



**Former Central Ambulance Station, Marybush Lane, Bristol BS2 0JB**

**Application no. 17/04267/F**

**Old Market Community Association (OMCA) Comments.**

It is important to state that the members of our planning group have been keenly involved with any of the meetings and workshops that have been held in relation to this proposal. We have tried to work constructively with the development design team and their associates to help them appreciate our considered comments as to how the buildings would work best. We support a well designed, quality development on this site. We are of the opinion that, as presented, this proposal falls well short of achieving either of those criteria. We have set out our comments below.

**Old Market Quarter Neighbourhood Development Plan (OMQNDP)**

The site is wholly within the OMQNDP area. There is no reference in the application to policies set out in the plan. The Design and Access Statement refers to the Neighbourhood Plan as 'emerging' whereas it was 'made' in March 2016 and is now an integral part of the Bristol Local Plan. This is a missed opportunity to take the ratified ambitions of the local community into consideration when first approaching the fundamental design of the scheme. Other developers, such as those who brought forward the Print Hall site (now almost complete) truly embraced the ideas laid out in the plan and worked with the community to produce a scheme that went successfully through the planning process and will deliver a win-win development for both the owners and the community alike.

There is only one 3-bedroom flat out of a total of 375; the Neighbourhood Plan Policy C5 states 'Proposals for dwellings suitable for occupation by families and having at least three bedrooms will be encouraged'. As this site is owned in partnership by BCC and the HCA we would have hoped that this would be an ideal opportunity to create these much needed larger dwellings that could potentially house families within the city centre.

**Building Height**

The existence of the two towers, Castlemead (21 storeys) and Eclipse (18 storeys) on the northern corner of Castle Park does not vindicate the assumption that a similar tower is suitable for the eastern corner of the park. These two buildings are too far away to create a readable, visual link with the ambulance station site.

OMCA have a fundamental objection to a 26 storey tower (Block C) on the corner of Castle Street and Tower Hill. It is not necessary to greatly exceed the height of the adjacent building, One Castlepark. The 'tower' needs to be considered in full context, including the views along the length of Old Market Street; it will be a highly detrimental intrusion onto the street scene, detracting from

the Old Market Conservation Area and its many listed buildings, and dwarfing the Central Hall cupola, which is a local landmark. A building the same height as One Castlepark would not have the same effect, but would be a continuation of the gently curving line of the southern side of Old Market Street.

Similarly oblique views of the development from the eastern end and centre of Castle Park must be considered; the 'tower' will dominate the views and will have even greater prominence than the Eclipse and Castlemead towers. These two buildings have a detrimental effect on the park, dominating the view eastwards from the western end and centre of the park and having the effect of making Castle Park appear much smaller than it is. A third tower will only exacerbate this perception. A building that is the same height as One Castlepark would not dominate the views from the park.

We would reiterate the comments made in our joint response with Bristol Civic Society following pre-application meetings with Bouygues in October 2015 that there is a strong argument to step down the storeys from the Marriott Hotel (13 storeys) towards the south west, which would create a better visual link to the Finzels Reach development and to No1 Queen Street. In addition to the 25 storey Block C, the 9 storey Block A does not provide such a visual link and indeed will be over dominant when viewed from the centre of Castle Park.

#### **Building Layout and the spaces between**

The footprint of buildings does not encroach on the area of the Castle Ditch. We therefore consider that the Ditch could be opened up, even if only partially, and made into an attractive feature in the centre of the site. It should not be considered as a body of still dank water surrounded by high walls; it is part of the Floating Harbour – possibly Bristol's most important asset.

OMCA support the view set out by the Bristol Urban Design Forum (BUDF) in their letter dated 8th December 2015 that the nature of the open space within the site should be determined by analysis of pedestrian routes through the area and should focus on how residents and the public alike will interact with this space and the form of the external areas. The site is gated off with no public access, whereas the nearby Finzells Reach development has embraced the concept of being openly accessible, to its benefit. The complete lack of any public access through the Ambulance Station site is not welcome. There is a very strong desire line from the end of Jacob Street to the main path crossing Castle Park, as the path worn in the grass short cutting the Castle Street/Tower Hill corner shows. Additionally there is a strong case for a north/south route through the site from the Queen Street/Marybush Lane corner to Castle Street, opposite the vaulted chambers; this would form a direct route from Counterslip Bridge across Castle Park to Cabot Circus.

The removal of the tree in the south west corner of the site is regretted. This tree, which is given a B category, has 40+ years of life left in it and it makes an important contribution to the street scene, as such it should be kept and exploited as an asset in the urban design context.

#### **The Design of the Buildings**

There is no reason to make the buildings in this development 'an iconic landmark in the centre of Bristol'. The site is not a natural location for a landmark; it forms an edge to Castle Park and as such the buildings facing the park should be treated as a backdrop to the trees around the edge of the park.

In general the proposed indicative materials bear little relationship to Bristol and many of the precedents shown have no relationship to Bristol whatever. It is essential that good quality materials are used; predominately brick of type and colour found in traditional Bristol buildings with some

stone and glass and ceramic panels. We would not encourage the use of timber cladding and large areas of scraped self-coloured render due to their poor ageing properties (though painted, roughcast render is fine). From the onset we have been somewhat nervous of the terms 'iconic, landmark, high-quality, achievable within a budget' being used in the same sentence. The proposed materials palette does not bode well in terms of delivering anything close to iconic or high quality. We are also unconvinced that a singularly tall building is the best or most efficient delivery mechanism for high-density, quality, city dwellings.

OMCA agree with BUDF view that more articulation of the blocks is required in terms of finesse in the bulk/ silhouette to make the buildings 'really interesting and fitting to this prestigious and prominent site' and that at present the scheme is 'unambitious and somewhat lumpen'.

### **The Relationship to Castle Park**

OMCA aims that are that are set out in Project PR6 of the Neighbourhood Development Plan for Castle Street to be closed to vehicles and made into a cyclist and pedestrian only route that forms the eastern gateway to Castle Park and for the mediaeval bridge that takes Queen Street over the Castle Ditch to be opened up to form another cyclist and pedestrian only entrance to Castle Park. The entrance to blocks C off Castle Street jeopardises this, as does the proposal to access the parking under blocks A, B and C from the existing entrance off Queen Street on the park side of the bridge. Providing the main entrance to these blocks and to the parking under them from Tower Hill would resolve this

OMCA and Bristol Civic Society wish to see improvements to the eastern end of Castle Park. Planning policy for development of the Ambulance Station site in the Bristol Central Area Plan seeks improvements to important gateways to Castle Park from Old Market and Queen Street/Castle Street and enhancement of Bristol Castle's vaulted chambers within Castle Park. As such we would seek a commitment from Bouygues to contribute to the removal of mounds and walls, redirecting paths, regrading, reseeding and replanting trees at the eastern corner of Castle Park (see attached diagram). This could be via section 106 agreement or by physically carrying out the work in lieu.

### **Summary**

The main points of concern to OMCA are:

1. The inaccessibility of the open space in the centre of the scheme. OMCA's aspiration is that this space should include a public thoroughfare that links the end of Jacob Street with the end of Queen Street and thence to Castle Park.
2. The failure to remove all motorised vehicles from Castle Street. The aspiration is that this becomes a cycle and pedestrian route with the eastern end marked by a gateway that becomes the formal entrance to Castle Park.
3. The lack of any study of the effect of the tower on Old Market. The tower will be visible from the eastern end of West Street and thence all the way along West Street and Old Market Street. West Street and Old Market Street are the core of the Old Market Conservation Area. The tower will severely affect the character and setting of the Conservation Area.
4. No acknowledgement of the community's aspiration to improve the eastern end of Castle Park – removal of mounds and walls to open up the vaulted chambers building and to create a level grassed area up to Lower Castle Street in place of the present unusable steep overgrown areas that attract antisocial activities and litter.

5. The loss of the fine street tree on the south-west corner of the site that helped to break up the bulk of building and lessen the loss of amenity that will be caused to the residents of Ferrymans Court.
6. The low level of affordable housing on a site part-owned by the City.
7. The lack of 3-bedroom dwellings.
8. The proposed buildings are bland and lack articulation. Architecturally they lack ambition, finesse and interest as the buildings are not recognisable as a part of Bristol.

**Public/community engagement process.**

We had strong reservations with the proposal and the design teams lack of response to the concerns of the various stakeholder groups and so in April 2016 we prepared an alternative proposal for the site on behalf of OMCA which does not include a tower block. We tabled this proposal at a meeting with the planning officers, together with 14 'SketchUp' photomontages which shown comparative views – existing, Linkcity/Bouygues proposal and OMCA proposal. While the officers thanked us for our efforts and confirmed that they would review and raise the concerns with Linkcity/Bouygues, we did not receive any response.

Despite our input and vocalised concerns, the scheme has hardly changed since it was first shown to the Civic Society and OMCA in 2015; all that has happened is that the amount of accommodation on the site has been greatly increased to the detriment of the surrounding area. We would therefore question the worth of all the time spent by so many concerned individuals attending the numerous meetings. There seems to have been little or no evolution of the fundamental design, regardless of the public consultation process, something which is most frustrating to the individuals who have given up precious time and energy to get the best for the built environment in this precious space.

Despite all the pre-application meetings and various 'stakeholder' representations, this scheme has not improved in over two years of development and there seems to be a reluctance to positively address the issues that are causing concern. The excessive number of pre-application meetings between the developer and the Council would suggest that there are too many problems with the proposed scheme. It is our view that the basic concept is flawed and that maybe a radical rethink is required. This site is so important in terms of creating a visual and physical reference to the east of the city that any tall building would need to be of truly high quality if it was to be worthy of handing on the future generations of Bristolians. We fear that this proposal will come nowhere near achieving that legacy, instead it may set an unwelcome precedent of lack-lustre tall buildings dominating our precious urban environment.

Presented by Paul Bradburn on the 28th August 2017.

Chairman OMCA