The Society's statement in response to Consultation request 17/04346/PREAPP - to redevelop Little Paradise Bedminster with a residential scheme, including a 22-floor tower.

11th September 2017

Introduction

The Society welcomes the proposal to demolish and redevelop buildings that do not contribute to the vitality and appearance the area. The Society regrets that it cannot support the current scheme. There is insufficient evidence to support the loss of valuable, urban centre employment space. The Society does not support a 22-storey tower in close to the Bedminster Conservation Area.

Change of use - employment to residential

The Society is concerned about the loss of jobs and diversity that would result from this major development. Policy BCS8 -Delivering a thriving economy says in relation to the retention of employment land at paragraph - 4.8.17:

"Retaining valuable employment land is an important part of the Council's strategy. It helps to maintain the city's diverse economic base by ensuring a wide variety of business spaces of different types, sizes, quality and cost. The built-up nature of the city means that it is very difficult to physically replace employment sites which are redeveloped for alternative uses. Employment land provides continued enterprise and employment opportunities across the city, especially for business start-ups and in those parts of Bristol experiencing persistently high levels of socio-economic deprivation. The approach can help to provide employment close to where people live and so helps reduce the need to travel, especially by car. The city's Principal Industrial and Warehousing Areas represent Bristol's essential core provision of industrial and warehousing land. Retaining these strategically important areas will help the city meet the latent and future demand for industrial and warehousing development."

This statement could have been written with this specific site in mind. The Society agrees that this land is used inefficiently. Whilst the Society supports the more efficient land use in the city centre, the Council must also consider the potential loss of useful employment land in this employment sustainable location.

The applicant's Planning Statement says, "Initial work has indicated that the current space is of low quality and that demand can be meet in more suitable locations in the City." The ability for individual businesses to relocate is irrelevant to the desirability of change of use. The Council must require the developer to justify the loss of the employment use of the site. This evidence must also explain why the site cannot be redeveloped with industrial units that the market would find more attractive.

Mass – is a tall building appropriate on the Bedminster Conservation Area boundary?

If the Applicant justifies the loss of employment space the Society comments on the mass and height of the proposal.

The Society opposes to a 22-storey tower in Bedminster, which is a suburban centre, not a city centre. Two and three-storey buildings create the predominant character of the East Street area. Any development on the scale of a 22-storey tower would dominate East Street physically and socially. It is essential for the Applicant to propose an urban design that connects with and considers the town centre. The advantages of increased density are well known but tall buildings are not necessary to provide high density accommodation. To justify a 22-storey tower in an area where the average height of the built environment is between 2-storeys and 4-storeys, will be a challenge.

The current owners of the St. Catherine's Place site have stated publicly that they will not build the permitted 18-storey tower but will reuse and remodel the 7-storey St. Catherine's House to provide new flats. The current owners also state that they do not propose to build taller than St. Catherine's House when redeveloping the remainder of the site. The St. Catherine's House 'landmark' building is no longer a precedent for tall buildings in this area of Bedminster townscape. The Society believes that the Council does not support the height and mass of the nearby, recent Pring Street and Hill Street proposal.

Public realm

The Bedminster Conservation Area includes the north side of East Street and some of the south side. Whilst the overall development would benefit the area, the proposed 22-storey building is close enough to harm the amenity and character of the Conservation Area. The tower would block out sunlight from the properties immediately to its north. The applicant must satisfy the Council that the tower would not harm close and longer distance views across the City, particularly from the Windmill Hill area.

The lack of human scale of the 22-storey tower would overbear Little Paradise and Stratford Street. The tower's 22-storey cliff of masonry would emphasise the tower's lack of human scale, harden the edge of Dalby Avenue and make it even less welcoming to pedestrians and cyclists.

Conclusion

The Society submits that the Council should encourage the Applicant to withdraw the current proposal. If the Council supports the change of use to residential development the Applicant should resubmit a mixed development scheme to complement the neighbouring St. Catherine's House scheme to create an integrated urban design that responds to the urban grain of East Street.

The Society suggests that the Little Paradise scheme that would not exceed the seven-storey height of St. Catherine's House. A medium rise approach could achieve a high density and could deliver these advantages:

- It could create public and private open areas within the site protected from the surrounding traffic.
- It would provide a human scale scheme within the surrounding streets.
- Front doors and windows onto the street would provide animation and surveillance in the public realm and would enhance Bedminster's residential character.

• It could provide a better housing mix and family housing in an area where it is needed. A mix of accommodation would build a more stable and sustainable community.

There is insufficient information for the Society to comment on other material aspects of the proposal such as housing and tenure mix, design and materials.