

Carriageworks Action Group

Planning application reference 14/05930/F

Response to proposals for redevelopment of Carriageworks and Westmoreland House as amended September 2015

Context

This response represents the conclusion of five months' discussions between the Carriageworks Action Group (CAG) Liaison Group, members of the local community, the planners and Fifth Capital. The response was issued as a draft for comment via the Carriageworks website from 23rd to 28th September.

Summary

Our primary reference point is the Community Vision (2012). This states that CAG is "keen to work with any organisation that embraces our vision for the future".

With the changes proposed, overall CAG now supports the application, albeit with some reservations as set out below.

The five months since the April Planning Committee have seen a much improved working relationship between CAG and Fifth Capital. We believe that this has facilitated significant improvements to the development proposals. To ensure that these gains are consolidated and progressed we would ask that the developer and the planners continue to involve CAG in discussions as the planning permission is finalised and the detailed development proposals are worked up.

Consultation on the Draft

After discussion by the CAG Liaison Group, a draft of this response was posted on the CAG website on 22 September. It was also sent to the CAG mailing list (630 subscribers) and linked via Facebook and Twitter. A press release triggered coverage in the Bristol Post and Bristol 247. Eight comments on the draft were received via email (most of which were transferred to the website) and eight via the website. Further comments were made on Twitter and Facebook.

Most of the comments received were supportive of the draft response and of the role of CAG in improving the proposals.

- "You have brought about real improvements and clarifications"
- "Thanks for all the work to get this far with the redevelopment"
- "(I) congratulate those that have dedicated so much of their time to diplomatically represent their community in the plans for this iconic building"
- "You have clearly worked very hard, so well done"

- “It seems like there is a will on all sides to engage in conversation for the benefit of the area, which is rare”
- “Huge appreciation for continued community action on our behalf”
- “Thank you for all your hard work and persistence in seeing this through to this stage with so many significant improvements from the original scheme”
- “fantastic work on behalf of the community. If not for orgs like yours we’d all be in the trenches”
- “Huge appreciation for continued community action on our behalf”.

There were two main areas of concern. The first was the level of social and affordable housing:

- “10 affordable units, and over 100 not affordable units. Is that what the area needs?”
- “I still have major concern about the low level of affordable housing when the whole of Bristol is sorely in need of more of such housing”
- “Without social housing central to the plan it’s just another white elephant compounding Bristol’s problems”
- “another affordable housing sell out”
- “they have entirely sidestepped issues of housing density, quality and affordability.”

There was additional concern that private landlords will buy into the development and push up rents: “it is clearly in the best interests of the community in the long-term if the accommodation is in some way protected from becoming buy-to-let”.

The second area of concern related to the agreement between the planners and the developer:

- “hope you can get everyone to “sign on the dotted line” asap”
- “from very bitter experience – things can change the moment any permission is given. Marc Pennick may have been really positive but he (or his Board) may still flog it off to someone else, after which much of what you have fought for could be up for grabs again.”
- “the concern is that this conversation gets lost due to a lack of legal obligation on behalf of Fifth Capital as well as future landlords further down the line. To this end I hope the council continues to represent the interests of CAG, particularly with regard to awarding the freehold to the housing association and detailing the management plan to provide significant control to a suitable management company. Good luck!”
- “Can binding agreements be made, when the developer can sell on the site and permissions?”
- “(I) am hesitantly confident that these new proposals, IF adhered to and respected by both the developers and the council show a major improvement on the original plans”
- “hope we can write in legally binding guarantees that will prevent back-sliding in the long term.”

Other comments related to dust and treatment of asbestos during demolition, concern that the target of 75% independent traders may not be achieved,

A poll on the CAG website attracted 25 votes. 17 votes gave full support for the draft and a further 4 gave partial support.

Response to the Amended Application

The April Planning Committee identified ten points which it wanted addressed by Fifth Capital.

We detail our response to each of these below. We also address other issues which we feel are of

great importance even though these were not specifically identified by the Planning Committee's decision.

Engagement with community groups including the Carriageworks Action Group.

Since the April Planning Committee the CAG Liaison Group has welcomed Fifth Capital's positive approach to engaging with, listening to and addressing the concerns of the local community. In this time, members of the Liaison Group have had a number of productive meetings with Fifth Capital. The developer has also met with other local parties, including the owner of 108 Stokes Croft, and attended three community meetings where they have provided briefings and engaged in lively debate about a wide range of issues relating to the proposals.

The quantity and position of visitors cycle parking

The total number of cycle spaces has increased from 196 to 216. Of these, 32 (up from 12) are provided for the use of visitors in the main square. This is an improvement.

We would like to point out that there are already problems finding suitable cycle parking in the surrounding area. This could justify contributions to additional off-site provision.

Relationship with 108 Stokes Croft

The issues raised in April related to the boxing-in of the rear of 108 by the new development. This was of particular concern to the owner and occupiers of the property. As the owner is an architect and very capable of representing their own interests the Liaison Group has not sought to get overly involved in the discussions. We understand from the owner that his concerns have been addressed by the design changes.

We also understand that the five wheelie bins currently stored to the rear of 108 will now be stored in the new development. This is an improvement.

The scale of development on Ashley Road and the lack of set back

The scale has been reduced and the building set back from the pavement. It is now much more in keeping with the Conservation Area and the recommendations of the Planning Inspector in 2010.

Contributions towards the improvement of the Ashley Road/A38 Junction.

We understand that there is a financial offer but we have not been involved in any discussions about how it will be used. We would like CAG to be involved in discussions as the proposals are progressed.

Additional information on the use of the ground floor units including revisions to relevant planning conditions, in particular Condition 27.

We have had extensive discussions with Fifth Capital about the future management of the site. Since the proposed design changes in June we have sought the input of companies that are experienced in the management of markets and small business units and have shared their comments with Fifth Capital. These are reflected in the 'strategy for delivering active, vital and viable mixed uses'.

We understand the essence of the proposals to be:

- Continuing improvement, investment and consultation through providing flexible non-residential accommodation that will be activated by having a variety of uses
- The creation of a permeable through route (facilitating a vibrant culture)
- An increase in non-residential space from 659 to 1010 sqm GIA along with increased active frontages in the public square
- An increase in the size of the public square from 745 to 1050 sqm
- Design improvements as detailed in the Delivery Management Plan
- Active management by the final appointed Management Company
- Close working with the local community and the Council, in the spirit of the Community Vision
- Development and evolution of a unique environment in the spirit of Stokes Croft
- A cohesive approach that connects communities and maximises ground floor uses
- A commitment to continuing improvement and investment.

We welcome this new approach. In particular: we welcome the increase in space for commercial and community spaces, the market area providing a low barrier to entry for new businesses, the proposals for community and Council involvement in long term management and the essence of the Delivery Management Plan.

More recent discussions with operators of other facilities indicate that the proposed unit sizes are too big to attract the type of small independent businesses (typically 1-3 people) that typify non-retail occupiers in and around Stokes Croft. In addition, smaller units will be more likely to qualify for relief from business rates. We understand that units can be sub-divided but this should be written into the management plan.

The target should be 100% occupation by independent businesses (not 75%).

The document states that the management development plan will include details of how the management company will be established. We believe that this should be an organisation with a proven track record in managing similar and comparable sites and that ideally the management company should itself be some form of social enterprise. The organisation should either be based in Bristol or have a good knowledge of the city. The management company should foster and support start-up businesses, should be hands-on in its management style and should actively work towards achieving and maintaining the "buzzing, vibrant place that directly contribute(s) to the vitality and character of the local area"

as envisaged by the Community Vision.

We understand that the need for a management plan will be included in the S.106 agreement between the developer and the planners. As many devils may lurk in the detail of this plan we believe that the creation of this plan needs close involvement of the community including CAG and representatives of local businesses.

On site renewables (only 5%) – explore the possibility of using other technologies.

This was not the subject of our discussions with Fifth Capital. We understand that the area of PVs is increased from 168 to 214sqm. We welcome this increase.

Additional information on the proposed gates, including consideration of their removal from the scheme.

We understand that there are no gates in the revised plans. Fifth Capital have introduced some significant changes to the through route. In particular they have provided a new access from Ashley Road opposite the top of Picton St, have removed buildings that obstruct sight lines to from the access entrance to the square, have increased the size of access routes. As a result they have effectively designed out the gates. We welcome these changes.

Consideration to a reduction on timescale for implementation of any permission including a revised condition 1.

Fifth Capital have told us that they will accept a two year period in which they have to start development. We welcome this change.

Affordable Housing – consider if the mix within the 8 units can be changed.

We understand that the number of affordable (shared ownership) units has increased from 8 to 10 (5 x 1 bed and 5 x 2 bed), or 10% of the total. All the units are now located in Block D (adjacent to the rear of the Carriageworks and backing onto Croft Dale) as opposed to in the Carriageworks.

We are disappointed that the proposals have not provided any significant increase in the amount of affordable housing and do not provide any social housing. 10% is still far below the Council's own policy of 30%.

We note that there has been a change in the number of smaller units for market rent and sale and that these will have lower values and therefore be affordable to more people. However, they will only meet the needs of some people and do not address the need for affordable or social rented family units.

We also note that the freehold of the site may be sold to a housing association which, we hope, will be able to increase the number of social and affordable units. We also hope that the involvement of

the housing association will introduce a high quality of residential management and avoid large numbers of properties becoming buy-to-let units. We are due to meet the housing association shortly after the Planning Committee. The engagement of the Council at all levels and the support of Officers and Members in securing a higher level of social and affordable housing will be vital.

Other Issues

Visual appearance

The developer has gone to great lengths to have their architects address local concerns. However, we still believe that the design misses the opportunity to create an inspirational development of which we will be proud. Much of the design is formulaic with little reference to local materials or styles. This is a shame but we appreciate that it is too late for wholesale revisions to the design approach. Furthermore the developer has indicated that surface treatments and details can still be discussed. We look forward to seeing approaches that help us develop pride in the development.

Design

Costas Georghiou submitted an eloquent objection to the original scheme detailing a number of design issues. We believe that some of these have been addressed, at least in part, but hope, as with the visual appearance, that further improvements can be made as the detailed design progresses.

Hepburn Road

Fifth Capital have engaged with residents of Hepburn Road in a positive manner; attending a meeting with residents in August, visiting residents houses and developing solutions to local concerns. This is very much welcomed and has helped us believe that they are genuinely listening to the community.

Local employment and apprenticeships

A development of this scale must deliver benefits to the local community in terms of training and jobs. Effective implementation of Condition 12 in the April committee report is vital.

Cultural plan and public art

Conditions 14 and 15 in Committee report of April 2015 state that a cultural programme and public art plan must be approved. These must reflect the local area and its culture. The local community must be closely involved in the development and delivery of these plans. They must not be imposed by distant consultants and officers.

We propose that the management company, as we detail above, be responsible for delivery of the cultural and arts plans. This will help ensure that the company is embedded in the local community and will also give a significant funding injection (from the S106 contribution) into the company and organisation and the community.

On-site travellers

The travellers living on the site have been involved in CAG since 2011. We understand that Fifth Capital have guaranteed them 6 months notice to find an alternative site. We also understand that it is the Council's responsibility to help find sites for travellers. We ask the planners to ensure that their colleagues fulfil their commitments to the travellers and find move-on sites within 6 months.

The travellers have provided site security for many years. Given the safety issues on the site consideration will have to be given to ensuring ongoing security after the travellers vacate the site.

Will we get what we think we'll get?

Fifth Capital have taken many steps to try to convince us that their proposals are worthy of our support. We acknowledge and thank them for their efforts. This working relationship must continue and we must also safeguard against unanticipated change.

The commitments recently made by Fifth Capital must be embedded in legally enforceable agreements. Furthermore, we have to be sure that circumstances do not result in Fifth Capital or a future purchaser changing the nature and character of the development so that it diverges from the Community Vision.

As an unincorporated community we are unable to enter into legally binding agreements with Fifth Capital or their successors in title that will ensure we get what we think we'll get. For that we have to look to the City Council.

We request that:

- i) the planners ensure that CAG continue to be involved in negotiations surrounding the S.106 agreement and all other aspects of the development
- ii) the planners ensure that Fifth Capital's commitments, especially those regarding the long term management of the site, are thoroughly protected
- iii) if any changes to the proposals are requested that the community is fully consulted and that the applicant for the changes be required to fully engage with CAG and the community in a manner similar to Fifth Capital since April.

Conclusion

We have detailed above our response to all the various issues. We also acknowledge the efforts made by Fifth Capital since April to engage with the local community. In this we feel that Fifth Capital have gone further than many other developers.

The Community Vision states:

"The Carriageworks development will make a positive contribution to the economy, culture and environment of Stokes Croft and surrounding area. It will be a mixed use development that is home to many activities, businesses and people. It will be a buzzing, vibrant place for people from the local communities and from further afield. We want to see the dereliction of this site addressed as a priority and are keen to work with any organisation that embraces our vision for the future."

Under 'delivery' it states:

"We are looking for a developer who will go the extra mile to deliver a scheme of which we can be proud. We are determined to find the best developer for the job who will ensure that we are continually involved in the development process and who will champion our Vision. It is accepted that there will need to be some level of flexibility in the choice of developer."

While we still hold reservations about the proposals we have to have regard to the original vision. In particular we want to see the dereliction addressed and we have to be flexible. We believe that on balance the scheme should now be given planning permission. Working with the developer, CAG has managed to secure considerable improvements to the proposals. It will be now for all departments of the Council to work together, alongside the community and the developer, to ensure that the proposals are actually delivered to benefit the community in line with recent discussions.

Carriageworks Action Group
29 September 2015