Impact on Amenity (see key issue F)
- The proposal will overshadow nearby residents and offices and increase overlooking, noise and disturbance.
 - No assessment has been submitted showing the cumulative impact of wind of this and the Debenhams proposals.
 - He proposal will have a harmful impact on air quality.
- 6.2.6 Proposed amenity (see key issue G)
- There is insufficient areas for bins for a development of this size.
 - High rise living is not conducive to health and well-being.
 - The proposal includes over 100 single aspect units, with 31% of rooms not getting adequate daylight.
- 6.2.7 Highways Issues (see key issue F)
- The proposals would impact on parking and traffic congestion in the area.
 - Provision should be made for electric scooters as part of the development.
 - It is not clear that concerns raised by TDM regarding servicing, bus stops, cycle storage, disabled parking, highway improvement and stopping up have been addressed.
- 6.2.8 Other issues
- It is apparent that when the application was first submitted that there were issues with the accessibility of some of documents. This was resolved prior to the main consultation taking place;
 - No consideration appears to have been given to the potential impact on access to the Bristol Royal Infirmary Helipad.
 - The proposal will lead to noise and disturbance during the construction process, and may result in potential damage to neighbouring buildings (Officer comment: This is covered by

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

other legislation, and is not a reason that can be cited for the refusal of an application).

- This application should not be considered until the City Centre Delivery and Development Brief (DPP) is agreed and adopted (Officer comment: The application must be considered against the adopted planning policies. The DPP is at an early stage and has limited weight in the determination of the application.)

6.2.9 The supporting comments all make reference to the housing shortage in Bristol, housing affordability, and the fact that the proposal will make a positive contribution in that regard.

6.3 Ward Members

6.3.1 In their request that the application be considered by committee, Councillor Stafford Townsend has raised concerns about the massing, height, density, lack of affordable housing, impact on local amenity and conservation area.

6.4 Local Amenity Groups

The following comments have been received from Local Amenity Groups:

6.4.1 Bristol Civic Society:

- The Society acknowledges that there is an undersupply and under-delivery of housing sites. In respect to the comments from the applicant that the tilted balance is therefore engaged BCS queries whether PBSA actually contributes to housing supply, and therefore would have the weight implied by the applicant. That said, it should be noted that to underline that the presumption does not give carte blanche to unacceptable development (as is clear from appeal refusals in Bristol). In this case it is considered that the proposal would meet both exceptions set against the tilted balance, in that it would impact on heritage assets, and be contrary to NPPF policies including those for meeting the challenge of climate change, achieving well-designed places, conserving and enhancing the historic environment (including protecting the setting of heritage assets) and supporting healthy living conditions and the wellbeing of communities.
- Bristol has a shared ambition to be carbon neutral by 2030. These proposals are in part justified by the applicant's life cycle analysis which says knocking down the existing buildings and starting again is best for carbon. Treating the data supplied at face value this is a highly questionable conclusion without the background analysis that is referenced but not available for public scrutiny.
- If the case were made for demolition, research evidence suggests that carbon emissions from new development start to climb above 15 storeys. In his recent decision to refuse the redevelopment of the M&S store on Oxford Street the Secretary of State underlined that because of concerns about carbon emissions "there should generally be a strong presumption in favour of repurposing and reusing buildings, as reflected in paragraph 152 of the Framework."
- The 28-storey tower would have substantial, adverse consequences for the character of Bristol. The proposed tower continues the destruction of the unique relationship intrinsic to historic Bristol of topography, built form and skyline. It is no accident that the existing premier in tops out at a height that does not loom over the Kingsdown ridge.
- The impact of a 28-storey tower on the settings of numerous designated heritage assets causes substantial harm, on individual assets in the immediate locality including the Church of St James Priory, a grade 1 listed building and one of the oldest and historically most significant buildings in Bristol; on Church House, a grade 2* listed building which incorporates the last standing remains of part of the cloistral range of St James's Priory; and in aggregate on a number of grade 2 listed buildings and structures integral to the St James' Parade Conservation Area. More widely, the proposals would affect the setting of a substantial number of listed buildings and conservation areas including the Portland and Brunswick

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

Square Conservation Area, the Stokes Croft Conservation Area, the Kingsdown Conservation Area and the City and Queen Square Conservation Area.

- The loss of part of Bristol's character only delivers a paltry return, given that recent safety requirements mean some 30% of the created floorspace in the upper floors is devoted to access, circulation and service ducting, and this means that above floor 17 the proposal only deliver 91 student bedspaces.
- The proposals also cut across several Urban Living SPD tests for tall buildings by masking the topography of the city, harming valued views from key vantage points and having a detrimental impact on the city's historic environment. They also ignore the combined effect with the near-by proposed Debenham's tower notwithstanding the advice in the SPD.
- For noise, the technical assessment concludes that to be acceptable the accommodation would have to have closed, sound-attenuating windows. This means the buildings will rely on mechanical ventilation and, to avoid overheating in the summer, comfort cooling (air con) to the co-living units and mechanical purge ventilation to PBSA habitable spaces.
- According to the applicant's own assessment, the proposed redevelopment will adversely affect the IQ student accommodation on Cannon Street.
- The applicant says there are no directly north-facing single aspect units in the proposals. Whilst this is strictly and narrowly true, over a 100 single aspect PBSA units would in effect face north and 8% of assessed rooms do not achieve the minimum levels of spatial Daylight Autonomy (sDA) recommended within the UK National Annex of the European standard. In relation to sunlight, 31% of rooms do not achieve at least one and a half hours of sunlight on the equinox as recommended as preferable by the BRE.
- In terms of air quality, the supporting assessment concludes living conditions will be acceptable. This conclusion, however, does not appear to have taken account of the City Centre Development and Delivery Plan's proposed diversion of traffic out of the city centre to The Haymarket and Bond Street.
- The transport assessment raises questions, including why use data from 2020 (the AQ assessment uses pre-pandemic data), why model, using comparative data, likely trip rates for a hotel in the middle of Bristol with limited car parking but exclude London data from the analysis and why ignore the likelihood that residents will use taxis and private hire vehicles such as Uber? The envisaged drop-off arrangements for the beginning of term are optimistic at best and are likely to be chaotic with adverse implications for safety on the St James Barton Roundabout.
- Under the heading green spaces, we are told that 63% of the site will be public realm, however the bulk of the public realm would be paved not green, dominated and shaded by the proposals and the public realm will mostly not be public and not feel inviting as a route from the city centre to the bus station.
- We also note the wind tunnelling/micro climate assessment comments that the introduction of the proposals would increase windiness around the site. This assessment does not include in the modelling the proposals for the Debenhams tower on the opposite side of the roundabout.
- As is set out in the supporting document, purpose-built co-living can provide a more affordable pathway to renting a home than a one-bed flat and it can have the positive attributes of flat-sharing with access to shared facilities. It is, therefore, a form of accommodation that is welcomed in principle. There can still be a gap between what is truly affordable and co-living rents, therefore we welcome the commitment to provide affordable housing. We do note that the policy expectation set out in the adopted Core Strategy is 40% not the 20% proposed here (which reflects the fast-track route set out in the latest Affordable Housing Practice Note). We are concerned, however, that these proposals are a missed opportunity to provide more affordable housing.
- In a number of the supporting documents, the applicant looks to put a value on the development's likely contribution to the city. These assessments are speculative at best, not least the assumptions relating to job opportunities for local people and local procurement.

6.4.2 Further comments were submitted as a result of amended plans. These largely replicate the comments made above, although the following additional comment is made:

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

- BCS are surprised to see the updated Whole Life Cycle Carbon Emissions Assessment (WLCCE) now uses the major non-residential standard from the regulation 19 draft Local Plan. In effect, this overemphasises the benefits of the development in respect of embodied carbon.

It then concludes as follows:

- We set out in detail in our August representation why we oppose these proposals. These recent, limited, revisions fail to address in any meaningful way the concerns we set out (and raised by many others in the consultation responses). In terms of reusing the existing buildings, we have a strong sense the applicant is simply going through the motions with a predetermined 'it's all too difficult conclusion'.
- We also remain very concerned that the proposals to redevelop the Premier Inn and Debenhams buildings (23/02827/F and 23/04490/F, respectively) are largely being considered in isolation. These substantial proposals, both involving 28 storey towers, are situated within 100 metres of each other and have significant impacts on the same environmental factors and the same receptors. It is disappointing that in presenting the recent set of (minor) revisions the opportunity has not been taken to update the assessments, including the verified views and impact on heritage assets, so as to address the cumulative effects. Not addressing the combined impacts and omitting them from the assessments supporting the public consultation is unhelpful. It also risks being seen as misleading and circumventing law and practice relating to EIA.

6.4.3 The **Conservation Advisory Panel** have commented as follows:

The proposed development would include a tower of effectively 30 storeys, nearly 50% higher than the existing; it would intrude on the skyline of Bristol and change the perception of the city. Many views would be significantly affected, including those of the Kingsdown escarpment and from it. The deplorable result would be of flattening the topography of the city. There would be significant harm to the settings of listed buildings, including St James's Church and the St James Parade conservation area in general. The height of the tower would lead to overshadowing of adjacent open space. In addition, this structure is presented in isolation, whereas rapidly emerging proposals for the Debenhams site to the south, opposite, are likely to complicate the wind system on the applicants' courtyards and overshadow south facing amenity areas. The design is lacklustre and anonymous, and does not respond to the character and distinctiveness of Bristol which is driven by existing heritage assets. Although increased public realm would be created, there would be noise issues in the piazza from passing traffic. The design does not meet the relevant tests of policies BCS22, DM26 and DM31, or requirements of para 202 of the NPPF. The panel strongly objects.

6.4.4 **Kingsdown Conservation Group** have objected to the proposal including the following comments:

Bristol City Council's Urban Living SPD makes clear that for a tall building to be acceptable it must satisfy a range of criteria itemised in the document. In our opinion this proposal fails to do so:

- Visual Quality Q3.2: Does the scheme make a positive contribution to the long-range, mid-range and immediate views to it?

The effect of this proposal on long range views of and to Kingsdown is of particular concern to the Conservation Group. The Kingsdown Character Appraisal notes that "the topography of the City is unique and views across it make an important contribution to Bristol's townscape and character. The spectacular City-wide views enjoyed from Kingsdown are fundamental to its special interest".

It is our belief that the setting of the "tall houses on the escarpment seen from many points

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

across the City" will be severely compromised by this proposal and set a precedent for other tall buildings in the area (one is already being discussed for the adjacent Debenhams site) that cumulatively will have a damaging effect on "unique views of the City".

- Visual Quality Q3.3; Does the scheme demonstrate design excellence?

In offering advice on how tall buildings should be designed the guidance states that "big, boxy, dominant massing should be avoided, as should large elongated or slab-like floor plates". The form of the taller tower in this proposal has a slab-like floor plate and as such does not meet this criterion. Its bulky form will impact adversely on the amount of sunlight and shading that is experienced in the public realm, including the Bear Pit, and by surrounding properties.

In this case the buildings proposed are generic in design and in form lack the elegance of a well-designed tall building. As such the proposal falls severely short of the design excellence required of a building that would become the most prominent building in the city.

- Environmental Quality Q3.7: Does the scheme create a pleasant, healthy environment for future occupants?

It is our belief that the quality of accommodation being offered in both blocks falls far short of what should reasonably be expected. The size of rooms are generally considerably below that required by the Government's Technical Housing Standards. The small shared balconies off each kitchen are not enough and the overall external private space provision is too small. Orientation of the taller tower means that half the units will be facing the sun with high cooling demands while the other half will receive no sunlight at all.

- Q3.8 Is the scheme sustainably designed?

In 2018 Bristol declared a climate emergency and pledged to be carbon neutral by 2030. This aim is not compatible with encouraging tall buildings. The situation is made even worse in this application by the fact that an existing tall building would have to be demolished to make space for the new ones, increasing the carbon footprint even further.

6.4.5 The **Montpelier Conservation Group** object to the application:

The scale of the proposed buildings ignores both their immediate context and the overall scale of the central area of the city. The Visually Verified Montages clearly demonstrate the inappropriate scale of the proposed buildings. They would be overbearing in their immediate vicinity and intrusive in the skyline from further away.

Although the site is not within a Conservation Area it is immediately adjacent to a large number of Heritage Assets, and its excessive scale would cause significant harm to many of them. In particular, the proposed buildings would dominate views of St James Priory, and would be intrusive in important views identified in the Character Appraisals of both the Stokes Croft and Kingsdown Conservation Areas.

6.4.6 The **Christmas Steps Art Quarter** group have made the following comments:

- Harmful concentration of students (monoculture)

In 2018, BCC's chief planning officer Zoe Willox wrote to our Association to reassure us the BRISTOL LOCAL PLAN was being strengthened so that purpose built student accommodation development near the City Centre would be more strongly controlled and should not contribute to a harmful concentration of students within any given area.

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

The Christmas Steps residential area would certainly be harmfully affected if many hundreds of additional students were to flock through it every morning and evening on their way to and from University.

The proposed development would be in massive breach of this policy, creating 442 double bed spaces (up to 884 students) directly adjacent to the existing IQ Bristol (362 double beds), Marlborough House (300 double beds), Old BRI Site (416 beds) totalling 1,520 double beds (possibly meaning 2,000 to £3,000 students).

- The proposal includes less than 4% affordable accommodation which falls well short of today's needs and policies.
- The proposed tower blocks would 18 and 28 storeys tall respectively. Bristol Civic Society has held two large meetings in which all of the eminent architect and urban planning speakers talked of mounting problems of inefficiencies of heating, cooling, carbon emissions, access, escape etc., the more the height exceeded about ten storeys. In the application, BCC's Sustainable City Team states that the carbon emissions would be "More than double" those from the existing Premier Inn building
- If such buildings heights are to be allowed at all, then they should comply with BCC's policies in being sited around Bristol's periphery rather than in central Bristol. The "Verified Views" montages, show the proposed development to break the city's skyline in a hugely brutal way, harming Bristol's character and roofscape of historic spires.
- To propose a 28-storey tower so close to the air-ambulance's helipad on the roof of the 8-storey Bristol Royal Infirmary would appear to introduce a serious hazard to helicopters.
- Also, to site such a vast accommodation complex immediately adjacent to St. James' Roundabout (the busiest roundabout in Bristol) would be dangerous.

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

- **New Student Accommodation:** Does the University support the product, price and type of accommodation?

Yes.

Purpose Built Student Accommodation helps to ease overall demand, relieves pressure on the city's housing stock. The rooms comply with university minimum design requirements for cluster units arranged in sizes with the largest clusters being no greater than 12 rooms but not less than 6 rooms. Cluster rooms are generously sized exceeding our MDR of 11m². The average studio room size of 19.14m² in the PBSA is slightly below our MDR of 20m². The scheme meets our MDR requirement of 2% of total number of rooms to be fully adaptable.

The University has no allocation agreement in place. The University would like to see a proportion of the cluster rooms available to students at affordable rents. We welcome the intent to offer 20% co-living rooms at an affordable rent.

- **Planning and Placemaking:** Does the University support the planning use and quantum on this site?

Yes.

The proposals meet the University's criteria, which include being within sustainable transport of

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

our campus. In providing 442 beds they meet our minimum requirement of 200 new bedrooms in any one location.

We expect the development will support the renewal and regeneration of the area through high quality connections and provision of green public open spaces. Student living increases levels of activity within areas and bring additional vitality to areas in need of regeneration.

They also respond to emerging draft planning policy H7, the general provision of which are: to ensure that there will be no adverse impacts on surrounding communities and areas; to be subject to an appropriate management regime; to be car-free and deter occupants from the parking of cars elsewhere in the city; to make provision for disabled access and disabled parking for occupants and visitors; to include active frontages and incorporate active ground floor uses wherever possible and appropriate.

- User Experience and Wellbeing: Does the University support the proposed operation and service provision?

Yes.

The provision of amenities including study, social, laundry, waste, cycling and high-quality landscape design is welcome. The University recognizes the frontage design addresses arrival and provides a means of accessing sustainable transport.

In addressing the Co-Living aspect, the University faces a significant challenge in offering nearby accommodation for staff, visiting lecturers, research fellows, and professors. The ability of the city to house these key knowledge workers plays a pivotal role in determining the University's sustained success, impacting both research and educational achievements. The proposed Co-Living housing solution is well-placed to provide convenient and sustainable housing in proximity to the University.

- Architecture and Design: Does the University consider the architecture and design to be of sufficiently high standard?

Yes.

This forthright response to a difficult site demonstrates some of the best attributes of building tall, through the careful composition, proportioning and disposal of form. With extensive evidence of testing a range of high and mid-rise options, the proposed buildings not only enhance the site of a prominent existing tall building recognising its status as an urban marker and its contribution to the skyline, it also radically transforms routes and external spaces at its base. Provision of roof gardens on levels 15&17 and communal social space on levels 17&27 should also be noted as being accessible to all residents and should be safeguarded as part of any granted consent, along with requisite attention to material specification and detailing in the façade.

6.5 Heritage Bodies

6.5.1 Historic England have commented as follows:

- Significance of Designated Heritage Assets

The application site is within the immediate setting of a number of highly graded heritage assets and three separate Conservation Areas. Most notably within the immediate setting is the 12th century Grade I Church of St James Priory, which is Bristol's oldest building. It contains significant medieval fabric, which is of high quality and which contributes to an understanding of Romanesque church architecture in England. Its 14th century tower, although not particularly tall,

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

is the primary architectural element of this historic building group.

While its setting changed significantly during the latter half of the 20th century, the open former churchyard, now St James' Park, provides a green and verdant setting with good southerly views of the Church. This, together with other significant heritage assets, makes up the St James' Parade Conservation Area. The silhouette of the Church is presently unchallenged, and the primacy of the tower is only partially compromised by the existing hotel to the east. The setting of the Grade I listed church is an important component of its significance.

There are other key heritage assets within the city centre, where their individual and combined settings are far reaching. Many of Bristol's Grade I and II* Churches maintain a degree of primacy and contribute to the legibility of the city; they provide wayfinding and define the surviving historic core of the city centre. Their settings contribute highly to their heritage significance and due to the scale of the proposed development, their settings would be impacted by the proposed development.

We recognise that a significant number of Grade II and non-designated heritage assets would also be impacted, contributing to the cumulative impact. While these impacts need to be considered separately and collectively, we advise that your conservation specialist considers the effects on the setting of these heritage assets.

Many nearby heritage assets are designated as Grade I and II*, and as required by the National Planning Policy Framework, the more important the heritage asset, the greater the weight that you should give to their conservation.

- Impact of the Proposed Development

Additional comments were received following the submission of amended plan, which state that HE have identified a number of combined and cumulative impacts in our previous letter, which will result in harm to the settings of highly graded heritage assets. This is on account of the proposed height and design of the proposed development, and is cause for great concern. It is advised that the height of the taller element should be reduced by at least eight storeys.

The submitted amendments have reduced the floor to ceiling heights within the taller element and this has resulted in a reduction in height of just over one storey. The revised TVIA indicates that the change would be very modest, and it is not considered that this reduction is meaningful and does not reduce the impact and harm on individual heritage assets.

In addition to the previously submitted TVIA and subsequent revisions to this, the Heritage Addendum includes additional images that we requested as part of our previous advice and discussions. These include the following:

- Entrance courtyard to The New Rooms (Grade I John Wesley Chapel): together with the side elevation of The Arcade (Grade II*). The prepared image from this viewpoint indicates that the proposed development would rise above the principal façade of this significance historic church and visual compete and distract from its architectural scale, resulting in a degree of harm to its significance.
- South-east of Quaker Friars: The tallest element of the proposed development would visually distract from the primacy and architectural interest of this building group, causing a degree of harm to its significance.
- The final pair of views are taken from Bristol Bridge and St Phillip's Bridge, in order to assess potential impacts of the proposed development on the setting of St Peter's Church (Grade II* listed and a memorial to the Good Friday raid of 1941). However, these images indicate that the impact of the tallest element of the proposed development would be experienced in a more peripheral aspect of views within Castle Park, as demonstrated in viewpoint 19. There is a small degree of harm here, by virtue

Development Control Committee A – 6 March 2024
Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR

of a visual challenge to the primacy of the Church tower within its altered parkland setting.

In terms of the design amendments to the west elevation of the tower, there is now better articulation of the upper the floors, which, on the western side accommodate the service lifts and runs. This improvement provides some mitigation to the harm caused by the previous treatment, but does not overcome the harm caused by the actual proposed building height and its wider impact on the historic environment.

Historic England retains very strong concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 205 and 206 of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, 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 and section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Finally, the following additional advice has been received following the submission of the cumulative impact assessment:

The additional submitted information includes a further assessment of cumulative impacts, namely that contributed by the proposed development to south on the former Debenhams site. We fully acknowledge that there are likely to be substantial cumulative impacts on the historic environment, should both applications be approved and these consents fully implemented. However, since the Debenhams site application is yet to be determined by your authority, we cannot consider this proposal as part of the overall impacts at this time. We therefore advocate that the current application is considered on its individual merits, with due consideration given to our previous advice and concerns.

6.5.2 An objection has been received from the **Council for British Archaeology** (a statutory consultee for developments of this nature) on the following grounds:

The existing building on the site is of low heritage value, and we have no objection to its demolition and replacement. However, we are concerned that the scale of the proposed structure would be overly dominant on the street scene and would have a negative impact on adjacent heritage assets.

The site is in close proximity to St James' Priory, which was founded in the twelfth century. The church is Grade I listed, meaning it is in the top 2.5% of all listed buildings in England. The site borders the St James Parade Conservation Area and is visible from other conservation areas within the city. The site is also immediately adjacent to the tower of the Victorian Scottish Presbyterian Church, which survives although much of the church was destroyed due to bombing. The surviving section of the church is a non-designated heritage asset which is noted within the Conservation Area Appraisal as a historic landmark.

Currently, the southern portion of the site is occupied by a curved single-storey building which allows views towards St James' Church, the Presbyterian church and conservation area to remain visible from a distance, including from the western end of Bond Street. This allows their historic importance and dominance to be appreciated within the street scene.

The CBA are concerned that the new high rise building proposed in this location would largely

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

obscure views of the two church towers from the east and would be overly visually prominent from the conservation area, dominating the skyline within the local area. We consider that this would cause harm to the setting of the Grade I listed church, the character and appearance of the St James Parade Conservation Area, and the setting of the non-designated heritage asset, the former Presbyterian Church.

The CBA do not consider that the proposed increase in height of the buildings on site, and particularly to the southern part of the site, has sufficient justification to outweigh the harm caused to the setting of nearby designated assets.

6.5.3 A further objection has also been received from **Historic Buildings and Places** (formally the Ancient Monuments Society), who are also a statutory consultee, on the following basis:

HB&P OBJECT due to the harmful impact the proposal would have on the nearby conservation areas and heritage assets. HB&P agree the existing building is of low heritage value and therefore the principle of redevelopment is accepted. However, the scale of the replacement buildings proposed are excessively high and overbearing.

The application site itself contains a relatively modern development from the 1970s, but it is situated in a sensitive location in terms of the impacts on the wider historic environment.

HB&P consider the height and bulk of the two proposed replacement towers to be excessive for this location. It towers over and dominates the conservation areas listed above, further harming the established character and setting of the grade I listed Church of St James Priory. The impact is particularly evident in the longer distance views, such as those along the river across Castle Park and the City's medieval core. The negative impact would only be amplified by the addition of this development.

Urban renewal and increasing densities are essential to the growth of the City, but this can be achieved in much more sensitive and appropriate ways than tall tower blocks. In considering this application HB&P urges Bristol City Council to prioritise the protection and value of its special historic streetscapes and skyline.

HB&P acknowledges the opportunities to regenerate and redevelop this site, however, the priority should be to ensure any new development is sensitive the historic environment and adjoining heritage assets.

6.6 OTHER COMMENTS

6.6.1 At the time of writing final **Transport Development Management** comments have not been received. However, the revised proposals have been discussed with TDM officers who are broadly supportive. The following issues have been raised in respect of earlier iterations of the plans:

TDM require the following amendments/ information before a positive recommendation can be made:

- Loading bay is of an insufficient size.
- Cycle parking numbers need amendment as does design.
- Footway around the corner of the site to be shown on plans.
- Land required to increase bus stop waiting area as agreed.
- Highways improvements to Canon Street.
- Adoption and stopping up plan.
- Disabled parking provision
- Amendment to moving in strategy.
- Cannon Street highway works plan.

Development Control Committee A – 6 March 2024
Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR

These issues are explored in full in key issue H.

6.6.2 Nature Conservation Officer has commented as follows:-

The site is located in an urbanised area and is not within or directly adjacent to any designated wildlife sites. The site is not within the West of England Nature Partnership (WENP) Nature Recovery Network.

The Preliminary Ecological Appraisal (PEA) (IES Consulting, July 2023) appropriately describes the ecological features of the site and mitigation required. Ecological enhancement such as bird boxes are proposed which is supported. The inclusion of a suitable placed peregrine scrape should be conditioned as there are records of peregrine in the area and the buildings offer suitable height to be attractive to peregrines.

The Biodiversity Net Gain (BNG) Assessment (IES Consulting, July 2023) calculates a 5684.28% gain in area habitat units. A 30-year Landscape and Ecological Management Plan (LEMP) should be conditioned.

Omissions in the BNG calculation regarding the provision of hedgerows and the delay in habitat creation have been addressed in the revised submission.

Conditions should secure the following:

- Ecological Management and Enhancement Strategy.
- Green Roof Method Statement.
- Protection of Nesting Birds.
- Soft Landscape Plan.
- Landscape and Ecological Management Plan.
- The applicant should be advised that permission does not remove the legal protection of bats.

6.6.3 Housing Delivery- Strategy And Enabling Manager has commented as follows:-

In this case, there is no adopted policy requirement for PBSA to provide affordable housing, and the policy and guidance does not address the applicability of affordable housing to Co-Living. The new publication of the Local Plan (Nov 23) says 'for the purposes of this policy the definition of build to rent development is as set out in the National Planning Policy Framework. Co-living or shared living developments that meet this definition will be considered as build to rent housing. National policy also expects build to rent development to make provision for affordable housing.' The applicant's affordable housing statement advises "proposed that 20% of the Co-Living units are affordable, which would be capped at Local Housing Allowance levels."

The applicant has offered 26 units in the co-living block as affordable housing. The applicant also advises that all affordable units are proposed to be studios. The average size of a studio is 21.3 sqm, with additional internal and external amenity space; the total is 29.7 sqm per resident. BCC's Spaced Standards Practice Note (March 2021) states that Nationally Described Space Standards are not applicable for Co Living accommodation. The proposed location of affordable housing is to be confirmed prior to occupation, and units may be varied from time to time, subject to prior agreement.

In accordance with Policy DM4 (Wheelchair Accessible Housing) of the Site Allocations and Development Management Policies, 2% of new homes within the scheme have been designed to be wheelchair accessible. The Scheme provides 2% M4(3) in the PBSA block and 3% M4(3) in the Co-Living block. In addition, the Scheme provides easily adaptable units for residents who are wheelchair user, with 8% M4(2) in the PBSA block and 7% M4(2) in the Co-Living block.

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR****6.6.4 Flood Risk Manager** has commented as follows:-

The above planning application involves a development proposal that would be served by a drainage strategy with an end sewer outlet. From the LLFA perspective the plans are acceptable, with green and blue roofs providing SuDS source control before this final discharge point which is to be managed at a reduced rate through a hydrobrake and attenuation storage.

It is noted that Wessex Water have been consulted regarding the discharge rate but have not provided any comments on the application.

6.6.5 Sustainable City Team has commented as follows:-

Since the comments were made the applicant has sought to address the issues raised, and a full response is yet to be received. Prior to this the outstanding concerns were raised:

- Whilst the overheating assessment shows that the all rooms would pass the overheating criteria for both 2050 and 2080, this appears to rely on comfort cooling, which would add to carbon emissions.
- The energy strategy shows a reduction in emission of around 54% beyond the building regulation, which is policy compliant.
- A revised BREEAM assessment has been submitted which targets 'excellent' which accords with policy.
- In respect of whole life carbon it is noted that the submitted statement suggests that the existing building is at the end of its life span and will require substantial refit to last for another 30 years. However, the RICS guidance suggests that whole life carbon requires assessment over a 60 year period, and it is not clear how this has been taken into account.
- Notwithstanding this, the assessment shows an improvement in carbon emissions per square metre, although the overall emissions would increase (i.e. as a result of the significant addition of floorspace). In addition, it is queried why the non-residential rather than residential targets are used in the assessment.

6.6.6 Bristol Waste Company has commented as follows:-

The proposal would require 29 waste receptacles for the co-living block and 41 for the student block.

It is noted that the proposed collection points are on Canon Street, which is currently busy and despite parking restrictions, can be difficult to access. The applicant should seek dialogue with Bristol Waste to ensure that the access can be maintained.

6.6.7 Energy Services has commented as follows:-

I write to inform you that we (Vattenfall Heat UK) are planning to construct a new a part of the Bristol Heat Network in this area in our role as Network Operator in support of Bristol City Leap.

We will be able to provide this development and all the neighbouring developments and existing buildings with a bulk supply connection for heating and hot water in advance of their occupation. The heat network in this area will be constructed in line with development timelines, and we can start work on individual connections prior to this to ensure they are ready to receive heat by the time the network spine is commissioned. In case development requires heat before this date, we will be able to advance our plans and expedite the construction of the network and of a localised

Development Control Committee A – 6 March 2024
Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR

heat source to meet development timelines.

6.6.8 Pollution Control has commented as follows:-

I have looked at this application and the noise impact assessment and have no objection to it.

The noise impact assessment makes a number of recommendations with regards to the insulation of the proposed residential part of the development against existing noise and noise from the development itself. The assessment recognises that further consideration will need to be given to the acoustical design of non-residential spaces and the selection of building services plant.

Therefore, it is recommended that any permission is subject to conditions to cover the following issued:

- The provision of a construction management plan.
- Sound insulation for residential properties.
- Noise from the development.
- Details of extraction and ventilation for E class uses.
- Noise from plant and equipment.
- Use of refuse and recycling.
- Time of deliveries.

6.6.9 Building Bristol has commented as follows:-

The development will require an Employment & Skills Plan in line with local authority guidance - details of which can be found here www.buildingbristol.com and the applicant is invited to make contact with the Building Bristol Coordinator to discuss the plan requirements.

Should Planning Permission be granted please ensure the following condition(s) are included within the decision and that the S106 fee is collected.

7. RELEVANT POLICIES

Planning (Listed Buildings & Conservation Areas) Act 1990
 National Planning Policy Framework – September 2023
 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.

8. EQUALITY ASSESSMENT

8.1 The public sector equalities duty is a material planning consideration as the duty is engaged through the public body decision making process.

8.2 S149 of the Equality Act 2010 provides that a public authority must in the exercise of its functions have due regard to:-

(a) eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Act;

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relationships between persons who share a relevant characteristic and those who do not share it.

8.3 During the determination of this application due regard has been given to the impact of the scheme upon people who share the protected characteristics of 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 to 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 Equality Act 2010.

KEY ISSUES

For information, any policies quoted in the report with the prefix BCS are from the Core Strategy, DM are from the Site Allocation and Development Management Plan, and BCAP are from the Bristol Central Area Plan. Draft policies quoted from the Bristol Local Plan Publication Version will be referred to in full.

9. A: WOULD THE PROPOSED DEVELOPMENT CONSTITUTE ENVIRONMENTAL IMPACT ASSESSMENT (EIA) DEVELOPMENT, AND SHOULD THE APPLICATION BE SUPPORTED BY AN ENVIRONMENTAL STATEMENT?

9.1 Bristol City Council issued a formal screening opinion under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in May 2023. This concluded that the development was schedule 2 development, which means that the LPA need to consider the following issued in determining whether or not the development is EIA development:

- The Characteristics of the Development;
- The environmental sensitivity of geographical areas likely to be affected by development;
- The likely significant effects of the development on the environment.

Having considered the proposal against this criteria it was concluded that the proposal was not EIA development.

9.2 It is noted that in respect of criteria a and c the LPA are required to consider “cumulation with other existing development and/or approved development” and “the cumulation of the impact with the impact of other existing and/or approved development”.

9.3 In this case, the application site is close to a number of other major development sites, not least the application for a similar scale development at the Debenhams Site (ref. 23/04990/F), which is likely to be considered at a forthcoming Development Control Committee. Through the cause of the consultation on this application it has been raised that the LPA should reconsider their view on this issue, given the cumulative impact of both developments.

9.4 The screening letter issued by the LPA does indicate that the cumulative impacts of the development was considered, and states as follows:

It is noted that there are some sites in the locality that have the potential to be further developed, but given the relatively local impacts of the proposal on this site it is not considered that the cumulative impact with any other sites if they were to come forward would be such that it would be

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

considered so significant, and significantly different in scale and nature to the existing condition of the site to warrant the requirement for an Environmental Impact Assessment. The proposed development could be adequately assessed within a planning application.

9.5 In respect of the proposals on the Debenhams site, whilst a formal pre-app had not been submitted when the screening opinion was issued, discussions with the LPA, including presentations to Design West, had occurred in March and April of that year. Importantly, those discussions had included the same officers who had issued the screening opinion. On this basis, officers are satisfied that when issuing the screening decision the relevant officer was both aware of the proposals on the Debenhams site, and this was considered prior to concluding that an ES was not required. On this basis it is concluded that screening opinion is still valid, and the proposal is not considered to be EIA development.

10. B: IS THE PRINCIPLE OF THE DEVELOPMENT ACCEPTABLE?

10.1 The application site is currently used as a hotel, and is located on an unallocated site within the Bristol City Centre Area. Development plan policies that support the principle of the development include BCS2, which states that Bristol City Centre's role as a regional focus will be promoted and strengthened; and throughout the city centre, higher density, mixed-use development will be encouraged with active ground floor uses along the busier streets. BCS20 also states that new development should maximise opportunities to re-use previously developed land, and that higher densities will be sought in city centre locations.

10.2 BCAP1 states that new development in the City Centre will be expected to contribute to the mix of uses in the wider area. A mix of new homes, employment and other uses will be sought as appropriate to the site and its context.

10.3 The proposal will result in the loss of hotel bed spaces and retail frontage. With respect to the hotel, policies are generally supportive of the provision of hotels, but there are currently no policies that relate specifically to the retention of hotels. There are policies that relate to the retention of retail, however given the site is not identified as retail frontage it would fall to be considered against policy BS7, which seeks to retain small scale retail where "it remains viable and provides an important service to the local community." In this case the site is directly adjacent to Broadmead, which is the main focus for retail development within Bristol. There is clearly a reasonable level of vacancy in Broadmead presently, and Haymarket Walk itself has a high level of vacancy, and appears to be relatively run-down. As such, there is no evidence to suggest that the retail either provides an important service to the local community which could not be provided within Broadmead, or that it would be viable in the long term. On this basis, there is no policy objection to the loss of the retail frontage. It is noted that the loss of the existing floorspace will result in the loss of employment opportunities, which would need to be balanced against the benefits of the proposal.

10.4 With regards to the proposed development, Section 5 (Delivering a sufficient supply of homes) of the NPPF outlines that "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay". In relation to maintaining sufficient supply and delivery of homes, paragraph 75 of the NPPF outlines: "Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites."

10.5 Bristol has a positive approach to boosting the supply of homes. Policy H1 of the emerging Bristol Local Plan (Publication Version November 2023) proposes an ambitious housing requirement of 1,925 homes per year, substantially higher than that of the current Core Strategy

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

(June 2011). The emerging plan offers a large range of potential development sites, areas of growth and regeneration and a variety of policy interventions that will help to ensure that the housing requirement is delivered and preferably exceeded. In doing so the emerging plan seeks to meet as much of the identified housing need as possible, consistent with paragraph 60 of the National Planning Policy Framework (NPPF).

- 10.6 Until the new local plan is adopted, the council is expected to identify and update annually a supply of specific deliverable sites to meet its local housing need for the next few years. If it cannot do this, the presumption in favour of sustainable development applies. For Bristol, only a four year supply must be demonstrated, as the emerging local plan has reached the Publication (Regulation 19) stage (NPPF paragraph 226).
- 10.7 The Government's standard method sets Bristol's local housing need at a very high level due to the inclusion of an additional 35% uplift for the largest cities and urban centres. Consequently, despite a substantial stock of planning permissions and a positive approach, Bristol is currently unable to demonstrate a four year supply of housing land. As a result paragraph 11(d) of the NPPF is engaged and the tilted balance applies.
- 10.8 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. The first is where the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed. Amongst the areas of particular importance that may be relevant to Bristol, the footnote to paragraph 11d includes habitats sites including those designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty; irreplaceable habitats; designated heritage assets and areas at risk of flooding or coastal change.
- 10.9 Or the second, where 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.
- 10.10 It is noted that the objectors to the scheme have questioned the relevance of paragraph 11 in respect of student accommodation, i.e. can student accommodation be considered as residential for this purpose. The Planning Practice Guidance confirms that all student accommodation can contribute towards an authority's housing land supply, and it has been accepted on other sites that student bedspaces can count towards 2.5:1 (bedspaces to dwellings). On this basis, the provision of student accommodation would contribute to Bristol's housing delivery.
- 10.11 Policy BCAP4 refers specifically to student housing and states that specialist student housing schemes that contribute to the diversity of uses within the local area will be acceptable within Bristol City Centre unless it would create or contribute to a harmful concentration of specialist student housing within any given area. However, the policy goes on to state that in areas where there is little or no existing residential population, such as the Old City, Nelson Street and Newfoundland Way, some clustering of specialist student housing may be appropriate.
- 10.12 The policy also acknowledges the benefit that growth of specialist student housing in the city centre has in relieving pressure on the local housing stock.
- 10.13 Members will be aware that consultation has commenced on the Publication Version of the Bristol Local Plan which will provide up to date planning policies for the City. As set out in the National Planning Policy Framework (NPPF) para 48, weight may be given to these emerging policies according to the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that can be given); the extent to which there are unresolved objections to relevant policies, and the degree of consistency of the relevant policies in the emerging plan to the NPPF.

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

- 10.14 Emerging policy H7 proposes a more direct approach to the location of specialist student housing. This states that outside specified areas for student development, any proposals for purpose-built student accommodation (PBSA) should form part of mixed-use developments comprising a proportion of other compatible residential uses where feasible and appropriate. The development should not result in an imbalance of PBSA within the area and should not conflict with the delivery of other planning objectives for the area in which it is proposed.
- 10.15 The written justification for the policy states that PBSA should be balanced with the needs of the wider community, and that problems can result from an individual large-scale development or clusters of developments. These can include a reduction in local housing choice, a general weakening of the diversity of uses within an area and increased levels of activity surrounding development resulting in detrimental effects on residential amenity and/or the character of an area.
- 10.16 The written justification goes on to state that, as a guide, the Council considers that a local imbalance of PBSA is likely to occur where bed space numbers within 200 metres of a site exceed a threshold of 1,000 bed spaces within the city centre's commercial areas. Assessments on whether an imbalance would occur should also consider the extent to which the development provides for a mix of uses, including residential, that contributes to the diversity of uses and housing choice within the area.
- 10.17 There are already a number of PBSA developments within a 200m radius of the site and the number of bed spaces exceeds 2000. This total is clearly well in excess of the guideline figure of 1000 bed spaces put forward in the written justification for the policy. However, it should be borne in mind that objections to the policy have been submitted in response to the public consultation currently underway on the Publication Version at the time of writing. It is therefore unclear whether Policy H7 will remain as currently written and as a result can only be afforded limited weight.
- 10.18 It should also be noted that an appeal (APP/Z0116/W/18/3212806) for a student development of 345 bedrooms at Wilder Street was allowed on 5th September 2019. Although not recent, this appeal remains pertinent. Within the decision letter, the planning inspector commented that "There are no absolute limits in what would represent a harmful concentration" [of students] and that potential adverse impacts "...can generally be addressed by the efficient management of the complex and enforcement of tenancy agreements".
- 10.19 The proposal is 'mixed-use' containing 442 student bedspaces together with 132 co-living studios, and a small amount of commercial floorspace. Mixed use developments are supported by Policy BCAP4 and H7. It should also be noted that both student accommodation and co-living have to achieve a critical mass to ensure that it provides appropriate facilities and makes the site viable – the comment from the University makes reference to PBSA being provided in blocks of at least 200 units.
- 10.20 Co-living is not a widely known concept in Bristol as there is just one purpose-built co-living development in the City known as the 'Zinc Works', located at Unity Street, Old Market, which opened in October 2022. Co-living accommodation can be described as catering directly for an identified housing need amongst 18-35 year old young professionals / key workers, who may be unable to purchase a property and would otherwise require HMO accommodation. They allow residents to live independently in studio accommodation (the units would be approx. 20sqm) whilst having access to communal facilities such as lounges, cinema rooms, kitchen/dining rooms (available to hire by residents) and laundry / concierge facilities. Through the use of shared facilities, co-living accommodation successfully creates a sense of community amongst residents.
- 10.21 For information, the Zinc Works has 102 studios and has been fully let since January 2023, demonstrating a demand for accommodation of this type in Bristol.

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

10.22 The Bristol Local Plan is silent in respect of co-living accommodation, however the Urban Living SPD states: "Higher density residential developments need to incorporate a variety of accommodation to meet the needs of families, elderly, co-living and those with specific accessibility needs, rather than just focusing on young professionals."

10.23 It is also noted that there are no current policies that relate to the delivery of affordable housing in co-living accommodation. In this case, the proposal shares many of the characteristics of built to rent accommodation, and Government Policy in relation to build to rent is that it should deliver 20% affordable housing. In this case, the applicant has offered 20% of the units at a rent level linked to the local housing allowance. The Council's housing enabling team have confirmed that they are supportive of this approach, and it would need to be secured through a s106 agreement.

10.24 It is undoubtedly the case that the proposed development would add to the concentration of student accommodation in the area, but despite the fact that it would exceed the guideline figure set out in draft Policy H7, this is not considered a robust reason to reject the principle of this development given the policy is at draft stage and subject to unresolved objections. With regards to the current policy position it is the impacts of the student accommodation which are key to considering the issue of whether an unacceptable concentration has been reached, and these are considered in more detail in the following key issues. It is also the case that the proposal would add to the diversity of housing in the area with the introduction of co-living, and the benefits of the additional accommodation attracts significant weight in the planning balance, given the performance of Bristol City Council against the Housing Delivery Tests. Therefore, whilst there is no objection in principle to the loss of the existing uses from the site, the proposal development offers a mix of benefits and harms, and ultimately these benefits and harms have to be weighed against each other in coming to a decision on the application.

11 C: WOULD THE PROPOSAL HARM THE SETTING OF THE NEARBY LISTED BUILDINGS AND CONSERVATION AREA?

11.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Authority is also required (under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990) to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. The case of R (Forge Field Society) v Sevenoaks DC [2014] EWHC 1895 (Admin) ("Forge Field") has made it clear where there is harm to a listed building or a conservation area the decision maker "must give that harm considerable importance and weight." This is applicable here because there is harm to the listed building and conservation areas caused by the proposals as set out below.

11.2 Section 16 of the national guidance within the National Planning Policy Framework (NPPF) 2023 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 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight shall be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

11.3 Further, paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. It states that substantial harm or loss of grade II listed buildings or grade II registered parks or gardens should be exceptional, and assets of the highest

Development Control Committee A – 6 March 2024
Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR

significance should be wholly exceptional.

- 11.4 Paragraph 207 states that where a proposed development would lead to substantial harm to (or total loss of significance of) a designated heritage asset, LPAs should refuse consent unless it is demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss, or where certain criteria apply). Finally, paragraph 208 states where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 11.5 In addition, the adopted Bristol Core Strategy Policy BCS22 and the adopted Site Allocations and Development Management Policies Policy DM31 seek to ensure that development proposals safeguard or enhance heritage assets in the city.
- 11.6 Officers have undertaken the assessment required under the Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF, and have given special regard to the desirability of preserving the assets, their setting and features of special architectural or historic interest which they possess. They have given this harm considerable importance and weight.
- 11.7 It is noted that the applicant has submitted a heritage assessment with the application. It is acknowledged that the application site does not contain any above ground heritage assets. Indeed, the existing Premier Inn building is identified as having a negative impact on the conservation area in the St. James Parade Conservation Area Character Appraisal, and therefore there are no objections to the demolition of the existing buildings on heritage grounds. The heritage assessment states that the impact on over 150 heritage assets have been considered, and identifies the impact on a number of these assets. However, it is noted that a number of assets have been identified through the assessment of the application and as a result of consultation. Given the location and the scale of the proposals it will be seen within the context of a number of heritage assets and any resulting impacts need to be considered here.
- Significance of Heritage Assets
- 11.8 St. James Priory (Which includes the Grade I listed Church of St James and various listed walls):
- Most notably the site is within the immediate setting is the 12th century Grade I Church of St James Priory, which is Bristol's oldest building. It contains significant medieval fabric, which is of high quality and which contributes to an understanding of Romanesque church architecture in England. Its 14th century tower, although not particularly tall, is the primary architectural element of this historic building group. This is amongst the highest graded listed structures, and is of national significance.
- 11.9 Church House (Grade II* listed building):
- Church House (two storeys) is dated from 1666 from a plaque on the front, and was altered in the 19th century. It is of rendered pennant rubblestone; limestone dressings; and timber-framing and is also highly graded.
- 11.10 White House Inn and attached wall (Grade II listed building):
- This rendered timber-frame building is dated 1672, though it was re-fronted in the 19th century. It is possible that parts of it are older and linked to the walls and gateway of St James's Church.
- 11.11 Scottish Presbyterian Chapel (Non designated heritage asset)

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

Identified in the Conservation Area Appraisal as a historic landmark, and now partially incorporated into St. James Court, a 1990s office development.

11.12 The following listed buildings and buildings of historic interest are also identified as being impacted by the proposals, although at a greater distance from the site:

- Nos 31-34 Portland Square (Grade I listed building),
- Nos 1-6 Portland Square (Grade I listed building),
- The new room at the John Wesley Chapel (Grade I listed),
- Quakers Friars (a complex of Grade I, II and II* buildings)
- Nos 7-12 Brunswick Square (Grade II listed building),
- Chapel Wing to the Old Bristol Royal Infirmary (Grade II listed)
- Bristol Eye Hospital (Grade II listed)
- The Baptist Chapel, Union Street (non-designated heritage asset: locally listed)

11.12 In addition, the proposal will have a visual impact on the following Conservation Areas:

- St James' Parade Conservation Area
 - Portland and Brunswick Square Conservation Area
 - Stokes Croft Conservation Area
 - Kingsdown Conservation Area
- Impact on heritage assets:

11.13 As referred to above, the application site does not contain any heritage assets, and therefore there are no direct impacts on heritage assets. It is noted that the concerns have been raised from neighbouring properties about the impact on the stability of neighbouring assets during construction, but it is considered that this can be addressed through conditions. Therefore, the issue to be considered is the potential impact on the setting of the assets.

11.14 In this case it relevant to the consideration that the site already contains a building of significant scale. It is widely acknowledged that in itself this building is harmful to the setting of a number of assets. It is also considered to be of limited architectural merit, and provides limited mitigation for the level of harm.

11.15 In respect of the St. James Parade collection of buildings, the existing buildings appear in the background to a number of the existing buildings from the west. However, it is considered that in views from the west the tower of the Church of St. James does retain a degree of primacy, i.e. the existing building is partially screened in these views. It is considered that the level of primacy will be lost as a result of the proposed development, which will appear significant taller and more dominant. This will impact on the historic significance of this building, as clearly the building was historically designed to have a degree of primacy in the local context. It is noted that design changes to the tower have introduced more texture to the elevation, and reduced the stark nature of the contrast between the buildings. Whilst these changes are welcomed, they do not remove the harm. In discussions with Historic England they have identified that it would be necessary to remove 8 storeys from the proposed tower to fully mitigate the level of harm introduced. Given this building is grade I listed, the harm must be seen in the context of the high value of the asset.

11.16 With regards to the views to the east, the existing building screens a number of views of the St. James Parade group of building, which significantly reduces the value of these buildings. From this direction, the increase in height has little impact on the views of the assets. However, the opening up of the public realm at ground floor level by removal of the podium, in effecting pushing the bulk of the building to the north, result in improved local views of the Scottish Presbyterian Church, and to a lesser extent the Church of St. James. The applicant also argues that this will better reveal the assets and improve the setting for these buildings and the conservation area, as well as increase footfall around the buildings. Officers concur that this is a heritage gain, albeit this

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

largely relates to views of a lower graded asset, and therefore the gains are considered relatively moderate.

11.17 In views from the south particular concerns have been raised about impacts in relation to Quakers Friars and the John Wesley Chapel. The proposal is not in the direct context of these buildings, and they are already surrounded by buildings of some scale. Whilst views would be available of the proposals, these are likely to be limited, and hence would have a minor impact on the significance of the buildings. In longer views, it is noted that the existing building is already viewable in a number of view points, and already appears dominant in the context of nearby heritage assets. Again, the increase in height would mean that it appears more dominant, and therefore it is considered the impact on the significance of those assets would be minor.

11.18 To the north of the site the area is characterised by the topography, raising up to the north, and is covered by a number of conservation areas. In particular, the proposals will appear as prominent in views from the Stokes Croft and Kingsdown Conservation Areas, and indeed will be visible across much of north Bristol. In general, the impact in more local views are considered to be relatively minor. The critical issue is that the proposal would replace one tall building with a larger tall building, albeit one of better design. However, a specific issue is raised about views of the proposal from Kingsdown, where the openness of the views to the south is a specific positive aspect of the Conservation Area. It is noted that from these views the slender design of the tower will not be beneficial, and indeed it is likely that the proposals would break the skyline, and would appear dominant in these views. Whilst the applicant claims no impact on the setting of Kingsdown Conservation Area, officers are not satisfied that this has been satisfactorily demonstrated.

11.19 As such, it is concluded that why there are some minor heritage benefits that arise from the application, it is considered that the proposal will result in a degree of harm to a number of heritage assets, particularly the grade I listed Church of St. James, the St. James Parade Conservation Area and Kingsdown Conservation Area. It is noted that some representations have suggested that this would constitute substantial harm, the test in relation to substantial harm is whether or not it would severely damage the assets significance. It is noted that Historic England do not claim substantial harm, and in this case officers are satisfied that given the context the proposal would therefore result in less than substantial harm.

- Justification for the harm

11.20 As discussed above, where less than substantial harm has been identified, the tests in the NPPF are engaged, specifically whether or not there is clear and convincing justification for the harm and whether the public benefits outweigh the harm.

11.21 The benefits of the proposal are discussed in more detail throughout the rest of the report. In broad terms these can be summarised as the provision of additional residential development on a brownfield, highly sustainable site, economic benefits, benefits in respect of design and public realm and economic benefits. The key consideration here is whether these benefits could be provided with a lesser degree of harm and would they outweigh the harm. It is noted that Case Law suggests that there are three clear categories of harm, substantial, less than substantial and no harm. As set out by Historic England, in order to move to a position of no harm would require the removal of around 8 stories from the development. Whilst no viability evidence has been submitted with the application, it is clear that such a substantial reduction in scale would impact on the benefits that the development can provide, particularly in relation to the mixed use nature of the development. In reaching a decision on the application the LPA do need to carefully balance these benefits against the harm, but officers are satisfied that there is justification for a degree of harm.

- Cumulative impact

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

11.22 It is noted that a number of objections are critical of the fact that the cumulative impact of the development of this site and of the Debenhams site have not been fully considered. In response to this the applicant has submitted a cumulative impact report.

11.23 In general, planning applications have to be assessed on the basis of their own individual merits. However, it is noted that in the national planning guidance it states that 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change.' However, in the response from Historic England it is noted that they state that they cannot consider the Debenhams application as that scheme has yet to be approved. In broad terms, the cumulative impact report does suggest that the two proposals together will result in some additional impacts, although the Debenhams scheme will provide some additional mitigation, especially in views from the south, which will be masked in part by the proposals. Overall, as this scheme is coming forward first it is considered that limited weight can be given to the cumulative impact, although this may change if one or other scheme is approved.

12. D: IS THE DESIGN AND CHARACTER OF THE PROPOSED DEVELOPMENT ACCEPTABLE?

12.1 Policy BCS2 (Bristol City Centre) expresses that the design of development will be expected to be of the highest standard in terms of appearance, function, conservation of heritage assets, sustainability and maintaining and enhancing green infrastructure. Key views will be protected.

12.2 Policy BCS21 promotes high quality design, requiring development among other requirements 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 and create buildings and spaces that are adaptable to change.

12.3 DM policies reinforce these requirements. DM26 requires development to contribute towards local character and distinctiveness. DM27 concerns the arrangement and form of buildings, structures and spaces. It states that the height, scale and massing of development should be appropriate to the immediate context, site constraints, character of adjoining streets and spaces, the setting, public function and /or importance of the proposed development. DM28, concerning public realm, states that development should create or contribute to a safe, attractive, high quality, inclusive and legible public realm that contributes positively to local character and identity and encourages appropriate levels of activity and social interaction. Finally, policy DM29 concerning the design of new buildings, states that new buildings should be designed to a high standard, responding appropriately to their importance and reflecting their function and role in relation to the public realm. It adds that buildings will be expected to be clearly organised in terms of their form, internal layout and circulation to reflect the hierarchy of function they will accommodate, the uses they will serve and the context they will address.

12.4 The DAS demonstrates a rigorous analysis of the form, materials and proportions of adjacent buildings to the site. This has informed the appearance and massing of the building, whereby the building volumes are distinct and separated, and dynamic in local views and wider vistas. It also sets out how comments from the LPA and from Design West have been taken into account during the consideration of the application.

12.5 The most significant issue in this case will be the substantial increase in height, and the impact of the form and massing of the proposed buildings has been assessed in the Townscape and Visual Impact Assessment (TVIA). This acknowledges that there will be a range of impacts as a result of the development. The site is already occupied by a tall building, and is clearly at a nodal point in the city centre. As such, there is considered to be justification for a tall building on the site. The assessment argues that the proposal would result in improvements in respect of design quality, describes as slight and moderate. This is particularly evident in views from the east and

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

west, where the slender form of the taller element is particularly beneficial. This is balanced against the additional harm outlined above, in respect to heritage assets.

12.6 The Design and Access Statement sets out how the design of the proposal has evolved, and what other options have been considered for the site, this includes lower development, but with a much larger footprint. The advantages of the proposed layout are listed as follows:

- Separation of blocks allows reduced mass
- Creates large area of south facing public realm
- Creates public realm and greater servicing access to Cannon Street
- Allows direct pedestrian routes through the site at ground floor, connecting the bus station at Cannon Street and Haymarket
- Opens up views to the church
- Reduced overall mass to the bearpit through presentation of staggered slender gables

12.7 It is certainly evident that the benefits of improved connectivity through the site, between Broadmead, the bear pit and the bus station, was identified at an early stage by the LPA. The current layout is considered to be successful in taking this into account. The splitting of the site into two building will help with the legibility of these routes. The separation of the building is relatively narrow, and it is the case that a greater degree of separation would achieve this more successfully, but this routes through will be evident from closer to the building, and particularly coming from the north at the bus station.

12.8 With respect to the design of the proposal, the massing has been stepped to create a cluster of buildings and better relate them to the existing fabric of the area. The buildings have been designed with a clear top, middle and base. The base has additional height, and is colonnaded to create interest at the pedestrian level. The materiality of the proposal is designed to respond to the use of Portland stone, which is common in the area. As a result to concerns raised by Historic England a darker tone for the cladding has been chosen, as well as additional textures introduced on the more blank facades, to give the building a slightly softer appearance, so it is less stark against the heritage buildings. It is proposed to activate the ground floor with communal space within both buildings, as well as a café and kiosk. The high proportion of glass will enable views into the building.

12.9 Of particular benefit, the proposal will result in a significant increase in public realm, compared to the existing position. The public realm around the existing site is constrained, and is generally quite poor. And the area around Haymarket walk in particular, is dated and at risk from anti-social behaviour. The proposal includes the provision of additional highway around the position of the bus stops, to allow additional waiting space, and a landscaped area to the south of the building. Whilst this area will be noisy, being adjacent to the road, it will benefit from good access to daylight, and in an area where greenspace is at a premium, is welcomed. In respect of the northern square, described as a community courtyard by the applicant, this will provide a much more welcoming aspect for those arriving at the station. Unfortunately, this area will benefit from very limited provision of direct sunlight, which would limit how desirable this is for leisure use for much of the year. However, it is considered that the is a significant improvement as an area to pass through than the existing environment. The applicant calculates that the proposal would provide over 2000 sq m of additional public realm.

12.10 In general, the proposal is considered to be of high quality design, and is of significant improvement compared to the existing building and public realm. The applicant has worked with the LPA and Design West to provide a development which secures the shared urban design aims for the site. Notwithstanding this, the scale remains challenging, and will set the building out as a significant landmark, along with the potential future development of the Debenhams site. If the additional height is considered justified it is considered that the design quality would produce a successful development.

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR****13. E: WOULD THE DEVELOPMENT MITIGATE ITS IMPACT ON, AND ADAPT TO THE EFFECTS OF CLIMATE CHANGE?**

13.1 As embedded in the NPPF, sustainability should be integral to all new development, and should encourage opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. BCS13 encourages developments to respond pro-actively to climate change, by incorporating measures to mitigate and adapt to it. BCS14 sets out a heat hierarchy for new development, and an expectation that new development will connect to existing CHP/CCHP distribution networks. The same policy also expects development to provide sufficient renewable energy generation to reduce carbon dioxide emissions from residual energy use in the buildings by at least 20%. BCS15 requires developments to demonstrate through a Sustainability Statement how they have addressed energy efficiency; waste and recycling; conserving water; materials; facilitating future refurbishment and enhancement of biodiversity. This policy also requires a BREEAM Excellent score to be achieved for all major non-residential development. Bristol City Council's Climate Change and Sustainability Practice Note provides further advice on these matters.

13.2 Whilst there are no objections on design and heritage grounds to the removal of the existing building, it is noted that the existing building represents a significant quantity of embodied carbon, and a number of objections have queried whether the demolition and replacement of the building would represent a sustainable development. In this regard, emerging policy NZC3 sets out a mechanism for assessing the impact of demolition, prioritising the retention of existing buildings. Whilst the aims of this policy are well established, as with other emerging policies it does not carry the same weight as the adopted policy. Indeed, the written statement by Baroness Penn regarding local energy efficiency standards from December 2023 sets out proposals for national standards, and it is unclear how this will impact on the emerging sustainability policies. That being said, energy efficiency and whole life carbon impacts are a well established material consideration (as can be seen in recent Secretary of State decisions at national level), and a negative performance in this respect would weigh against the grant of planning permission in this regard.

13.3 At the time of writing, final comments from the sustainable cities team have not been received. However, the applicant has submitted a whole life carbon assessment as well as a sustainability statement in support of the application. This sets out that the building is coming to the end of its useful lifespan, and will require upgrading in order to continue occupation. Whilst there is limited definitive evidence of how much longer the building can be occupied for, it is noted that the building is around 50 years, and the expectation for a commercial building of this age would be a lifespan of around 60 years, so it is reasonable to expect that the any significant increase in lifespan would require significant interventions in the building.

13.4 Whilst there are technical issues with the statement that are still being reviewed, the broad conclusion is that the proposal will result in a significant uplift in carbon emissions, but in large part this is a result of the significant increase in floorspace. On a per square metre basis the proposal would see a reduction in in emissions, and on this basis the benefits of the additional floorspace could not be achieved more efficiently with the retention of the existing basis.

13.5 This assessment takes account of the proposed energy efficiency and renewable technologies proposed as part of the new development. This includes connecting to the local heat network, and the use of photovoltaic panels to generate electricity. The sustainability statement suggests the development would achieve a CO2 emissions improvement against building regulations of 54.8%. The revised statement also commits the development to meeting BREEAM 'excellent' standards. As such, the proposal is considered to meet and exceed current policy expectations, and even taking into account embodied carbon, is of benefit in respect of emissions per floorspace.

13.6 In addition to this, whilst this scheme does not fall to be considered against the provisions of the

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

Environment Act, and achieving a 10% Biodiversity Net Gain, the submission does show a net gain of over 5,000%, as well as the planting of a number of additional trees (the latest plans show 33 additional trees withing public realm, plus additional planting at roof level). These elements are considered to be benefits of the scheme which weigh in its favour.

14 F: DO THE PROPOSALS PROTECT THE RESIDENTIAL AMENITY OF ADJOINING OCCUPIERS IN TERMS OF RETAINING ADEQUATE LEVELS OF SUNLIGHT AND DAYLIGHT?

14.1 Policy BCS21 expects development to safeguard the amenity of existing development and create a high quality environment for future occupiers. Policy DM2 requires development to provide a good standard of accommodation by meeting relevant requirements and standards and not adversely impacting neighbouring amenity. Policy DM29 expects new buildings to safeguard the amenity of the host premises and neighbouring occupiers.

14.2 The proposal is surrounded by a mixture of commercial, residential an PBSA developments. In terms of residential impacts, an assessment on impacts on daylight has been undertaken, and this demonstrates that there is no material impact on the majority of surrounding residential properties. However, the exception to this is the IQ student block, which is directly to the north of the site. At its closest point the proposal would be around 13 metres from this block, albeit at an oblique angle.

14.3 A Building Research Establishment (BRE) Dayight and Sunlight report was submitted with the application in accordance with the BRE's report "Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice" (2022 Edition). It is noted that the IQ building is already affected by the existing building, and indeed the IQ building, which post dates the existing building on the site, relies on the application site for a significant proportion of its outlook, which significantly limits any development potential on the application site without ant impact.

14.4 In accordance with the BRE guidelines, the windows facing the application site in the IQ building has been tested for its performance against the vertical sky component (VSC), no sky line (NSL) and annual probable sunlight hours (APSH). The results of the testing show that 57.4% of the windows would fail the VSC test, 40.2% would fail the NSL test and 46.3% would fail the APSH tests. This is considered to be a high failure rate, and demonstrates that the proposal would have a harmful impact on the daylight levels received by the neighbouring properties. It is noted that within urban areas, where making efficient use of development sites is a critical issue, very high levels of compliance are difficult to achieve. The applicant also makes the case that a different weighting should be given to student accommodation, on the basis that the use is transient in nature, and the impacts on amenity are temporary.

14.5 The applicant has also provided an assessment of the 'cut back' that would be requires to significantly reduce the impact (to remove 'major adverse' impacts). A number of options are presented, but all of the option would see a significant reduction in the amount of accommodation that could be provided on the site (option A would result in the loss of around 100 co-living spaces, option B 172 studio bedrooms and option C 72 co-living spaces and 104 student bedrooms). In all cases this would not remove the impact all together. This would clearly significantly impact on the viability of the scheme, and in particular the impact on the co-living block would make the delivery of the a mixed used development on the site difficult to achieve.

14.6 In these scenarios, the BRE guide states that their parameters need to be applied flexibly. Appendix F of the guide is titled "Setting alternative target values for skylight and sunlight access". This states that the target values for assessing how much light from the sky is blocked by obstructing buildings are advisory and that: "... different targets may be used based on the special requirements of the proposed development or its location. Such alternative targets may be generated from the layout dimensions of existing development, or they may be derived from considering the internal layout and daylighting needs of the proposed development itself."

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

- 14.7 Similar advice is contained in the Urban Living SPD which in Part 3 advocates an approach ... "which allows an assessment of daylight and sunlight targets to be informed by a comparative contextual analysis. This approach provides flexibility to the application of targets set in the BRE guidance in dense urban environments in line with NPPF paragraph 123(c). In determining a comparative context, physical and environmental characteristics should be considered together with other context considerations. For example, the amenity of living in a city centre location, such as the Old City, where its central location, high quality of urban environment and access to public open space compensates for a lesser standard of daylight than may be appropriate in other areas of the city."
- 14.8 Notwithstanding this, officers are of the view that the proposals will result in a noticeable loss of daylight in the IQ building. However, the BRE guidelines are not policy, and appeal decisions indicate that given the arguments raised above, this is not a determinant issue in isolation. However, it is considered to be a negative balance which must attract weight in the planning balance.
- 14.9 In terms of levels of noise and disturbance affecting adjoining occupiers, there is already a concentration of students living in the area and the impact from this development through introducing further students and co-living residents is not expected to give rise to any amenity issues. The site is also close to a busy road, which means that background noise levels are likely to be high. The development will be managed full-time which will ensure anti-social activity does not take place on site. On the basis of noise, therefore, officers consider the impacts of the proposal to be acceptable.
15. G: DO THE PROPOSALS PROVIDE A SATISFACTORY LIVING ENVIRONMENT FOR FUTURE OCCUPIERS?
- 15.1 Policies BCS21 and DM29 require developments to create a high-quality environment for future occupiers.
- 15.2 In terms of daylight and sunlight, the results of the report submitted demonstrate a good level of compliance with the BRE Guidelines, with 82% of the rooms meeting the BRE recommendations and 69% meeting the requirements for sunlight. It is noted that a number of the objections to the scheme have objected on the basis of the relatively high number of north facing rooms. Whilst the orientation is such that there are no single aspect rooms which face directly north, there are a number which would perform in a similar way, particularly on the lower levels of the building. The layout has been carefully designed such that the stair cores are in the areas which get the most limited daylight exposure, and communal rooms in cluster flats having the highest levels of outlook and access to daylight.
- 15.3 There are no required space standards for student housing, or the proposed co-living accommodation which is also sui generis. The student accommodation is similar in character to other purpose-built accommodation of this kind. The co-living accommodation has a similar format although the size of the studios are larger. Both the PBSA and co-living have large areas of communal space. The quality of the internal and external spaces proposed is considered satisfactory and would provide good accommodation and an acceptable standard of amenity given the high-density nature of development proposed. Both elements of the scheme are also provided with outdoor amenity space, 200 sq m for the PBSA in a roof terrace, and a 100 sq m roof terrace and small private (shared) balconies on the co-living. The outdoor amenity is small, but the site does have easy access to some existing outdoor green space, at St. James Park, and given there are no specific standards that relate to this type of accommodation it is considered that the provision is acceptable.
16. H: WOULD THE DEVELOPMENT SATISFACTORILY ADDRESS TRANSPORT AND

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

MOVEMENT ISSUES?

- 16.1 Policy BCS10 states that development should not give rise to highway safety issues and should reduce the negative impacts of vehicles as far as possible. It also sets out transport user priorities, with pedestrian and sustainable modes of transport taking precedence over the private car. Policy DM23 states that development should not give rise to unacceptable traffic conditions.
- 16.2 The cycle parking standards for a student hall of residence requires a minimum of one cycle parking space per 4 bed spaces for students and a further one space per 12 bed spaces for visitors. Regarding the co-living flats the minimum standard is one cycle parking space per bedroom and for visitors one space per 10 units. A total of 196 cycle parking spaces have been provided for the student element in the form of 14 Sheffield stands (28 spaces) and 84 double stacked units (168 spaces). The minimum standard for 442 student bedspaces is 111 excluding visitor spaces. TDM welcome this level of cycle parking for the student element.
- 16.3 Concerns were originally raised about the relatively low level of cycle parking proposed for the co-living block. However, it is acknowledged that there are currently no specific standards that relate to the co-living block, and as a result of comments raised the total number of storage has been raised to 108 spaces (one space per 1.22 bed spaces). Additionally, it is noted that there is provision for E-Scooter/E-Bike parking facilities within the development.
- 16.4 Revisions to the proposal show 2 disabled parking space for the development (noted for staff). Given the highly sustainable location it is not proposed to provide any parking provision for the occupants. Whilst some additional disabled spaces would be preferable, the proposal meets the policy guidelines in this respect.
- 16.5 This development is within the Central Parking Zone and not within a Residents Parking Scheme Area. The development will not qualify for parking permits and as such BCC are content this can be adequately managed through the application of an advice restricting the issuance of a parking permit to residents of the development. It should be noted the site is also located within the Clean Air Zone.
- 16.6 Concerns regarding the suitability of the loading bay given the scale of the development and lack of viable options for loading elsewhere were raised in regards to the current proposal. Further details of the servicing proposals have been provided as a result of these concerns.
- 16.7 In respect to s106 contributions it is considered that the following contributions are justified:
- £166,724 towards the upgrade of local cycle infrastructure in the vicinity of the development
 - £199,529 towards the upgrade of the local bus stops along the Haymarket.
 - A contribution towards the provision of a crossing point linking the site to Gloucester Road (currently being calculated)
 - £6,310 TRO contribution towards the amendment of TRO along Cannon Street
 - £33,968 (£14,520 towards co-living and £19,448 towards the student element) Travel plan contribution
- 16.8 The development is heavily geared towards students and therefore the key desire lines towards UWE Frenchay, the Temple Quarter campus, and the Whiteladies Road area are key routes for the movement of students. The collaborative work that has been undertaken to date to identify land that is required to provide a betterment to the Haymarket bus stops which run along the frontage of this site, including the provision of a 4.5m gap between the bus stop and the re-provided ramp, is welcomed.
- 16.9 The bus stop infrastructure surrounding St James Barton Roundabout is absolutely key to the transport network and catering movement from the development. The car-free proposal will

Development Control Committee A – 6 March 2024**Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR**

increase demand on the bus stops and bus services in the vicinity of the St James Barton roundabout and as such further improvements to bus stop infrastructure in the vicinity is key, as is the consideration to help public transport efficiently operate through the Haymarket corridor which effects all city-wide services and beyond. The proposals involve the stopping up of the arcade retail element and the current route through this area from/to the Bearpit and to the bus station to be replaced by the introduction of a 100m plus detour routing through the development. There are limited other options linking Stokes Croft to the bus station and mitigation is required, in the form of a contribution towards a crossing at Marlborough Street.

- 16.10 A TRO will be required to amend waiting and loading provision along Cannon Street. It should be noted the applicant will be required to implement the physical measures associated with the TRO such as lining and signage.
- 16.11 Moving onto Cannon Street as detailed above amended swept path analysis have been provided demonstrating how vehicles will perform a turning manoeuvre to enable them to leave Cannon Street in forward detail and information on this is required. Improvements to Cannon Street are required due to the proposed change in its nature and this will include improvements to the footways such as reinstatement of dropped kerbs, kerb works, street lighting, tactile paving, and the improvement of the access into the bus station from the site to signify pedestrians have priority, such as a change in material.
- 16.12 Given the large number of highway structures and retaining walls within the vicinity of the site and the potential impact upon these and the local highway network during demolition and construction oversight will be required. As such an Approval in Principle (AiP) will be required and a suitably worded condition should be applied which requires information be submitted and reviewed in a timely fashion.
- 16.13c Concerns are raised regarding the management plan/proposal regarding the intake days (move in process). In theory the numbers and timings stack up over a 2-weekend period. However, in practice there will likely be issues regarding congestion, space to wait and students arriving outside (either early or late) to their booked time slot. No accommodation is made for this. Further details have been provided, and whilst it is considered a specific plan will need to be secured by condition, officers are satisfied that this can be achieved.

17. CONCLUSION AND PLANNING BALANCE

- 17.1 The application relates to a significant scale development within a central area in Bristol. Having assess the application officer are satisfied that it will deliver a number of benefits, but this will need to be balanced against the harm that would result. Therefore, the decision on the application has to be made on the basis of whether the benefits would outweigh the harms.
- 17.2 In particular, concerns remain that the proposal will result in less than substantial harm to the setting of a number of heritage assets, and also cause a level of additional overshadowing, particularly to the neighbouring PBSA development.
- 17.3 Weighed against this are the following issues:
- The proposal would positively contribute to housing delivery in a sustainable location. Whilst it is acknowledged it would lead to the increase in the concentration of student accommodation in this area, it does also achieve a mix of uses, including the delivery of affordable housing. A smaller proposal, i.e. one that does not lead to harm to heritage assets or overshadowing, would deliver less benefits in this regard.
 - Heritage benefits in association with opening up views of the Scottish Presbyterian Chapel.
 - Design improvements.
 - Significant improvements to the public realm, including improved access to the bus station,

Development Control Committee A – 6 March 2024

Application No. 23/02827/F : Premier Inn The Haymarket Bristol BS1 3LR

additional space for the bus stops, tree planting and net gain in biodiversity.

- Improved performance in respect of carbon emissions.

17.4 It is noted that there are still consultation responses to the amended plans that are still awaiting at the time of drafting this report. Notably these include sustainability comments and comments from the HSE regarding fire safety.

17.5 Notwithstanding this, at the time of writing officers are of the view that the package of benefits that the development will provide do merit the support of the application, and therefore it is recommended for approval.

18. COMMUNITY INFRASTRUCTURE LEVY (CIL)

18.1 The CIL liability for this development is £2,039,668.02

19. RECOMMENDATION:

19.1 Approve subject to a Section 106 Planning Agreement to cover the following:

- Provision of Affordable Rent in 20% of the co-living studios
- Highway contributions (to be finalised prior to the meeting)
- A monitoring fee for the employment and skills plan

19.2 Request delegated authority for officers to prepare the required planning conditions to cover the following issues:

- Archaeology
- Detailed Design
- Landscaping
- Land Contamination
- Highways
- Construction Management
- Nature Conservation
- Air Quality
- Pollution Control
- Sustainability (including connection to the Local Heat Network)

Supporting Documents

1. Premier Inn The Haymarket, BS1 3LR.

1. Landscape GA Plan
2. L(--)-001_Plan_Level 01,03
3. L(--)-015_Plan_Level 15
4. L(--)-200_South Elevation
5. L(--)-201_East Elevation
6. L(--)-202_North Elevation
7. L(--)-203_West Elevation

Notes

LEGEND

Walls + Seating

▬ Precast concrete walls and stairs

Hardscape

▬ Existing pavement to be retained and extended

▨ High quality smooth precast concrete paving

▨ Exposed aggregate concrete paving

▭ Blue badge parking space

Softscape

○ Semi mature multi stem tree

○ Mature single stem tree

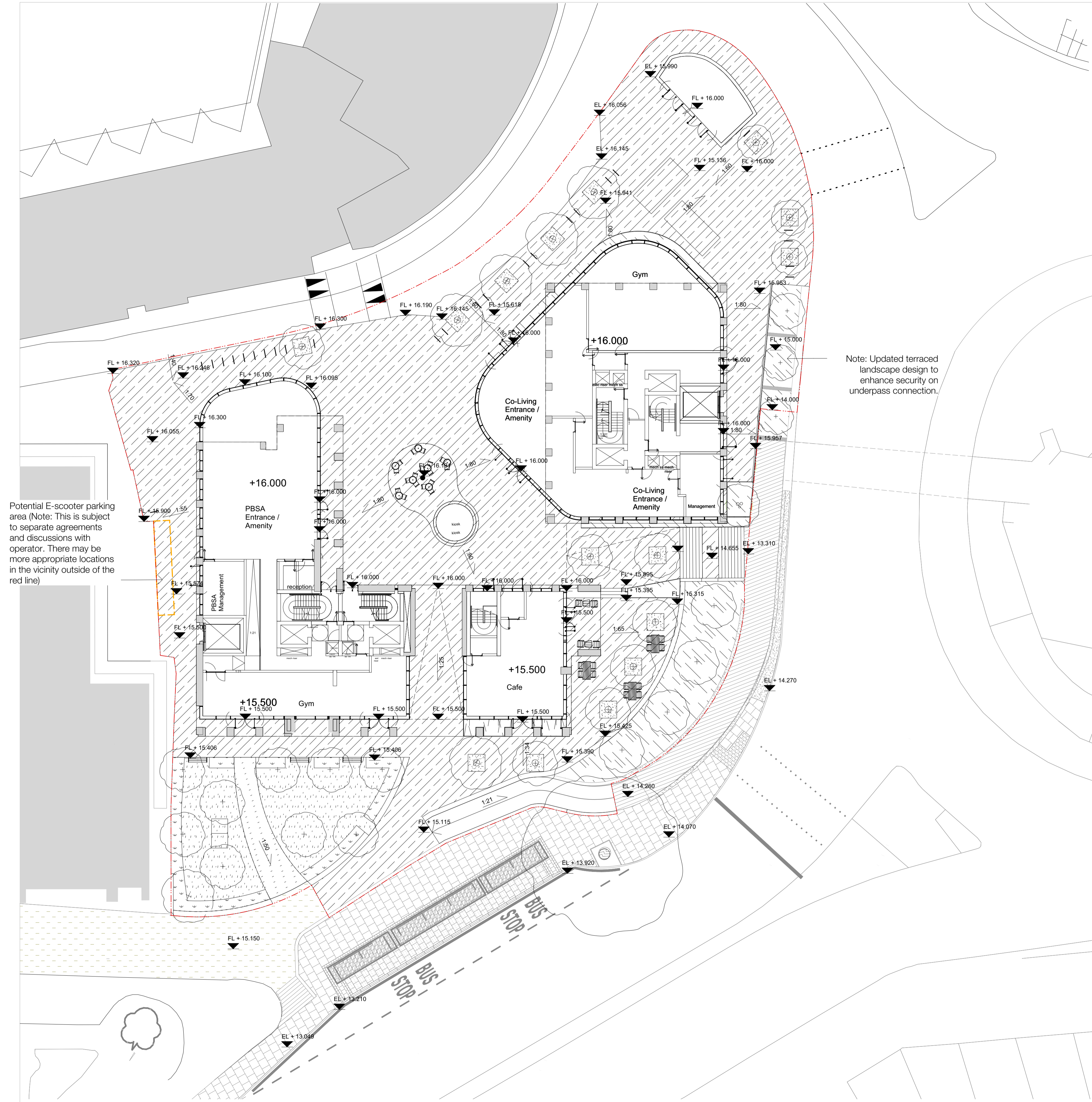
▨ Flowering lawn

▨ High quality ornamental planting

▨ Native hedge

Furniture

▬ 25 Sheffield cycle stands

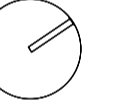


Potential E-scooter parking area (Note: This is subject to separate agreements and discussions with operator. There may be more appropriate locations in the vicinity outside of the red line)

Note: Updated terraced landscape design to enhance security on underpass connection.

Key Plan

North



Issue Log

Rev	Description	Date
A	Draft Issue	20.06.23
B	Issued for Info	29.06.23
C	Issued for Info	08.01.23
D	Planning Revision	18.01.24
E	Planning Revision	07.02.24

Client

Olympian Homes

Consultants

Project Name

Haymarket

Project No.

0997BRS

Address

Bristol

Sheet Title
Landscape GA Plan

Scale
1 : 200 @ A1

Phase

Drawn

DJ

Checked

UBH

Rev

E

Sheet No.

MCGC-LD-SK-001



hodder+partners
 SCI Studios
 1 Kelso Place
 Manchester M15 4LE

t: +44(0)161 832 9842
 e: mail@hodderandpartners.com
 w: www.hodderandpartners.com

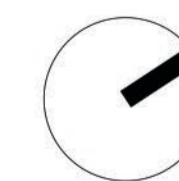
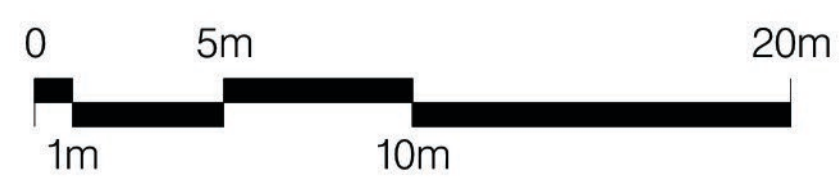
DO NOT SCALE
 Work to annotated dimensions only.
 Read drawing in conjunction with relevant specification,
 Structural Engineers' and Services Engineers' drawings.
 Confirm all dimensions before commencement of any
 work on site or fabrication.

revisions + notes:

Rev P1 - Planning Issue - 04.07.2023
 Rev P2 - Planning Updates - 12.12.2023
 Rev P3 - landscape amendments - 01.02.2024

Note: The landscape scheme is shown as illustrative
 on this plan. Please refer to the Landscape Architect
 drawings for the detailed landscaping scheme.

- PBSA Cluster Bedroom
- PBSA Cluster LKD
- PBSA Studio
- Co Living Bedroom
- Co Living Amenity



client: Olympian
 date: MARCH 2023

project: The Haymarket, Bristol
 scale: 1:200 at A1
 drawn by: JT

title: Plan_Level 01,03
 drawing number: L(-)001

status: Planning
 job number: 0645
 revision: P3

St James Barton
 Roundabout



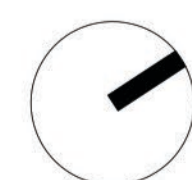
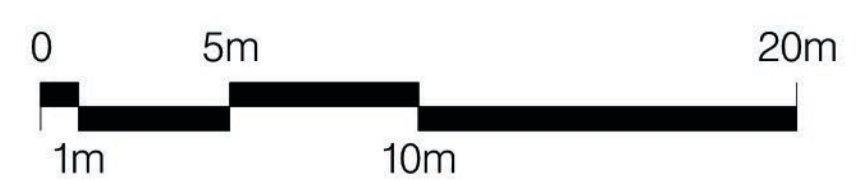
hodder+partners
 SCI Studios
 1 Kelso Place
 Manchester M15 4LE
 t: +44(0)161 832 9842
 e: mail@hodderandpartners.com
 w: www.hodderandpartners.com

revisions + notes:
 Rev P1 – Planning Issue – 04.07.2023
 Rev P2 – Planning Updates – 12.12.2023
 Rev P3 – landscape amendments – 01.02.2024

DO NOT SCALE
 Work to annotated dimensions only.
 Read drawing in conjunction with relevant specification,
 Structural Engineers' and Services Engineers' drawings.
 Confirm all dimensions before commencement of any
 work on site or fabrication.

Note: The landscape scheme is shown as illustrative
 on this plan. Please refer to the Landscape Architect
 drawings for the detailed landscaping scheme.

- PBSA Cluster Bedroom
- PBSA Cluster LKD
- PBSA Studio
- Co Living Bedroom
- Co Living Amenity



client: Olympian
date: MARCH 2023
project: The Haymarket, Bristol
scale: 1:200 at A1
drawn by: JT
title: Plan_Level 15
drawing number: L(-)015
status: Planning
job number: 0645
revision: P3



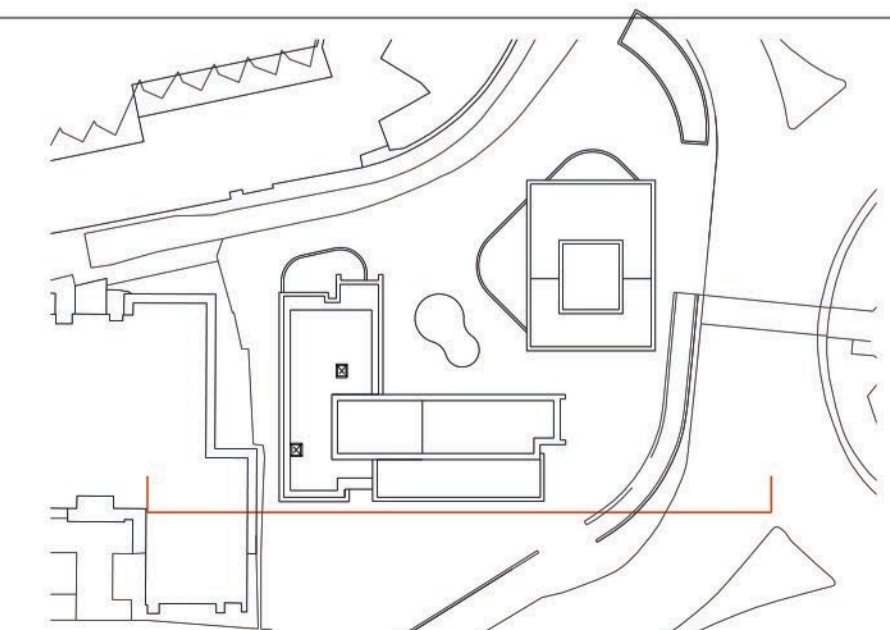
+99.660 Roof
 +96.810 Level 27
 +93.960 Level 26
 +91.110 Level 25
 +88.260 Level 24
 +85.410 Level 23
 +82.560 Level 22
 +79.710 Level 21
 +76.860 Level 20
 +74.010 Level 19
 +71.160 Level 18
 +68.310 Level 17
 +65.460 Level 16
 +62.610 Level 15
 +59.760 Level 14
 +56.910 Level 13
 +54.060 Level 12
 +51.210 Level 11
 +48.360 Level 10
 +45.510 Level 09
 +42.660 Level 08
 +39.810 Level 07
 +36.960 Level 06
 +34.110 Level 05
 +31.260 Level 04
 +28.410 Level 03
 +25.560 Level 02
 +22.710 Level 01
 +15.500 Level 00

+71.290 Roof Co.L
 +68.440 Level 17 Co.L
 +65.590 Level 16 Co.L
 +62.740 Level 15 Co.L

hodder+partners
 SQJ Studios
 1 Kelso Place
 Manchester M15 4LE
 t: +44(0)161 832 9842
 e: mail@hodderandpartners.com
 w: www.hodderandpartners.com

revisions + notes:
 Rev P1 – Planning Issue – 04.07.2023
 Rev P2 – Floor to Floor reductions by 150mm – 12.12.2023

See landscape architect information for landscape proposals



client: Olympian
date: JULY 2022
project: The Haymarket, Bristol
scale: 1:250 at A1
drawn by: NW
title: South Elevation_Proposed
drawing number: L(-)200
status: PLANNING
job number: 0645
revision: P2

DO NOT SCALE
 Work to annotated dimensions only.
 Read drawing in conjunction with relevant specification,
 Structural Engineers' and Services Engineers' drawings.
 Confirm all dimensions before commencement of any
 work on site or fabrication.

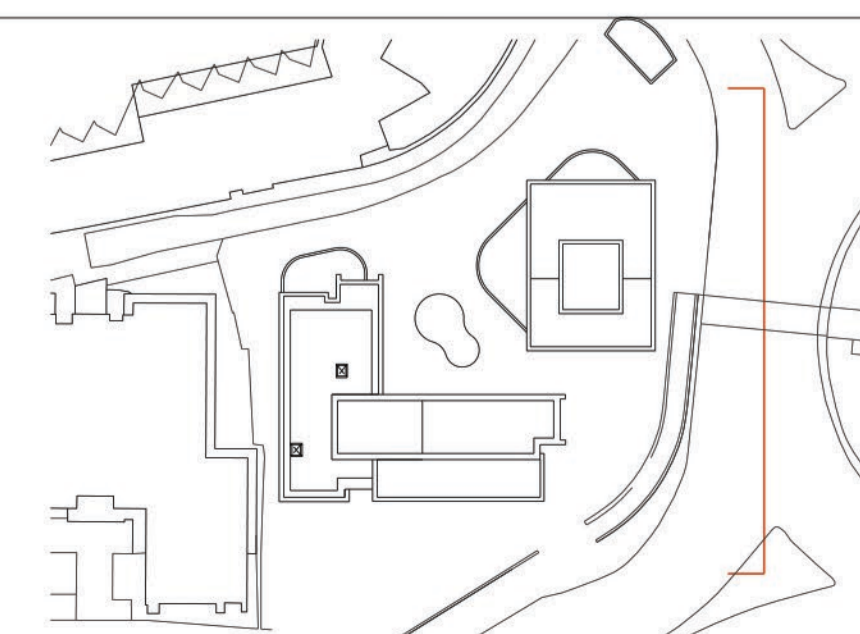
hodder+partners



hodder+partners
 SQI Studios
 1 Kelso Place
 Manchester M15 4LE
 t: +44(0)161 832 9842
 e: mail@hodderandpartners.com
 w: www.hodderandpartners.com

revisions + notes:
 Rev P1 – Planning Issue – 04.07.2023
 Rev P2 – Floor to Floor reductions by 150mm – 12.12.2023
 Rev P3 – Substation reduction for crossing – 01.02.2024

See landscape architect information for landscape proposals



client: Olympian	date: JULY 2022
project: The Haymarket, Bristol	scale: 1:250 at A1
title: East Elevation_Proposed	drawing number: L(-)201
status: PLANNING	job number: 0645
	revision: P3

DO NOT SCALE
 Work to annotated dimensions only.
 Read drawing in conjunction with relevant specification,
 Structural Engineers' and Services Engineers' drawings.
 Confirm all dimensions before commencement of any
 work on site or fabrication.

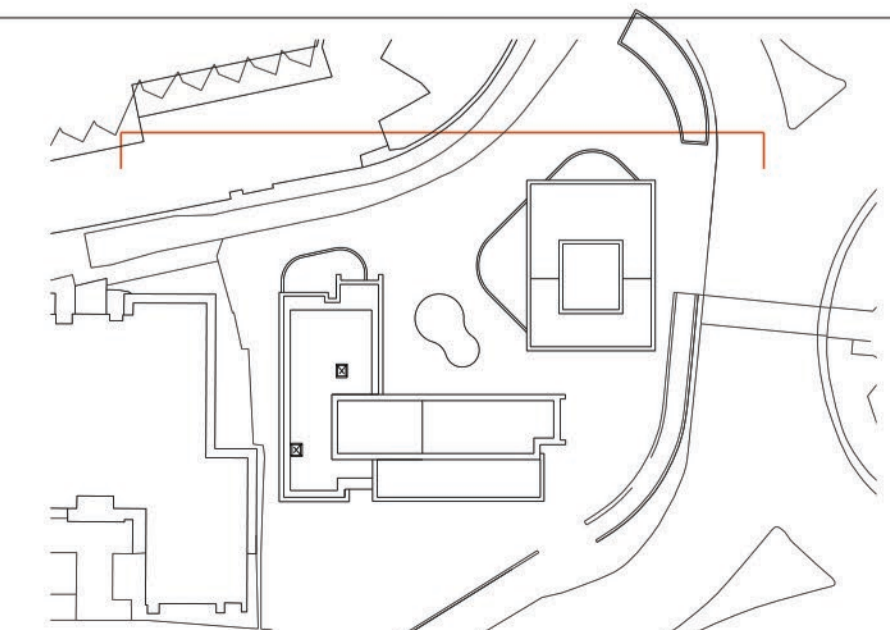
hodder+partners



hoddler+partners
 SCI Studios
 1 Kelso Place
 Manchester M15 4LE
 t: +44(0)161 832 9842
 e: mail@hoddlerandpartners.com
 w: www.hoddlerandpartners.com

revisions + notes:
 Rev P1 – Planning Issue – 04.07.2023
 Rev P2 – Floor to Floor reductions by 150mm – 12.12.2023

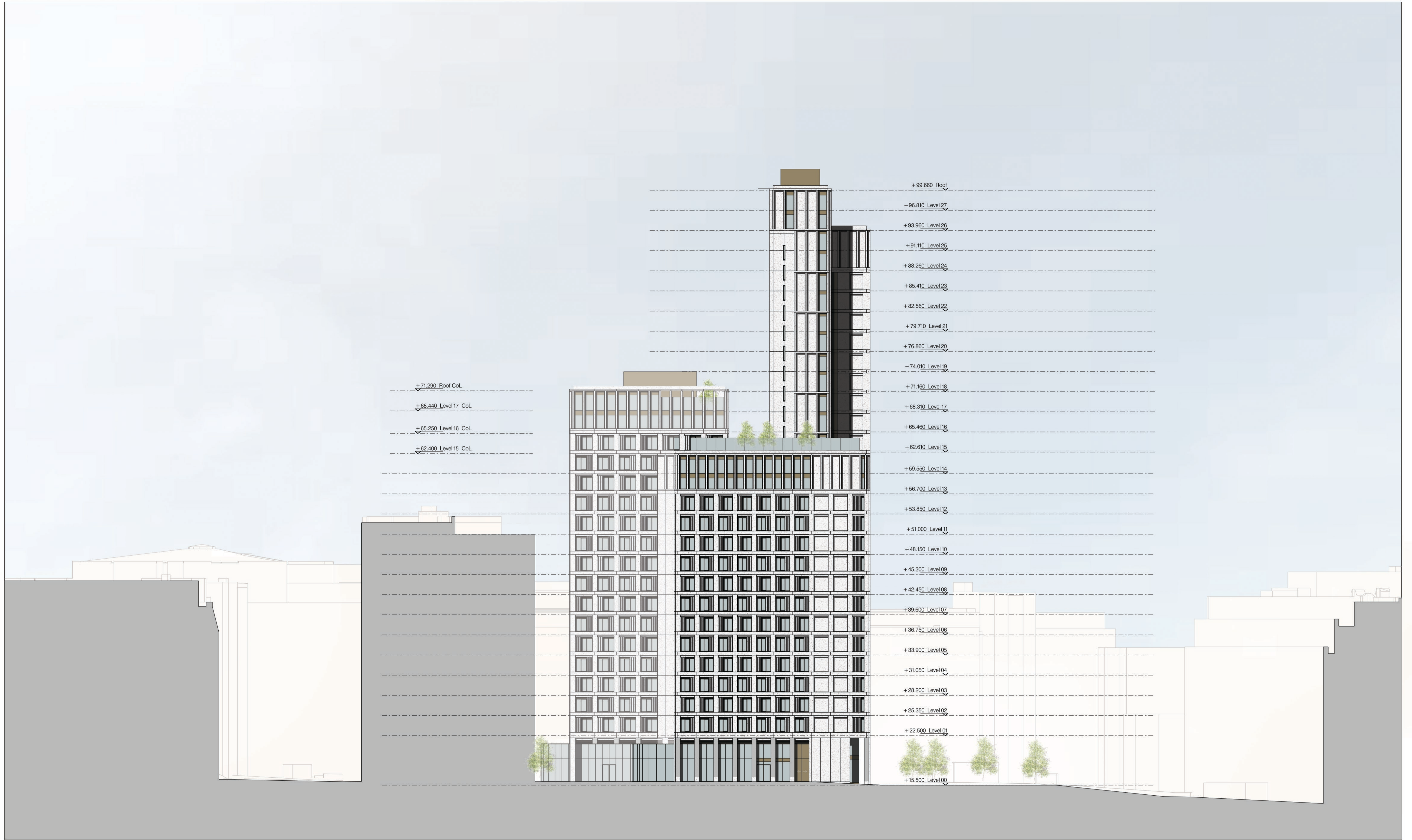
See landscape architect information for landscape proposals



client: Olympian	date: JULY 2022
project: The Haymarket, Bristol	scale: 1:250 at A1
title: North Elevation_Proposed	drawn by: NW
status: PLANNING	drawing number: L(-)202
	job number: 0645
	revision: P1

DO NOT SCALE
 Work to annotated dimensions only.
 Read drawing in conjunction with relevant specification,
 Structural Engineers' and Services Engineers' drawings.
 Confirm all dimensions before commencement of any
 work on site or fabrication.

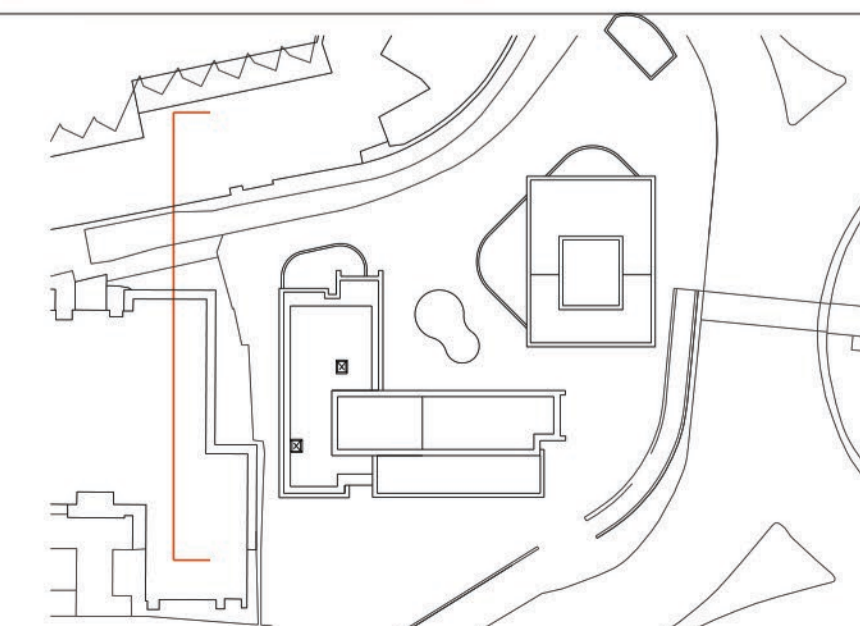
hoddler+partners



hoddler+partners
 SCI Studios
 1 Kelso Place
 Manchester M15 4LE
 t: +44(0)161 832 9842
 e: mail@hoddlerandpartners.com
 w: www.hoddlerandpartners.com

revisions + notes:
 Rev P1 – Planning Issue – 04.07.2023
 Rev P2 – Floor to Floor reductions by 150mm. West Gable Elevations – 12.12.2023
 Rev P3 – ground floor cycle storage – 01.02.2024

See landscape architect information for landscape proposals



client:	Olympian	date:	JULY 2022
project:	The Haymarket, Bristol	scale:	1:250 at A1
		drawn by:	NW
title:	West Elevation_Proposed	drawing number:	L(-)203
status:	PLANNING	job number:	0645
		revision:	P3

DO NOT SCALE
 Work to annotated dimensions only.
 Read drawing in conjunction with relevant specification,
 Structural Engineers' and Services Engineers' drawings.
 Confirm all dimensions before commencement of any
 work on site or fabrication.

hoddler+partners