

WHaM response to the proposed development at St Catherine's Court, Bedminster (Nov 2018)

WHaM were pleased to have the opportunity to comment on application 18/05310/F for a comprehensive redevelopment of the St Catherine's site to provide a mixed use scheme which would comprise residential, new retail, leisure and commercial space including a cinema, refurbishment of existing retail facilities together with parking and amenity space, vehicular access, servicing arrangements, public realm, landscaping and associated works. The proposal would build approximately 270 new homes in five blocks between 4 and 22-floors tall. **The group regrets that the proposal cannot be supported in its current form.**

Refurbishment

Whilst the group believe that the refurbishment of the shopping centre would help revitalise the town centre of Bedminster we were concerned that the scheme itself comprised far more accommodation in an unsuitable form for the area:

Housing mix

The mix of apartments is all small 1 and 2 bed apartments, this does not represent any form of family accommodation. The inclusion of family accommodation would help generate activity in and around the development. We were concerned that the development of a narrow type of accommodation types might produce a glut of similar apartments all on the market at the same time, which could lead to apartments standing empty rather than the housing it claims to be providing.

Amenity space

Few of the apartments have their own private amenity space relying on public realm and roof terrace at 12 floor.

The public realm at ground level will be overshadowed from the south by the tallest part of the development, which might make it uninviting during large parts of the day and the winter. Additionally, within the site the existing homes will be overshadowed by the tallest parts of the development for much of the day.

The new SPD on urban living notes that:

Tall buildings will generally be discouraged on physically constrained sites within existing built up areas, where a tall building is likely to have a negative impact on the daylight and sunlight penetration into the habitable rooms of existing buildings, or onto well used parts of the public realm as the tallest part of the development is placed to the south (discouraged in the SPD) the penetration of sunlight will be reduced.

This development does not seem to comply with this guidance, the overshadowing of existing residences also seems to be against the spirit of the guidance on assessing sunlight and daylight.

Designing for children

Bristol has a Child Friendly City Group. WHaM are meeting with them to discuss working together on real-life applications of this holistic and positive approach to urban design. Bedminster Green could be a great example for this because it is at the heart of an existing community with many families in the area.

It is disappointing that this development shows nothing for children. The tiny balconies (not included in all 2 bed apartments), 1 roof garden, a busy road, a non-playful public realm and seating by a main road that is famous for its air pollution.

The new SPD on urban living notes that a variety of accommodation should be provided in high-density developments (not provided here) and that this should include families and the elderly. Private outdoor space and integrated children's play are called for in the new document (within part 2) as well as the need to access this facility safely we felt the proposal ignored this.

(BCC Urban living SPD November 2018).

Urban realm

If much of the ground level publicly accessible space is denied sunlight by the taller surrounding buildings, it seems possible that this open space may yet again become underused and run down, negating the advantages of any renovation work done now.

Height

The building is much taller than anything around it, will almost be as high as Polden House. This will make it visible from areas of the city over the top of Windmill Hill and in conjunction with the other developments noted in the DAS will form a wall masking the hill from other parts of the city. The new SPD on Urban Living notes that developments should work with the topography of Bristol and not mask or obstruct view of landmarks it is likely that this in conjunction with neighbouring developments may well do this, walling in the green and access to Windmill Hill.

We would note that developments of this scale are completely out of keeping with Bedminster with the local area, as a site that incorporate elements of the local conservation area we felt this would have a negative impact on the area as a whole contrasting unfavorably with the historic town centre of Bedminster at 2-4 stories generally. A development of this scale would seem to be more in keeping with that of a city centre rather than the smaller scale town centre which retains an independent identity from the city centre.

No affordable housing

The lack of affordable housing is disappointing, the group notes that the previous application for the refurbishment and additions to the existing building next door made the case for no affordable housing in those phases on the condition that this allowance was to be incorporated into later stages.

Green infrastructure

The proposal contains little in the way of green infrastructure, it remove 3no.

large plane trees and replaces them with smaller ones. The planted terrace at high level will do little for the surrounding area and it is unclear which residents will have access to it.

Wildlife corridors should be considered within this development as this development sits between the green and the city farm, both valuable assets in the area with wildlife.

See policies: DM 15, Site Allocations and Development Management Policy (BCC 2014); BCS9 and BCS21, The Bristol Local Plan Core Strategy (BCC 2011)

The River Malago

The Heritage Statement acknowledges how important the River Malago was to the history of the site – it used to run across the site, with a Mill using the river, and various mill leats. The river was diverted from the site at the beginning of the 20th century, but it still runs nearby, within 25m of the site.

As very little is being done for wildlife on the actual site then the River Malago offers an opportunity for the developer to create a healthy wildlife corridor along this major ecological asset we have in the neighbourhood.

Air Quality

The application notes that the concentration of NO₂ in the area is a problem but does little to counter it, this development is proposing to seal its residents in to keep them healthy whilst at the same time containing publicly accessible shopping precincts. An increase in planting would go a little way to mitigating this benefitting residents and the general public simultaneously. There was also concern that too many tall buildings in an enclosed area might trap pollutants at ground level.

BCS23, BCC Development Framework Core Strategy

Flood risk

A number of points concerned the group regarding the flood risk assessment:

1. Flood and floor levels: The report refers to the site being 'only at medium risk of flooding' and that sensitive areas should be above 8.52mAOD. It fails to say what the predicted 1 in 1000 year flood level is, with climate change allowance, and then recommending an actual floor level for those sensitive uses (and important service equipment, which should be above the highest flood level). The site might only be at medium risk in terms of the category, but that does not mean it couldn't be 1m under water. As a guide, the potential 1 in 200 year flood level in the Avon could be about 10.5m AOD, resulting in 1.5m deep in water at the site. The implications of a low risk situation should be considered, and the way in which this is dealt with, explained in the report. This could be a serious problem and should not be omitted from the report.
2. Safe escape – without knowing the flood level, and the potential depth of water surrounding the building it does not seem that an evacuation plan can be successfully drawn up. The duration of the potential flood and an escape strategy for residents should be proposed. This is a fundamental omission.

3. Sequential Test: The Sequential Test is also a fundamental part of the planning process (guidance contained within a BCC practice note) and should assess why this building should be here, rather than in a place which does not flood. A confirmation that this area is zoned for such a development does not seem to have been included.

Appearance

The treatment of the elevation makes the tall building look clunky, the grouping of four windows together is producing a building that looks and feels larger than it is rather than minimising it. By bringing the change of material along Dalby Avenue into the same plane as the rest of the facade the building now feels wide and more like a wall against the green. We noted that the viability statement is not done 'in accordance with RICS guidance' we would suggest that this be redone to ensure a more accurate valuation is presented.

We do not believe this is high quality design and do not believe that it will enhance the townscape or the local area in some way. This does not represent new or landmark design but rather seems to be a poorly dressed monolith that pays no attention to the local architectural heritage or the history of the local area.

Emergency issues

Single stair access or emergency escape

The group felt that a single stair access was unsuitable for such a large building for 2 principle reasons:

- 1 A single access is easy to block, preventing escape in the event of fire (in the event of fire, is it reasonable to expect tenants to stay put given recent events).
- 2 In the event of antisocial behavior in internal areas a single stair does not allow for alternative routes out for tenants

We note that the new SPD requires fewer apartments per floor from a core (no more than 6) than are currently shown on the floor plans, this is to encourage a greater feeling of community within the building.

Height over the Green

Whilst the tallest part of the development has been located away from the surrounding side streets but presents a sheer facade to the green (along Dalby Avenue) this creates an imposing presence over the green (that will become worse if the information provided about future developments is accurate) and its sheer façade will encourage wind tunneling effects in contravention of the proposed changes to/the new SPD on 'urban living' the proposal flies in the face of the guidance in appendix D of that document. Where the sheer facade might encourage high winds at ground level. This street is a busy route for pedestrians and has a bus stop which is well used nearby, steps should be taken to ensure this building does no harm to the public realm.

Parking numbers

There are very few parking spaces (25) provided for the whole development, given that this is a scheme likely to be occupied by many young people with cars the developer should be putting forward a scheme to mitigate any parking issues in the surrounding areas.

Health and Wellbeing

The Health Impact Assessment part of the application notes adverse impacts from developments in general are possible from:

- Poor air quality
- acute or chronic low-level noise,
- light pollution
- overlooking
- lack of privacy
- detrimental visual impact.

Given that this development seems to include most of the potential issues from the list above and some will impact the existing residents of the site, it seems strange that the application would suggest it will have a neutral impact on health and wellbeing.

Nature of the consultation

The group was further concerned that despite listing out a number of concerns by local people in their record of the consultation, very few changes of substance were undertaken. It notes that many points were made about the height of the block, and yet this does not seem to have been addressed.

Framework

The group understood that this development was to be assessed as part of a larger framework. It is disappointing therefore that such a large scheme has been brought forward without mention of this framework and any indication of what the wider picture for the area might be. Given the number of sites up for development the group would like to know more about the proposed housing mix and general feel for the area to understand what sort of developments the council would believe are acceptable in this area.

We would urge the council to reject this proposal at this time and find it difficult to support any large scale application in this area until a wider scale masterplan covering the entire area has been produced, consulted with local residents, businesses and communities and agreed by the council.