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The Society's statement in response to – 13/05273/F - Demolition of New Bridewell Police Station and redevelopment of the site to provide t student accommodation.

December 2013

### **Introduction**

The Society supports the redevelopment of this site, which is the neighbour to several conservation areas. The removal of these unremarkable buildings gives an excellent opportunity to mitigate one of the city's worst planning disasters. Nelson Street and Rupert Street are acknowledged townscape failures. They form alienating canyons of bad architecture. The Nelson Street, SPD 8 recognised that the long-term solution lay in improved architectural quality. The SPD design brief demanded, "A development of exemplary architectural quality constructed from durable building materials of high quality to ensure a long life span for the building." The Society has informed the developer in pre-application discussions that it could not support the current scheme for the following reasons.

### **Demolition**

The Society supports the demolition of the standing buildings and the suspended walkway, none of which has any special architectural merit or contributes positively to the townscape.

### **Use**

**The upper floors** - The Society accepts the proposed change to student accommodation. The distribution of the accommodation between cluster flats and studio rooms and their construction should ensure that the internal alterations are flexible to enable conversion to flatted accommodation if the need arose.

**Street level** –SPD 8 recommends that there should be significant retail use at ground level. The city council adopted SPD 8 in 2006, in a different retail economy. The Internet shopping revolution has irrevocably reduced the demand for retail space, which has moved to the east of Broadmead. The vacancy rate at the west end of Broadmead is chronically high. The Society proposes that any street level retail space should be limited to that required to meet the anticipated needs of the local student population. More retail space would weaken the demand for the currently vacant retail units in the remainder of Broadmead. The Society believes that the developer would fail to let a significant retail development. The Council must plan for the post-Internet shopping evolution and cease to require developers to build retail space distant from the primary shopping activity at Cabot Circus. The Council knows that many recently built mixed use developments in the

city centre have failed to let their ground floor retail space. Many of these new built retail units have never been fitted out and have remained sterile and boarded up. Retail use is only one solution to create an active frontage. The development includes "common rooms" at street level, which would probably be under used and not very active. The applicant should explore other uses. The Dighton Street student developments use the ground floor for student accommodation, which could be appropriate for this development if the rooms have double glazing and appropriate security.

### **Mass and height**

Past planning policy failed to understand the context of the topography of the city centre, which is a river basin under the Kingsdown ridge to the north. The former policy permitted tall buildings along the newly created urban motor roads (Rupert Street) and within the traditional urban grain (Nelson Street). The tall buildings destroyed any sense of place and created concrete canyons that pedestrians avoid if possible. No one would now seek to emulate the indifferent architecture of the concrete framed buildings between the Grade II listed Westgate House and the Grade II listed Bridewell Island. To avoid aggravating or perpetuating past planning mistakes and to repair this part of the city's townscape the SPD 8 design brief indicates buildings whose height is consistent with and does not overbear the adjacent listed buildings.

The new Nelson Street elevation faces the Grade II listed former Central Bristol Job Centre. The Applicant's computer generated images show the imbalance of mass between the proposed development and the heritage building. The parapet level of the flat roof of new block is significantly higher than the eaves of the listed building. Nelson Street is narrow and the back of pavement elevation aggravates the 'canyon effect' that disfigures Nelson Street and discourages pedestrian use. The area of the New Bridewell site is large enough to allow a set-back in Nelson Street elevation without loss of economic viability.

The new Bridewell Street elevation faces the former Bristol Police Headquarters (Sir Percy Thomas), the former Magistrates Court and the former Fire Station, which are all Grade II listed. The criticism of the Nelson Street elevation applies with even greater force to the Bridewell Street elevation. The development proposes a fifteen floor block that opposes the refined designs of the smaller scale listed heritage buildings. Both the Nelson Street and the Bridewell Street elevations ignore their architectural context and SPD 8's design advice. The Applicant's CGIs of the 'landmark' tower are the best evidence of the manner in which that block would overbear and overwhelm its neighbours and dominate the views along Bridewell Street and Rupert Street. This development would perpetuate the now discredited planning philosophy that degraded Rupert Street into its current hostile character.

The Society notes that the planning permission 13/00452/F for the demolition and redevelopment of the former Nelson Street Magistrates Court to provide student accommodation does not exceed nine floors. The floor heights of both developments are similar. The highest part of the former Nelson Street Magistrates Court development in Rupert Street does not affect the setting of any identified heritage assets nearby.

### **Design**

This is an important city centre site faced on two sides by Grade II listed buildings. It is important that the Council maintain the support that the National Planning Policy Framework gives to improved architectural design and to its own Policy BCS 21 – Quality Urban Design. This substantial building must set the standard for design quality near the Old City. It is probable that other 20th century buildings in the area will be demolished and redeveloped in the medium term. In the Society’s view, the proposed design fails to meet the new policy requirement of a ‘quality design’. Elements of modernism fail to articulate the unrelieved mass of the elevations, which compare unfavourably to their listed neighbours. This development could be anywhere; and it would be of no better architectural quality than the buildings that it would replace. The development would be characterless and have no sense of belonging to the Old City. A major development such as this requires the developer to consider the relationship of its development in the context of the surrounding buildings and public spaces. Despite the design statement’s narrative that accompanies the CGIs, the CGIs illustrate that from all angles the development fails to relate to its context and it overbears and dominates Nelson Street and Bridewell Street in manner that sets back the regeneration of this area. The design does not appear to recognise the design advice that “Roofs should be designed as a fifth façade.”

### **Public realm and public space**

There has been debate about whether the SPD 8 proposal for a new public space is preferable to the alternative proposal to restore the area’s historic grain. The current open space on the corner of Nelson Street and Bridewell Street only creates a hole in the urban fabric and fails to create an area that attracts public activity. The Society welcomes an improvement in permeability between Rupert Street to Nelson Street. However, the public space that the design statement calls a square is essentially a corridor. The design would not create the ‘activity node’ that SPD 8 seeks. The Society would support the reinstatement of the ancient street pattern if the development creates a new pedestrian right of way between Nelson Street and Rupert Street. This would permit development to the back of the pavement on the whole of the Nelson Street and Bridewell Street boundaries. The Society suggests that archways could close both ends of the pedestrian route to give a sense of enclosure. To compensate for reducing the height of the development floorspace could extend over the arches.

### **Conclusion**

Whilst the principle of re-using this site for student accommodation is acceptable, the layout, height, scale, massing, form and overall design and appearance of the buildings proposed would not contribute positively to the area’s character and identity to an extent and it would harm the identified neighbouring listed heritage assets. The harm that the development would cause to the identified heritage assets would be substantial harm. Far from promoting or enhancing Rupert Street Bridewell Street and Nelson Street, the ‘landmark’ tower would aggravate the area’s urban blight and planning dysfunction. The ‘landmark’ tower would perpetuate the planning disaster that created Rupert Street. The development could not result in any substantial public benefit that would outweigh the substantial harm identified. This development offers little public benefit. The development’s negative effects would thus outweigh the limited public benefit that a private student accommodation scheme could deliver. The development would be contrary to policy. There are no material considerations that outweigh the significant harm that has been identified. This planning application should be refused.