

**OBJECTION TO PLANNING APPLICATION REF. 14/05930/F,
WESTMORELAND HOUSE, 104-106 STOKES CROFT, BRISTOL BS1 1RU**

1. General

The proposed scheme suffers from numerous problems and shortcomings which would result in unacceptably poor living conditions for a large number of its future inhabitants and would impact negatively on the legitimate development prospects of adjoining sites, contrary to Government and City Council Policies, acknowledged Good Practice Principles and Guidelines and the achievement of Sustainable Development in general. The reasons are set out below.

2. Poor Solar Orientation and Sustainability

The central six storey apartment block consists of single aspect dwellings, accessed via an internal central corridor. In their Planning Statement the applicants say that “this building runs lengthways North-West, allowing daylight to all apartments”. In fact, looking at the submitted drawings, the long axis of the building runs North-West to South-East. In this case the South-West facing single-aspect apartments would get good amounts of sunlight, as well as daylight. However, the North-East facing apartments would get zero or practically zero daylight, according to the sun path. Acknowledged professional standards for solar orientation of habitable rooms in dwellings would require one hour of sunlight in winter, as a minimum. Tolerable but not ideal orientation is considered to be where habitable rooms are orientated within the arc of North-East to East and also North-West to West. However, Good orientation requires habitable rooms to face within the arc of South-East to South-West.

It is widely acknowledged and established that good amounts of sunlight to dwellings are essential for the health and well-being of the residents. It is also scientifically established that southerly facing dwellings benefit from passive solar heat gain during the cold months of the year, whereas northerly facing dwellings do not, and as a consequence their heating bills are more than twice those of the former. For health and well-being, as well as energy saving and sustainability reasons, half of the central apartment block dwellings and three quarters of the three storey apartments suffer from serious shortcomings and are unacceptable.

With regard to the South-West facing central block apartments, these have good solar orientation but will suffer from unwanted heat gain during the hot summer months and will not be able to relieve this by cross-ventilation, due to their single-aspect nature. Mechanical ventilation/ air-conditioning would be necessary, which means costly energy consumption and poor sustainability. By contrast, a double-aspect apartment would enable cross-ventilation and save energy.

Similar problems and shortcomings regarding poor solar orientation, natural cross ventilation and sustainability occur in the design of the single aspect apartments in the Ashley Road block.

The proposals are not in accordance with and fail the provisions of the Government's National Planning Policy Framework and Bristol City Council's Policies on Planning and Sustainable Development, including:-

Bristol Core Strategy BCS15 – Sustainable design should be an integral part of all developments in Bristol – Developments should maximise energy efficiency and are designed to be flexible and adaptable.

Bristol Development Management Policy DM29 (Design of new buildings) – New buildings should respond to solar orientation to support energy efficient design; ensure appropriate levels of privacy, outlook and daylight. Allow for future adaptation Where possible, new residential development should provide dual aspect, particularly where one of the aspects is north facing.

Bristol Supplementary Planning Document 5: Sustainable Building Design & Construction (Adopted Feb. 2006) – Aim to reduce overall energy use and maximise potential for renewable supply and use.

3. Excessive Overshadowing of communal open spaces

The artist's digital visualisations in the planning application are seductive, but inaccurately present the communal open spaces and surrounding buildings as if bathing in sunlight and none being in the shade. In reality the buildings will cast shadows onto large areas of the communal open spaces for different parts of the day, particularly the six storey central apartment block. Unlike what is presented on the visualisation drawings, northerly facing facades will always be in the shade. The attractiveness of the open spaces to sit out and enjoy one's self and engage in recreation activities will therefore be significantly restricted. The small vegetable/allotment garden patch within the communal courtyard to the east will be in the shadow of the 6-storey central apartment block in the afternoon; this fact will undermine the garden's purpose and usefulness.

4. The proposals would prejudice the development potential of adjoining sites

The three-storey apartment block along the Southern boundary of the site leaves only about one metre gap to this boundary for three quarters of the block, and actually touches the boundary for one quarter of its length. The four 3-bedroom family houses along the North-East boundary are spaced very closely to this boundary, leaving a gap of approximately 1.5 to 2.5 metres. In addition to the miserable, unacceptable prospect (see point 5 of this response), the development prospects of the adjoining sites along these boundaries will be seriously prejudiced in terms of daylight and outlook. If the rear areas of the adjoining sites were to be developed in accordance with the Government's and Bristol City Council's policies, the new buildings there would have to be located much further back from the boundary, than would be the case if the buildings in question in the current application were to be approved as currently proposed. Were the totally unsatisfactory positioning of the buildings too near the boundary in the current application to be approved, an unfortunate precedent could also be set tempting

developers of adjoining sites to do the same, as the Government's and Council's policies would have been repudiated.

The current proposals are contrary to the provisions of Bristol City Council Development Management Policy DM27 which requires that developments should not prejudice the existing and future development potential of adjoining sites.

5. Inadequate privacy space/private gardens, poor outlook and other problems

As indicated under point 5, the very close spacing to the rear South-East boundary of the 3-bedroom family houses, leaves only miniscule micro-patios, which by no stretch of the imagination can be construed as or function as gardens. Decent size private gardens are considered essential for family houses. The outlook to the long blank walls of the existing building along the rear boundary is dismal and the micro patios and rear house elevations will be overshadowed on the lower floors. The 3-bedroom family houses along the North-Eastern boundary have mini-gardens approximately 4 metres deep, in striking contrast to the adjoining generous rear gardens of the houses they back on to.

Both the micro-patios and mini-gardens are totally inadequate for the 3-bedroom family houses which are likely to include children, and cannot cater for the normal activities which need to take place there, such as children playing safely, privacy, drying clothes, gardening and relaxation. The proposed sizes are not fit for purpose and are also contrary to Bristol Local Plan Policy Advice Note 1 – Residential Guidelines.

6. Poor location of residential and commercial refuse bin stores in relation to health and amenity of dwellings.

The huge residential refuse bin store of 86 spaces is jammed hard up against the end dwellings of the central 6-storey apartment block and also the end dwellings of the 3-storey South apartment block. Even if well camouflaged with a 'green' roof, the positioning is very unsatisfactory for the health and amenity of adjoining residents due to emanating smells and contamination and the in and out movement from the refuse store. The Western apartments of the 3-storey block will suffer similarly next to the commercial refuse store.

7. Conclusion

The only conclusion that can be drawn from the above description, analysis and evaluation of the numerous, very serious problems and shortcomings is that the proposals constitute **Overdevelopment**, trying to squeeze too much development on the site, to the detriment of the living conditions, amenity, health and well-being of future inhabitants and without proper regard to the sustainability of the development for this and future generations.

As currently proposed the scheme is unacceptable and should be firmly **REFUSED** because of its poor merits and for being contrary to Government and Council Policies and Good

Practice. The applicants try to justify the overdevelopment of the site by citing 'economic viability' reasons. This factor needs to be considered. However, 'economic viability' is dependent on many factors and interpretations and assessments can vary enormously depending on the outlook, make-up, values and skills of different development agencies. What cannot and must not happen is for poor and substandard development, which would be damaging to the living conditions and well-being of residents/occupants and the wider community, and failing to meet sustainability criteria and Government and Council Policies, to be approved for purely 'economic viability' arguments by a particular developer.

This scheme could be made acceptable if it were to be substantially revised in the following ways: (a) Substitute double-aspect apartments in the central block; reduce the height from six to four storeys to mitigate overshadowing of the communal open spaces; shorten the block at its Southern end to keep it away from a re-configured refuse store, in the interests of health and residential amenity. (b) Change the design of single-aspect apartments to double aspect in the Ashley Road block (c) Create decent size private gardens for family dwellings, not less than 8 metres deep. (d) Move the 3-storey Southern apartment block Northwards by at least 6 metres and re-plan the interiors to benefit from solar orientation on the South, while safeguarding adjoining land owners their future development rights. The end apartments abutting the commercial refuse store should also be moved back to safeguard residential health and amenity.

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