

WHaM response to the revised Urban Living SPD

Windmill Hill and Malago Community Planning Group (WHaM) have reviewed the revised Urban Living SPD.

In summary, we appeal to the council to:

- 1) **Strengthen the constraints on tall buildings.**
- 2) **Re-define tall buildings as six storeys or higher (rather than 10+).**
- 3) **Strengthen the commitment to community engagement in high density developments.**
- 4) **Recognise the existing, historic character of Bedminster.**

Overall, we are concerned by the use of the word 'recommend' throughout the document. We would like to see clearer direction given.

We also wish to re-iterate our concerns about the consultation on the first draft. The window for feeding back on the Urban Living SPD was very narrow and poorly promoted. A significant number of respondents were mobilised through the efforts of local groups such as WHaM.

Density

The document recommends that "a Masterplan should be prepared at the outset for any significant scheme seeking to increase densities" and states that "A Masterplan will normally be required for developments" which have the characteristics then listed. We suggest this should be a *requirement*, not a recommendation, and *always* required in the circumstances given.

Tall buildings

WHaM disagrees with the designation of tall buildings as 10 storeys or higher. This should be amended to six storeys or higher.

WHaM notes the clear rejection of tall buildings from those who responded to the consultation on the first draft:

- "Clear majority strongly disagreed that new buildings should be allowed to be significantly higher than those around it.
- The majority agreed that new building heights should reflect the prevailing building height of those around it.
- There was strong disagreement that Bristol should extensively promote high rise tower blocks to meet its housing need."¹

There was a "strong objection to the promotion of tall buildings to meet housing need from visual, social and environmental perspective".²

The Urban Living SPD revised draft does not adequately reflect the clear direction given in this feedback. We suggest that stronger and more specific constraints on very tall buildings should be reflected in the SPD. The foreword states that there is a "renewed appetite to build

¹ URBAN LIVING SPD Consultation Statement, Section 3, pp.15-16.

² URBAN LIVING SPD Consultation Statement, Section 3, p.21.

at higher densities, including tall buildings”; there is not an appetite for tall buildings from the general public.

We agree that tall buildings should not mask topography, and we support commitments to ensure prevention of overshadowing and to limit any detrimental impact on the city’s skyline.

We are concerned about the replacement of the 25m separation rule with ‘adequate’ separation distances.

Transport

We are pleased to see the prioritisation of active and sustainable travel, in relation to street design.

Mixed developments

We agree that schemes should have a range of accommodation types.

We agree that “Residential schemes that are likely to include children should have spaces for play and informal recreation”. We also note the commitment made for large schemes to include a range of accommodation types. We understand this to mean that all large schemes should therefore be intended to include, and therefore be appropriate for, children. We suggest this is stated more clearly.

Community involvement

The revised SPD says that a key success factor in high density developments is early and sustained community involvement. We would like to see this commitment strengthened. We would like the SPD to be more specific about what community involvement should entail.

Visual impact assessments

We agree with the change proposed to assess visual impact to conduct these in relation to views of specific landmarks, rather than from certain points.

Bedminster

Bedminster Green is described as having “significant potential for intensification”. Whilst we recognise the sustainability benefits of increasing density in an area with good transport links, we are concerned that currently there is insufficient supportive infrastructure, such as social amenities, doctors’ surgeries and schools to sustain a very significant increase in density.

We note that Bedminster is designated as an inner urban area and therefore optimum density is likely to be 120 units/ha (i.e. Paintworks or Junction 3). It is unclear whether the ambitions for Bedminster Green are in line with this.

We suggest that the SPD fails to sufficiently acknowledge the existing, historic character of Bedminster.