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The Society's response to a planning enquiry to develop the former Esso Garage Bath Road Totterdown - 17/02293/PREAPP

### **The proposal**

The Hadley Property Group proposes to construct a mixed use residential / commercial development comprising 159 apartments in a 16-storey tower (14 above street level) a linear apartment block building with two cores ranging from 5 - 7 storeys along the centre and a 3 storey building to east of the site. There will be commercial space along the riverside area. The parking space and servicing area will be below ground level. The scheme will construct a riverside walkway to Paintworks with public realm enhancements to the Bath Road frontage.

### **Introduction**

The Society is grateful to the Hadley Group's development team for the opportunity to meet them. Public consultation is effective when it occurs early enough in the planning process to affect the final form of development. The Society welcomes the regeneration of this site, which has been a long-standing negative feature in the Bath Road. The Sites Allocation Development Plan Document includes this site. The Society supports the broad mix of uses proposed, residential, business, open space and riverside access using a sustainable approach to development.

This will be a demanding site to develop. The obvious difficulties involve the demolition of the extensive hardstanding associated with the former petrol filling station and its massive supporting concrete columns and the site topography. The heavy traffic at the signalised junction of Bath Road and Totterdown Bridge together with noise from the waste depot on the opposite river bank may adversely affect market interest in the accommodation. The critical issue for the Council to assess will be the quantity of development that would make development viable. This issue is important because the Framework proposes that developments in the Avon Riverside Character Zone are lower than the proposed height.

Although the Society supports the principle of redevelopment of this site it cannot support the current design. The height of the corner tower is contrary to the Council's recent planning advice set out, following extensive public consultation, in the Enterprise Zone Spatial Framework (The Framework). If the Council does not follow its own planning advice, the standard 'anywhere' design of a parallel sided tower block does not justify or mitigate the impact of a tall building on this prominent site. The tall building design is not good enough to satisfy Policy BCS21 – Quality Urban Design or acceptability criteria set out in

SPD1 – Tall Buildings. Many of the Society’s comments remain the same as those submitted in May; the current design iteration does not appear to have responded to the public’s responses made after the earlier consultation.

### **The height and mass of the development**

The Society’s principal submission is that the Council should support the planning advice given in the Framework, which it adopted as recently as October 2016. To achieve the overriding objective of creating a liveable city quarter the Framework, in the section ‘Development Form, proposes that the height of development in the Avon Riverside Character Area should be low-rise; defined as between 2-4 floors. The Framework illustrates development of the Avon Riverside in figures 22 and 30. The principle underlying this advice is to ensure that the attractive views of the Totterdown escarpment are not spoilt. The Society supports the logic and purpose of the spatial advice for the Avon Riverside to ensure that development enhances its riverside setting and respects the surrounding topography. The recommended building height reflects the height of the residential terraced properties on Bath Road, which would be appropriate for this site.

The applicant relies upon the reasons that the Planning Inspector gave in the Appeal Decision that refused an earlier planning application in 2007. Both the Inspector and the Council, in the appealed decision, accepted the principle of the mass of the proposed Bath Road linear buildings and a tall, landmark building to the west of this site. If those views prevail in 2017 over the spatial advice contained in the 2016 Framework, the Society makes these comments.

### **The 5-7 storey linear block**

The facade of the 5-7 storey linear block shows some variation in design, breaking up the mass, which we support. However, without a section through the site it is difficult to evaluate the impact of the development on the housing and the development site on the opposite, south side of the Bath Road. If the Council does not follow the Framework’s spatial advice the Society makes no further comments about the height and massing of the linear block. The Society had reservations about the gap that separates the tower from the linear block, which it feared could become a bleak unused area. The placing of commercial units beside the space should relieve this possibility.

### **The 14-storey point block**

The planning advice SPD1 – Tall Buildings requires that to be acceptable a tall building should be of exceptional design. This advice is supported by Policy BCS21 – Quality Urban Design. This is a significant site for a tall building because it ‘turns the corner’ and will be widely visible. The projecting balconies exacerbate the impression of bulk. It is highly probable that wind and road noise will make the small balconies uninhabitable. The current design does not lift the building above examples of the standard apartment blocks of an earlier planning regime. The parallel sided design does not justify or mitigate the impact of a tall building on this prominent site. The elevations require a more sensitive architectural articulation. The Society suggests that the design of the tower should make it appear slender. The shape should change with the angle from which the tower is viewed. The materials chosen should support the illusion of slenderness. The construction of the tower in cross laminated timber should not inhibit a construction with, for-example, set-backs.

### **Materials**

Subject to agreement with the Council about the choice of brick and seam detail, the Society supports construction of the riverside frontage and the linear block in red brick and zinc cladding. However, the Society suggests that the materials chosen for the tower should support the illusion of slenderness.

### **Access, open Space and the Riverside**

The Society appreciates and the attempt to make the site permeable and the commitment to high quality open space including the green edge to the Bath Road frontage. The use proposed for the space between the tower and linear building should increase the site's permeability and encourage use by non-residents to the riverside area. The Society applauds the respectful approach to the site's ecological context. The Society supports improved pedestrian and cycle links to Bristol Temple Meads and the city centre. The access lay-by and the entrance to parking spaces below ground level is improved. The Society agrees that this site, close to the city centre, is suited to low parking provision. The Society welcomes the adoption of the Enterprise Zone Public Realm Guide proposals to improve public access to the Avon riverside. An extension to the Paintworks (subject to the neighbour's agreement) would be an important planning gain.

However, we have the following comments:

- It is unfortunate that the developer does not wish to fund a cantilevered path around the Totterdown Bridge abutment. Without this, the riverside route ends in a cul-de-sac without oversight, which is likely to be prone to anti-social use. Activity is proposed - a riverside barge and a plaza for markets/events/play/cafe, but will these provide enough activity and oversight to discourage anti-social activity? All the residential apartments are at a higher floor level than the riverside walk, so do not provide oversight of the riverside route, or direct access on to it.
- A public lift is proposed for disabled access, but who will maintain it?
- Apart from providing a route along the river which links to Paintworks, the designs have not responded to the pedestrian access opportunities that were highlighted in the first presentation - eg a link to the bridge over the Avon, and a link from the footpath to Totterdown on the other side of Barth Road.

### **Residential Mix.**

The Society supports the Council's policies to ensure a mix of property sizes and tenures on the site, which would help to provide a more balanced and settled community. The society assumes that the accommodation layout complies with Policy DM29 that new flats should be dual aspect wherever possible and specifically that single aspect units are not appropriate on northern elevations. The Society supports the Council's policy to secure affordable housing in larger residential developments and welcomes the intention to provide affordable housing.

### **Business Uses.**

The Society supports the proposal to offer the widest choice of business uses to introduce activity on to the site and agrees that only a small convenience store would be viable

### **Archaeology**

The site has some archaeological significance, being on the site of the original turnpike road, the predecessor of the current line of the Bath Road. Archaeological evaluation in 2007 found evidence for the road as well as of the 18th century Turnpike House. Any

development here should be preceded by a full programme of archaeological works, secured by conditions.