

# Comments for Planning Application 19/05740/F

## Application Summary

Application Number: 19/05740/F

Address: Former Pring And St Hill Ltd Malago Road Bristol BS3 4JH

Proposal: Redevelopment to provide student accommodation across four development blocks, landscaping, access, public realm works and associated works to the Malago River.

Case Officer: David Grattan

## Customer Details

Name: The WINDMILL HILL & 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: This is a comment made by the Windmill Hill and Malago Community Planning Group (WHaM) regarding the development of the former Pring St Hill site on Malago Road by A2 Dominion 19/05740/F

The scheme comprises 542 student bed-spaces arranged into 73 'clusters' of bedrooms each around common facilities in 4no. 9 storey blocks. This application does not provide any further type of accommodation. The reduction in height of the revised proposal is insufficient to make much of an impact on the overall massing of the scheme. The blocks are still much higher than their surrounding context and will continue to dominate the flats on the other side of the road. The removal of any social housing provision is a detrimental step and we are disappointed to see this and other large schemes ignoring this important aspect of responsible development. We felt the social rented accommodation should have been retained as the scheme density and size were reduced.

Generally it was felt that the execution of the scheme lets down the aspirations of the scheme. This is partly due to the scale of the development as described below, but at its current scale and density may ultimately prove harmful to the surrounding residents and communities. It is slightly mitigated by the aspiration to provide new green infrastructure and open up the Malago, however the group had concerns that the scheme as designed may limit the utility of these naturally existing assets.

## Context within the framework

The group is aware that this development forms part of a larger framework for the area. Within this the Pring St Hill site forms only a single site out of 5 (Plot 1). The developers of these 5 sites in

in conjunction with the city council have prepared a set of conditions for their proposed development to follow. When viewing this development it is difficult to review it as a 'one-off' - the development needs to be assessed on its own merits and in conjunction with the wider plans for the area.

The group was concerned that the proposed framework did not (as seen at consultation stage) contain many hard and fast constraints and stated much of the proposals as aspirational.

### Community Consultation

There was concern that due to the timing of the revised application being registered shortly before Christmas (27 November) and the neighbour notification list going out 2 weeks after this time that there was not a lot of time for people to get comments in by the 6 January deadline when many people are away for the holiday period.

### Transport

Car free may be environmentally desirable but there does not seem to be any understanding of the large volume of traffic generated by student arrivals and departures on term starts and ends. There also seems to be some lack of understanding about how the car owning restriction will be enforced. At an event held at the Windmill hill Community Centre (regarding the previous application) on 4th February 2019, the representatives seemed uncertain that it could be done.

WHaM understands that the city council are planning some consultation on the proposed traffic provisions around Bedminster Green and as such it is difficult to see how the application can be resolved if there is not a detailed plan in place covering the whole of Bedminster Green and its interfaces with the surrounding areas, especially given the massive scale of the proposed developments.

### Accommodation

There is some concern within the group that the location between a busy road and railway line was also not ideal for this type of accommodation. The noise and pollution make this quite a high stress environment. Guidance on creating healthy environments for students is freely available and we would want to be certain that this location is going to be socially and emotionally healthy for all residents.

The blocks are spilt by narrow corridors between them and have wider courtyards to the South which are also proposed to be landscaped. The Urban Living SPD suggests that the gap between tall buildings should be 'adequate' but this does not seem to be happening in this scheme with the result that a number of the bedrooms seem to be looking onto blank walls.

In terms of the elevation the windows on the blocks appear to be quite tall and narrow. This approach is fraught with problems as although an area of window is created the lower parts of the window are ineffective illuminating only the floor. This is rendered further ineffective by the placing of furniture or other floor mounted objects directly in front of the window that also creates an

unattractive appearance to the street. Floor level windows also provide opportunities for the socially unacceptable practice of 'up-skirting' and should be avoided.

### Landscape

Precedents within the application show wider green spaces than are currently proposed. The group was concerned that the narrow gaps between blocks will receive only a portion of natural light shown and be quite different (much darker) than those proposed. Unless widened these spaces will not be appealing outdoor areas to populate and therefore not useable amenity space.

### Exemplar schemes

The group found the exemplar schemes shown to the rear of the DAS to be of interest, all seem to be of similar scale at 7-8 storeys (much lower than the proposed scheme here, furthermore we note that the spaces shown around them are much larger and wider than those shown here. Those schemes all have generous public realm allocations, some fronting onto pedestrianized areas. Were the scheme for the Pring St Hill scheme really similar in design, many of the issues surrounding the scheme such as overshadowing and insufficient amenity space might be resolved. With a reduction in height this scheme might perhaps be just as successful.

### Response to context

The scheme seems to be wildly out of context with the surroundings. The proposed height of 9 storeys is much taller than anything around them.

There is an abrupt change in scale from the surrounding context being on the edge of the framework this will be extremely noticeable, and apart from a small set of vantage points (directly opposite the gaps between blocks) will appear as a continuous wall of development between the North of Windmill Hill and the centre.

This wall of development will mask Windmill Hill and its topography from the city and, conversely the city from the hill, this is against the requirement of the SPD, especially when read in context with the other buildings proposed as part of the framework if they are permitted to be similarly tall. Rather than work with the existing character of the area, the proposal is concealing it and trying to dominate it.

The blocks are spilt by 12m wide corridors between them and have courtyards to the South which are also proposed to be landscaped. The gaps between blocks are extremely narrow compared to the height and will not feel like open courtyards but for much of the day will be shadowed canyons that will not make for attracted spaces. Will any planting in the narrow gaps be suitable for them. The rooms looking onto these dark areas will have very little light allowed into them as well.

### Overshadowing

The reduction in height of the revised proposal (to 9 storeys) is insufficient to make much of an impact on the overall massing of the scheme. The blocks are still much higher than their

surrounding context and will continue to dominate the flats on the other side of the road. The group remain concerned that the daylight provided to the residents of the flats will be irreparably harmed. The assessment shows that the flats over the road are going to be severely overshadowed, losing high levels of sunlight and indirect day-lighting (some rooms losing nearly half of their existing daylight and some losing between two-thirds and three-quarters of their sunlight). Though it is noted in the document that some of these flats already have overhangs, it seems ridiculous to allow such a reduction of natural light and blame poor design in part for this, when a smaller better-designed scheme would not have the same utterly damaging effect. The design must be altered and lowered, to 'provide a fair and equitable share of sunlight and daylight between existing occupants in neighbouring buildings' (Urban Living SPD, Question 1.5).

The group was particularly dismayed about the attitude toward the flats on the other side of the road given that many of these dwellings are social housing and occupied by vulnerable or disabled people who spend a lot of time in their homes.

Does the scheme make a positive contribution to the area?

The scheme appears to provide some flexible community space, which it is anticipated will mostly be used by the resident students. The continuous wall of development however will significantly harm the flats opposite (as noted elsewhere), and the height could significantly harm the appearance of the city.

The visual impact assessments show how out of scale the proposed development will be. In context with the other developments in the framework the view from Bedminster Station will devastate the outlook of Windmill Hill. There will be a severe lack of privacy for residents to the north and south of the new development. Similarly the setting of St John's Churchyard will be harmed by these buildings. The ultimate change in character for the area will unacceptably harm the skyline of Bristol and provide a visual barrier across the city, preventing the view of Windmill Hill from across the city, contravening the advice of the SPD on Urban Living which requires tall buildings to be sited to avoid masking the topography of the city.

### Sustainability

The inclusion of the sustainability matrix was welcome within the document but some of the measures have drawn notice.

CHP in this location has previously been a concern of the group. Whilst recognised as an energy efficiency measure rather than a sustainability measure, there has been great concern as to what happens with the exhaust and to what direction they discharge in? A diagram of where the fumes will end up would allay resident's concerns. It is not just CO<sub>2</sub> at issue here but a host of other pollutants that can be similarly harmful. Given Bristol City council's ambition to become carbon neutral by 2030 there is a question about the cost effectiveness of running a CHP for only 10-11 years, is there a better option for increased sustainable generation, what is the developer's plan? It seems an opportunity has been missed discounting any alternative renewables based on the

use of CHP.

Given the recent revelations that concrete in construction is responsible for around 8% of carbon emissions globally the use of it for large-scale construction needs to be recognised as a source of emissions and if proposed to be used it must be countered, responsible developers should take this into account and offset it.

It is recognised that 'sustainability' is no longer sufficient as a strategy for design in the current climate situation. New developments should be designed with a 'regenerative' approach, to have a positive impact on their areas. To enhance and improve biodiversity, air quality and minimise water use. This development does not go far enough and should be made to do much more. Mitigating damage is no longer sufficient. Further carbon emission reduction could be achieved with higher levels of insulation and building performance.

The matrix is unclear about whether external planting will be irrigated or rely on precipitation, this will have a drainage implication, please clarify.

#### Support infrastructure

The documents note that it is assumed that existing infrastructure of healthcare facilities is deemed acceptable and yet includes the Wedmore Vale / St John's Lane Heath Centre which was closed in 2018. Some research is suggested to confirm the provision actually exists. The group does not believe the provision exists when taken into account with the other proposed developments described in the framework.

#### Conclusions

The group felt that the scheme as designed does not balance the increased density for the area with the requirements for liveability as outlined in the SPD. The development will create a wall and mask views to and from Windmill Hill. There is insufficient amenity space for 500+ residents.

The potential loss of light for the surrounding neighbours is appallingly high

The abrupt increase in traffic will make the already busy Malago Road impassable at certain times of the year.

The scheme needs some radical redesign to avoid harming the neighbourhood, harming the livelihood of the existing residents and provide a supporting environment to its proposed occupants. The urban living SPD notes that optimal density is one that balances efficient and effective use of land with positive responses to context, successful place-making and liveability. In this case that should have been determined by a 3D area wide spatial framework informed by detailed context appraisal, this has not been provided. The existing industrial area is a low-density area and the surrounding residential area is a Victorian suburb. This is much less dense than what is being proposed. A level of density in context with this would produce a much lower form of building and do less harm to the neighbouring flats. In its current form this development does not

do this in part due to its excessive height, and also due to its overwhelming density.

The planning group does not support this application.