



an independent force for a **better Bristol**

Draft v 1.0

Response to Local Plan review and Urban Living SPD March 2018

1 Introduction

The Society supports the main thrust of the documents. In particular, the Local Plan review is proposing changes to planning policy on all the right issues that have arisen since the Plan was written, and the Urban Living SPD aims to ensure that, where denser development occurs, it is done well.

However, there are some aspects which the Society suggests could be improved. This document contains the most important of our comments. We have also annotated more detailed comments in the documents themselves, the aim being to make the comments easier to assess.

2 Suggested areas for improvement:

2.1 Too much emphasis on tall buildings

The Society strongly supports the principles of 'Urban Living', which commands a high degree of public support. The phrase 'Urban Living' is shorthand for concentrating housing, primarily on brownfield land. Densification is a popular idea because people see that traffic congestion, sustainability, and health imperatives make it necessary.

The Society supports densification in Bristol if it is done well. We are not against tall buildings per se, but higher density does not have to be achieved through building tall. It is possible to achieve higher densities using different building forms. Mid-rise buildings are the appropriate form of densification in most areas. Terraced housing along traditional street patterns is another efficient use of land and is the most sought-after housing.

We are concerned that the proposed policy should be informed by the mistakes of the past, for instance tower blocks surrounded by sterile empty space. We are also concerned that the policy should learn from the views of people currently living in high density schemes on the liveability of different building forms, and in particular tower blocks.

We think that both the Local Plan review (ULH4) and the SPD do not do enough to emphasize that denser development does not necessarily mean tall development. ULH4 does not make this point at all: it "encourages" tall buildings without qualification. The SPD explains that there are alternatives, eg "amplified height", but states no preference between the alternatives. This is no defence against individual developers wanting to build as high as

possible on their own development site. Both documents should promote "amplified height" more.

Bristol Civic Society does not support the Mayor's statement, *"I want Bristol's skyline to grow. Tall buildings... built in the right way... in the right places...and for the right reasons...communicate ambition and energy."* There was no public consultation to precede the Mayor's initiative.

Building high produces a generic landscape; Bristol will look more like Leeds. People are attracted to the city because it is historic, different, and largely low or medium-rise. Visitors contribute significantly to Bristol's economy and employment. Other historic cities such as Vienna, Amsterdam and Copenhagen, have chosen to avoid high-rise to preserve their attractive life-styles. To harm the city's historic character would be politically unpopular.

Building high will not solve the housing crisis. Towers can cost 40% more than mid/low-rise buildings, are less floorspace-efficient because of lift shafts, extra concrete and other utilities. Social landlords are unwilling to manage high rise apartments because they are more expensive to heat and maintain. High rise flats are bought by those who can afford the additional cost and pay the higher maintenance charges.

Towers will not solve Bristol's core problem, housing those who need affordable housing. Tall buildings will not increase housing supply for lower-income groups. High rise does not mean higher density. Bristol's sad post-war high-rise estates have low density. Clifton ward has Bristol's highest density and is mid-rise. Encouraging high-rise will only profit developers who will receive wind-fall gains on their land bank.

Don't make or let people live in residential towers. Many have been antisocial, high-maintenance, ugly, and never truly safe. No fire engine can reach up 20 storeys. There is an opportunity for more holistic solutions. Bristol has space to accommodate the housing needed, while promoting happiness and well-being. The overwhelming evidence is that mid-rise housing in mixed-use streets are most people's preferred urban form. Such densification will return us to something like the pattern of 19th century cities, the 'tramway pattern', a name that reflects how trams spurred the first great expansion of our cities while keeping people living near lively streets, in reach of public transport.

2.2 The areas for Urban Living need stronger design guidance

Dense development needs careful design. In the draft documents, the areas for Urban Living are no more than blobs on the map. The SPD says that to help ensure good design "there is an expectation that key stakeholders will work together to prepare a joint vision for the area; through either a spatial framework or a masterplan". To avoid repeating the confused Bedminster Green development proposals which produced several major development schemes that failed to consider integration of the development with their surrounding area, the Society believes that the Council should play a more proactive role in ensuring high quality spatial frameworks (not masterplans) than this statement implies. It might be sufficient to rely on others in an area where there is a single developer and team of professionals of the highest quality, or where there is a local group with professional skills

producing a high quality Neighbourhood Development Plan. But in all other circumstances, we believe the Council should take the lead, as it has done successfully, for example, for the Temple Quay Enterprise Zone.

It is recognised that the Council will struggle for resources to do this, and may need to look for extra funding to do this, not least because a spatial framework needs to be in place before major redevelopment gets under way. The Council should publish a schedule of the existing area spatial frameworks, and the ones it plans to do.

An initial spatial study would determine the area's optimum development density. A subsequent spatial framework would set out a design-led approach to ensure that following densification the development responds to the context, local need and delivers successful placemaking. The spatial frameworks for each area would:

- specify where tall buildings are acceptable and where amplified height is required, and at what height
- quantify minimum densities in different areas, taking into account the local characteristics
- define the existing character that should be retained in any development, involving local and other professional resources to do this.
- make the links between building development and movement/transport/public realm needs.

It is also essential to maintain Policy DM 26 - Local Character and Distinctiveness. This policy will be critical to place-making in denser developments.

2.3 Addressing the impact of densification on transport

The Society feels that the documents should address the impact of densification on transport. Higher urban density will inevitably have a potentially negative impact upon space for pedestrians, cyclists, parking and public transport. The planning policy must face into the concern that densification will be delivered before public transport improvements.

It is not easy to see how to address this, but one idea comes from the draft London Plan, which has parking standards for new developments that refer to PTAL - public transport access levels. See in particular Tables 10.3/10.4/10.5 - Maximum residential parking standards in

https://www.london.gov.uk/sites/default/files/new_london_plan_december_2017.pdf.

London is very different in its starting point of public transport provision, so it does not necessarily follow that it would work in Bristol, but it is worth considering.

We suggest that the council considers whether it would be feasible to incorporate PTALs in planning policy in Bristol. In particular, parking policy should vary by area with the density of development.

2.4 The language of the SPD needs strengthening

Planning policy needs to include both guidance for developers that value it, but also clear requirements and limits for those developers that push the boundary towards excessive development. The Society suggests that the language of the SPD is in many places too

Proposal CDS 4: Delivery of an enhanced gateway and new city quarter at the Western Harbour

The replacement of the present network of aging and outdated roads and bridges and their replacement with a simpler new system will unlock additional development potential around Cumberland Basin. The development of new homes will be expected to deliver affordable housing and be supported by a complementary mix of uses, services and infrastructure. Any development will be expected to make efficient use of land and will have regard to the area's important heritage assets, the Bonded Warehouses, for which the Council will seek new uses.

Separate out from Western Harbour the area south of the Cut – it has a different character. It is all conservation area, with several heritage assets, and includes an important park and varied employment land important to Southville. None of it is redundant sliproads. This area should be taken out of CDS4 and given serious separate consideration in a Southville context.

3.3 South Bristol

Separate out Parsons Street from the Bedminster Green urban living area – it is a separate area with different characteristics.

Central Bedminster - Focus for new homes

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3.3.8 If the opportunity arises the Council will seek funding to build new pedestrian and cycle bridges across the Avon New Cut.

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3.3.13 In this edge of town settlement the Council will require a denser, mixed form of development.

Changes to Green Belt at South West Bristol

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3.3.22 When an area is removed from the Green Belt the Council will plan the improvement of undeveloped land to ensure an enhanced landscape and leisure value.

3.4 North Bristol

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3.4.5 The Council will seek the cooperation of the South Gloucestershire District Council to coordinate development and the infrastructure to support the urbanisation that spans the administrative border.

Include Henbury for Urban Living, as the SPD does. It is close to Cribbs Causeway. It is getting a new station and rail link and expansion there could help make the case for the Henbury loop which would make employment opportunities in Avonmouth very accessible.

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How can the local plan help?

4.0.2 In its role as the statutory development plan for the city, the local plan can:

- Establish a planning approach which sees development of new and affordable homes as a primary objective in development decisions. and ~~remove any~~ remove the unnecessary or obsolete policy barriers to developing homes set out in Appendix XX;

4.2 Urban living

Proposal ULH 3: Urban living

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Development proposals should make the most efficient use of land by developing land to the fullest amount consistent with creating a liveable environment. This will include promoting the replacement of or building over low-density uses and extending buildings upwards by using airspace above them. The

Council will encourage the development of innovative building design and off-site-fabrication. Permission will generally be refused where new flats are not dual aspect, or access is by long artificially lit corridors. (This requires a cross-reference to Policy DM29)

ULH3 should cross-refer to other relevant design policies, both existing ones and the Urban Living SPD.

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Proposal ULH 4: Tall buildings

We think that both the Local Plan review (ULH4 and various CDSx policies) and the SPD do not do enough to emphasize that denser development does not necessarily mean tall development.

Proposal ULH 4: Tall buildings

The local plan will encourage ~~high quality tall buildings in the right places and of the right design.~~ Urban densification.

Buildings with amplified height and tall buildings may be appropriate in the locations for more intensive forms of development described in Proposal ULH 3 or at other locations where the urban form would support this form of development.

...
...

4.2.8 Tall buildings have ~~an important~~ a role to play in helping Bristol accommodate its expected growth as well as communicating ambition, energy and innovation. They can contribute to urban living objectives, make efficient use of land to deliver homes, jobs and mixed communities.

Proposal ULH 6: Specialist student accommodation

Proposals for larger developments over 100 bed spaces being mixed tenure could lead to developments that please nobody. In order to comply with the policy as written, developers might propose other forms of residential use that were incompatible with student accommodation. For example, affordable family units and student flats would probably not work well together. Perhaps the bullet point beginning " In cases of proposals of 100 bedspaces or more" should be say something like "In both cases the mixed use proposals need to be compatible with other relevant planning policies".

Page 42 – additional bullet point

Bespoke student development must be adaptable to other uses, both outside of terms dates and should there be a fall in the demand for student accommodation. To ensure that purpose-built student housing can be easily converted into residential accommodation the rooms in student flats must comply with the Council's residential space standards.

...

4.3.8 The existing policy will be enhanced to provide greater clarity on the suitability of new HMO development. It is proposed that the following new criteria for assessing the impacts of HMOs are applied:

- Proportion of HMOs - it is suggested as a guideline that no more than 10% of the housing stock in any given area should be occupied as HMOs. When the proportion of HMOs to housing stocks exceeds the guideline the Council will use its best endeavours to manage down the number of HMOs to increase the family housing stock.

6. Health and well being

6.1 Air quality

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6.1.1 This is likely to include a number of measures to promote more sustainable travel options across the city. The Council will seek to promote parcel collection points in the centre in the business areas of the city to reduce the number of parcel delivery journeys.

Proposal HW 1: New development to contribute to delivering the council’s Air Quality Action Plan

Whilst this could provide funding for worthwhile improvements, there is a risk that it becomes a fig-leaf for allowing development that generates more transport emissions than it should.

Proposal HW 2: Controlling potentially polluting development

This policy needs tightening up a bit to make it clearer. Air pollution is a very site or area specific problem. If, for example, a proposed development were going to result in an increase in traffic in an area already suffering from poor air quality, it would not necessarily help if the offsite measures were outside that area.

Additional bullet point in the suggested new dedicated policy

A developer of a multi-storey car park in the city centre must produce an air quality impact assessment of the effect on local air quality.

6.3 Takeaways -additional paragraph

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6.3.3 An applicant for permission for a take-away must propose a litter control plan either be a contribution to supplementary local cleansing or the operation of a dedicated litter collection programme.

8. Local plan policies proposed to be retained

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SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES (June 2014)

Proposed Retained policy	Reason
DM 26 - : Local Character and Distinctiveness	The retention of this policy is referred to in paragraph 3.17 but omitted in the schedule to part 8. This policy will be critical to place making in denser developments
DM23 – Transport Development Management (re car parking). BCAP29: Car and cycle parking	Parking policy should vary by area with the density of development. Perhaps refer to PTAL - public transport access levels, as in the draft London plan.

Urban Living SPD

The language of the SPD needs strengthening:

- Planning policy needs to include both guidance for developers that value it, but also clear requirements and limits for those developers that push the boundary towards excessive development. The Society suggests that the language of the SPD is in many places too weak to achieve the second objective. Verbs like “is keen to” and “needs to” should be replaced by verbs that are more directive and give clear requirements.

- It is recognised that to some extent the SPD is a description of design principles. The Society suggests that for clarity the document is re-structured to distinguish between the parts that are design principles and the parts that are design requirements.

2. Optimising Density: design guidance

The SPD says “there is an expectation that key stakeholders will work together to prepare a joint vision for the area; through either a spatial framework or a masterplan”. To avoid repeating the confused Bedminster Green development proposals which produced several major development schemes that failed to consider integration of the development with their surrounding area, the Society believes that the Council should play a more proactive role in ensuring high quality spatial frameworks (not masterplans) than this statement implies. It should publish a schedule of the existing area spatial frameworks, and the ones it plans to do.

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- make the links between building development and movement/transport/public realm needs

4 Tall Buildings

The SPD should say more strongly that higher density does not have to be achieved through building tall, and explain how. The SPD explains that there are alternatives, eg "amplified height", but states no preference between the alternatives. This is no defence against individual developers wanting to build as high as possible on their own development site. The SPD should promote "amplified height" more.

5. Guidance on submitting a planning application

There is a reliance on greater scrutiny of major 'urban living' applications, but should the Council be more prescriptive on the process to be followed, placing the process in the context of the area's spatial framework ?

Urban Living - Learning from recent higher density developments - evidence base

- the document might cite exemplar schemes from outside Bristol. The schemes cited in the current document do not have enough best practice examples.

Key Learning points

- the "Quick View Assessment: Optimising Density" diagram (p54) plots the recent developments along a line of increasing density, with a blob labelled "Optimised" in the middle, implying that the density of Junction 3 (120 dph) is optimal, and the developments either side of the blob are sub-optimal. The diagram is not referenced anywhere in the words. It needs explaining.