



Strategic City Planning Team
Bristol City Council
PO Box 3176
BS3 9FS

23 March 2015

By email
blp@bristol.gov.uk
let.020.DG.07080065

Dear Sirs

OLD MARKET QUARTER NEIGHBOURHOOD DEVELOPMENT PLAN

Indigo Planning has been instructed by Harmsworth Pension Fund Trustees Limited to make representations to the Submission Version of the Old Market Quarter Neighbourhood Development Plan.

Our clients, Harmsworth Pension Fund, own 1 Temple Way together with land surrounding it including land which is identified within the Neighbourhood Plan as being appropriate for development. We address the relevant parts of the Neighbourhood Plan below with our comments.

Aims of the Plan

We suggest that the need to provide accommodation for students should be recognised in 6.3 as follows:

New developments will provide a range of housing types for different household sizes and budgets including families, first time buyers, older people, young professionals and students seeking good quality housing in a city centre location.

Policy T1

Policy T1 seeks to safeguard the existing and proposed pedestrian routes shown on page 21. We consider that the Neighbourhood Plan should retain some flexibility to allow the provision of pedestrian routes along slightly different alignments, should this contribute to the achievement of better planning outcomes. We suggest that the fourth bullet is amended to read '*safeguarding appropriate pedestrian routes, such as those indicated on page 21*'.

Policy B1

In order to be consistent with paragraphs 132 – 135 of the National Planning Policy Framework, we suggest that Policy B1 is amended as follows:

*Development of these heritage assets will be expected to sustain and enhance these features and their visual impact **in a manner appropriate to their significance**. Demolition of these buildings will not normally be permitted, **unless the harm or loss is outweighed by benefits**.*

Policy C8: Jacob Street and Broad Plain

We support the allocation of the land between Unity Street and Jacob Street (Site C8,1) and the former Bristol Evening Post print hall (Site C8,2) within the Neighbourhood Plan for development.

The plan for Policy C8 shows the existing hardstanding to the rear of 1 Temple Way incorporated into the 'safeguarded green space' in order to create a rectangular space. Whilst we support the safeguarding of the existing green space in this location, the area of existing hardstanding is required to provide access into the rear of 1 Temple Way. There is, therefore, no merit in safeguarding this area as green space as this would not be deliverable. The same comment applies to the Open Spaces Map on page 39.

The same area of hardstanding is situated on the former route of David Street, which the Neighbourhood Plan proposes to safeguard as a direct pedestrian access and reinstate to its former width of 7 metres. As this land is required to provide access to the rear of 1 Temple Way, it is not possible to safeguard this section of the former route of David Street or to reinstate this section of David Street to its former width. We consider that the Neighbourhood Plan should recognise that it may be possible to provide alternative north/south pedestrian routes, such as through the safeguarded green space.

We therefore suggest that the first bullet under 'development of these sites should contribute to' should refer to:

'the provision of north/south pedestrian routes between Jacob Street and Unity Street'.

We suggest that the first bullet under 'development of these sites should ensure safeguarding of' should refer to:

The garden to the rear of 1 Temple Way.

In respect of the individual sites:

Site C8.1 Unity Street and Jacob Street

As currently drafted, Policy C8 states that development of the site between Unity Street and Jacob Street (Site C8.1) should:

- *Re-use and sensitively restore existing character buildings on Jacob Street and Unity Street;*

- *Incorporate a new pedestrian route between Jacob Street and Unity Street/New Thomas Street;*
- *Comprise new buildings maximum 3 storeys high on Jacob Street and 4 storeys high on Unity Street with a 5-storey tower on the Hawkins Street corner, predominantly residential (potential 60 dwellings) with A2 use at ground level along Unity Street; and*
- *Include on-site residential parking at a minimum ratio of 1 space per 2 dwellings.*

Our client welcomes the inclusion of this site within the Neighbourhood Plan. Planning permission was granted on 14 December 2012 for 42 apartments, 6 townhouses, 4 retail units and 34 car parking spaces on the site. That planning permission has not been implemented and is unlikely to be implemented due to viability issues. As such, the owners are undertaking a feasibility study to review what the site can realistically accommodate and the type of uses that would be viable. Whilst work on a revised scheme has not been completed, to date it would appear that a development of a mix of student accommodation along with private residential units would be viable within the short term.

In light of the above, we would propose the following alternative wording for Site C8.1:

- *Any scheme should review the potential to re-use the buildings on the site as identified in Appendix 3 Old Market Quarter Listed and Unlisted Buildings of Merit;*
- *Incorporate a new pedestrian route between Jacob Street and Unity Street/New Thomas Street;*
- *Comprise new buildings with the heights to reflect the various characteristics surrounding the site with the form of development stepping up towards the west of the site close to 1 Temple Way. The use should be a mix of residential and student accommodation with some active uses at ground level along Unity Street; and*
- *Include on-site residential parking, with the ratio to reflect the type of development which comes forward.*

We propose alternative wording for the final bullet point because the requirement for a minimum ratio of 1 space per 2 dwellings is not consistent with Policy T4, which only requires this level of provision on sites more than 100 metres from Old Market Street. This site is within 100 metres of Old Market Street.

Site C8.2 Former Bristol Evening Post Print Hall

As currently drafted, Policy C8 states that development of the former Bristol Evening Post print hall (Site C8.2) should:

- *Incorporate an active ground floor to the Old Market roundabout frontage;*
- *Comprise retail use (large or small units) at ground level residential, student accommodation, hotel or offices above;*
- *Reinstate the former line of Jacob Street as a pedestrian route;*
- *Comprise new buildings, maximum 3 storeys high along David Street and adjacent to the Grade II listed Stag and Hounds pub and otherwise no higher than the parapet to the roof above the highest floor of No.1 Temple Way; and*
- *Include a shallow depth building on the exposed blank façade of No.1 Temple Way.*

A planning application for student accommodation together with A3 floorspace is currently with the City Council for consideration (Ref.14/06283/F). We welcome the fact that the latest document appears to have taken this into consideration with the introduction of a veneer on the north elevation of 1 Temple Way.

However, we suggest that the wording to the third bullet point is amended as the scale and heights of new buildings on the site and the relationship any proposed building would have would be informed by the appropriate work being undertaken. A large amount of work was undertaken as part of the planning application in assessing the relationships both with the immediate buildings adjacent to the site and the wider setting. The parameters as described in the Policy text are too prescriptive and do not take in to account differing storey heights for different uses. We do not consider it appropriate to provide for a maximum height along David Street and adjacent to the Stag & Hounds public house. Likewise, it will not always be the case that a scheme necessarily has to be lower than the adjacent 1 Temple Way.

We suggest the following alternative form of wording in respect of the third bullet to Site Allocation C8.2:

“Comprise new buildings, the height of which should have regard to neighbouring buildings, and demonstrate that there is little impact on surrounding uses. As a general guide, this could include three storeys to the north of the site up to eleven storeys towards the south of the site next to 1 Temple Way.”

Our client is keen to work with the Neighbourhood Forum to further enhance the Old Market Quarter. Please contact my colleague Simon Roberts or me if you wish to discuss these representations and please keep us informed of the process going forward.

indigo

Yours faithfully

Simon Neate

cc: Mr C Moore, Alaska Development Consultants