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The Society's statement in response to pre-application enquiry to develop at Silverthorne Lane a mixed use development of a residential new build

April 2015

Principle of development

Although the Society welcomes development in the Enterprise Zone, it objects to this ambitious application, which is premature. The applicant has given no thought to the provision of social infrastructure. From the brevity of the documents filed with the developer's pre-planning application enquiry, the Society infers that the enquiry is limited to

- (i) the change of use of the land to mixed commercial and residential, and
- (ii) the scale and massing of the proposed scheme.

Planning policy

The Core Strategy Policy BCS3 and the Temple Quarter Enterprise Zone Prospectus (the Prospectus) propose that the Silverthorne Lane Character Area could offer 21,000 square metres of employment space and 1,200 residential units by 2026. Both the Prospectus and the TQEZ Shaping Quality Places Spatial Framework Review (the Review) require development to respond to and reflect the heritage constraints described in the TQEZ Heritage Assessment. The principle of Policy BCS8 is to retain employment land and to encourage new employment floorspace suitable for smaller businesses as part of mixed-use development. Silverthorne Lane is particularly important industrial location not least because it is in the TQEZ. Retaining valuable employment land is important. It ensures a variety of business spaces and types and is difficult to replace. Imaginative mixed development can provide employment close to where people live.

Change of use – non-residential

The developer's Project Description (PD) says that the listed building will produce approximately 1,000m² of retail use at ground floor and 1,000m² at first floor. The Society submits to the Council that the inclusion of this retail space would be insufficient to create a 'mixed use' development. In addition to the retail space, it is reasonable to expect a major

development in the Enterprise Zone to offer a significant mix of employment space. The opportunity for residential development occurs because to the proximity of the Enterprise Zone. The long term viability of the substantial public investment in the zone depends on maximising employment opportunities. It would defeat the zone's objects to pursue the short term advantage of the greater margin that the residential market currently offers. This scheme to build 262 residential units would house a large population. This is an isolated area where there are no shops or social infrastructure. It is reasonable to expect that when the scheme is fully worked up it would offer its future residents a considered and imaginative mix of space to provide a social infrastructure in addition to a convenience retail presence.

Change of use – residential -mixed and balanced communities

Policy BCS18 of the Core Strategy requires development to provide or contribute to a mix of housing that helps to support the creation of mixed, balanced and inclusive communities. Over the last twelve years, over 90% of the homes delivered in the central wards of Cabot, Ashley and Lawrence Hill have been in the form of smaller flatted units. There is evidence from studies including the Strategic Housing Market Assessment 2009, that there is both need and demand for family sized homes. The Central Area Action Plan policy BCAP3: Family sized Houses; states that an appropriate proportion of family sized homes will be sought in all areas of the city centre by negotiation. Of the 262 residential units, 6% would be 3 bedroom flats and 52%, 2 bedroom flats. It would appear that this mix would not satisfy the requirement Policy BCS18. It is reasonable to expect the developer to reconsider the mix of housing types, and offer more family sized homes to ensure the scheme meets the housing policy requirement to deliver a housing choice.

Height and mass - is a tall building appropriate for this out of city centre site?

The Prospectus and the Review use common language to describe the emerging placemaking policy for the Enterprise Zone and specifically for Silverthorne Lane. They describe Silverthorne Lane as, *“An area with a strong 19th century industrial character with many buildings and spaces that will appeal to creative businesses and residential occupants looking for a distinctive ambience.”* Planning policy requires that the TQEZ Heritage Assessment must inform development. The Silverthorne Lane character analysis says, *“Many of the heritage assets in Silverthorne Lane are listed structures. The undesignated structures and spaces contribute to the area’s character.”*

The Prospectus and the Review give developers planning guidance in these terms.

- *“The re-use and repair of existing buildings and spaces presents opportunities to enhance the setting of the area’s heritage assets.”*
- *“Silverthorne Lane, an industrial streetscape re-animated through incremental, heritage led regeneration with a rich mix of live work and leisure uses opened with new links through intimate court yards to waterfront walkways.”*
- *“One of the significant views within the Silverthorne Lane area is towards St. Vincent’s Works factory building along Silverthorne Lane. This view suggests the scale and massing of any new buildings should be and defined by and subservient to the principal listed structures in the area.”*

The scheme proposes that Blocks B and C will have seven floors while Block A extends to sixteen floors. The scheme would be a 'tall building' within the definition of In SPD1, Tall Buildings. In 2005, the Council adopted SPD1 because earlier planning regimes had left Bristol with a legacy of poor quality isolated tall buildings, which are unpopular because they dominate and overbear their surroundings. SPD1 creates a presumption against tall buildings outside the centre of the city.

Conclusion

The Society could support the principle of a mixed development on this site that contained a substantial but not a dominant residential element. The Society supports higher density of development in central locations but the scheme must offer a greater mix of accommodation and also create a high quality living environment. The Council's planning advice for the Silverthorne Lane Character Area must inform the height, mass and form of the development. Successful placemaking requires that the development must enhance the local designated and undesignated heritage assets. The scheme is premature because it makes no constructive offer to contribute to the social infrastructure, which the area lacks. The Society objects to the height and mass of the proposed scheme, which would dominate its surrounding area, overbear, and harm Silverthorne Lane. The scheme conflicts with planning advice. Before the Society can support the scheme, the applicant must reduce its scale and impact, and include a greater area of employment space. The applicant should reconsider the housing mix and make proposals to provide amenities and social infrastructure for the future residents.