

WHaM's responses to the [detailed Urban Living survey](#)

1. The City is seeking to optimise densities, by balancing the more efficient and effective use of land, with aspirations for successful placemaking, liveable homes, and a positive response to context. Chapter 2 of the SPD shows the ways in which this can be successfully achieved, setting out the important considerations at a city, neighbourhood, street and building level.

Do you have any specific comments on the design guidance provided?

The aspiration for successful placemaking liveable homes and a positive response to context is admirable. However, WHaM disagrees with the proposals for how this could be achieved. In particular, we disagree with the proposed policy to increase density up to 350dph, particularly in Bedminster. Whilst some density is a good thing from an environmental and community perspective, such a high density increase over a short period of time in a localised area will have serious consequences for existing communities. For example, it will cause a strain on public services and cause a loss of green space and trees. We are also concerned about the kind of behaviour from developers this policy will incentivise.

WHaM disagrees that 350dph should be the trigger point for increased scrutiny. We suggest that there should be a much lower threshold, which should also be tied to a percentage increase in density.

We want to emphasise that successful place-making requires a mix of uses, good urban planning and a range of housing types, including family homes, to create balanced and sustainable communities.

Master-planning and guidance must be provided for all high density sites including within the Bedminster Green area to ensure we do create the kinds of neighbourhood that supports the existing communities and adapts to the needs of future developments. We are clear that very tall building are not appropriate for Bedminster.

2. The City believes that opportunities exist to modestly increase densities within most areas of Bristol and has additionally identified a number of 'Urban Living' focal areas which are considered to have the potential to significantly increase densities. The degree of change will need to be established through a design-led approach, with a spatial plan being prepared for areas of anticipated change, which gives form to the concepts outline in this SPD (see Chapter 2)

Do you agree or disagree with the proposed 'Urban Living' focal areas? Bedminster Green presents an opportunity for modestly increasing density – we strongly disagree with a significant increase in this area. Bedminster is an urban area; it is clearly not a central area and is surrounded by council identified urban areas. To identify Bedminster as a central area is a specious

claim to justify the council's ambitions for tall buildings. The idea of producing a document to specifically enhance/control the standard of urban developments is welcome, but urban development must not be at a cost to existing communities.

- The document favours tall buildings over sustainable communities.
- What is a design-led approach? Please set out the guidelines for this in plain English so it is clear for lay people. How does this approach guarantee the involvement of stakeholders such as local residents, businesses and communities?
- Balanced and stable communities require proper facilities such as : gardens, community areas, family housing, recreational, health and educational facilities.
- Recent proposals for Bedminster Green (which have included tall building proposals) have provided only flats that are suitable for young single people and couples, the document must discourage this and promote a mix of accommodation types.
- Low rise, high-density housing with gardens and streets would create greater opportunities to create balanced and sustainable communities than Tall buildings centred around stairways containing large numbers of 1 and 2 bed flats encourage transient populations.
- What form will the spatial plan for Bedminster Green take? It should include community involvement at every stage of the planning process.

3. The City is keen that all new residential development achieves a minimum indicative net density of 50 dwellings per hectare (net). Net densities below 50 dwelling per hectare should only occur where it is essential to safeguard the special interest and character of the area. Hyper-density development (above 350 dwellings net per hectare) will be discouraged and would be subject to much more rigorous impact testing to ensure other policy aspirations are met.

We agree that 50dph should be the minimum. WHaM however, disagrees that Bedminster Green should be considered as a focus for high density development. We are keen to see housing development that creates long-term, well planned, stable and balanced communities that have the future needs of the residents in mind. We are keen that future development will be sustainable and have the involvement and support of existing communities through any master-planning stages and all subsequent planning processes. Tall buildings are not the only solution for high density development, as the council correctly points out when referring to Clifton and Southville. Historically there have been cases where tall buildings in Bristol have resulted in impoverishment of the areas concerned. These have included Barton Hill, Hartcliffe, Bedminster, Lawrence Hill and Easton. These are largely places where poor and minority ethnic communities are focussed and are not sustainable communities because people actively try to leave them to settle elsewhere, preventing them from being stable. They have resisted regeneration due to the logistical and economic difficulties of overhauling or replacing tower-blocks without rehoming the residents, we do not want to see a repeat of this situation in other areas of the city.

4. The City is seeking to drive up the quality of higher density housing schemes, and has prepared a set of new ‘quality standards’ to help achieve this. These are broadly based on standards that have been in operation across London since 2015. It includes a new open space standard (See Chapter 3).

**Do you think the standards provided are the right ones?
Are there some additional standards that need adding?**

WHaM supports the application of quality standards. We would like these quality standards revisited.

WHaM encourages planning officers and developers to seek similar approaches to the high density design of Clifton and Southville. We support the statement in the document that advises to “*avoid large scale reconstruction of urban blocks that undermines connectivity by carving areas out of community use/ownership*”. This seems to fly in the face of increased density across Bedminster Green, which has seen multiple proposals for developments of just this type. WHaM would be keen to see development that respects the tight grain of local neighbourhoods, such as Windmill Hill, Totterdown and Southville.

In addition to hyper density scrutiny and density control, we believe that developments should also be subject to more rigorous impact testing where they differ from the current neighbourhood context, building form and housing mix. This should also apply to developments adjacent to conservation areas. WHaM seeks the extension of the Bedminster conservation area to cover Bedminster Green.

5. The City is seeking to encourage tall buildings, built in the right locations and to a high quality of design. Chapter 4 of the SPD provides a revised definition of tall buildings (30m or taller - approximately 10 residential storeys), and provides guidance on siting a tall building and achieving design excellence.

Is there anything that could be added to the guidance on siting a tall building, promoting design excellence or achieving a sustainable design?

WHaM strongly disagrees with this point, eight storeys or 24m is plenty and is a historic strategy; there is no need to change it. It is also a strategy that has worked for other cities.

Tall buildings need to suit the context of an area and should be sited only where similar buildings are evident, rather than in an area which is comprised of lower height buildings adjacent to the site. Additional criteria for designating tall buildings are also welcome, such as: a tall building is one which represents a 50% increase over the prevailing surrounding building heights, for example an eight storey building becomes a tall building if surrounded by existing 4 storey development

More stringent criteria should apply to those buildings which are eight storeys and above. We suggest considering all tall buildings as major developments requiring higher levels of community involvement.

6. The City is keen to provide clarity to developers and other stakeholders on submitting a planning application for a higher density or taller building. Applicants are encouraged to more fully utilise their Design and Access Statements to describe the rationale for their scheme, and to provide an assessment of its likely impacts (both positive and negative). To assist this, Chapter 5 sets out a number of new checklists for applicants.

Comments on checklists:

Using a design and access statement to justify a development is commendable. Planning approvals should include compliance with the design and access statement as a condition in addition to drawings. These documents should be binding planning documents.

We believe the response to the checklists in the SPD should be made public as part of the application documents, and applicants must respond fully to the checklists, for transparency.

7. The City is keen that all applications for tall buildings, should be subject to additional scrutiny, as well as major residential developments that exceed the following thresholds:

**more than 150 units/ha in a suburban setting;
more than 200 units/ha in an urban setting; or
more than 350 units/ha in a central area setting**

Comments on thresholds:

WHaM thinks that the thresholds for scrutiny are too high at 350dph. We suggest that there should be a much lower threshold, which should also be tied to a percentage increase in density. We do not support the idea of density as the sole yardstick for additional scrutiny. There are other factors such as scale, massing, appropriateness, existing housing mix and sustainability which all should be considered.

8. The City recognises that building at higher densities can present a range of on-going management challenges whose resolution will be critical to the success of the scheme. It has not been within the scope of this SPD to address these challenges, but it is hoped that a separate practice note will be prepared later in the year dealing with this.

What should the scope of this practice note be?

In the wake of recent events, the group feels that fire safety should be high on the list of future planning concerns for any large scale development.

We have a governmental minister of loneliness; this should encourage developers to engage with the historic issues around the health, well being and safety of tall buildings' occupants. Design should factor in interactive, safe, community spaces.

Developers are currently not accountable for the way the development is actually run – as they sell the development on. We suggest additional conditions to put the responsibility of management onto the development company (rather than onto a management company), ensuring accountability for poor design and insufficient resourcing of developments, or for those developments that do not have a suitable management plan.

Management plans and other arrangements should be a planning condition.

A practice note is needed to ensure functioning waste disposal measures with a commitment to maintain and review periodically. We await the council's practice note.

9. To inform the preparation of this SPD, the City has undertaken a review of a number of higher density schemes recently built in the city, with a view to identifying best practice. It has also held a number of stakeholder events with Bristol's planning, design and development community to better understand the issues involved with delivering good quality higher density schemes. The findings of this can be found in a companion document 'Urban Living – Learning from recent higher density developments'

Do you think there are any additional learning points that we have missed through the Case Study review?

WHaM is concerned that the example developments contain only one hyper density development and one tall building which are not the same example. Neither of these developments are of the same scale that are being proposed for Bedminster Green. If the council believes that the community should have development in excess of this scale and density, it should provide examples of successful developments. There should be clear guidance about what works at this scale of development, and the expectation of the planning department. As it stands, this document (the evidence base) is of little value for ensuring good design at the scale that they are endorsing in the SPD.

Finzels Reach and Quakers Friars are both buildings surrounding a pre-existing successful vibrant city centre in an area suited to young single people and couples. These are both wholly inappropriate examples contextually and geographically for Bedminster Green and Parsons Street which do not have the current infrastructure needed to support developments of this scale.

Successful examples drawn from other cities could be used in the supporting documents.

10. Would the SPD be more useful to use if it was split into 2 parts?

- 1) Introduction, Design Guidance, Quality Standards & Tall Buildings**
- 2) Guidance on Planning Applications & Assessment Criteria**

If you have any additional comments about the SPD, please provide them below:

We would suggest the document is kept as a single entity to ensure all parts are complied with. We would like this document to be clear, concise and understandable to a lay person.

In addition, we must ensure that good, clear, tight conditions on development are enforceable and make sure there is a properly funded planning authority to enforce them.