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The Society's statement in response to a pre -application submission by Pegasus Life to demolish the existing buildings to construct 65 retirement apartments on the former St Mary's Hospital site Upper Byron Place with parking and landscaping - 15/03605/PREAPP

3rd September 2015

Summary

The Society is grateful to Pegasus and their agents for presenting the scheme and giving it the opportunity to comment on the proposed development at this stage in the planning process. The Society supported Pegasus's proposed redevelopment of Queen Victoria House Redland Hill to construct a supported living development. The Society supports the site's change to use residential; but regrets that it cannot support the proposed scheme. The former hospital main building (the hospital) makes positive contribution to the setting of the landscape and townscape of the northern slope of Brandon Hill, which are heritage assets of high significance. The substantial harm that the impact of the mass and appearance of the proposed replacement building blocks would cause to the highly significant heritage of the Brandon Hill townscape and landscape would outweigh the public benefit of the proposed development of private apartments. The Society takes a commercial view of development. The redevelopment and return of the site to economic use is in the public interest. The Society would strongly support redevelopment within the main hospital building, which could provide a substantial number of apartments within a building of character. Such an attractive development in this desirable location would be highly marketable. The absence of interior historic architectural details creates a greater opportunity to remodel the interior.

Change of use

In the committee report to the refused planning applications 13/02699/F and 13/02357/F, the Council gives the reasons to accept the loss of hospital space; the Society respectfully agrees. The Society agrees with Pegasus that the site is suitable for residential development and supports the proposed change to residential use.

Demolition

The Society supports the demolition and removal of the unsympathetic extensions to the hospital and redevelopment on Upper Byron Place. The Society opposes the demolition of

the main building of the former hospital, part of which is an unlisted building of merit, in the absence of an acceptable scheme of redevelopment. The proposed three replacement linked apartment blocks would cause substantial harm to the character setting and appearance of heritage assets of high significance.

Key issue - the impact of the proposed development upon the identified designated and non-designated heritage assets

1 Planning policy

For the sake of brevity, the Society omits reference to specific National and Local Planning Policies, which apply to this proposal and which will be familiar to the Council and to Pegasus. National and local planning policies that relate to the conservation and enhancement of the historic environment require high quality design; respect for and enhancement of local character and distinctiveness and preserving and enhancing heritage assets and the natural environment or ‘green infrastructure’. These policies are important material considerations to this proposal.

2 The existing hospital building

The front elevation of the hospital has high quality. The facade has a rusticated Bath stone plinth Bath and stone architectural decorative elements in an historic Italianate style. The northern half is from the second quarter of the 19th century. The design of the 20th century southern half is a facsimile of the original design intended to create a unified facade. The overall effect is scholarly, well proportioned, modestly grand, and appropriate for a building of its scale. The hospital makes a positive contribution to the Park Street and Brandon Hill Conservation Area (the conservation area). The rear extensions are of no historical or architectural interest; their demolition would be welcome.

The hospital is a positive feature in the conservation area. The dominant issue is the impact of the proposed development on the fabric and setting of the designated heritage assets, the unique townscape and landscape of Brandon Hill. The hospital is an element of the conservation area’s skyline and forms an integral part of the built agglomeration of Brandon Hill’s north slope. The indicative outline of the proposed three replacement linked apartment blocks gives little indication that the local architectural context influences their height and mass or their indicative design. The hospital has a more interesting design than the replacement buildings. The height and mass of the three linked replacement blocks would dominate the townscape and landscape of Brandon Hill in a manner that the hospital does not. The result would cause substantial harm to heritage assets that are of high significance and would harm the local character of the conservation area. The National Planning Policy Framework acknowledges that development of a building ‘of exceptional quality’ could justify the replacement of the hospital. The height, mass and form of the proposed three linked replacement building blocks excludes that possibility. Whatever the scheme’s landscape ambitions, the footprint of the proposed three replacement linked

apartment blocks with their ancillary hard landscaped areas, appears to be greater than the current development.

3 The character and appearance of the conservation area and the heritage assets

The site borders Brandon Hill Park, a designated as a Site of Nature Conservation Interest (SNCI) and a Regionally Important Geological and Geomorphological (RIGS) site. The Conservation Area Character Appraisal says that

- *“The topography, planting, landscape and landmarks of Brandon Hill are key contributors to the Conservation Area and the wider city.*
- *The characteristics of this Conservation Area are defined by a 'spacious and verdant character and a dramatic local topography that marks the Conservation Area as one of Bristol's most well-known and interesting districts.*
- *The verdant character of Brandon Hill has a vast importance for the city in terms of its landscape, planting and historical significance.”*

There are a number of Listed Buildings close to this site at Berkeley Square, Berkeley Crescent, Upper Berkeley Place as well as Grade II listed Cabot Tower; a well-known and significantly important landmark.

4 The proposed six-level linked apartment blocks – the north and west aspects

The height and mass of the three linked replacement blocks would exceed the height and mass of the buildings proposed in either the refused schemes 13/02699/F (student accommodation) or 13/02357/F (apartments). Viewed from the north and the west the hospital integrates into the townscape, which consists of terraced dwelling houses clustered around the lower slopes on Brandon Hill and terminates with Brandon Hill's green crown and Cabot Tower. This proposal to develop three linked replacement blocks, two with six levels, would increase development and would present a large building mass when viewed from all sides. The linked replacement blocks would stand out strikingly; they would dominate the townscape below and block the view of the upper part, the green landscape of Brandon Hill. Pegasus's CGIs illustrate the contribution that the hospital makes to the townscape and green topography of Brandon Hill. The CGIs also illustrate and how the increased height and mass of the proposed three linked replacement blocks would dominate the townscape and mask views of the green landscape. The report to the committee that recommended the refusal of the earlier planning applications 13/02699/F said,

“This mass fails to contribute positively to the area's character and would cause harm to the character and appearance of this site and its contribution to the conservation area. The proposed increase in development would fundamentally alter the character of the townscape of the lower slopes of Brandon Hill; effectively masking the landscape and topography of Brandon Hill. However, the form, mass and scale of this block suggests a much more modern, clinical form that would present itself as a cliff of development that obscures the existing, attractive character of Brandon Hill and bears no real resemblance to the natural form and stone evident of Brandon Hill.” And

Cabot Tower is recognised as a primary landmark within the city, one that is a common reference point that can be seen from a wide area throughout Bristol and is symbolic of

Bristol's identity and history. Therefore, its significance as a designated heritage asset is substantial. Any diminution of this significance by obscuring an important view is considered to constitute substantial harm. A harm that is not mitigated, in this case, by a commensurate public benefit.

Pegasus's CGIs demonstrate that the conclusions quoted from the report to the planning committee apply as forcefully to the current proposal, which has a greater mass and height than the scheme that the Committee refused in the application 13/02699/F, which the unsuccessful developer did not appeal.

5 The Upper Byron Place development

Upper Byron Place has no pavement; it is the width of a lane. Its purpose was to give access the back of the houses in Berkeley Square. The lane probably followed a former public footpath to Brandon Hill. To the east side of the Upper Byron Place lane stand small scale modest buildings in keeping with the character of the lane. The Society supports the redevelopment of the architecturally undistinguished hospital extensions on Upper Byron Place. The 'green lane' context should inform the design of any new development.

Paragraph 15 of the appeal gives the Planning Inspector's reasons to refuse the appeal, among other things she said,

"The north-eastern corner of the new building would be closer to Upper Byron Place where, due to its height and mass, it would be a dominant and overpowering feature in this narrow street. This would also be the case in views up the street from Triangle South, where the height and mass of the new building would detract to some extent from the setting of the small lodge building, which is also classified as a building of merit in the CA. For these reasons,I find that the proposalswould, harm the character and appearance of the conservation area and, to a lesser extent, the setting of the lodge which is an undesignated heritage asset."

These reasons apply forcefully to the current proposal. The proposed two linked replacement blocks would be taller than the buildings proposed in the earlier refused schemes in applications 13/02699/F and 13/02357/F. The separation of public from private space in Upper Byron Place is unclear but whatever the resolution might be, the development would destroy the informal quality of this green lane. The six level blocks, which would rise from the edge of the carriageway, would wall in lane on its west side. The blocks would be taller than the principal buildings in Berkeley Square. At the lower entrance to the site, a new block would replace the lodge, an unlisted building of merit. The loss and replacement of the lodge and the adjoining traditional rubble stone boundary wall with the mass of a six floor block would cause substantial harm to the conservation area. The block would reduce the entry to Upper Byron Place to insignificance. Users of the lane would face a six floor wall of masonry built on rising ground.

Conclusions

1. In the Appeal, the Inspector considered the test in National Planning Policy Framework, paragraph 132. The Inspector found that the proposal in application 13/02699/F would cause substantial harm to the significance of a designated heritage assets that she classified as of 'high significance' and that the harm that the development would cause would outweigh any other consideration. That conclusion remains valid and applies to this proposal.
2. The Inspector made a decisive and critical finding that the agreeable agglomeration of townscape and green landscape of the northern slope of Brandon Hill that rises to the Cabot Tower at its summit is of high heritage significance. The site constrains possible development. This scheme fails to achieve the necessary balance between development and respect for its sensitive context that the NPPF test requires. Where a proposed development will lead to substantial harm to or loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless Pegasus can demonstrate that the substantial harm or loss is necessary to achieve a substantial public benefit that outweighs the harm or loss. Pegasus does not appear to have considered an alternative scheme that could convert this attractive and valued building to a new use.
3. The negative effects of this development would outweigh any public benefit of the new homes, which redevelopment would create. The harm that this development would cause to the local character would be indistinguishable from the harm that the Inspector and the Council identified in their reasons to refuse to grant planning permission to the earlier student housing and apartment schemes. This proposal fails to address the requirements of national and local planning policy in terms of urban design and conservation.
4. To refuse this proposal would not prevent the reuse of the site to create new homes. There is impressive market evidence to support the view that heritage buildings have the potential to realise a varied accommodation mix in a building in harmony with its surroundings. Apartments created within a building of character are attractive and marketable as demonstrated by the current conversion of the former Bristol General Hospital and the many other examples of the conversion of former hospitals. The reuse of the main building could provide a substantial number of new homes without any impact on the local townscape and landscape. An imaginative garden layout in the car park area would transform the former hospital and would enhance the conservation area. There would be no shortage of market interest.