

Public Forum

D C Committee A

Wednesday 6th March 2024



1. Members of the Development Control Committee A

Councillors: Richard Eddy (Chair), John Geater, Fi Hance (Green Party Group Spokesperson), Tom Hathway, Philippa Hulme (Labour Party Group Spokesperson), Farah Hussain, Chris Jackson, Paula O'Rourke, Andrew Varney (Liberal Democrat Group Spokesperson)

2. Officers:

Jonathan Dymond, Philippa Howson, Simone Wilding.



Statements	Request To Speak Made Where Indicated S = Speaker	Name	Application
A01	S	Simon Hickman (Statement awaited)	23/02827/F - Premier Inn, The Haymarket
A02	S	David Mellor	"
A03	?	Simon Birch/Peter Ellis	"
A04	No	Sue Ellis	"
A05	S	Stephen Wickham	"
A06	?	Alex Deacon	"
A07	S	Kim Hicks	"
A08	S	Hamilton Caswell	"
A09	S	Matthew Montagu-Pollock	"
A10	S	Rob Harding	"
A11	No	Serena Ralston	"
A12	?	Richard Guise	"
A13	?	Cllr Ed Plowden	"
A14	S	Joe Banks	"
A15	S	Mark Slatter	"
A16	S	Mark Cowdy	"
A17	S	Nick Wright	"
A18	S	Zeta Sebbings	"
A19	S	Richard Morton	"
A20	S	Craig O'Brien	"
A21	S	Amy Kington	"
A22	?	Nicholas Kidwell (Kingsdown Conservation Group)	"
A23	?	Nicholas Kidwell (Personal statement)	"

A24	?	Cllr Ani Stafford-Townsend	“
A25	S	Stephen Wickham	“
A26	?	Cllr Guy Poultney	“
A27	S	Dan Stone	“
A28	?	Cllr Mohamed Makawi	“
B01	No	Serena Ralston	23/01407/F - NCP Car Park, Rupert Street
B02	S	Neil Howells (Greystar)	“
B03	S	Henry Courtier (Pegasus)	“
B04	S	Caroline Welsh (CTF)	“
B05	?	Nicholas Kidwell	“
B06	?	Cllr Ani Stafford-Townsend	“
B07	S	Stephen Wickham	“



Response to Premier Inn proposal

I have lived and worked as an architect in this city for over 40 years and care deeply about its good built environment which is valued by its residents and is also a factor in attracting new businesses. Proposals which seriously damage its environment are therefore of great concern .

The officers report talks of the need to balance harm against benefits, but the benefits here are in no way sufficient to balance the excessive harm this proposal will create.

28 stories is simply much too tall .

It would be very damaging to the immediate area, in its impact on the oldest church in the city and on conservation areas, including particularly Kingsdown and on the city as a whole . The montages produced demonstrate this very clearly and depressingly

Because of the 18 stories of the existing Premier Inn Building which people have got used to a height of 20 stories would be acceptable I suggest in this particular location(also the view of Historic England) . This is still a tall building by any standards but would not establish a precedent for other tall buildings, such as that proposed for the adjacent Debenhams site if this one is justified by the height of the existing building .

A major concern with all tall buildings is the negative impact on our sustainability goals. They are not just particularly carbon intensive in their construction but in their inevitable use of mechanical means for cooling and longer term maintenance .Your sustainability teams latest comment didn't sound convinced even in their limited terms of reference.

I entirely accept the need for new housing a good proportion of which should be truly affordable. Co living may well suit a particular section of the housing market and I note the officer's recommendation that 20% of this should be "affordable".

However this remains a minority part of the development which in the 28 storey element is entirely student flats .We need those as well but not to the detriment of the overall environment

I also accept that in the city centre we should be building to a high density. However high densities can be achieved without excessively tall buildings as for example, at Finzels reach and Wapping Wharf .

In addition to NPPF requiring high quality, beautiful and sustainable places – which is what Bristol should be aiming for, your own urban living SPD – a carefully developed policy which is a material consideration- asks for a number of characteristics – contributing to a good place et cetera, which this proposal does not meet. We note its particular concern about isolated tall buildings “ standalone tall buildings ,not part of a block or a street structure will be discouraged “

There are other issues of concern – eg lack of sunlight in some of the 28 storey flats and in adjoining student rooms justified as residents only being transient!

The existing Premier Inn is an ugly building in a rather miserable setting so this is an opportunity to address both – but not with built forms which would have such a negative impact .

This is I fear a very damaging proposal which I urge you to reject.

The applicant could be advised that another proposal with 8 less floors might offer a way forward

David Mellor MA (Cantab) Dip Arch RIBA

STATEMENT BY BRISTOL CIVIC SOCIETY re 23/02827/F | Demolition and redevelopment to provide co-living units and purpose built student accommodation, (PBSA) etc | Premier Inn, The Haymarket Bristol BS1 3LR

Bristol's housing crisis... Like anybody who cares about Bristol, we want to see more affordable homes, and in numbers that make a difference. But we don't support cutting corners: in liveability, tackling the climate emergency or in delivering good design. We don't have to panic ourselves into accepting second-best.

You are being **invited by your officers to accept significant damage to Bristol's townscape and built heritage to pave the way for PBSA**. The 28-story tower is student housing - there's no affordable housing in it. **Less than 4% of the total floorspace being proposed would be provided as affordable housing**. Can't we do better than this?

Does Bristol deserve better...? In our view, Bristol deserves better than these proposals. We can house our citizens in decent, affordable homes and densify with dignity, keeping the essence of Bristol. **Tall buildings privatise public panoramas**. They dilute the contribution of views to the community's wellbeing through cutting off the sense of being in touch with the countryside and nature. It **makes for a claustrophobic, brutalist city that has lost touch with human scale**. The **huge carbon load** of these proposals **sits uncomfortably with Bristol's ambition to be carbon neutral by 2030**.

Are you surprised by the recommendations? There is nothing in the local plan that that even remotely suggests we would see 28-storey towers in Bristol.

What is your legal duty? Applications should be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework is a material consideration in planning decisions. **There is nothing in the local plan or SPD, or the CCDDP, which says you must approve these proposals**. And many policies that suggest you shouldn't. National policy underlines "the importance of securing well-designed and beautiful, attractive and healthy places" and **is very clear that making the effective use of land is subject to "safeguarding and improving the environment and ensuring safe and healthy living conditions."** HSE, the statutory adviser on fire safety and land use planning, have concerns, and say the necessary design changes to resolve these will affect "the number and configuration of dwellings in the building, and layout of the development." The developer disputes this advice.

The **Court of Appeal has emphasised that a finding of harm** to the setting of a listed building gives rise to a strong presumption against planning permission which can only be outweighed by powerful material considerations. **Are there any..?**

Notwithstanding the 'opening up of views' of the Scottish Presbyterian Chapel stated as a heritage benefit in the report, Historic England (the statutory adviser on such matters) say "**our strong concerns have not been overcome**" and "**a more significant reduction in height is insisted upon.... we still advise this to be eight storeys.**" Cutting the height in line with this loses 69 (16%) of the student units. **Surely, this tower cannot be the only way, anywhere in Bristol, to provide these?** Not least given concerns about the over-concentration of students in the locality.

The "improved performance in respect of carbon emissions" is a mirage. The rest of the officer's list justifying approval "Design improvements" and "Significant improvements to the public realm" and biodiversity don't require 28 storeys.

VERIFIED VIEWS

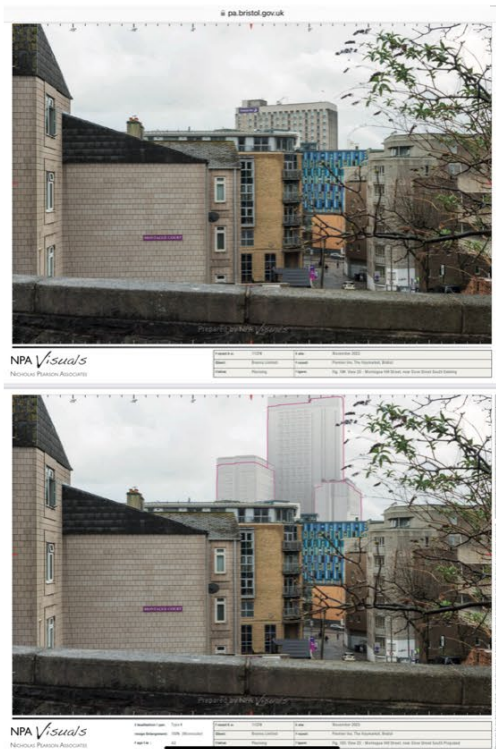
Red outline where shown is to illustrate applicant's response to concerns about height



The application's heritage benefit: 'opening up views of Scottish Presbyterian Chapel'...



Making the Premier Inn look neighbourly....



Debenhams redevelopment
23/04490/F

And

Premier Inn redevelopment
23/02827/F



Current view



Combined impact



Welcome to downtown Bristol..



NPA Visuals
 Nicholas Pearson Associates
 Project Name: [illegible]
 Location: [illegible]
 Date: [illegible]

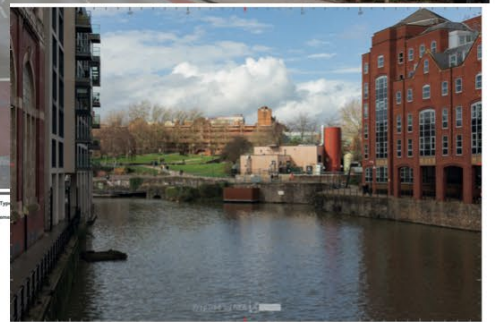


NPA Visuals
 Nicholas Pearson Associates
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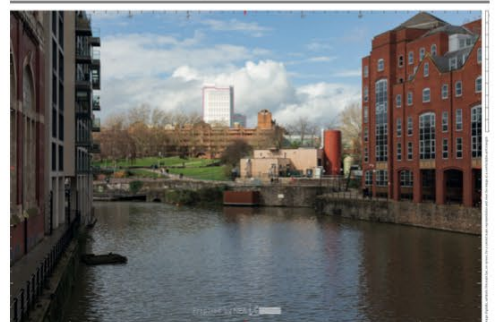
And with the Debenhams redevelopment...



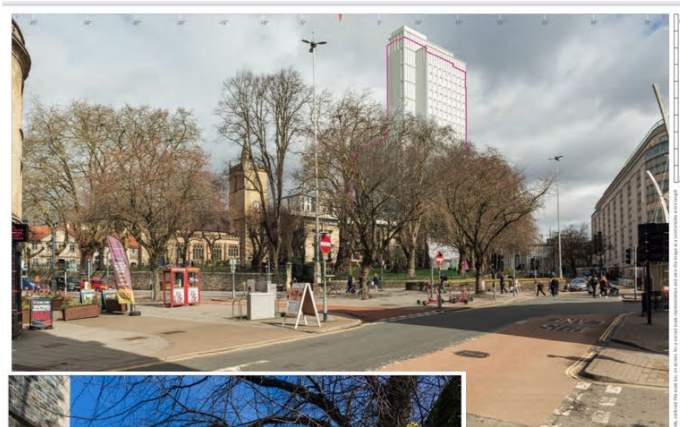
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Church of St James Priory, grade 1 listed and one of the oldest and historically most significant buildings in Bristol

NEIGHBOUR CONSULTEE STATEMENT

23/02827/F | Demolition and redevelopment to provide co-living units and purpose built student accommodation, etc | Premier Inn, The Haymarket Bristol BS1 3LR

I want to question the transport and public realm improvements listed in section 17 of the report to the Committee. The report says:

“17.3 Weighed against this [the substantial harm caused by the proposals] are the following issues” ...“Significant improvements to the public realm, including improved access to the bus station, additional space for the bus stops...”

- “Significant improvements to the public realm” - won't most of the public realm, actually be privately owned and in practice amenity space and access / hanging out area for the development?
- “improved access to the bus station” - but the report says in 16.9 says “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 Malborough [sp] Street.” Will pedestrians get phasing priority at a crossing on this busy road, and get to cross both carriageways in one phase or made to wait in the middle? Why only “a contribution”? Does this mean the local community is going to have to pay to sort out the inconvenience to the local community caused by the development?
- “additional space for the bus stops” - the officer's report says “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... 16.9 The bus stop infrastructure.... is absolutely key to the transport network and catering movement from the development.... proposal will increase demand on the bus stops and bus services in the vicinity”. The benefits listed in the report aren't for the existing community. They're needed to help the development consume its own smoke!
- The officer's report says “16.9..... The car-free proposal will increase demand on.... bus services.... 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.” Has there been any assessment of what the effects will be from longer boarding times and fuller buses, and congestion caused by the demolition and construction works? Has there been any liaison with bus operators? Who will fund the extra buses?

The Bristol Conservation Advisory Panel is viscerally disturbed that this scheme is coming to committee with a recommendation to Grant. It trusts the individual Members will think otherwise. The Panel has studied the revised drawings and TVIA's and reiterated its objection, but notes the officer report was having to be written before this, and indeed before all the published consultation periods had expired. Statutory Consultation is supposedly still open today.

The Panel's more formal written objection to the revisions now proposed is as follows :

Revised drawings have been submitted that include verified views. and views of Debenhams. Whilst there is a reduction in height of one storey and limited changes to one external elevation, it remains clear that there is significant harm to existing designated heritage assets. Furthermore, additional harm to additional buildings is revealed as a result of this further information.

Consequently, BCAPs original minute remains valid.

A tabulated version of this follows : (The original paragraphs being in your officer report)

- 1. "The proposed development would include a tower of effectively 30 storeys, nearly 50% higher than the existing premier Inn;**
- 2. it would intrude on the skyline of Bristol and change the perception of the city.**
- 3. Many views would be significantly affected, including those into the Kingsdown escarpment and those from it.**
- 4. The deplorable result would be of flattening the topography of the city.**
- 5. There would be significant harm to the settings of listed buildings, including the Grade 1 listed St James's Church and the St James Parade conservation area in general.**
- 6. The height of the tower would lead to overshadowing of adjacent open space.**
- 7. 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 of the Premier Inn site proposal.**
- 8. The design is lacklustre and anonymous, and does not respond to the character and distinctiveness of Bristol which is driven by existing heritage assets.**
- 9. Although increased public realm would be created, there would be noise issues in the piazza from passing traffic.**
- 10. The design does not meet the relevant tests of policies BCS22, DM26 and DM31, or the requirements of para 202 of the NPPF.**

In conclusion; The Panel strongly objects, and requests that Members refuse the proposal.

BCAP's Objection to 23/02827/F Replacement of Premier Inn, The Haymarket Bristol BS1 3LR
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)

WRITTEN STATEMENT: 23/02827/F | 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) | Premier Inn The Haymarket Bristol BS1 3LR

I am in my 20s and live in a private rented flat. So of course I want to see more affordable housing in Bristol.

I WFH, don't have any aspect from my flat but walking in my neighbourhood enjoy the stunning views you get across the city, including down Montague Hill. They help you breathe.

What's proposed is a complete eyesore and blocks the view. When combined with the Debenhams tower, we'll lose the horizon completely.

Outside of the view from Montague Hill, this and the other tower blocks being proposed are surely going to ruin many other skyline views Bristol currently has to offer?

Skyline views aren't nice to have. They're what helps make Bristol special. If you're going to turn Bristol into some sort of dystopian nightmare, don't do it in the name of young people like me!

Statement by Kim Hicks to the Development Control A committee meeting 06/03/24
Concerning 'PREMIERE INN SITE' development.

This development of the Premiere Inn site will be the one that **sets a precedent** for this part of Bristol - alongside the massive proposal for the Rupert Street car park site (and of course the forthcoming proposition for the Debenhams building). These vast blocks will completely alter the look and feel of the city centre and will **destroy wonderful views from all directions**. You must begin by rejecting the Premiere Inn site development. If that goes through you will not have a leg to stand on when it comes to containing subsequent developments.

What would be an acceptable height? – Historic England suggests something at least 8 stories less. This is because, at 28 stories, (taller than the monstrosity on Castle Park) **it will diminish further the already overshadowed Church of St James Priory** which is one of Bristol's most historic assets. The current proposed height flies in the face of National Planning policy which underlines the importance of protecting our historic environment.

The response of the developer to these intense concerns about height has been to offer a tiny reduction, so paltry as to be barely noticeable. **It is frankly an insult for them to suggest that they have listened at all**. They clearly believe that they have it all sewn up and have no need to bother with our petty concerns.

In this period of pressure to build because of the housing crisis – it is shocking to think that this vast building will create **ZERO affordable housing!** It is for Student accommodation only (in an area already oversubscribed with other Student buildings). And they, poor creatures, are offered rooms with few windows, that they can't open anyway because of the air pollution from the hectically busy roads alongside. Again, what about National Planning Policy which insists on Healthy living conditions – how can this development pretend to offer that.

Bristol Civic society has explored in depth the issue of the **substantial carbon emissions** that tearing down the Premiere Inn and then building so high will create. How can we possibly justify this when Bristol's ambition is to be Carbon Neutral by 2030. (Same goes for the Rupert St car park).

You have every justification to reject this proposal. Bristol is capable of creative solutions for much needed housing. We can do it with imaginative designs in medium and low-rise developments which will provide sustainable modern solutions that will be a pleasure to live in and to live near and at the same time will retain the human-scale character of our precious city.

On behalf of the many Bristol people who no longer believe that their voices will be heard – **I urge you to reject this proposal.**

KIM HICKS

STATEMENT re. 23/02827/F – Premier Inn – Planning Meeting of 6th March 2024
from Hamilton Caswell, Christmas Steps Arts Quarter (Residents & Traders)

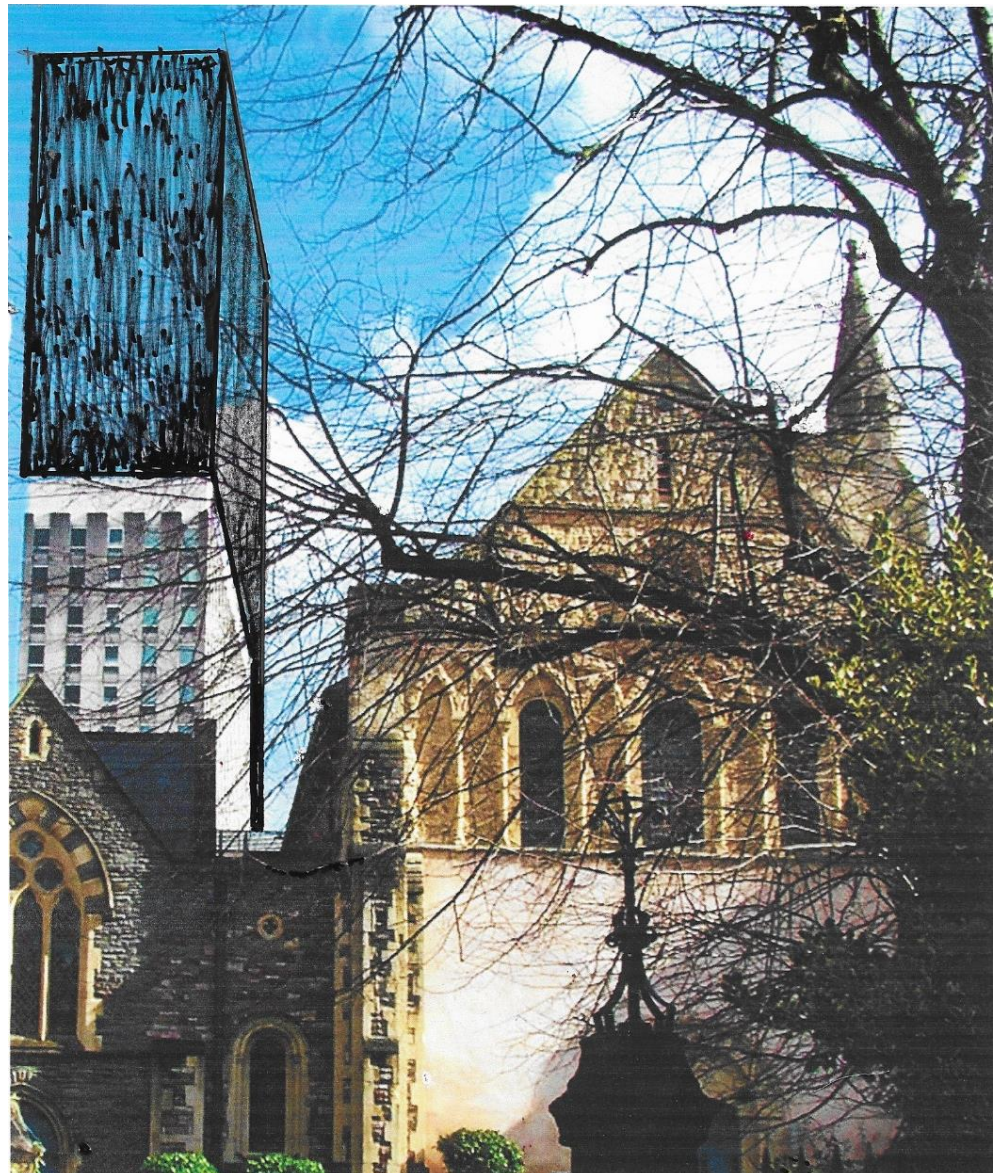
A08

Good evening Chair and Councillors,

We in the Christmas Steps and St. Michael's Conservation Area overlook this neighbouring Bearpit site. We strongly object to this application as it seriously breaches four major local planning policies:

- 1. Height** The 20-storey Premier Inn had long been the tallest tower block in Bristol. This application proposes to replace it with a gigantic 30-storey tower block of half as high again. It would breach the Council's policies on keeping high-rise buildings to the city's periphery to preserve the inner city's roofscape of church spires and historic buildings.
- 2. Dangerous Concentration (Monoculture) of Students** The proposed development would be in massive breach of this policy, adding 442 double bed spaces to the surrounding student of accommodation 1,078 double beds. If the Bristol Local Plan is to mean anything, then this would be an extremely "Harmful concentration of students within a given area".
- 3. Harm to Local Communities** The Christmas Steps residential area is already harmed by armies of students flocking through it every day from the central "Canyon of Tower blocks". The additional hundreds of students would be a nightmare for our community. In 2018, chief planning officer Zoe Willox wrote reassuring us that the Bristol Local Plan would resist harmful concentrations of students in any one area.
- 4. Harm to the setting of Listed Buildings**

We illustrate Bristol's oldest working building – Grade 1 listed St. James Priory built 1129 with the existing Premier Inn just behind and the extra height of the proposed gigantic 30-storey tower shaded-in. It would overwhelm and dwarf St. James Priory and would harm the setting of other nearby listed buildings - Fripp's Chapel, the Georgian Dental Hospital plus the many listed buildings in the adjacent Stokes Croft and Brunswick and Portland Square Conservation Areas.



We request that this application be refused to make way for something much smaller and in keeping.

STATEMENT re. 23/02827/F (tower blocks to replace Premier Inn) AND REQUEST TO SPEAK on 06.03.24

Here is a statement from Better Urbanism for Bristol, a charity, regarding planning application 23/02827/F which is to be considered by Development Control Committee A at their 6pm meeting on 6th March 2024 – and a request to be allotted time to speak.

My complaint is the enormous damage which would be done to the city by this proposal, against the small gain.

We shall lose the views of our hills. The tower - a 30 metre wall, 28 storeys tall - will block views across the city, hiding many listed buildings. It will set a precedent for many other tower blocks. We will lose much of the beauty which attracts talent, students, and tourists and makes Bristol relatively rich.

Filling the city centre with a series of 28 storey blocks will not only damage the environment, with their very high embodied carbon cost per square metre, but reduce the centre to a generic, characterless urban desert which is not going to attract anyone much. To do so is to throw away our economic future, as many cities did in the 60s and 70s when they went down a similar high rise route.

The country is dotted with these disasters, and till recently Bristol has had the good sense to avoid taking this path. With a little ambition our city could increase its beauty rather than reduce it. The key is to resist the developers.

What will we get for the tower's extra height? 91 tiny student rooms, used only 36 weeks a year, many north facing, with unopenable windows because of the noise and pollution.

A more realistic option to allowing this terrible precedent would be to repurpose the existing building as housing. As originally an office block it has strength. It can be repurposed with a probably design life of 100 years. An example is the ugly Bristol and West Building which became the much more attractive Radisson Hotel. Let's insist on doing the same here.

Statement to Development Control Committee A on 6 March, 2024

Re. Planning Application 23/02827/F Premier Inn, The Haymarket, Bristol BS1 3LR

Submission by the St. James Priory Project

- The St. James Priory Project is extremely disappointed that, as a key neighbour and owner of the most important heritage assets close to the proposed development, its comments have been ignored and are not referenced within the officer's report.
- The developer has made no effort to engage with the Project nor is there any evidence that it has had any regard to the setting of the Project's buildings or the service it provides.
- The increased height of the proposed new development will cause substantial and unacceptable harm to the setting of buildings which have been described as being among "the oldest and most historically significant" in Bristol.
- The new towers will loom over the west and south elevations of the grade 1 listed church and the grade 2* listed Church House. They will completely dominate the former churchyard, St. James Park, a valuable local asset.
- The report downplays the "very strong concerns regarding the application" which English Heritage have articulated.
- The report makes no "exceptional" case for the harm the additional floors will cause. All the public realm benefits could be provided within a reduced scheme.
- The report mentions an appeal on a development in Wilder Street but fails to reference the much more relevant case history of the development of the Old BRI site. In 2017 Development Control Committee refused permission for a scheme including a 21 storey block submitted by Unite Student Housing. Unite appealed the decision but later withdrew their appeal and built a much less overbearing scheme including an 8 storey block.
- St. James Priory Project provides accommodation for those in the process of recovery from drug and alcohol addiction. After treatment they are generally provided with accommodation by the Council as vulnerable single adults. They require self-contained accommodation where they can close their own front door and not share with others in what may or may not be a "dry" household. Within the development there is no provision for them, for local key workers or for families.
- The blocks will provide accommodation primarily for students and make no significant contribution to local housing need. There are more suitable locations for more University of Bristol student accommodation, i.e. the Temple Meads campus.
- St. James Priory Project strongly urge the Committee to refuse the application.

Statement on Application 23/02827/F Premier Inn, The Haymarket, Bristol BS1 3LR

I wish to object in the strongest terms to this application. The scheme is poorly designed, a threat to the heritage and history of the city, and the type of accommodation proposed will do nothing to address the dire housing shortage.

The application proposes 422 student bedrooms, yet more purpose-built student accommodation in the city centre. This is alongside the 328 student bedrooms proposed in the Rupert Street application. This intensification of use risks turning the centre into a giant campus and monoculture. Bristolians need housing for all ages and ranges of people in a mixed-use centre, not just accommodation for students and short-term solutions. The sort of accommodation proposed is not good for students either. There is plenty of evidence that tall buildings – in this case a whopping 28 storeys- increase social isolation and poor mental health.

Student numbers in the city have increased by a third over the last five years (17,200), with a similar rate of growth forecast for the next half decade. The result is that student accommodation is dominating the housing market in the city, forcing out other types of new housing development. Nearly 30 per cent of students at the University of Bristol are from overseas, paying higher fees. What will happen when conditions change and the international student market bubble bursts, as it inevitably will? Will the negative impacts on our city have been worth it? While developers risk killing the golden goose, it is the council who will be left picking up the pieces. What will happen to the leftover, surplus accommodation? Will it become the slums of the future?

The application also proposes a separate block of 142 co-living bed spaces, also known as large-scale purpose-built shared living (LSPBSL). This type of housing is in no way a long-term or decent housing solution. The Mayor of London last month published London Plan Guidance on large-scale purpose-built shared living. The guidance says the following: ‘Whilst LSPBSL provides an additional housing option for some people, due to the unique offer of this accommodation type it does not meet minimum housing standards and is therefore not considered to meet the ongoing needs of households in London.’ [LSPBSL LPG Feb24\[1\].pdf](#)

What applies to the ongoing needs of households in London equally applies to Bristol households. Along with the glut of PBSA, LSPBSL will do nothing to meet the needs of Bristolians. Instead, our choice, as presented by this and the Rupert Street application, will either be to leave the city centre or to live in cramped conditions which fall below the minimum space standards. We will soon face a situation, if we are not already there, where there is nowhere for families to live in our city centre. Families, older people and children are being forced out.

The application proposals do not, as the planning officer claims, positively contribute to housing delivery in a sustainable location because they do not cater for Bristolians’ housing needs. Instead, they will mean an over-concentration of use – student housing - and cramped, short-term accommodation in the form of co-living.

The 28-storey height of the student block is completely inappropriate for this site and will dominate and overshadow much of the surrounding area. This tone-deaf design shows a blatant and arrogant disregard for the heritage and history of the city centre. It is hugely ironic that the developer has

dubbed the scheme St James Square. To the south-west of the site 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. But instead of enhancing and respecting this historic area, the design is a missed opportunity and the 28-storey tower would destroy the unique relationship intrinsic to historic Bristol of topography, built form and skyline.

The city centre needs a proper masterplan/SPD rather than the current, piecemeal planning done on the hoof. Different applications are coming in for different sites at different times such as Debenhams, Castle Park, and Premier Inn and Rupert Street. If this application, and the Premier Inn application, are approved, we risk repeating the dreadful planning mistakes of the postwar period. You only have to look at the Bear Pit to see how the city still bears the brunt of previous poor planning decisions. In 70 years' time, what will this committee's legacy be? Another poorly planned centre, with shoddy, ageing tower blocks? Or a master planned, restored coherent city centre that you and Bristol can be proud of? It is not NIMBY behaviour to demand the best design and decent housing for Bristolians. I would respectfully ask that the committee refuses this application.

I wish to strongly object to this amended application, following my earlier objection to the original application proposals.

I would respectfully urge the members of the committee to bear in mind the following points in their deliberations;

- The purely nominal reduction in height of 4.05m will make no material difference of impact of the proposed tower on the views across the city, especially north-south (eg from the Kingsdown ridge to the open countryside to the south); these views to the open countryside are a key feature of the Bristol bowl are a valued asset to residents and visitors alike. This intrusion on the skyline will also have a critically negative effect on the setting of adjacent heritage assets, the conservation areas to its immediate west, north and south and in particular to St James Priory, the oldest building in Bristol, on whose axis the west elevation of the slab tower will lie. (this will be closer to the centre of the Priory front elevation than the slightly off centre view in the applicant's montage).
- The frequent references to the slenderness of the tower is matched only by the non-mention of the sheer cliff faces of the massive south and north elevations. These will in turn be white, high solar gain elevations on the south (being uncomfortable for those single aspect apartments on that side) and conversely the north elevation will be sunless and permanently in shadow for those single aspect apartments on that side. Good principles of layout advocate avoidance of this extreme north/south orientation, for comfort and access to useful sunlight.
- Layout. Added to the issues above, the 'plaza' on the north side of the slab block will be mostly in shade and subject to downdraughts, making it an unattractive place. For this and all the reasons above, the siting of the slab is actually worse than the Premier Inn. Perhaps the existing tower might have been repurposed, making a more sustainable solution?
- The use of lifeless white/grey Portland stone is not particularly characteristic of Bristol; being mainly used in the 1930s-1950s. The much warmer Bath stone, brick and terracotta has a more vibrant and warmly attractive appearance, more characteristic to Bristol over many more years than this recent interloper.
- I stress and welcome the move to provide more and varied housing provision in the city centre. There are many opportunities to secure this in denser medium rise solutions than this dated solution more reflecting the symbols of 'progress' of the 1960s. This proposal is not the only way to achieve city living.
- Finally the NPPF requires developers to build back beautifully. Despite the superficial tweaks to achieve elevational improvements, I argue that few will regard these proposals other than yet another squared off generic slab tower bedevilling a highly valued city skyline.

Kind regards,

Richard Guise – Dip Arch, DipTP. AoU FRSA

Cllr Ed Plowden

Please accept this comment for tomorrow's DCA committee.

This proposed building is not of an exceptional design as required of very tall buildings in the Urban Living SPD; it is a standardised "cookie cutter" building that is unattractive, too high and will be out of place. It will overshadow the City and dominate the skyline with its utilitarian ugliness.

The carbon case for demolishing the old building, with all its embedded carbon and embedding a whole lot more in this new building has not been made, even before it becomes an inefficient building to operate due to its excessive height.

The argument advanced in its favour, which is effectively the current building is already tall and there is a poor urban realm here anyway, is not a good reason to proceed with this development and more or less admits that this too is simply replacing one eyesore with another, with only marginal improvements to the surrounding urban realm.

Anyone claiming to care about the climate crisis would be looking to repurpose the existing building.

Anyone claiming to be a proud Bristolian will recognise that Bristol has nothing to learn from the Manhattan skyline and that approving this application will demonstrate abdication rather than ambition.

Joe Banks

Premier Inn

Is this planning application ready to be assessed by this committee? There appears to be lots missing from the report.

Why does the report barely mention the Urban Living SPD, the council's main planning document on tall buildings and a key material consideration?

Why is the report silent on the view of the council's City Design officers? There are two pages worth of their comments for the Rupert St application being determined today and their comments are on the planning portal for the nearby Stokes Croft student accommodation application.

The Premier Inn proposal will be the tallest building ever to be built in this city. It will also stand next to Bristol's oldest Grade 1 listed building, St James's Priory. Why isn't the committee being told what City Design officers' assessment is?

Have members taken on board the fire safety concerns expressed by the Health and Safety Executive about means of escape from the building? Are you satisfied by the response from the developers? If Grenfell has shown us anything it is the fatal consequences of these kinds of concerns being ignored or kicked down the road.

But ultimately this application needs to be refused because of the excessive size of the 28-storey tower, which falls far below the high standards of design and place-making required by planning policy, will blight the city for generations to come, and kick-start a radical transformation of its historic character. The current building on the site was a failure, this one will be a disaster.

You have many planning policies, both in the local plan and the National Planning Policy Framework, to justify a refusal of this application.

The Urban Living SPD requires "the efficient and effective use of land" to be balanced by "a positive response to context, successful placemaking and liveability".

DM26: "Development will not be permitted where it would be harmful to local character and distinctiveness or where it would fail to take the opportunities available to improve the character and quality of the area and the way it functions."

The National Planning Policy Framework, paragraph 128: "Planning decisions should take into account...the importance of securing well-designed and beautiful, attractive and healthy places."

Paragraph 131: "The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve."

Paragraph 139: "Development that is not well designed should be refused".

Paragraph 203: “Local planning authorities should take account of...the desirability of new development making a positive contribution to local character and distinctiveness.”

There are hard-nosed economic reasons for refusing this application. If this is what the city becomes, fewer people will want to visit as tourists, or stay after they graduate, or come to live and work here. This will damage the city financially and culturally.

Historic England have said this proposal is *8-storeys* too high.

And the impact must be considered in light of the other 28-storey building proposed just yards away on the Debenhams site. The Urban Living SPD says: “When assessing a tall building, it is important to understand the cumulative impacts of the proposals, if there are other tall buildings (either existing or proposed) in the vicinity.”

And if this is approved it will mean the Debenhams proposal is sure to go through. And that will in turn bring forward other proposals of this scale. And then you have transformed the centre of Bristol – one of the great historic cities of this country, whose human-scale mid-rise character is highly valued by the people that live here - into any generic British or American city, filled with ugly high-rise blocks.

Your decision here today is that profound and far-reaching for the future of the city.

If you approve this application be in no doubt that you are opening the door to the destruction of Bristol’s unique character, making it a hostile, oppressive urban environment.

And let’s be clear about what is going on here. This is a dysfunctional planning department, currently threatened by the government with takeover. They are rushing to get the applications that the Mayor’s Office – working for developer interests and the universities – want to get through before elections in May. Is that how you want to determine the future character of this city? Is that rational? Is that moral? Is that in the best interests of Bristol’s current and future citizens?

**Olympian Homes, 23/02827/F Premier Inn, Haymarket
Statement in support, Mark Slatter**

Dear Councillors

After three long years we would like to thank the Bristol Planning team, local stakeholders and all the councillors who have engaged with us, for all their hard work and sometimes difficult conversations. Nobody said it would be easy and it hasn't been.

This development would replace a very tired building, with what we hope will be the most elegant, tall building in Bristol, helping relieve the pressure on wider family housing stock as well as transforming the public space in this location.

We propose to deliver 20 per cent affordable homes at local housing allowance rents within our co-living building. These homes would be perfect for key workers, not least those working at the nearby hospital.

Co-living provides an alternative option for renters and are typically 25 - 27% cheaper than renting a one-bedroom flat.

They are also a much better option than HMOs which usually have little or no shared space. As well as their own private studio apartment, our residents would also have a whole range of shared social spaces, co-working areas, a roof terrace and a gym.

Each floor has eight studios, each with its own bathroom, double bed and kitchenette. But these residents also have access to a large kitchen, dining room and living room, split over two floors, creating smaller communities of 16 throughout the building. These spaces also have outside balconies on each level.

The committee may also be reassured that Olympian has an excellent track record in delivering. If we are fortunate enough to receive your support tonight, as Chairman and founder of Olympian Homes, I can assure you we will start the development this year. This will get built.

Many thanks,

Mark Slatter
Founder and Chairman
Olympian Homes

23/02827/F Premier Inn, Haymarket Statement in support – Mike Cowdy

Dear Councillors

I am a director at McGregor Coxall, the landscape and urban design consultants working on this redevelopment.

It is extremely rare for any major city centre regeneration to see two-thirds of a site handed over for public realm.

Instead of the building footprint using the whole site – as it currently does – 63 per cent would become fully-publicly accessible open space.

Anyone who has visited the site, arrived at or departed from the bus station, would know how unwelcoming and unsafe it currently is. Leaving the bus station, you are most likely to walk around the site, rather than through it.

Our proposals would see 34 new trees and a biodiversity net gain of more than 5,000 per cent. This is most unusual for a major urban brownfield regeneration.

The landscaping strategy would completely transform the site, with:

1. Clear publicly accessible routes through the site connecting the bus station to Haymarket;
2. The whole site becoming one single-level with fully wheelchair accessible routes throughout;
3. 2000m² of public open space, including a large, south-facing public space and an informal play area of 50m²;
4. Naturalistic sensory planting and places to stop and rest for both the new residents and the wider community to share;
5. Planted bunds to help separate pedestrians from traffic;
6. 34 new mixed species trees within the public open spaces and along the new pedestrian routes;
7. Areas of wildflower lawn and mixed shrub planting to help reach that 5000 per cent biodiversity net gain;
8. Roof terraces with protective planted edges and a further 10 new trees for residents of both buildings;
9. Extra space for a new, expanded bus stop and pedestrian connection to the north onto Marlborough Street.

Professionally it has been enormously rewarding to be part of a scheme that would have such a positive and transformative impact on Bristol city centre.

Yours faithfully
Mike Cowdy
Director, McGregor Coxall

OLYMPIAN HOMES, PREMIER INN REDEVELOPMENT STATEMENT IN SUPPORT - NICK WRIGHT

Dear Councillors

I'm one of the architects at Hodders+Partners that has been working for the past three years on this proposal.

I'm sure you all know the site extremely well and agree it needs totally redeveloping.

The starting point for our design was to create a place that felt safe and welcoming for residents and anyone walking through, or spending time at, the site. This demanded freeing up as much of the site as possible for public realm.

The answer to that challenge was to minimize the building footprint, which – in turn - meant going up, not out.

While clearly not everyone likes taller buildings, this is probably the best place in Bristol for one: not just because there's already a tall [and bulky] building on the site now, but also because the buildings and spaces around the Bearpit need to frame what should – in years to come – also be transformed into a vibrant civic space.

By creating two separate buildings, with slim elevations and varying heights, we've sought to allow views and routes through the site. We've carefully refined and further sculpted these designs to maximize daylight into the public spaces and minimise any heritage impacts: not least opening up views of - and creating public open space next to – the neighbouring historic buildings.

Back at ground level – where most people will experience the development – the base of the buildings are highly glazed, with extensive active frontages. There is no 'back' to the site – the whole scheme has been designed as welcoming frontages, with 'back area' storage all in the repurposed basement.

We've shaped the buildings to follow the street curves, creating an attractive and interesting place that is designed for people to move through and around.

We've also given the detail a great deal of attention. For example, we've re-interpreted carvings from St. James Priory to use on the ground floor columns, connecting people with the history of the place.

I understand design can be subjective. But I can also say this scheme strikes a very considered balance between what is like to live somewhere, what it is like to pass through or dwell somewhere, and what it is like to view something from a distance.

Yours sincerely
Nick Wright,
Associate director, Hodder+Partners

23/02827/F Premier Inn, Haymarket Statement in support – Zeta Sebbings

Dear Councillors

I am a chartered environmentalist. My role – as a carbon specialist on this project - has been to ensure this proposal minimises its carbon emissions, in line with the emerging policy.

We've used the most robust industry software tools to assess the lifecycle carbon of the building, including a retention option.

The results of this thorough assessment are emphatic: they show that **retaining the existing building would produce three times the carbon over its operational lifetime, compared to replacing with highly energy-efficient new buildings.**

We've used a whole suite of design measures to do this, including use of existing buildings, and new innovative materials, like Techcrete which produces significantly lower carbon than traditional concrete.

Structural studies show the existing building has suffered significant concrete degradation and has reached the end of its 55 year life. We would expect the lifespan of the new buildings to be at least twice that.

The current building has an extremely poor carbon performance – no amount of refitting could address these major issues.

I became an environmental engineer because I am passionate about climate change. My unwavering professional advice is that the current building needs to be removed to allow for a better use of the site that is both highly-energy-efficient and low carbon.

Yours sincerely

Zeta Stebbings
Associate Director
Hodkinson Consultancy

**23/02827/F Premier Inn, Haymarket
Olympian Homes.
Statement in support – Richard Morton**

Dear Councillors

My name is Richard Morton, Principal Heritage Consultant at Cotswold Archaeology, and I am advising on this proposal.

Cotswold Archaeology is a registered charity that advances public education of archaeology and furthers an appreciation of the historic environment. We are a Registered Organisation with the Chartered Institute for Archaeologists.

Cotswold Archaeology has carried out extensive research on the historical development of the site, and its place in the historic city. The site lay within the precinct of the medieval Priory of St James, and in the 18th and 19th centuries was developed for varied uses including a school, pubs and industry. Post-war placemaking in 1969-74 created a new layout of buildings and circulation at the Haymarket, which included the present 18-storey structure and other buildings across the site. This led to removal of connectivity through the land, with public open space limited to the Bearpit, within a roundabout and connected by subways.

The proposals will bring **direct heritage benefits**, provided through heritage influence in the design process. This includes greatly improved access and connectivity for the public into and through the site, which is influenced by former historical access and connections. **These measures improve the access between the nearby medieval and Victorian churches and historic park at St James', and other nearby parts of the city. The new public space in the site will also open-up views to the adjacent Scottish Presbyterian Church. The ground floor architectural form of the proposals provides contemporary design, with design details reflecting the local built history.**

New place-making within a city inevitably brings change, and the heritage assessment also identifies where the experience of established historic views and buildings in the city will be specifically adversely affected. Ongoing consultation and meetings have been held with Historic England, and the proposed designs include measures informed by those discussions.

In consideration of both the heritage benefits and harms, **the assessment work has concluded that no designated heritage assets would be harmed to more than a low degree, and that, specifically, there would be no instances of 'substantial harm'**, which Historic England agrees with.

Yours sincerely,

Richard Morton
Principal Heritage Consultant
Cotswold Archaeology

23/02827/F Premier Inn, Haymarket Statement in support – Craig O’Brien

Dear Councillors

I’m Head of Planning at Savills in Bristol, and the planning consultant for this proposal.

The redevelopment of this site has been a long time coming. And clearly it is greatly needed. The adopted and emerging local plans support the provision of PBSA in this location and as the proposal includes Co-living and affordable homes, it is compliant with the emerging policy requirement for a mixed use scheme.

This scheme is the result of extensive engagement with officers, statutory consultees, Design West, neighbours, local stakeholders and the community. After working with Design West and your officers for over 2 years through the pre-ap process, the proposal provides a high quality architectural design solution for the site, supported by Design West and BCC.

When we consulted the local community:

- a. Two-thirds agreed it is a good location for purpose-built student accommodation;
- b. 59 per cent liked the co-living proposal;
- c. 88 per cent supported the approach to opening up the site;
- d. 81 per cent supported having two buildings rather than the current single block.

This redevelopment would bring significant public benefits, including:

- A significant and much needed contribution to the city’s housing supply, mixing well-managed student accommodation with co-living – consistent with emerging policy;
- Delivering crucial affordable housing, at local housing allowance rates, amounting to 20% of the co-living homes, with the same access to amenities as other residents;
- Giving 2/3rds of the site over to new public realm, opening up views to nearby heritage assets and creating a high quality arrival space from the bus station.
- Over £500,000 in contributions towards upgrading local cycle infrastructure, delivering upgraded bus stops on Haymarket and a new pedestrian crossing connecting the site and the bus station to the north, over Marlborough Street.
- 159 full time construction jobs and 22 operational jobs, plus apprenticeships;
- Contributing an estimated £276,000 in Council Tax a year, approximately £2M in Community Infrastructure Levy, and approximately £2.6M in New Homes Bonus;
- £100,000 investment in public art, enhancing the sense of place and creating opportunities for local artists;
- Kick-starting the regeneration of this important part of the city centre, in line with the Council’s DDP ambitions for the city centre

I respectfully ask you take these comprehensive benefits into account when making your decision.

Your sincerely

Craig O’Brien, Head of Planning, Savills

STATEMENT IN SUPPORT - APPLICATION TO REDEVELOP PREMIER INN Amy Kington, CEO, Community of Purpose

Dear Councillors

I am founder of Bristol charity Community of Purpose which supports and celebrates thousands of less privileged young people from across our city.

I grew up in Knowle and know and love this city as much as anyone else. But I also know it is a city with divisions.

Our work – which includes Bristol Young Heroes Awards - seeks to help build a more united Bristol, one every young person – no matter what part of the city they come from – feels proud to be part of.

Why am I speaking in support of this application? Because Olympian Homes has put its money where its mouth is and is investing in the important work we do, as part of *its* commitment to *our* city.

The project it has helped fund – Bristol Together Championships - helps tackle those divisions head on.

But *my* support for Olympian extends way beyond this [very welcome!] financial help. This site is currently a disgrace. And it's been like this for as long as I can remember.

What does it make people from Knowle or Hartcliffe – or any other part of Bristol – feel when they arrive at the bus station? It says: 'why should I care about this dump?'

Civic pride is massively important when it comes to how young people feel about where they live, and what they are part of.

This scheme – which is a massive investment in Bristol – would absolutely transform a place that thousands of us pass through every day.

It is also extremely important that – as a community - we provide homes for our young people if we want to continue to tackle the City's divisions.

My sister is in her mid-30s. She lives with me because she cannot afford her own home. How can that be right?

So, please support these proposals to regenerate this really important site and provide much-needed homes. Thank you.

And please do have a look at our work – I'd be very happy to meet any of you to tell you more. <https://communityofpurpose.com/>.

Amy Kington
Founder and CEO Community of Purpose



23/02827/F - Premier Inn The Haymarket Bristol BS1 3LR

5th March 2024

Public Forum Statement

The Kingsdown Conservation Group urge the committee to refuse this application.

Not so long ago an application was submitted for tall buildings on the Old Hospital Site, which is similarly close to St James Priory. That time the planning officer recommended it be refused for all the same reasons that objectors have raised regarding this application - excessive height, failure to respond to context, impact on historic buildings, impact on Conservation Areas, impact on views across the city etc. The committee upheld this recommendation with the result that what has now been built meets those concerns, while at the same time providing student accommodation and housing units. This shows that it is possible to provide much-needed student and general housing without having to resort to tall buildings, which inevitably have such a negative impact on the urban fabric and are less sustainable in terms of both construction and day-to-day use.

All we ask is for a similar approach to be taken with the Premier Inn site. Accept Historic England's recommendation that the taller tower be lowered by at least eight storeys, refuse the application and ask the developer to reconsider their proposal. It should be easy for their architects to reconfigure the site to accommodate these floors without significant loss of public space. That way all planning issues will be satisfied.

Surely planning should be aiming for the best possible outcome, particularly on as important a site as this, not pitting planning considerations one against the other? We strongly believe that this still remains possible and for this reason urge the committee to refuse this application.

Nicholas Kidwell 9 Somerset Street Kingsdown Bristol BR2 8NB

5th March 2024

Public Forum Statement

23/02827/F - Premier Inn The Haymarket Bristol BS1 3LR

The grounds for objection to this proposal are far ranging and will no doubt be reiterated by others such as the Civic Society. Suffice it to say I wholly support their point of view and that of Historic England.

What I wanted to raise however are two issues regarding the irregular processing of this application:

Neighbour Consultation Letter - This was sent out on 8th February to over 500 neighbours, of which I was one. The deadline for submitting a response was given as 29th February. However the 23rd February, almost a week before the given deadline, I received a letter to inform me that the application would be referred to committee on Wednesday 6th March and in that letter it stated that *'the application was submitted to us in July 2023 and any comments formally submitted to the Local Planning Authority since that date will have been considered by officers'*. Yet on the 28th February, a day before the deadline for neighbour's comments, the Report to Committee was published online. This surely is in breach of the democratic process and as such unacceptable?

Validation of drawings - All the drawings submitted display the statement "DO NOT SCALE", yet Bristol City's formally adopted Drawing Standards: Planning application guidance—plans and drawings clearly states that *'Plans/drawings containing disclaimer such as "Not to Scale" and "Do not scale" will not be accepted by the council.'* In August I submitted a comment online to raise this issue (among others, which were subsequently sorted) yet nothing seems to have been done to address this. In my opinion therefore the drawings submitted should not have been validated.

Application 23/02827/F - PREMIER INN

Much has been made of the benefits of this scheme to the public realm, to the housing crisis and to the historic assets around it.

The church is grade 1* listed, and the church house is grade2*. St James church yard is a valuable green space for residents and visitors. Therefore I have been disappointed to be told by the historic asset, the very significantly important St James' Priory that they have not been engaged with on this scheme. St James Priory consider this application to be significantly detrimental to the historic setting of the priory. They Priory also serves a key function in supporting those recovering from drug and alcohol use. There is concern for the overshadowing and impact of the towers on all these historic assets, and Historic England are quite damning in their condemnation and request that this application is withdrawn. The detrimental impact of the scheme on the multiple surround site of conservation and conservation areas such as Kingsdown and Christmas Steps Arts Quarter.

It is not possible to claim that this application helps with the housing crisis, it firstly creates an incredibly dense concentration of student housing with this block, the old BRI, the Debenhams site, and the 6 other existing or in the process of being built student blocks within a few metres. My largest issue is the co-living apartments. Highrise HMOs are not the answer to Bristol's housing issue. Rather than creating a solution, they fuel the ever increasing costs for people unable to afford an entire home. There are stages to life where HMOs can be fun and desired, however increasingly people are having no choice but to live in them regardless of their preferred housing situation. HMOs are no longer the preserve of students and recent graduates in their 20s. They are increasingly lived in by those in their 30s and 40s, I know of people post-retirement age having no choice but to live in them. Once upon a time, HMOs were the affordable accommodation option for young people starting out in life, laying the foundations for life.

I have asked the developer for a ballpark of how much a room would be, they have not been able to answer beyond the "the market will decide and less than a 1 bed flat". Firstly, it's a room not a flat so one would sincerely hope it less than a 1 bed flat. I have looked at the market and the costs of co-living elsewhere, specifically in Manchester which has been used to promote the concept and Bristol schemes are tighter lipped about market prices. According to a range of websites such as Rightmove, the average price for a standard HMO share in a flat is approx. £700. However the co-living apartments start at £1000 for 4 person shares, and increase with size of room or smaller share sizes. Bristol has a higher average market rate, so I would expect the market will dictate a higher average price. Therefore it will further drive up the average accommodation prices, fuelling the crisis rather than helping to ease it in anyway.

Finally, much as been made of the improvements to the public realm. As fond as I am of the Beefeater and the independent shops on the Haymarket, and however much I would have wished for the developer to take a more compassionate approach toward the tenants there, the site does need to be improved. However the improvements to the public realm could be achieved without such an over bearing and detrimental scheme. The application conflicts with BCC aims to avoid intense density of students or one style of accommodation. One of the selling points of co-living is short term rental, thus creating two blocks of transient communities. The city centre needs to be sustainable in both what we build and how we live. This application delivers neither, creating more instability and pressure on the existing amenities. The application does not compliment the incoming city centre development plan and offers nothing to improve the surrounding public realm.

Whilst I appreciate beauty is in the eye of the beholder, this design is also uninspiring from an architectural perspective and so I am very disappointed to see this to be brought forward to be in such a dominant location.

Every surrounding resident group, historical group and civic group, as well as national groups such as Historic England have objected to this application. I urge the committee to reject this application.

Cllr Ani Stafford-Townsend (them/they)

Stephen Wickham

For all the reasons below I think the applicants proposal is bad for Bristol and its setting.

I don't know what everyone is expecting of this plot but it is no Shard, no Eiffel Tower.

We are not getting Capital City quality here.

Yes, it's the arrival of "Big-Rental" but in Bristol's recent "behind the scenes" push for towers

Opening the door for "good enough for secondary cities" cheap towers all over the place .

And does all this rent money really stay in the city ?

It's not clear to me that it does , nor that it will contribute heavily to council tax.

There is a town planning reason why the old plot has its tower to the right when seen from Bond street. This application fills that left-sky and as soon as you approach reveals not a slim monument but a slabby, indifferent wide flank

And this proposal introduces a sundial , shadow-casting over the adjacent conservation area and the Grade 1 listed church and its own student population at different times of day.

Have you visited Castle Park on a frosty day?

The Castle Park View Jenga tower has this affect but it's the eight storey element that keeps the ice from melting all day on the former Coffee shop and its out door tables. This is a serious issue for all tall sites.

The castle park view tower is unfortunately visible from all sorts of random points two miles away. That doesn't make it either good architecture or a great Bristol landmark.

The premier In proposal represent another intrusion on the skyline, but not a good one.

Finally I can remember the present building going up.

Its an office of the 1970's and as such designed by engineers for near infinite amounts of heavy filing cabinets loading its floors. It's taken one adaptation to Hotel already and it could take another adaptation into the future IMHO .

Thank you for reading my statement

Councillor Guy Poultney

Subject: 23/02826/F - premier inn dca 6/3/24

I share the concerns of Historic England, the Civic Society and a wealth of residents associations in the city including in Kingsdown and the conservation area there. The over bearing, extreme height of this development is significantly detrimental the amenity of Bristol, those in close proximity and further afield. I agree with the request from Historic England that this is rejected and that the application breaches: BCS22, DM26, DM31 and Parea 202 of the National Planning Policy Network and 130, 152, 199 & 200 of the NPPF (2021).

The application creates no benefits to our city, it does not address the housing criss and does not address the issues caused by unbalance communities, rather than addressing these issues this application fuels the causes.

I urge the committee to reject the application.

Application no: 23/02827/F

Site address: Premier Inn The Haymarket Bristol BS1 3LR

Proposal: 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)



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Dear Democratic Services,

I wish to make a written Public Forum Statement for the above-mentioned planning application on behalf of the Centre for Sustainable Energy. **I would like to register to speak** at the Development Control Committee A meeting, which is being held on Wednesday 6th March 2024.

Our statement is as follows:

CSE is a charity supporting people and organisations across the UK to tackle the climate emergency and end the suffering caused by cold homes. Our vision is a world where sustainability is second nature, carbon emissions have been cut to safe levels and fuel poverty has been replaced by energy justice. We work with councils, communities and lobby government to ensure the planning system contributes to the creation of a zero-carbon future and to ensure that every building is zero carbon and liveable.

CSE is based in St James Court which adjoins the site to the west. We therefore have an interest in the development of the site insofar as it affects our working conditions, and in respect of whether the development would contribute to or help mitigate climate change and be adapted to the future climate.

As our electricity system decarbonises the relative importance of embodied carbon (in materials, construction, and demolition activities) rises. To reduce emissions and meet our climate commitments, we must start conserving the carbon already embodied within existing buildings, re-using and refurbishing buildings rather than demolishing and re-building. Draft policy NZC3 acknowledges this, "stating that development should prioritise the renovation or retrofit of existing structures" and that "development proposals should seek to minimise and design-out construction and end-of-life waste".

We object to the wholesale demolition of an existing tall building and creation of a new tall building on a similar footprint, which appears directly contrary to draft policy NZC3. Why isn't the existing structure being re-used / adapted? Why aren't the foundations being reused at the very least? The Whole Life Carbon Assessment appears to assess the wholesale removal of the existing building, its re-fit or refurbishment, but it is not clear whether it has assessed retaining and re-using part of the existing structure.

We raise concerns in respect of the height of the building from the perspective of embodied emissions. Whilst the site is a sustainable location for high density development, tall buildings are not the only way to achieve higher densities or the most building forms and are likely to result in higher levels of embodied carbon.

We raise concerns about the overbearing and overshadowing impact the development will have and how this will affect working conditions within our offices, part of which looks directly out onto the application site. Due to the depth and bulk of the proposed buildings, their height and proximity to the south-west boundary, the proposed development would reduce daylight levels within our offices and have an overbearing effect on our outlook.

We are naturally concerned about the potential for noise, dust and disruption arising from the proposed demolition / construction works.

The development will harmfully block views from elevated vantage points through and across the city to the adjoining countryside, and by locating a tall building in a low-lying position within the city, the development will mask the topography of the city. If the principle of a tall building is accepted, and we don't think it should be, the existing Premier Inn hotel should define the maximum acceptable height.

Whilst the wider urban environment has been much altered with the construction of the bus station and St James Barton Roundabout to the north and west, St James' Church (Listed grade 1) and its associated buildings, the remaining churchyard, stone flagged walkways and listed churchyard walls retain a strong historic character. Whilst itself a relatively modern addition, our office building St James Court responds relatively successfully to its historic context, both through its height and scale, the facing materials used, the modelling of the building and the way our building turns the corner to face the church. The result is a clearly modern building which nevertheless complements the adjoining church without being a pastiche of it.

It is not evident that the proposed development takes any account of its historic context in its design and appearance. This is particularly clear in the photomontages where the proposed development appears to loom above the church and its churchyard and compete for dominance with the church tower.

Our view is that the proposed it would detract from the setting of the church and the character of the churchyard, by virtue of its inappropriate height, bulk and bland design.

For the above reasons, we therefore object to the proposal and respectfully ask Members to refuse planning permission.

Yours sincerely,

Daniel Stone
Policy and Influencing Officer

Centre for Sustainable Energy

St James Court, St James Parade, Bristol, BS1 3LH

Councillor Mohamed Makawi

Premier Inn

This application is pitched as a solution to the housing crisis, and a way to return HMOs elsewhere in the city to long term residential usage. However high rise co-living is not the solution that the city needs. Ever increasingly expensive high rise HMOs push up the price of accommodation in our city fuelling the crisis. What our city needs is truly affordable housing for the diverse range of communities in our city, this development does not offer that. It only offers a trap for future generations. I ask you, would you wish to live some where like this in your 30s, your 40s, your 50s? Is this the future you want for your children and grandchildren?

I urge you to reject this application

Statement on NCP Rupert Street City Centre Bristol BS1 2PY23/01407/F

I wish to object in the strongest terms to this application. The scheme is poorly designed, a threat to the heritage and history of the city, and the type of accommodation proposed will do nothing to address the city's dire housing shortage.

Yet more purpose built student accommodation in the city centre (PBSA) – 328 student bedrooms in this case, alongside 442 proposed in the Premier Inn application – puts the centre at risk of turning into a high-rise, giant campus, and mono culture. What Bristolians need instead is housing for all ages and ranges of people, in a mixed-use setting.

The sort of accommodation proposed is not good for students either. There is plenty of evidence that tall buildings – in this case 20 storeys- increase social isolation and poor mental health.

Student numbers in the city have increased by a third over the last five years (17,200), with a similar rate of growth forecast for the next half decade. Student accommodation is dominating the housing market, forcing other types of new housing development out. Nearly 30 per cent of students at the University of Bristol are from overseas, paying higher fees. What will happen when conditions change and the student market bubble bursts as it inevitably will? Will the leftover empty stock and the negative impacts on our city have been worth it? Developers risk killing the golden goose but it is the council will be left picking up the pieces.

The application also proposes a separate block of 249 co-living bed spaces, also known as large-scale purpose-built shared living (LSPBSL). This is in no way a long-term or decent housing solution. The Mayor of London last month published London Plan Guidance on Large-scale purpose-built shared living (LSPBSL). The guidance says the following: Whilst LSPBSL provides an additional housing option for some people, due to the unique offer of this accommodation type it does not meet minimum housing standards and is therefore not considered to meet the ongoing needs of households in London.' [LSPBSL LPG Feb24\[1\].pdf](#)

The same applies to the ongoing needs of households in Bristol. Along with the glut of PBSA, LSPBSL will do nothing to meet the needs of Bristolians. Instead, their choice, as presented by this and the Rupert Street application, will either be to leave the city centre or to live in cramped conditions which fall below the minimum space standards. We will soon face a situation, if we are not already there, where there is nowhere for families and older people to live in our city centre.

Contrary to what the officer's report says, that the proposed development brings forward 'an appropriate mix of uses', this application only serves up student and short-term accommodation.

The 20-storey block is completely inappropriate for this site and will dominate the surrounding area. It will have a negative impact on the development on heritage assets. The building will harm a number of nearby listed buildings, including the Church of St Nicolas and the Colston Almshouses.

The whole area needs a proper masterplan and SPD rather than piecemeal planning done on the hoof, with different applications coming in for different sites at different times such as Debenhams and Castle Park, as well as Rupert Street and Premier Inn. It would be great if a masterplan for this area could restore some of the historic street patterns and squares.

If this application, and the Premier Inn application, are approved, we risk repeating the dreadful planning mistakes of the postwar period. You only have to look at the Bear Pit to see how the city still bears the brunt of previous poor planning decisions. In 70 years' time, what will this committee's legacy be? Another poorly planned centre, with shoddy, decaying tower blocks? Or a master planned, restored coherent city centre that you and Bristol can be proud of? It is not NIMBY behaviour to demand the best design and decent housing for Bristolians. I would respectfully ask that the committee refuses this application.

Statement to Planning Committee

NCP Rupert Street Greystar and Student Roost

23/01407/F

March 2024

Good afternoon committee, I am Neil Howells a senior director at Greystar.

Our proposal for co-living and student homes and a new car park at Rupert Street, Bristol is an opportunity to make better use of the existing NCP Car Park.

Our plans have learnt from our hugely successful inclusive co-living and student communities at Zinc Works and Zinc Quarter at Unity Street.

Opening in October 2022, Zinc Works – our co-living community - has remained at full occupancy since January 2023. Over half of Zinc Works' residents renewed their tenancies in 2023.

Our student living community at Zinc Quarter, operated by our Student Roost brand, has been home to University of Bristol students.

Co-living is a new type of housing that provides affordable, flexible and convenient rental homes in city centres.

Our proposals for 249 co-living rooms at Rupert Street will give residents the opportunity to live alone, whilst also enjoying the sense of community that this type of communal living can bring.

Within the development, approximately 20% of the co-living homes will be classed as affordable homes. These homes will be targeted at key workers in Bristol, helping them live affordably in the very centre of the city, close to employment such as the Bristol Royal Infirmary.

The plans also include 328 student rooms and a new safe and sustainable 400 space car park, fit for the future.

Our plans support the economic future of the centre of Bristol. Students, key workers and young professionals will support the city centre with the new fit for the future car park providing somewhere for people from further afield to visit the city centre.

We have worked with local organisations, Voscur and Creative Youth Network to provide ground floor community uses. This will not only make the area more welcoming for new residents but support the area's existing communities.

As well as contributing to Bristol's housing need, we have also recognised the climate crisis. We have prioritised sustainability in our plans, such as reducing CO2 emissions and connecting to the Bristol Heat Network.

We hope the committee feels minded to approve this application today, so we can get to work in delivering the equivalent of 11% of the city's housing targets.

Members Written Statement

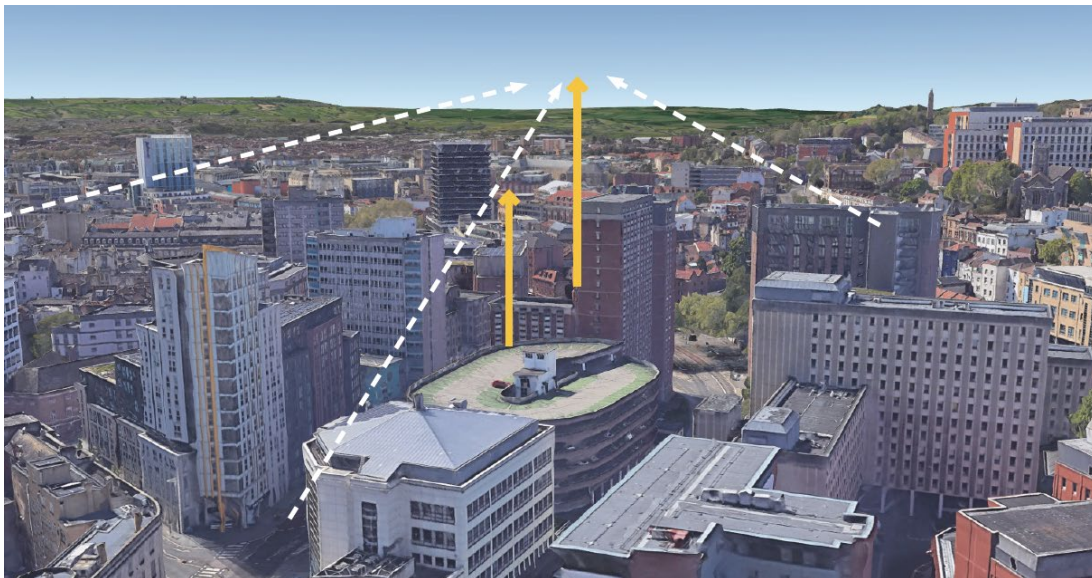
Project name: NCP Rupert Street, Bristol
LPA Reference: 23/01407/F

Existing Building

NCP Rupert Street Car Park occupies a central position within an existing cluster of tall buildings. The building has two unattractive frontages to Rupert Street and Lewins Mead, with the site prone to anti-social behaviour.

The existing car park was built in 1960 and designed to have a 50-year lifespan. Continuing to operate beyond this lifespan, the car park is now in a poor physical condition and no longer meeting the requirements of modern public car parking (larger vehicles / electric charging). In 2023, the 20th Century Society attempted to list the building and secure statutory protection, however this was rejected by Historic England who cited the following:

- * the car park is a structure where its function dictates its form; although of some interest for its imposing presence, this is not sufficient to merit listing.*
- * whilst an interesting example of an early multi-storey car park, its construction did not become a standard for post-war car parks and it is not considered technologically innovative;*
- * although an early example of a solution to the post-war urban parking problem and reflective of the dramatic changes in society and car ownership in this period it does not represent a key moment in urban planning.*



Redevelopment Proposals

The mixed-use redevelopment of this site will provide:

- 400 space public car park, including 40 EV charging spaces (10%) initially, with energy provision for up to 200 future EV charging spaces (50%) when demand requires. 24 accessible spaces and 12 Parent and Child spaces;
- 154sqm of Commercial and Community Units, where the applicant will work with local charities to operate the spaces;
- 249 co-living studios, including 50 studios (20% at an affordable discounted rent, targeted at Bristol's key workers.
- Purpose built student accommodation comprising 120 studios and 208 en suite cluster bedrooms arranged in 6, 7 and 8 bedroom cluster flats.
- Generous shared amenity space including gym, laundry, cinema room, communal kitchens and dining facilities;
- Great enhancement to the public realm, including public art funding, featured paving and lighting, widening of the pavement on both Lewins Mead and Rupert Street, creating spaces for tree, green planting and seating areas

The site is located within the Bristol Local Plan site allocation KSO8 Nelson Street & Lewins Mead, which allocates the area for a mix of uses including retail, leisure, new homes, hotels, student housing and youth and community facilities. The development proposals accord with this site allocation, as well as contributing to the objectives of the Bristol City Centre Development and Delivery Plan (DDP).

Design and Public Realm Benefits

- The existing car park is a poorly designed relic from the 1960's when townscape was poorly considered, blighting the Lewins Mead area.
- Redevelopment provides opportunity to transform the streetscape of Rupert Street and Lewins Mead. Provision of active building frontages and public realm / landscaping enhancements will improve pedestrian environment.
- The proposed mixed-use scheme will creating a new diverse shared living community, with high quality indoor and outdoor amenity spaces to be flexible so they can adapt to suit any future requirements of the residents.
- Missing centre piece within cluster of tall buildings within city centre.
- Optimizing density within sustainable city centre location, thus reducing pressure to develop Green Belt.

Housing Benefits

- The provision of much needed student accommodation within Bristol City Centre.
- The delivery of purpose built co-living accommodation, to cater for a growing need of young professionals and key workers who want a communal living experience.
- Equivalent contribution of 269 dwelling houses to 5 year housing supply (328no. student beds equivalent of 131 dwelling houses (applying BCC ratio of 2.5 : 1) and 249no. co-living beds equivalent of 138 dwelling houses (applying BCC ratio of 1.8 : 1)
- The delivery of 20% affordable rent co-living studios (50 units).

Economic Benefits

- Creation of over 1,000 new jobs during the construction phase and once the proposed development is operational.
- Increased spending in the millions of pounds in the local area: There would be approximately £435,000 of construction worker spending per annum.
- Annual expenditure by operational workers at the proposed development would be approximately £32,400.
- Total annual spend of £1.5m across from the co-living accommodation; of which, £768,000 is expected to be retained within Bristol.
- It is expected students at the proposed development would spend £3.7m in living costs per year, of which £1.8m would be retained within Bristol.
- Tax revenues over £300,000 per year.
- Business rates associated with the new commercial space will equate to approximately £150,000 per annum.
- Significant contribution towards the Community Infrastructure Levy.

Environmental Benefits

- Making effective use of land by redeveloping an under-utilised site in a sustainable city centre location.
- Achieving BREEAM “Excellent” through energy efficient building fabric measures and materials and water consumption reduction.
- An overall regulated CO2 reduction of 54% against the Part L baseline, with 41% reduction beyond residual emissions, exceeding the BCS14 policy target of 20%.
- Connection to the Bristol Heat Network from “day one”.
- Exceeding 10% biodiversity net gain.
- Comprehensive landscaping, green infrastructure and public realm improvements, including street tree planting, raised planters and amenity terraces.

It is respectfully requested that Members support the Officer’s recommendation to approve this planning application in order for this development to deliver the benefits defined above.



Proposed roof terraces

The hidden river

The existing public realm around the Rupert Street site is poor quality. It is concrete and sterile, there is no biodiversity, no life, and nowhere to stop.

Yet if you were to look back through the years, it was once a different story. The River Frome flowed through the site, surrounded by meadows, trees and life, as the name Lewin's Mead suggests.

While we cannot bring the river back to the surface, we can bring some of the biodiversity back through lush green planting - and tell the story of the hidden river through public art.

Public realm

The proposed public realm has been increased on both sides of the building, replacing the forecourt on one side and parking spaces on the other with a well-activated space which puts people first.

The colonnade becomes a welcoming haven away from the road. On Rupert Street decorative paving will reveal the story of the hidden river, with the final design defined by an artist as part of the public art strategy. On Lewin's Mead the paving celebrates the Bristol Byzantine theme. Good lighting will allow the colonnades to act as lanterns in winter, creating a welcoming glow, visible up and down the street.

We will plant street trees on Rupert Street away from the underground culvert, offering large-scale greenery to the streetscape. Lush green woodland edge planting acts as a buffer to the road, and brings life and biodiversity back to both streets, with a planting palette that takes the Frome river valley as inspiration.

The proposed seating offers somewhere to pause – for passers by or residents. There are now opportunities for people to dwell, rather than pass straight through.

The existing site offers no cycle parking provision, while we are proposing visitor spaces to encourage sustainable travel. Pedestrians are given priority where vehicles cross into the site.

Rupert Street

Residents' roof gardens

The roof terraces at level seven and fourteen offer a generous amount of outdoor amenity space for the buildings' residents.

The naturalistic, woodland-edge planting has been designed to create the sense of woodland glades, with lush planting and small, open-canopied trees creating good opportunities to find a peaceful spot to connect with nature.

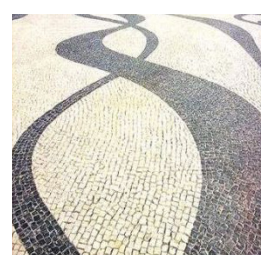
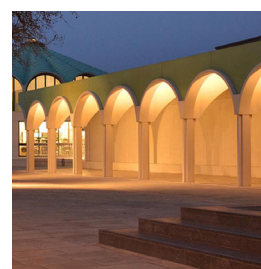
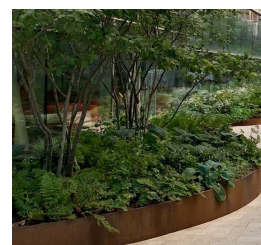
Foraging species found further upriver in the Frome valley are woven into the planting palettes, including alliums, wild garlic and wild strawberries, giving residents elements they can pick for dinner.

Across the different terraces there are a variety of spaces. Some are more sociable, with places to eat or work together. The central south-westerly space offers outdoor kitchens, giving residents a great place to gather on a warm summer's day. Some spaces are quieter, with shady nooks to tuck yourself away amongst the planting. Shadier areas also offer communal tables, offering somewhere to work outside once the sun has passed through.

The layout allows residents to move around the building, following the sun as it charts its course. If the wind is coming from a particular direction, there will be a garden where you feel more sheltered, and the roof terraces have been wind tested.



Proposed public realm



Precedents



23/01407/F - NCP Rupert Street City Centre Bristol BS1 2PY

5th March 2024

Public Forum Statement

The Kingsdown Conservation Group does not support this application. The sudden proliferation of applications for tall buildings, with more in the pipeline, is a worrying trend and we would encourage the committee to nip it in the bud. So many cities are seen their skylines spoiled by tall buildings - London, Leeds, Manchester and Liverpool which has even been stripped of its Unesco World Heritage Status because of this. There is still time to prevent this happening in Bristol and instead encourage developments that put people and places first. Tall buildings have a blighting effect on their neighbourhood, and in the case of this site the effect would be compounded by the adjacent towers, making Lewins Mead an even more unpleasant place than it is now. . Medium height development can still deliver high densities of housing and is surely the model to be encouraged. Please refuse this application.

Cllr Ani Stafford-Townsend

I am somewhat repeating myself with my objection to the second co-living application that you will consider this evening.

It is not possible to claim that this application helps with the housing crisis, it firstly creates an incredibly dense concentration of student housing with this block, the old BRI, the Debenhams site, and the 6 other existing or in the process of being built student blocks within a few metres. My largest issue is the co-living apartments. Highrise HMOs are not the answer to Bristol's housing issue. Rather than creating a solution, they fuel the ever increasing costs for people unable to afford an entire home. There are stages to life where HMOs can be fun and desired, however increasingly people are having no choice but to live in them regardless of their preferred housing situation. HMOs are no longer the preserve of students and recent graduates in their 20s. They are increasingly lived in by those in their 30s and 40s, I know of people post retirement age having no choice but to live in them. Once upon a time, HMOs were the affordable accommodation option for young people starting out in life, laying the foundations for life.

I have asked the developer for a ballpark of how much a room would be, they have not been able to answer beyond the "the market will decide and less than a 1 bed flat". Firstly, it's a room not a flat so one would sincerely hope it less than a 1 bed flat. I have looked at the market and the costs of co-living elsewhere, specifically in Manchester which has been used to promote the concept and Bristol schemes are tighter lipped about market prices. According to a range of websites such as Rightmove, the average price for a standard HMO share in a flat is approx. £700. However the co-living apartments start at £1000 for 4 person shares, and increase with size of room or smaller share sizes. Bristol has a higher average market rate, so I would expect the market will dictate a higher average price. Therefore it will further drive up the average accommodation prices, fuelling the crisis rather than helping to ease it in anyway.

The application conflicts with BCC aims to avoid intense density of students or one style of accommodation. One of the selling points of co-living is short term rental, thus creating two blocks of transient communities. The city centre needs to be sustainable in both what we build and how we live. This application delivers neither, creating more instability and pressure on the existing amenities

Co-living does not answer the question or provide the solution that Bristol is looking for in our housing crisis. Please reject this application.

Stephen Wickham

For all the reasons below I think the applicants proposal is bad for Bristol and its setting.

I don't know what everyone is expecting of this plot but it is no Eiffel Tower no Shard, not Wills-tower-2

We are not getting Capital City quality landmark here. Funny top from some angles maybe?

Yes, it's more of the arrival of "Big-Rental" but in Bristol's recent "behind the scenes" push for towers

Opening the door for "good enough for secondary cities" cheap towers all over the place .

And does all this rent money really stay in the city ?

It's not clear to me that it does , nor that it will contribute heavily to council tax.

And this proposal introduces another sundial , shadow-casting over the adjacent neighbourhood at different times of day.

Have you visited Castle Park on a frosty day?

The Castle Park View Jenga tower has this affect but it's the eight storey element that keeps the ice from melting all day on the former Coffee shop and its out door tables. This is a serious issue for all tall sites.

The castle park view tower is unfortunately visible from all sorts of random points two miles away. That doesn't make it either good architecture or a great Bristol landmark.

The Rupert street proposal represents another intrusion on the skyline, with a playful element possibly , but overall not a good one. I would fear permitting the height and then a secondary cheaper proposal nosing in for development.

Thank you for reading my statement