

ST. CHRISTOPHER'S SQUARE: APPLICATION NUMBER 22/01221/F OBJECTION TO THE REVISED PROPOSALS FROM WESTBURY PARK COMMUNITY ASSOCIATION (WPCA)

This submission from the WPCA sets out our objections to the submitted revisions to planning application 22/01221/F.

We made four sets of objections to the original application, in terms of overdevelopment, parking, viability assessment and community engagement. On this occasion we are making a single set of objections under slightly different headings.

Preamble

Before moving on to our objections we again want to make clear what we stated in our original objections, that “the Westbury Community Association fully supports in principle an ‘Extra Care’ facility on the proposed site”. We do now, however, have further and important comments to make to qualify this support.

At the time of the original application, and our objections, there was still uncertainty about the appropriate use class for an Extra Care development. The delay in determining this is a result of the planning system becoming seriously behind in terms of dealing with newer approaches to older people’s provision such as Extra Care – in fact there is still no clear or consistent national approach to dealing with this relatively new form of development. We understand that Bristol City Council has now determined that this proposed development falls under use class C2. This presents problems because C2 is mainly for care home provision, the residents of which seldom if ever leave their accommodation (which is often gated) and there are invariably few visitors. Our support for the Extra Care proposal was precisely because the residents would be able to be active members of the Westbury Park community and, as the applicants themselves state, “*the site will be open to the local community allowing people to use the facilities and enjoy the grounds*”. In fact the applicants now use the term “*Integrated Retirement Community*” to confirm its ‘integration’ with the wider area.

The C2 use classification creates two problems. First, that no affordable housing provision is required on site (or an offsite contribution made). This is very unfortunate but we do not comment further on this. Secondly, the transport requirements for a C2 scheme – especially in terms of parking – are clearly lower than for an “*Integrated Retirement Community*”. The decision to classify the development as use class C2 increases the danger of allowing the applicant to succeed with their incorrect application of the Council’s C2 parking standards (which we detailed in our original submission on parking provision) and the risk of overspill parking.

OUR OBJECTIONS TO THE SUBMITTED REVISIONS

Note: In each section below we list first (in italics) statements made by the applicant, drawing not just on the formally submitted and revised material but also on the applicant’s widely circulated December 2022 ‘newsletter’. We then add (in plain text) our comments along with any additional points and a summary objection at the end of each section.

Overdevelopment and Housing Density

- *The Bristol Core Strategy (Policy BCS20) requires development to maximise opportunities to re-use previously developed land and higher densities are sought.*

- *This site (and others) must be redeveloped in a way that meets the density policy, not only to meet that specific policy requirement, but in order to provide the homes that the Bristol community needs, as set out in the Core Strategy.*
- *At 1.9ha, the 116 dwellings proposed equate to a density of 61 dwellings per hectare. This is toward the lower end of what the Local Plan requires and is a result of an assessment of site constraints and other factors.*

We made an argument in our original objection about overdevelopment (points 4.2 to 4.9) that applying a single density to a site with two such different parts (frontage and backland) is very poor practice. Using our approach, commonly applied across the country, the density on the backland area would be c.180 dwellings per hectare, above the City Council's maximum level for this area of Bristol.

The importance of maximising previously developed land is, of course, recognised but as the recent letter (1st December) to local authorities from Michael Gove, Secretary of State for Levelling Up, Housing and Communities states: "Developments that are not well-designed should be refused planning permission and housing targets should not be used as a justification to grant them permission." We agree with this.

The Unacceptable Scale and Impact of the Proposed Development

- *The total number of homes is now 116 (down from 122).*
- *The height of Villa B has been reduced by one storey and height of all the other villas has been reduced by 300mm.*
- *Footprints of Villas A & B have been reduced and additional chamfers added to façades facing Grace House. Footprints of each of new build blocks have been reduced. (This is confusing; it is not clear if all footprints have been reduced or just those for Villas A and B.)*
- *The eastern row of cottages has been moved south. These cottages are at an oblique angle. Measuring from the Bayswater Avenue properties to the proposed cottages the dimension varies between 18m to 22.8m.*
- *The two cottages adjacent to the Bayswater Avenue access have been replaced with a single storey bungalow to reduce the impact on Grace house, (with) obscured glazing to its first-floor windows with an addition(al) clear glazed window to its north elevation facing away from Bayswater Avenue.*
- *New blocks have been offset from the existing Lodges where possible providing views from within the lodges towards open garden spaces.*
- *Amenity space for residents in the refurbished Grade II Listed Grace House, with elements open to the wider community, and in what we are calling an 'Urban Village Hall' where we will curate activities for Westbury Park and beyond.*

The proposed marginal reduction in the number of units makes no basic difference at all to the overall bulk, scale and ground coverage of the proposals. The part of the backland covered by buildings is still almost the same as in the original scheme and this approach is clearly not 'landscape-led' as the City Council are seeking and which we fully support.

One storey has been removed from Villa B but, as the amended Verified Views report shows clearly (and as did the original report), this still leaves the other three blocks inappropriately high and seriously visually intrusive all around the site. Though views from surrounding houses are not something to be formally taken into account, the visual impact on those residents will be horrendous.

The reduction of Villa B from six to five storeys might prevent visibility of this block from The Downs but it will still exceed the height of the Lodges and be visually conspicuous from many other viewpoints (also see Grace House section below).

Removing from the original scheme the two northernmost cottages to the east is an improvement, especially in terms of tree loss (see later section). However the replacement of the two cottages by a single bungalow called “*Woodland Glade Cottage*” is a clear step back. A glade is ‘an open space in a wood or forest’ allowing light to penetrate. That space would now be filled with a building and that building and small garden would be almost permanently deprived of sunlight.

The 300mm (just one foot!!) parapet height reduction, chamfering, offsetting the new Villas etc. are all completely inconsequential to the basic point about the amount and heights of the proposed development and their negative visual and intrusive impact on the predominantly two storey surrounding residential areas.

In addition:

No mention is made in any of the revised scheme documents of the distances between the blocks; a key point in the comments from the City Council Conservation and Design Team. Though some improvements have been made as a result of reduction in building footprints, there are still a number of occasions where window to window (and certainly balcony to balcony) distances are below, sometimes almost half of, the necessary 20 metres. The applicants also acknowledge that some of the distances between Bayswater Avenue houses and the eastern cottages are less than the standard (in fact they point out that some are more than 20 metres and some less, almost implying that averaging out is acceptable).

We wish to re-affirm our objection concerning the amount of development crammed inappropriately into this site, the height of all the new blocks and the distances between the new blocks and from the new blocks to surrounding properties. This is massive overdevelopment which damages the recognised character of this area as a whole. And, of course, it damages the Conservation Area (see Listed Building section).

Design

- *Entrances to the new villa blocks are now defined with a contextual interpretation of the Victorian villa entrance. The entrances to the new villa blocks are on the side of the buildings, reflecting the side entrances to the existing Victorian Lodges.*
- *The proposed façades have been refined following further analysis of the fenestration on the neighbouring frontage villas along Westbury Park. The proposed windows now combine a vertical emphasis and variety of sizes to achieve vertical and horizontal hierarchy, better reflecting the frontage villas along Westbury Park.*
- *The proposed roof form reflects the mansard roofs found on neighbouring villas along Westbury Park which is their primary reference. There are a number of mansard-like roof forms along Westbury Park, these include dormers and slate roof tiles, all of these aspects have been reflected within the proposed design.*
- *Following further analysis of the Westbury Park frontage villas, the facing materials have been changed to red brick.*

We do not wish to dig into matters of detailed design but:

1. We are not aware of anybody actually asking for chamfered corners, for changes to the fenestration pattern or for entrances that reflect the side entrances to the Lodges.

2. There is clearly an attempt to try to secure support for the new Villas by constantly referring to design details from Westbury Park (the street) rather than – as we believe should be the case for the backland area - from the houses in Royal Albert Road, Bayswater Avenue, The Glen and Blenheim Road.
3. The design changes are based on formal elevations, which is not how people experience buildings when walking along.

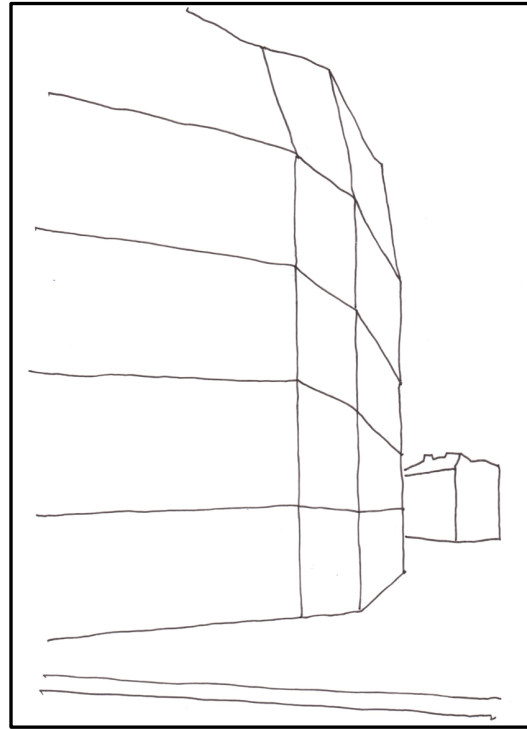
We object to the applicant's use of selective design references in a forlorn attempt to ameliorate the impact of the proposed overdevelopment of the site.

Grace House

- *The previously proposed spa extension has been removed from Grace House. The new spa building now sits to the north of Grace House, along the boundary, and is no longer attached to the listed building.*
- *Views of Grace House will be opened up on entering the site from both Westbury Park and Bayswater Avenue, making the building more visible within its enhanced green setting.*
- *In order to retain the original shadow gap around Grace House a carefully conceived edge detail will be developed to keep any raised levels set back from the original building. This will allow the shadow gap to be appreciated by those in close proximity to the building edge when the full height of the building will continue to be appreciated.*
- *The chamfers on the entrance façades of Villa blocks A & B gently undulate in and then out again on the approach to Grace House; this visually and physically frames the view of the listed building on approach from Westbury Park with deliberate yet subtle and expressive geometries. The eastern corner of villa A aligns with the SW corner of Grace House.*
- *The proposed amendments to the area behind Grace House includes consolidated service/plant areas and relocation of the refuse store along the boundary which, together with the removal of the external fire escape, allows for the introduction of more soft landscape along this edge. A simple green roof pavilion building extends along the boundary in place of the existing sheds; this pavilion building includes a combination of ancillary and wellbeing spaces.*
- *The expressive splayed dormers at roof level make a gentle reference back to the more eccentric roof of Grace house without detracting from the primacy of the listed building.*

Relocating the spa building may help in terms of safeguarding the character of Grace House but it would mean that users of the facilities in Grace House would have to walk in the open from across to the spa.

Opening up better views to Grace House, emphasising the 'shadow gap', chamfers, tidying up the buildings to the north and splaying dormers may all be simple design improvements but they make absolutely no difference to the overall balance between Grace House and the proposed new Villas. This is also about the issue of distances between buildings (as in the Overdevelopment section above). The key issue here is the distance between Grace House – specifically at its main entrance – and Villa B, probably around 10/12 metres. The photo overleaf is from the entrance to Grace House (note the railing at the front). The sketch is taken directly from the photo so can be regarded as appropriately accurate. It shows the appalling impact on the setting of Grace House of the five storey Villa B at this location (note the entrance railing again and the need to significantly raise the eyeline in order to show the height of the new Villa).



We wish to re-affirm our objection to the proximity of the proposed Villa B to Grace House and to the failure to provide an appropriate setting to Grace House.

Landscape

- *The landscape setting has been redesigned so as to retain and enhance the verdant nature of the site and wider conservation area. This also allows for the retention of an additional five existing trees.*
- *The northerly cottages have been replaced with a single storey cottage which sits within the footprint of the existing building to enable trees to be retained in this location.*
- *Through the retention of trees and a new approach to the landscape design, the sylvan setting is retained and enhanced to create a woodland glade around Grace House.*
- *The new landscape design proposals make a clear definition between the public and private realm.*
- *The shadow gap around Grace House will be screened by the lush new landscaping which will enhance the overall setting of the listed building*
- *Overall layout changed so that the setting of Grace House within its wooded area setting is appreciated. The landscape around the building is a wooded area/natural setting that is enhanced with additional tree planting.*
- *The overall landscape has been reviewed, minimal intervention proposed to the existing setting access and new tree planting complementing and enhancing the existing wooded area.*
- *The villas and its landscape have been designed as individual precinct respecting the original villa boundaries with the landscape becoming a landscape to be viewed as a visual amenity with minimal intervention. Existing trees are retained with a wild flower meadow introduced to the front and edge of the site. A sculpture/piece of art introduced within the revived historic frontage respecting the villa setting.*
- *A clear access and wayfinding strategy has been progressed that creates a special moment as one walks their way through the site. The East/West connection has been defined to create a cohesive route.*

- *Trees have been strategically located and a thorough strategy has been devised. The built form now sits proudly with a clear strategy for public and private landscape edge.*
- *A thorough review has been carried out in regard to future canopy spread of proposed trees.*
- *Tree planting strategically done and accords with the NHBC Trees near building standard.*

(Some of the comments above could also apply to the Overdevelopment and Grace House sections.)

In general, the landscape layout and design has been improved as per several of the responses noted above, including in relation to aspects of the setting of Grace House (but see comment and photos above).

We note that, in their response to the original masterplan, the City Council commented that the enclosure ratio of 1:1 is too uncomfortable and not appropriate in a verdant Conservation Area and will overshadow the public realm. We agree with this assessment and are of the view that the revised proposals do not respond sufficiently to this criticism.

The comment about retaining an additional five trees is 'economical with the truth', because the amended arboricultural report notes the five trees to now be retained but then mentions a further two to be removed. A total of 39 trees were to be removed with the previous scheme and the changes still mean the removal of an unacceptable number of 34 trees out of 82.

We have commented above about the bizarre notion of introducing a 'glade' to the north east then filling it with a permanently shaded building!

There is minor but no fundamental improvement in the 'clear definition between the public and private realm'.

The 'wayfinding' comment is valuable but hardly a 'strategy'. No explanation is given anywhere for what is, what is not and at what times the site or parts of it are open to 'the community'.

Despite some minor improvements, we re-affirm our objection to the removal of such a large number of often good condition and certainly visually important trees. And the scheme is still not (as we and the City Council wish to see) 'landscape-led'.

Parking

In submitting the revisions the applicant has either reiterated or made several new statements about parking:

- *The proposals include 65 spaces, which is over the standard. The extra spaces will reduce the risk of overspill parking onto residential roads.*
- *Whilst the number of units has been reduced from 122 to 116, the number of proposed parking spaces remain the same, so the ratio of parking spaces per unit (0.56) has increased marginally.*
- *The parking survey (Transport Statement - Appendix G) demonstrates that although the site has more parking provision than is needed, there are spaces available off-site should there be any overspill.*
- *Parking is now provided off The Glen, in response to confirmation from Highway officers that they will not support use of the Etloe Road access for parking (other than related to substation maintenance).*

- *We have also looked nationally at a number of Integrated Retirement Living schemes. Applying the parking ratio of these schemes to the proposed development the proposed site would require 56 spaces.*

The applicant states that there are 65 spaces but the revised Transport Statement paras. 6.7 and 6.9 lists just 62 spaces, i.e. 37 resident spaces, 10 staff spaces, 4 accessible spaces, 8 charging points, 2 car club spaces and 1 minibus space.

In April 2022 the Community Association objected to the original application on a number of grounds including that the 65 parking spaces proposed by the applicant was insufficient and would lead to overspill parking on surrounding roads which are already at full parking capacity.

We also queried the claim that the 65 spaces figure was over the standard as this claim was based on the incorrect application of Bristol City Council's C2 resident care home parking standards (see earlier comments on C2 land use designation). The parking standard for care home visitors was mistakenly used to assess the parking requirement for St. Christopher's residents, an independent living scheme. Additionally, the staff parking requirements were underestimated while no attempt at all was made to assess visitor parking requirements for either those visiting residents or for non-residents attending community facilities and events at Grace House and the proposed urban village hall. (NB. One of the 'selling points' of the development is that non residents will be allowed to use the facilities and enjoy the grounds.)

We estimated that a total of between 60 and 70 spaces would be required for residents' parking, between 16 and 22 spaces for staff, between 12 and 15 spaces for visitors and three spaces for the car club and minibus making the overall requirement for spaces in the range 91 – 110 spaces with the actual number required within this range depending largely on staff (FTE) numbers, shift patterns and changeovers, and the age profile of residents.

In our previous submission we pointed out that the applicant had acknowledged that there might be overspill parking by stating that the proposed provision would "*reduce the risk of overspill parking*". The applicant has now further acknowledged the risk of overspill parking by stating that "*although the site has more parking provision than is needed there are spaces available off-site should there be any overspill*". This statement is based largely on night time parking surveys conducted in November 2022, the results of which are presented in Appendix G of the applicant's Transport Statement

The parking surveys were conducted on a Monday and Wednesday at night – between 10.00 pm and midnight. We can only assume that this time frame was selected as it was calculated that this would be the most advantageous time as far as the applicant was concerned in demonstrating the availability of on street parking spaces in the vicinity of the St. Christopher's site. Indeed, the surveys did show 30 and 27 free spaces respectively on the two survey nights. A survey(s) conducted during daylight hours when residents, visitors and staff are far more likely to be looking for spaces would have shown a very different picture with virtually no spaces available within 150 metres (as demonstrated by several community surveys conducted in recent years) and obviously clear to anyone who has tried to park in nearby roads during the day and at night.

Most of the available spaces revealed by the two night time surveys were along Westbury Park which is fully parked up during the day by commuters and freed up at night. Westbury Park is some distance from houses and is therefore best avoided by local residents at night for safety and security reasons (as it would likely be by future St. Christopher's residents). The surveys actually indicated that the roads closest to St, Christopher's and likely to be

most affected by any overspill parking (Belvedere Road, The Glen, Bayswater Avenue) had very few available spaces, confirming parking surveys conducted in recent year by the Community Association and by local residents.

On a technical note it would appear that the parking survey extended to a 150 metres distance from the respective edges of the St. Christopher's site and thus included roads and parts of roads which would be well beyond a 150 metres distance that future residents living in most parts of the site would have to walk to reach their cars.

The new proposal for vehicle and pedestrian access to the St. Christopher's site from The Glen will increase even more the likelihood of overspill parking in The Glen, Belvedere Road and nearby roads. With this access it will be easier for residents to walk to and from surrounding roads should they choose not to pay for an on site parking space or are unable to find an available space within the site. In addition, attendees of events at the proposed Urban Village Hall and SEND related visitors will almost certainly be drawn more towards parking in The Glen etc. because of their proximity to this facility.

The Transport Statement submitted with the revised proposals included a new table and analysis (para. 6.17, page 22) which attempted to demonstrate that the parking provision proposed is sufficient by reference to four integrated retirement schemes elsewhere in England.

The choice of the four cited schemes is somewhat surprising for the schemes do not in any way support the argument that 65 spaces on the St. Christopher's site will meet the parking needs of residents, staff and visitors. Three of the schemes were, unlike the St. Christopher's site, close to city/town centres and involved a variety of car parking regimes (lift systems etc.) that would almost certainly act as a disincentive to owning a car: the fourth scheme, Beechmoor Nurseries, had a relatively generous overall parking provision compared with what is being offered at St. Christopher's. Details of each scheme are included in the Appendix but the conclusion is clear – 65 parking spaces is inadequate.

For the reasons stated in our previous submission and for the reasons / arguments/ counter arguments set out in this submission we still hold strongly to the view that that the proposed parking provision is too low and will inevitably lead to overspill parking on surrounding streets which are already at full parking capacity.

Community Engagement and Imagery

The applicants state in their December 2022 newsletter that:

“After extensive consultation and engagement with the community over the last 18 months including numerous in-person and virtual events, written submissions, broad reaching surveys, and electronic comments, we have taken on board the feedback received and have amended our plans in response.”

We made very, very clear in our own report on the community engagement prior to the original application that, although the range of engagement activities was acceptable, their delivery in detail was hopelessly inadequate – the workshops descended into farce, the exhibitions offered very limited scope for commenting and the surveys were seriously rigged to get the results the applicants wanted.

In relation to the revised application, we note that, although the revisions would have been developed well before their submission, no further community engagement of any kind was undertaken during this period. This is also despite the fact that a Planning Performance

Agreement was being developed (and is now in place) and both national and Bristol City Council requirements for a PPA include community engagement prior to application.

We re-affirm the extensive critique of community engagement in our original objections and object to the complete lack of necessary community engagement on the revisions.

Both our original objection on overdevelopment and our report on the submitted Statement of Community Involvement also criticised the imagery used, not just in the application material but also at all stages during the engagement period.

In the material submitted for the original application, in the revisions to the application and in the applicant's recent newsletter, there is very limited imagery, especially imagery that shows the new Villas in relation to one another, in relation to the Lodges and in relation to surrounding streets and properties. Given that all this material is CAD-based where it is extremely easy to produce very good quality or even just basic images, this can only be a deliberate ploy to make it difficult for lay people to properly interpret the actual, as experienced, implications of the proposals.

The amended Design and Access Statement includes just two images, one (p.6) using the dark, almost twilight format used in the original application and one (p.17, repeated in the newsletter) showing a new view from the 'woodland glade cottage' towards Grace House* and Villa B. The 3D versions of the blocks (pp.24-27) provide some help in assessing building relationships but that is very limited. (*It had been agreed with the applicants, several months ago, that the inclusion of Grace House in imagery would no longer take place because, even in the latest image, it distorts the overall effect of the four huge Villa blocks. It is unclear why they have ignored that agreement.)

We object to the imagery used in the revised proposals and to the overall lack of imagery to show the all-important relationships between the new Villas, the Villas in relation to the Lodges, the Villas in relation to Grace House and the Villas in relation to surrounding streets and properties.

The View of the Secretary of State

Having elaborated our objections, we think it appropriate to end by quoting further from the December 2022 letter referred to earlier from Michael Gove, Secretary of State for Levelling Up, Housing and Communities. In the letter he states the following:

- "... all development that is not good design should be refused, especially where fails to reflect local design policies."
- "... councils to set clear standards for what they and the local community find beautiful and refuse what they find ugly".

We trust that Bristol City Council will also take these statements fully into account when determining this application.

APPENDIX

The four schemes cited in the revised Transport Statement as examples where parking provision was lower than that being proposed at St. Christopher's are detailed below.

Epsom

This application was refused on appeal but a second application for 305 care units and 24 key worker units was subsequently approved on appeal. The proposed development is close to Epsom town centre so that there is less need for residents to own a car compared with the more suburban St. Christopher's site. The scheme involves an automated parking system requiring residents to drop off their vehicles using a lift system – hardly an inducement to owning a car. On a point of accuracy, the number of proposed parking spaces was 156 rather than the 150 indicated in the table in paragraph 6.17 of the Transport Statement.

Bath

This application on the former Homebase site was allowed on appeal. The site is close to Bath City Centre and so a lower level of parking provision was deemed acceptable by Bath City Council as it reflected the 0.5 level of car ownership per dwelling in Bath City Centre revealed by the 2011 Census (*By way of comparison St. Christopher's is in Henleaze Ward where car ownership per dwelling in 2011 was 0.84 per dwelling in the adjoining Redland Ward the respective figure was 0.79 per dwelling.*)

The 136 space residents' car park comprises a double and triple stacking system requiring residents to drop off and collect their cars from a valet. With a further 16 spaces proposed at street level the total provision is 152 spaces rather than the 136 indicated in the Transport Statement.

The Bath site is in a commercial area with strict parking restrictions and the nearest residential streets are in a residential parking zone (unlike the residential areas closest to St. Christopher's). The nearest available on-street spaces are more than 500 metres away.

Walton-on-Thames

This application, comprising 196 extra care units and 26 nursing home care units, was refused by Elmbridge Borough Council on several grounds (including insufficient on-site parking) and subsequently allowed on appeal. The proposed 122 spaces included 98 basement spaces accessed via a car lift – again rather a disincentive for owning a car.

In respect of the parking provision it was mentioned in the appeal decision letter that (i) there were two car parks within easy walking distance available for visitors and possibly staff to use and (ii) a number of surrounding roads were private roads which could not be used for unauthorised parking.

Beechmoor Nurseries

This application was refused by Chester West and Chester District Council but allowed on appeal. The scheme comprised not just 85 assisted living apartments but 25 care bungalows as well – a total of 110 units. The total parking provision was 87 spaces including visitor spaces. To equate to this level of parking provision the St. Christopher's scheme would require approximately 90 spaces rather than the 65 spaces proposed.