

# Comments for Planning Application 18/06722/F

## Application Summary

Application Number: 18/06722/F

Address: Land At Little Paradise & Stafford Street Bristol BS3 4DE

Proposal: Demolition and redevelopment to provide 2 new buildings (4-17 storeys) comprising 329 no build-to-rent residential apartments (Use Class C3) including flexible gym, flexible activity space, concierge and residents lounge and landscaping, public realm, bin storage, plant areas and cycle parking.

Case Officer: David Grattan

## Customer Details

Name: The WINDMILL HILL AND MALAGO COMMUNITY PLANNING GROUP (WHaM)

Address: C/O 20 COTSWOLD RD NORTH BRISTOL

## Comment Details

Commenter Type: Amenity - Residents Group

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Comments from WHaM (Windmill Hill & Malago Community Planning Group) on Dandara's Planning Application Ref. No. 18/06722/F

### 1. Introduction

#### 1.i WHaM

WHaM is neither a corporation nor a political grouping. It is a loose collection of residents, mainly but not exclusively from the Windmill Hill area, which was formed some three years ago with the primary aim of ensuring that locals and other Bristolians were kept informed of major developments planned for the area. We have about 600 followers on Facebook and some 250 email correspondents; the group is led by a steering committee of volunteers, four of whom put together what follows.

#### 1.ii Dandara

This application is to develop Plot 4 which is one of five Bedminster Green plots designated for development. Applications on Plots 1 and 2 are pending and submissions on Plots 3 and 5 expected soon. It is difficult, therefore, for WHaM to respond to this application in isolation, when faced with the prospect of a massive wall of tall buildings stretching from Malago Road via Bedminster Green to Clarke Street and perhaps beyond. However, we appreciate that Dandara is not responsible for other applications so we will concentrate, for the moment, on this one.

## 2. Plot 4

### 2.i Consultation

The Bristol City Council (BCC) Urban Living Supplementary Planning Document (SPD) recommends 'early and sustained community consultation'. Dandara's consultation was confined to informing stakeholders of the plans at a late stage, listening to and noting comments, making (to be fair) some adjustments in massing and then pressing on. This was particularly galling for WHaM which had produced in its early days a site brief which should or could have been of 'material consideration' .

### 2.ii History

Dandara takes us on a nostalgia trip to a world of Victorian flower shows, happy children and a close-knit working class community living in terraced houses, some destroyed in the blitz and the rest finally demolished in 1961. Is Dandara seriously suggesting that the new development will somehow replicate that community?

### 2.iii The site

Little Paradise and Stafford Street are Victorian byways designed for small houses. Even the current low-rise buildings, which incidentally mimic the height of the old terraces, cannot disguise the narrowness of the streets.

### 2.iv The buildings

Dandara's architects have exercised considerable design ingenuity. They have avoided a single block monolith, divided the development into two main buildings separated by a new pedestrianised street, offered a variety of heights, kept some levels at a human scale four storeys, included a gym and activity space for residents, cycle storage, a semi-public courtyard and some softening landscaping and cosmetic touches. All this can be commended but the taller sections, at eight, ten, thirteen and seventeen storeys, are likely to dominate and overshadow not only the new street and the existing side streets but also the lower homes within the complex, especially those which are single aspect and/or north facing. For example, the four storey building at the north end close to East Street is hidden behind the eight storeys to its south. And those eight storeys flank the new street on its north with ten storeys on the south. The two tallest buildings are on the south close to Malago Road - not exactly set back - with most of the complex to the north of them.

### 2.v Immediate neighbours

One of the supporting documents is a DAYLIGHT AND SUNLIGHT REPORT prepared by Point 2 Surveyors. This is a paper of 62 pages, including 36 pages of figures. The language is technical and the calculations often complex but it states that there will be loss of light to many neighbouring residences. It goes on to say that according to guidance issued by the Building Research Establishment (BRE), any loss below 20% will be unnoticeable, that losses a little above that could probably be disregarded and that for any large losses (and there are a few) BRE guidance can be ignored because such losses are only to be expected in an urban environment. This strikes WHaM

as a cavalier disregard for the rights and comforts of others. And note this quote from Section 7.5 on page 8:

'It should first be borne that the Plot 4 site forms part of a wider masterplan of the Bedminster Green Regeneration project. The site has been allocated for redevelopment where the introduction of tall buildings was as inevitable and should have been borne when the planning application and subsequent permissions of 12 & 26 Stafford Street occurred.'

This is an extraordinary passage. It is critical of an earlier developer and the BCC planners for allowing the Stafford Street houses to be built. The houses should not exist; therefore the quality of life of their inhabitants is of no significance.. And may we ask 'What masterplan?' 'Are tall buildings inevitable?'

### 3. Images

#### 3.i Malago Road

On page 21 of the DESIGN AND ACCESS STATEMENT Part 3 there is a Computer Generated Image (CGI) showing how the development might look (including the Firmstone building behind) when viewed from Malago Road with the Church Lane houses in the foreground. The image gives the impression that the tall buildings would be only twice the height of the houses. As the houses are a standard two storey height and the proposed buildings are, as we know, thirteen and seventeen storeys (plus Firmstone's twenty-two storeys), this is severely misleading. Let us assume that it was by an accident of computer generation rather than by design but it is careless of Dandara to let such a gross misrepresentation remain in place.

#### 3.ii Alfred Road

On page 22, there is another, unfortunately believable, CGI which gives a view from Alfred Road (halfway up Windmill Hill) over the roofs of the first few houses in Eldon Terrace. Understandably, images for Plots 1,3 and 5 were not available but, even without them, it is clear that a range of high buildings would cut off any view of the city from Windmill Hill and any view of Windmill Hill from the city.

### 4. Residents' Well-Being

#### 4.i Safety

WHaM understands that questions of safety would normally arise later in the development stage but it seems prudent to mention the worry that many of us have about how effectively an emergency evacuation could be carried out should it become necessary. There seems to be a paucity of exits and only one core in the tallest buildings.

#### 4.ii Density proposed

The site is 0.486 of a hectare, an area just over half the size of Ashton Gate football pitch. The proposal is for 239 one bedroom apartments and 90 two bedroom, making a total of 329 dwellings. Using the standard measure, this indicates a density of 677 units per hectare.

#### 4.iii Density in context

WHaM is cautiously reconciled to the idea of high density development although naturally wary of how 'high' such density could become. Having noticed that 'high' can be interpreted as 'maximum' we much prefer the term used in the Urban Living SPD - 'optimising density', which allows for other factors besides numbers. The SPD includes on page 12 the following:

'In a Bristol context, optimum densities in new development schemes have been demonstrated as:

- 200 units/ha in a city centre setting (i.e. Wapping Wharf)
- 120 units in an urban setting (i.e. Paintworks or Junction 3); or
- 100 units/ha in an outer urban setting (i.e. Gainsborough Square, Lockleaze)'

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In light of this, it beggars belief that the density being offered on Plot 4 is 677 units/ha. That is over three times the figure for the city centre, and more than five times the optimum for an urban setting which is how Bedminster Green is defined.

#### 4.iii Tenure

We do not have a problem with Build To Rent, welcome the provision of concierge and security services and note with approval Dandara's intention to manage the building for the foreseeable future. We note, however, that all the dwellings are of one or two bedrooms, that the majority of tenants are expected to be well-paid young professionals and that there seems to be no expectation of, or provision for, children or older people. This suggests that the apartments are not suitable for families and that, therefore, tenants are expected to be relatively transient, which reduces the chances of their integrating with the local community.

#### 4.iv Mix and affordability

In the AFFORDABLE HOUSING STATEMENT prepared for Dandara by Pioneer, it is recorded (apparently with approval) that the policy of Bristol City Council is that any individual large development should contain within it a mix of housing types and 30% affordable housing. But the statement then goes on to say that, in this case, a mix will not be offered because there is the greatest demand for one and two bedroom provision. Not only is this debatable, to say the least, it contradicts council policy and could encourage a situation where there is nothing other than small flats offered in the entire area.

The statement then asserts that a reduced provision to 20% affordable housing is more appropriate within a Build To Rent scheme. It does go on to explain enthusiastically that these

could be offered at 20% below market rent and that they would be indistinguishable from the market rent properties.

However, the later VIABILITY REPORT claims that a 20% provision would make the whole development unviable and, indeed, that the provision of any affordable housing would make it unviable. [Note that Firmstone makes a similar claim for Plot 2]

Dandara states that it realises the desirability of including affordable housing and requests further discussion with BCC. This sounds like the opening bid in an attempt to squeeze concessions from the council. It should be resisted. It must be possible to include affordables without making a loss.

## 5. The residents and the wider community

### 5.i Car Parking

As we know the debate about the place of cars, especially in cities, is ongoing: should we heavily discourage use or accommodate the reality of a continuing need for them? Dandara proposes 84 onsite spaces, one for each two bed flat. This seems like an uneasy halfway house between the two sides of the argument. It acknowledges that residents will have cars yet provides no spaces for most of them. Does Dandara have a mechanism for controlling car ownership or will the extra vehicles simply overspill onto neighbouring streets?

### 5.ii Health, Pollution, Transport, Infrastructure

These are such big subjects that it is probably best to stick to one simple point. The HEALTH IMPACT ASSESSMENT in the application goes to some length to claim that this development will make little or no difference to the stresses on the local environment and services. This cannot be true. The gymnasium and all that cycling might raise residents' fitness levels but demand on doctors will increase, pollution will rise, traffic will slow down, space will be at a premium. That might be a price worth paying for more homes but it has to be coped with and the developers cannot avoid a share of the responsibility.

## 6. Positive Precedents

### 6.i Wapping Wharf

Dandara cites the Gaol Ferry Steps at Wapping Wharf as an inspiration for its proposal to create a new pedestrianised street at Plot 4. It is a pity that there was not further inspiration to copy the height limit of six storeys and to include affordable housing.

### 6.ii Ashton Rise

This public/private partnership (Ref.no. 17/06559/FB) of 133 dwellings is a mixture of houses and apartments with 40% affordable housing and nothing above four storeys.

### 6.iii Malago Drive

This private development by Redrow of 110 dwellings, half a mile from Plot 4, is low rise and includes affordables.

## 7. Not so positive precedents

### 7.i Plot 2

When consent was granted for a 16 storey tower at St Catherine's Place, we were led to believe that this would be a one-off landmark building which would act as a beacon of welcome to Bedminster. However, not only has the current landowner Firmstone applied to increase that height to 22 storeys but Dandara initially justified its 17 storeys with the comment that it would be no higher than the 16 storeys already consented at St Catherine's. A2Dominion includes 8, 10 and 12 storeys in its plans for Plot 1.

### 7.ii Other plots

Formal planning applications for the other plots near Bedminster Green have not yet been submitted but the indications are that they are likely to follow the pattern of tall buildings and consist mainly of small apartments and student accommodation.

### 7.iii Framework

Unfortunately, the draft Framework Plan prepared by the Nash Partnership does little to discourage the erection of tall buildings. Indeed, because it envisages the possibility of such buildings, subject to certain conditions, amongst surrounds of six to nine storeys, developers are taking it that high rise will be permissible or even welcome.

## FINALLY

Bristol City Council and the developers know from their own researches that 85% of Bristol citizens are not keen on tower blocks and that there is an organised campaign against them. Yet so far no plan has been put forward which consists solely of low to mid-rise buildings. Is it too much to hope that there can be a radical re-think? We are genuinely fearful that, if the Firmstone and Dandara proposals (or something like them) are agreed, we could soon find ourselves with ten or more towers surrounding Bedminster Green, soon to be followed by others replacing the car workshops on Whitehouse Lane and the trade outlets on Malago Road. And is it really the plan that all buildings going up should be of the same type?

This injunction from the National Planning Policy Framework that Charlotte Taylor quotes approvingly in her HEALTH IMPACT ASSESSMENT is hardly applied in the Dandara plan. '. . . to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations;'

Lest it be thought that WHaM members are motivated by some sort of selfish nimbyism, let us commend to you the sober and disinterested comments of the Bristol Civic Society whose wise words should be heeded, and then add that we are in favour of extensive development which we regard as necessary and inevitable. We will be delighted if others get to live in decent homes as we do. But the proposals seem to be led less by housing need and more by the business interests of each developer.

That famous quote from Aneurin Bevan can bear repeating: 'We shall be judged for a year or two by the number of houses we build. We shall be judged in ten years' time by the type of houses we build.'

WHaM opposes the application.