



Mr Peter Westbury
Bristol City Council
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Direct Dial: 0117 975 0717

Our ref: P01434150

22 July 2021

Dear Mr Westbury

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**SITE BOUNDED BY HIGH STREET, WINE STREET, BRIDGE STREET AND
CASTLE PARK, BRISTOL, BS1 2AN
Application No. 21/03020/F**

Thank you for your letter of 7 June 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The proposals are for the redevelopment of a large site around the ruins of St Mary le Port church in the historic heart of Bristol. The site was formerly the commercial epicentre of the City but largely razed to the ground by enemy action during World War II. It was redeveloped in the postwar era with two large, but architecturally undistinguished, office buildings. These are now disused and an opportunity is presented for the wholesale redevelopment of the site.

Historic England strongly supports the principle of the site's redevelopment. We think there is much to admire in the detail of the proposals, which will see restoration of the surviving heritage assets and a vibrant new city quarter created. However, we are concerned at the scale and massing of the proposed replacement buildings.

The proposed buildings would be large, monolithic, entities, which would fail to respond to the fine grain of the Old City. Their scale and massing would challenge the visual primacy of the various Grade II* listed church spires in close proximity to the site. The character and appearance of the City and Queen Square Conservation Area would be irreversibly harmed, as would the setting of several highly-graded listed buildings.



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With regret, Historic England are compelled to object to the proposals in their current form. We recommend that you seek amendments to the proposals to address our concerns about the scale and massing of the proposed buildings.

Historic England Advice

Significance

The site is known as St Mary-le-Port, after the standing remains of St Mary-le-Port church, the tower of which was consolidated after the war and incorporated into the postwar redevelopment. It is the heart of the city where the Saxon town was founded on the edge of the Castle Walls.

Any secular buildings which survived the blitz were demolished not long after, including the remnants of the celebrated “Dutch House”, a spectacular five-storey late-medieval timber-framed merchant’s house which formerly dominated the medieval crossroads of Corn Street, Broad Street, High Street and Wine Street.

However, the standing remains of two churches were conserved and consolidated. The Grade II* listed ruins of St Peter’s Church, to the east of the site of the proposed development, memorialise the city’s war dead. The Grade II* listed and scheduled tower of St Mary le Port church was retained within the postwar office development. The post-war redevelopment of the site included widening the High Street carriageway; the former building line runs approximately up the middle of the present road.

There is significant archaeology on and around the site, including a surviving set of fine vaulted medieval cellars which are now scheduled. Fragmentary upstanding remains of the nave and chancel to St Mary le Port remain, next to the church tower. The construction of the postwar Bank of England office buildings is thought to have removed most archaeology within their footprints. Beneath the Norwich Union building there is surviving archaeology, relating to the Saxon and Medieval towns.

The site is within the City and Queen Square conservation area. The conservation area was designated in 1974 and extended around 2001 to include Castle Park. Castle Park is so named as it marks the site of the city’s Norman Castle. It is strategically located between the River to the South (now canalised as the floating harbour) and the River Frome to the North (now culverted). The castle was destroyed around 1656 following the Civil War, and the area subsequently developed for commerce.

Castle Park today is well-used public open space, but is not a particularly coherent one. As the product of post-war clearances its edges are ill-defined, its landscaping of variable quality, and its integration with surrounding streets unsatisfactory.

The designated heritage assets on the site are in poor condition. The tower of St Mary



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le Port church is included on our register of Heritage at Risk. The High Street Vaults are not on the HAR register but are vulnerable and would benefit from sensitive re-use.

The two existing buildings within the site are the former Bank of England offices and the former Norwich Union offices. Historic England carried out an initial listing assessment of the former Bank of England building, which is attributed to Howard Robertson, best known for his buildings at London's Shell Centre. We concluded the buildings lacked sufficient architectural or historic interest to warrant statutory designation. They have a degree of architectural interest, but their poor condition and relatively unrefined design means that they presently detract from the character and appearance of the conservation area.

While the area bounded by High Street, Wine Street, and the Floating Harbour was cleared after the war and later landscaped to become Castle Park, the Old City area to the South of High Street survived. It remains a busy and architecturally diverse area, densely developed, but with narrow streets and alleyways which make it highly permeable to the pedestrian.

Impact

The proposed development seeks to reinterpret some of the lost section of the Old City, by recreating the prewar street pattern. A new St Mary le Port Street would join High Street immediately opposite the north entrance to the Grade II* listed St Nicholas's market. The new St Mary le Port street would provide the viewer with a framed view of St Peter's Church from the market entrance, enticing the market user through the proposed development and into Castle Park. On this journey they would encounter the consolidated remains of St Mary le Port church, repurposed as a public piazza overlooked by the restored church tower. On the north side of the former church, a pedestrian thoroughfare on the approximate alignment of the long-lost Adam and Eve Lane would link the public piazza with Wine Street.

The works to the ruins of St Mary le Port church have been the subject of detailed discussions with our Inspector of Ancient Monuments. We consider that the plans accord with best conservation practice, and if completed would enable the monument to be removed from the register of Heritage at Risk.

Historic England has been working with the applicant and the City Council to agree an archaeological mitigation strategy. This will identify areas of impact on the surviving archaeological that will need to be mitigated through excavation, recording or watching brief

To the east of St Mary le Port church, the proposed development would incorporate relatively extensive landscaping to facilitate a smooth transition between its built form and the green open space of Castle Park. The proposed buildings would have active



frontages at ground floor, with café/bar uses envisaged which could potentially spill out into the park in clement conditions.

The Proposed Buildings

All the proposed buildings would be designed for office use. At ground floor level they would have A3/A5 (retail/bar/restaurant) uses, with the applicants taking care to ensure that the buildings are animated on all sides to create a busy and active destination.

Building A would occupy the site of the “Dutch House”, overlooking the mediaeval crossroads and former site of the Bristol High Cross. The proposed building would rise to 8 storeys at its highest point, with a series of jettied projections designed to evoke the memory of the Dutch House. If there is a part of the site that can accommodate a building of significant scale, it is here: the Townscape and Visual Impact Assessment provided as part of the planning application demonstrates that Building A as proposed would have a considerable presence in the streetscape but would not appreciably harm the setting of nearby heritage assets; the one possible exception being in views from Corn Street where it would coalesce with the lower stages of the Grade II* listed tower to All Saints’ Church. This effect would be relatively minor.

In considering the potential impact of the proposals on the setting of the tower of St Mary le Port church, we must be mindful that its current visibility in the townscape from Castle Park is a relatively modern construct. For much of its life, the tower was hemmed in by densely development and its tower was not a dominant element in the townscape. Prewar views of the area from Bristol Bridge show the tower’s spirelet was just visible above the lost Bridge Street townhouses.

We are relatively supportive of the conceptual design of Building A, but are disappointed in its lack of refinement. The repetitive nature of its elevations would exacerbate its perceived scale and massing. The introduction of a bay rhythm to reference the prewar townscape could significantly improve its appearance. We regret that the opportunity to explore modern timber framed technology has not been taken, in homage to the building’s celebrated predecessor.

Building B would have a High Street frontage, occupying the part of the site which slopes down from St Mary le Port towards Bristol Bridge. It is an interesting design, slightly art-nouveau in appearance, with passing reference in tonality and details to the Bristol Byzantine style of the late Victorian era. It is planned that the basement of Building B would provide access to the Scheduled High Street vaults through a blocked entrance to an adjacent vault which did not survive the bombing

The High Street vaults are a remarkable survivor, but severely constrained in terms of their reuse by the present awkward access arrangements. They are late-medieval



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stone-vaulted structures with considerable aesthetic appeal and historic interest, with generous spaces which would lend themselves to creative reuse were it not for their constrained access. Building B would solve this problem by linking them into its basement, which would be possible without significant intervention in historic fabric. It is suggested the vaults could then be used as a bar or restaurant.

However, despite the benefits outlined above, Building B would have a significant impact on the surrounding townscape. In views from Bristol Bridge, it would dominate, if not overwhelm, the spire of the Grade II* church of St Nicholas, opposite. It would erode the visual primacy of the tower of Christ Church (Grade II* listed), which was designed to terminate views up the High Street from Bristol Bridge.

The asymmetric appearance of the upper floors of Building B is contrived and would only serve to exacerbate the apparent scale of the building. The applicant states that the massing of building B references the historic warehouses of Welsh Back, on the other side of the floating harbour. This may well be, but they are within a different conservation area and one designated for its robust maritime industrial character, and not within the much finer urban grain of Bristol's Old City.

Building C takes a more modernist approach to its design, which is an appropriate contextual response given its position fronting Wine Street, close to the post-war shopping streets of Broadmead. However, again we consider this building would be too high. It would present a monumental elevation to St Peter's Church, whereas in our view it should step down at this point to better assimilate with its townscape context.

The massing of the buildings is a cause for concern in longer views. From various viewpoints within Castle Park the unmodulated flat-topped buildings would be conspicuous, and at odds with the fine urban grain of the Old City beyond. This equally applies to longer-range views of the site from Redcliffe Bridge and Redcliffe Parade. Greater articulation of the roofscape and a reduction in height to buildings B and C could mitigate this effect.

An unfortunate by-product of the proposed development would be the loss of views of the leaning tower of Temple Church (another memorialised ruin, listed Grade I and scheduled) from St Michael's Hill. This is a classic view of the city where the towers of All Saints and Christ Church are seen alongside the square-plan tower of Temple Church, and the lesser spire of St-John-on-the-wall (Grade I listed) as dominant elements in the townscape. The view is marred by the 1960s St Lawrence House (now student accommodation), a former office tower which screens a view of the spire of St Mary Redcliffe from St Michael's Hill.

This development would block views of the tower of Temple Church, as would any here over four storeys in height. This could be justified if the development were





repairing the grain of the historic streetscape, but the proposed development, rather than repairing, would be at odds with the city's historic grain and character.

Taken as a whole, the proposed development would markedly jar with the scale of the Old City, detracting from the historic cityscape at Bristol's heart. While we acknowledge that the redevelopment of the post-war buildings on this site is an important strategic objective for Bristol, which has proved difficult to secure, the harm consequent on these proposals appears to be unnecessary.

The applicants' decision to develop three larger buildings, rather than the four buildings envisaged in the City Centre Framework SPD, must be questioned. It is desirable that the redevelopment of the site should repair, rather than damage, the cityscape. Were the excess accommodation in the proposed three blocks transferred to the fourth block the proposals might achieve this, while providing much or all of the accommodation the applicants seek.

Policy

Bristol City Council's City Centre framework SPD identifies the site as a key development opportunity, with a preference for an employment-led mixed use scheme. It advocates a "restore" design approach to this lost city quarter, stating:

"In historically rich areas, with strong character the design approach should follow the BCAP 'Restored City' urban design approach. This requires the thoughtful and creative reinstatement of historic street patterns, building lines and public spaces and the enhancement of important views in areas where significant historic building fabric and street pattern remains. This generally requires development to respond to prevailing building height and form. This approach does not advocate pastiche, rather the contemporary design of new spaces and buildings that respond positively to the historic local context."

Constructing four buildings as advocated by the SPD, rather than three, might obscure some views of St Mary le Port's tower from the direction of the floating harbour, the church was largely concealed by buildings for much of its existence. The advantage of maintaining - or enhancing - views of the church from the floating harbour and park does not justify the harm consequent on the development's bulk.

The harm, under the definitions set out by the National Planning Policy Framework, would be less than substantial. However, that does not mean that the harm is acceptable. The NPPF is quite clear on this, under paragraph 199:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is





irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

Paragraph 200 states that *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”*

In our view, reducing the scale and massing of the proposed buildings - possibly by developing the “fourth plot” as advocated by the SPD - would allow much, if not all, of the benefits of the scheme to be delivered. This could be achieved while reducing, or potentially avoiding, the harm we have described above. In other words, the justification for the harm is not clear, or convincing, as it appears that there are ways in which the benefits could be delivered without the harm.

Position

Historic England considers that the proposed works would harm the character and appearance of the Old City and Queen Square Conservation Area, and the significance of the Grade I and II* listed churches of St Nicholas, All Saints, Temple, St Peters, and Christ Church.

The harm would be less than substantial in the terms of the National Planning Policy Framework; but this harm would nevertheless be contrary to the Framework’s aspiration that development should bring social, economic and environmental benefits. Furthermore, consideration should be given to some reduction in the scale of massing by means of stepping it back and reducing the height of each building

The heritage benefits offered by the scheme, although valuable, should attract limited weight in the planning balance, and would be outweighed by the harm noted above.

Recommendation

Historic England objects to the application on heritage grounds.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 199 and 200.

If determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

You should also bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas, and





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section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires decision-makers to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

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