

## **WHaM's response to the Pring and St Hill site (Plot 1) consultation by Rollo Homes**

This is one of a number of sites in the area between East St and Windmill Hill that is being considered for development. It has the potential to significantly help regenerate this area of south Bristol. The Pring & St Hill site represents an opportunity to bring life to the area, to connect Windmill Hill to the centre of Bedminster and fulfill a need for residential and employment space.

The scheme presented at the public consultation showed a number of changes from the scheme submitted for planning.

### **Density**

The density of the scheme has changed little and is still extremely high at approximately 400 dwellings per hectare (DpHa). This is still twice that of nearby Consort House which is 200 DpHa and Wapping Wharf (also 200 DpHa). The site cannot accommodate such large numbers of residents successfully.

### **Massing**

WHaM has concerns that the development, by virtue of its height and massing will separate Windmill Hill from the centre of Bedminster. This is in conflict with policy BCS 2 which requires major developments to take opportunities to reduce severance of part of the city centre from neighbouring communities caused by major roads and other physical barriers. Worryingly, the architect at the consultation noted that the proposed height of the scheme was encouraged or led by BCC's planners and that the architects themselves did not want to build as high. Whilst this may be construed as consultation platitudes, it suggests that the architects and developer were confident they could deliver a financially viable scheme at a reduced height/density and in line with BCC's adopted policy re. tall buildings.

### **Massing and context**

The height and scale of the building is inappropriate for the local context being far in excess of buildings in the vicinity. The flats on the opposite side of Malago Rd are three storeys high. Even with the welcome slight change in set-back the buildings will be overbearing for neighbouring residents and dramatically reduce their amenity. A series of tall building blocks in this area will obscure views across the city to Windmill Hill and will have an adverse affect on the neighbouring Bedminster conservation area immediately to the north of the site.

We note that there is a submitted comment by the Civic Society regarding the height of the previous iteration which is still pertinent to the revised scheme which WHaM agrees with. We are also concerned the visual analysis photographs submitted within the documents are misleading as to the impact the block of flats will have on the houses and green space on the opposite side of Malago Road and Bedminster conservation area. The proposed height of the development contravenes SPD1. References to the Polden House and Northfield House are not appropriate precedents given the acknowledgement of their negative impact on Bristol's character in SPD1.

### **Urban environment**

The development provides some improved planting and increased landscaped areas however there is no clarity at this stage on how these will be used as communal outdoor or public space. The Core Strategy's objectives and Policy BCS9 both recognise the need for green infrastructure, recognising its role in producing healthy places for community.

WHaM is disappointed by the lack of consideration and failure to provide any meaningful Green Infrastructure at street level. It appears that any planting is intended purely to screen the building. Major developments should aim to provide opportunities for physical activities, including sports, active play and food growing. It is also important for the mental and physical health of residents to

be close to green infrastructure. There has been improvement on the size of the green space but moving the building back towards the railway embankment has also reduced the area of green space behind the building.

The NPPF paragraph 7 also implies developments should have an environmental role 'contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity'. There are no significant areas of planting or activity space included in the development and the important opportunity to provide a space for recreation.

- Details of the treatment to the Malago watercourse should be provided.
- Details of use and intended access for the roof terraces and the inclusion of planting should be provided and WHaM would expect at planning stage the inclusion of these are protected by conditioning so that they are not omitted.

### **Sustainable development**

WHaM encourages developments around the Malago Green area that provide for a mix of uses. We agree with the core strategy objective that: 'Mixed use and inclusion of a mix of uses is essential to allow the city to meet latent and future demand for industrial and warehousing development'. WHaM has concerns that these and other planning requirements for mixed use sustainable developments are not being met. High quality design is an essential part of all new development in the city, required to support quality of life and the attraction of the city to businesses and visitors. Provision of a mix of homes, together with social infrastructure, is essential to help stabilise housing affordability and help meet the needs of a growing and changing population; this scheme does not provide such a mix; it is unclear whether or not the type and mix of dwellings will provide family housing.

The Spatial Strategy Section within the Core Strategy requires that new homes to be developed in south Bristol should not be of a single tenure type, that they should include a variety of housing types to ensure a development of balanced and sustainable communities. The inclusion of some shared ownership housing is a step in the right direction but concerns that this is too small in number, and that it could be reduced or omitted at application stage, have been raised during local feedback.

### **Ground floor changes**

WHaM notes that some commercial space has now been included in the application which is considered welcome. WHaM welcomes the inclusion of some active frontage at street level but this change does not address the fact that the overly-imposing built form will physically isolate Windmill Hill. The new layout shows a reduction of parking numbers which could reduce the impact on traffic by the scheme but conversely is likely to have an impact on on-street parking in the area which is already at full capacity. There are no proposals for the inclusion of community facilities, (ie doctor's surgery etc.) within the scheme and given the current strain on those existing in the area this further reinforces the fact that the site cannot accommodate such a high number of dwellings.

### **Relevant policy:**

- Paragraph 7 of the NPPF supports developments which create strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflects the community's needs and support its health, social and cultural well-being
- Paragraph 17 of the NPPF calls for the promotion of mixed use developments, and encourages multiple benefits from the use of land in urban and rural areas, whilst recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)
- Paragraph 38 of the NPPF reinforces this by noting that for larger scale residential developments in particular, planning policies should promote a mix of uses in order to

provide opportunities to undertake day-to-day activities including work on site.

### **Local infrastructure - including amenities**

The NPPF (Paragraph 9) seeks improvements in the built environment which would encourage sustainable development which would make it easier for jobs to be created in cities, and improve the conditions in which people live, work, travel and take leisure.

### **Healthy development**

There is great concern from WHaM that the development will block light to the flats on the other side of Malago Road. In some cases these will be overshadowed for much of the year with no access to direct sunlight during that time.

Whilst amended designs for the site's energy centre were not at the consultation presentation, WHaM still has concerns over the safety and health impact for the energy centre, its pollutants, including exhaust fume by-products from the generator propellants/lubricants which in other energy centre studies have been shown to contain heavy metals and volatile compounds (aside from NO<sub>2</sub> emissions). The fact that a rival developer is proposing a larger energy centre nearby, and the lack of coordination between the two, shows the lack of cooperation between the developments.

The consultation boards do not suggest that an Environmental Impact Assessment will be provided for the application. WHaM would consider this a necessity for development of this scale.

The development is sited in an already polluted area. The massing and arrangement of the buildings will exacerbate this and the impact on residents will need to be carefully reviewed and harmful effects mitigated. We are unaware of any investigation of the buildings effect on wind. Evidence gathered by Bristol City Council in 2015 suggests high levels of NO<sub>2</sub> build up in confined areas between buildings in the local area along busy streets. In other cases of high pollution this has led to new developments having extraction and sealed windows. WHaM is concerned that this approach is not acceptable in this instance. The flats on the opposing side of the road will not have this protection and as such may suffer as a 'knock-on' effect from the construction of the building. Some of these flats are council owned and may contain vulnerable residents such as the infirm and elderly.

WHaM welcomes the inclusion of Photo Voltaic (PV) panels but would like to know more details of the percentage of energy they will be providing for the scheme.

### **Use of St Catherine's Place precedent**

When permission was granted for the 16-storey block of flats at St Catherine's Place, the report stated that this size of building would be a landmark building that should stand alone and not set a precedent for other high rise buildings nearby. WHaM is concerned that the Pring & St Hill development, coupled with St Catherine's Place, will start to create a series of uncoordinated buildings and will significantly affect the Bedminster Conservation Area and the existing character of south Bristol, this is especially true now that the framework plan for Bedminster Green has unravelled.

Supplementary planning document SPD1 says: 'any building of 27m or taller (approximately 9 storeys) will automatically trigger the need for applicants to address the assessment criteria as set out in this SPD, regardless of whether the proposed building is significantly taller than those around or not'. It specifically notes that the area around Victoria Park, which is 200 yds away, is unsuitable for tall buildings. This application is for a building over 39m high.

### **Concluding remarks**

WHaM would like housing development at the Pring & St Hill site but feels that the changes to the scheme are too minor to significantly address the overriding issue that the site cannot successfully

accommodate such a high density of residential units whilst promoting sustainable healthy living.

Whilst the design has made some relatively minor improvements, the density is still too high and at street level the building bears little response to context and would be overbearing and have a negative impact on south Bristol. It would take a major redesign to fulfil these criteria in line with BCC's core strategy and consequently WHaM cannot support this proposal.

#### **WHaM's public consultation**

WHaM has held a public meeting to discuss the revised proposals with the local community: a public meeting was held on 10th July 2017 to get feedback. The community's concerns have been incorporated into the comments above.