

Heritage, Design and Access Statement

Application for Planning Permission & Listed Building Consent

Generator Building, Bristol

April 2021

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Status: FINAL

Draft Date: April 2021

For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 This Heritage, Design and Access Statement (HDAS) has been prepared by Avison Young, on behalf of Spengler Investment Holdings, in support of a listed building consent application for the installation of 2no. vents and a replacement grille to the eastern elevation of the Generator Building, Counterslip, Bristol ('the site'). A site location plan is attached at **Appendix I** for clarity. The intention of this statement is to demonstrate that the proposed works do not present any harm to the listed building and help facilitate its re-use.

1.2 The proposals are described as follows:

'Installation of 2no. vents and replacement grille to the eastern elevation'

1.3 This HDAS seeks to outline and assess the impact on heritage, as well as addressing design and access considerations of the proposed works at the Generator Building. This Statement is therefore structured as follows:

- Introduction
- Site context and Listing description
- Planning History
- Proposed Development including Design and Access
- Legislation & Planning Policy
- Assessment
- Conclusion

1.4 The following documents are also submitted in support of this application:

- Application forms;
- Covering Letter;
- The following plans:
 - 3473-TBC-V1-00-DR-A-0001 Site Location Plan;
 - 3473-TBC-V1-XX-DR-A-2001(A)- Existing Elevations;
 - 3473-TBC-V1-XX-DR-A-2002(I)- Proposed North-East Elevation;
 - 3473-TBC-V1-ZZ-DR-A-2025 Larger Scale Proposed North-East Elevation;
 - 3473_Ironmongery World_9" x 9" Cast Iron Victorian Air Vent Brick

2. Site Context and Listing Description

- 2.1 The application site lies within the administrative boundary of Bristol City Council (BCC). The application site comprises the Grade II* listed Former Tramway Generating Station (hereafter the Generator Building). The property fronts onto Counterslip and forms part of the wider Finzels Reach regeneration area, to the south of the Floating Harbour, within the North Redcliffe area of the city centre of Bristol. The site is also located within the Bristol Central Area, as defined within the Bristol City Council Core Strategy (2011).
- 2.2 The Generator Building was originally constructed in 1898-1899 to cater for the massive expansion of the tramway system in Bristol. The building underwent major internal works in 1980 to provide offices for the Courage Accounting Centre. Since the property ceased to be used by Courage in 2000, the building has been the subject of planning applications as part of the wider urban regeneration area known as Finzels Reach.
- 2.3 The lower levels of the building have been temporarily used as offices for the contractors working on the wider scheme.

2.4 Listing Description

Historic England List Entry

Overview

- Heritage Category: Listed Building
- Grade II*
- List Entry Number: 1282287
- Date First Listed: 01st November 1966
- Statutory Address: FORMER TRAMWAY GENERATING STATION, COUNTERSLIP STREET

With reference to the Historic England's listing search, the following characteristics are noted to be of special and/or architectural importance:

- Age and architect: Dated 1899, by W Curtis Green
- Materials: Red brick with limestone ashlar dressings;
- Building fabric:

"Baroque style. 5 storeys. Tall pedimented end has a large Venetian window with a splayed, coffered central arch and narrow flanking windows, below a moulded entablature forming an ashlar band round the building, with smaller windows above in sunken panels with architraves and floating cornices. Above is a second band with roundels to the base of 4 Ionic columns set flush with the wall with a balustrade between, in front of a large lunette window. Dentils, egg-and-dart and modillions to the pediment, which contains a narrow louvred light below a shell within a shallow niche with an arched cornice, and parapet above; this is balustraded along the splayed left-hand corner, which contains a small doorway. The side elevations are a 5-window range of sunken panels between brick pilasters with Ionic capitals, containing 3-light ground-floor windows below first-floor lunettes with Venetian windows to the third floor, and keyed oculi above.

INTERIOR: inserted c1980 interior. Green designed the shells of a number of power stations including Hove and Chiswick, of which this is considered his finest. (Gomme A, Jenner M and Little B: Bristol, An Architectural History: Bristol: 1979-: 390; Lord J and Southam J: The Floating Harbour: Bristol: 1983-: 99; Grey A S: Edwardian Architecture: London: 1985-: 199)."

3. Planning History

Historic Planning Applications

- 3.1 Avison Young has reviewed BCC's planning history files relating to the site. The wider Finzels Reach site has been subject to an extensive planning history and benefits from an extant planning permission dating back to November 2006 (04/02177/F) for a mixed use scheme (including development falling within Use Classes A1 – A5, B1, C3, D1 – D2) for the comprehensive redevelopment of the area. This planning permission included proposals to refurbish and retain the Generator Building in use as offices (Use Class B1). Separate listed building consent 04/03864/LA was also granted for the works associated with the refurbishment of the Generator Building under planning permission 04/02177/F. The listed building consent application proposed:

"Insertion of new door and construction of ramp on west elevation, alterations to fenestration at existing 4th floor level, remodelling of internal staircase and circulation space, installation of lift shaft and WC facilities on each floor, extension to existing basement for car parking, demolition and relaying of ground floor, creation of new 4th floor with expansion of 3rd floor mezzanine. Construction of a lightweight aluminium stair core attached to north elevation, new fenestration at roof level with the insertion of skylights and removal of internal wall partitions". Approved July 2005.

Planning Permission & Listed Building Consent for refurbishment and change of use

- 3.2 More recently, the Generator Building has been subject to the following applications:
- 17/06919/F – Proposed conversion of Generator Building to office accommodation (Use Class B1), including external alterations. Conditional permission. Approved May 2018.
 - 17/06920/LA – Internal and external alterations to the Generator Building to facilitate the refurbishment and conversion of the vacant building to provide of office accommodation (Use Class B1). Conditional consent. Approved May 2018.
- 3.3 In May 2018, full planning permission and listed building consent was granted for the above works enabling the comprehensive refurbishment of the building and bringing it back into optimal use as office accommodation.

Planning Permission 19/03696/X

- 3.4 A number of subsequent Section 73 applications have since been submitted to and determined by Bristol City Council (BCC) as the Local Planning Authority (LPA) seeking consent for alterations to the approved scheme. The most recent planning permission (ref. 19/03696/X) was granted in March 2020:

"Application to vary condition No.24 attached to planning permission 19/02072/X application to vary condition No. 18 (BREEAM) attached to planning permission 17/06919/F. Proposed conversion of Generator Building to office accommodation (Use Class B1), including external alterations."

Listed Building Consent 20/02368/LA

- 3.5 Furthermore, a number of subsequent Listed Building Consent applications have since been submitted to and determined by Bristol City Council seeking consent for alterations to the approved scheme. The most recent Listed Building Consent (ref. 20/02368/LA) was granted in October 2020 for the internal subdivision of the ground, first, second, third and fourth floors.

4. The Proposals

4.1 This application seeks consent for the following:

- Installation of 2no. vents (each 232mm x 232mm) to the eastern elevation to provide natural ventilation to the gas meter cupboard.
- Installation of 1no. replacement metal grille to existing opening on eastern elevation

4.2 There is a requirement for my client to provide two vents (each 232mm x 232mm) on the eastern (harbourside) elevation to provide natural ventilation to the gas meter cupboard. This will involve coring two holes within the façade (approx. 150mm diameter) which will be then covered by a black cast iron vents as per the submitted documents. From the elevations submitted, you will be aware that the vents will be relatively small in size and also largely obscured by an external staircase which will sit in front of them.

4.3 My client is also seeking permission to replace an existing grille serving a small opening on the eastern elevation. The opening will be cleaned of debris and a new black metal grille will be installed with a black insect mesh. The existing grille is considered to be obsolete and no longer fit for purpose. A replacement grille is not considered to impact the character and appearance of the building because it replicates the existing façade treatment.

4.4 The minor works described are requirements which have emerged as part of the detailed design stage for the on-going refurbishment of the Generator Building authorised under planning application ref. 17/06919/F (& LBC ref. 17/06920/LA) as outlined in the preceding section. As you are aware, the overall re-use/ refurbishment works will put this significant City Centre Grade II* Listed Building back into optimal use as 'Grade A' Office accommodation.

4.5 As part of application refs. 17/06919/F and 17/06920/LA, a number of alterations were approved to the Grade II* Listed Building, including vent features and therefore this type of intervention is not unprecedented in the context of the building's refurbishment.

4.6 The access to the site and main access to the building is to be retained as consented and is unaffected by the proposals.

5. Planning Policy Framework

- 5.1 This section of the Report sets out the legislation and planning policy considerations and guidance contained within both national and local planning guidance which specifically relate to the site, with a focus on those policies relating to the protection of the historic environment.

Legislation

- 5.2 Legislation relating to the built historic environment is primarily set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, 24 which provides statutory protection for Listed Buildings and Conservation Areas.
- 5.3 Notably, Sections 16(2) of the Planning (Listed Buildings and Conservation Areas) 1990 Act (The Act) as amended states that:

"In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

- 5.4 With regards to development within Conservation Areas, Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

- 5.5 In addition to the statutory obligations set out within the Planning (Listed Buildings and Conservations Area) Act 1990, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.

National Planning Policy Framework (February 2019)

- 5.6 The NPPF sets out the Government's overarching planning guidance. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The NPPF continues to recognise that the planning system is plan-led and that therefore Local Plans are the starting point for the determination of any planning application, including those which relate to the historic environment.

- 5.7 Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 190 that:

"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

- 5.8 Paragraph 192 goes on to state that:

"In determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c. the desirability of new development making a positive contribution to local character and distinctiveness"*

- 5.9 Regarding proposals that may cause less than substantial harm (the lowest degree of harm) Paragraph 196 outlines:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

National Planning Practice Guidance

- 5.10 The PPG explicitly refers to the Historic Environment, which confirms that the consideration of 'significance' in decision taking is important and states:

"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals."

- 5.11 In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

"In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm."

The Development Plan

- 5.12 The adopted development plan comprises the following:

Bristol City Council Core Strategy (2011);

Bristol City Council Site Allocations and Development Management Policies (2014);

Bristol City Council Central Area Plan (2015).

Bristol City Council's Core Strategy (June 2011)

- 5.13 The Core Strategy (CS) was adopted in 2011 covering the plan period to 2026; this document establishes the strategy for the city and sets out the Council's vision to deliver a growing city centre, strengthening Bristol's regional, national and international role. The CS contains a vision for the city centre as the regional office capital, enhanced as the location for some of the city's key and most vibrant economic sectors; the CS outlines that successful and vibrant mixed-use city centre environments will be delivered which provide for safe and mixed residential communities, integrated with businesses, shops, leisure and open spaces.
- 5.14 Policy BCS22 relates to the conservation of the historic environment and seeks to secure that development proposals safeguard or enhance heritage assets and protect or enhance the character and setting of areas of acknowledged importance including historic buildings and conservation areas.

Bristol Local Plan Site Allocations and Development Management Policies (July 2014)

- 5.15 The Bristol Site Allocations and Development Management Policies Plan (SADMP) comprises the second part of the Bristol Local Plan and provides detailed planning policies to be used when assessing planning applications. Policy DM31 relates to heritage assets and sets out that development which has an impact upon heritage assets will be expected to conserve and, where appropriate, enhance the asset or its setting, all reasonable efforts have been made to mitigate harm to the significance of the building, and that the proposed works are the minimum required to secure viable long term use.

6. Assessment

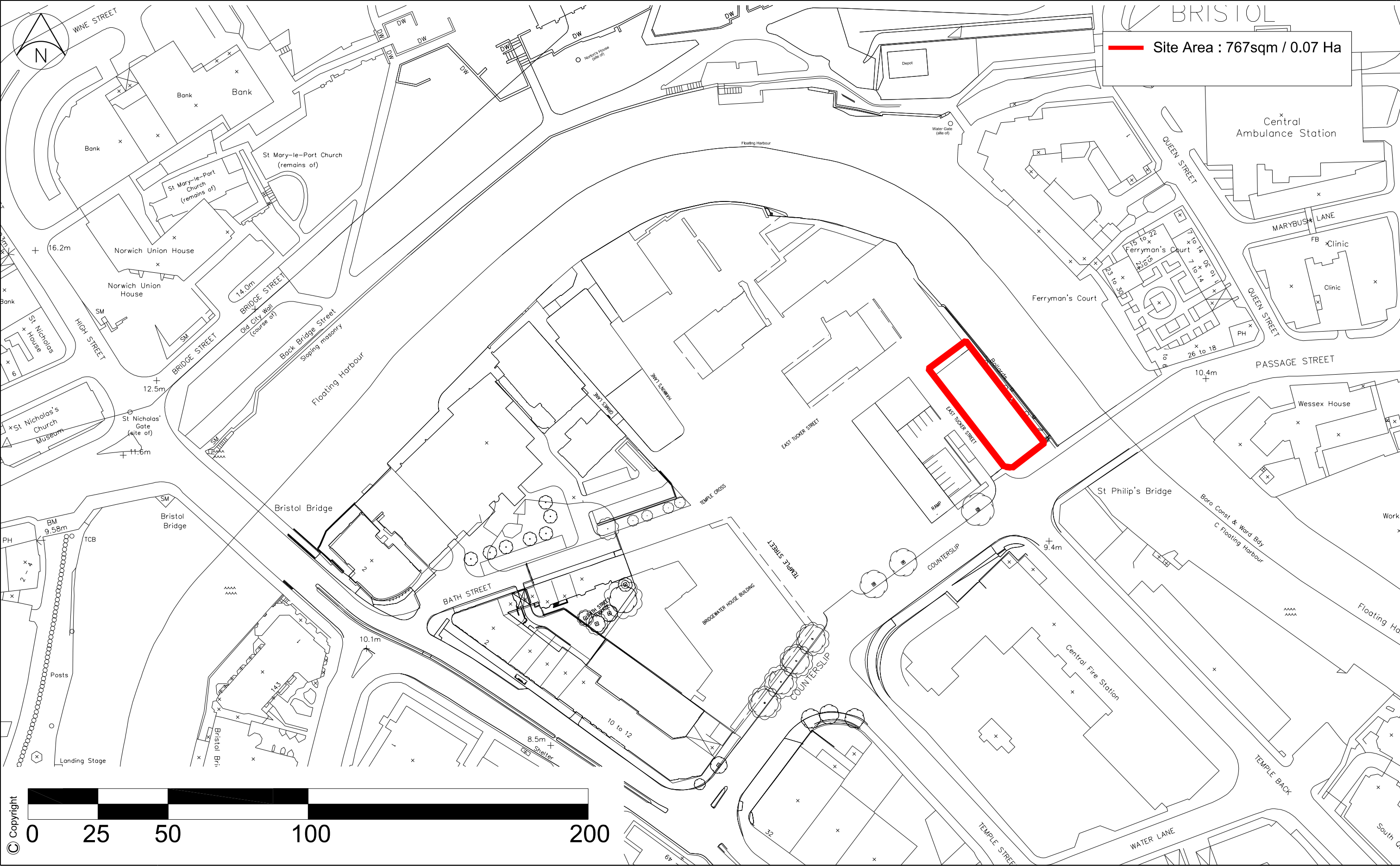
- 6.1 Sections 16(2) of the Planning (Listed Buildings and Conservation Areas) 1990 Act (The Act) as amended states LPAs should consider listed building consent applications on the basis that proposals *“pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”*. Therefore, the LPA could assess whether the proposals cause any undue harm to those areas being altered or the overall significance of the building.
- 6.2 In addition, while they do not strictly apply to listed building consent applications, we note that Policies BSC22 and DM31 of Bristol City Council’s Development Plan relate to heritage assets (including Listed Buildings and Conservation Areas) and seek to preserve or enhance these assets.
- 6.3 With reference to the above, we consider that in the context of the entire building, by virtue of their minor scale and their inconspicuousness (largely obscured by the external staircase which sits forward of the vents on the harbourside elevation and replacement grille that replicates current façade appearance), the proposals would not unduly impact on the character and special interest of the Grade II Listed heritage asset. Therefore, we consider that the requirements of Section 16(2) of the Planning (Listed Buildings & Conservation Areas) Act 1990 are therefore met by the proposals. We also consider that the proposals preserve the Heritage Asset in accordance with Local Plan Policies BCS22 and DM31.
- 6.4 In this respect, we consider that the proposals would not pose harm to the building or any features of architectural or historical interest and therefore accords with national and local policy guidance.
- 6.5 The development proposals are a result of further design development as the plans for the re-use and refurbishment of a significant Grade II Listed Building in the heart of Bristol progress. Granting Planning Permission & Listed Building Consent would, therefore, facilitate the completion of this significant redevelopment scheme.

7. Conclusions

- 7.1 This application seeks listed building consent for the installation of 2no. vents and a replacement grille to the eastern elevation of the Generator Building.
- 7.2 This application follows on from the grant of planning permission and listed building consent under application ref 17/06919/F & 17/06920/LA to enable internal and external alterations to the wider building.
- 7.3 This statement provides an overview of the site and its surroundings and considers the proposals in relation to adopted and emerging national and local planning policies, highlighting key considerations that have informed the scheme.
- 7.4 We have identified that by virtue of their minor scale and location, the proposals would not unduly impact on the character and special interest of the Grade II* Listed Heritage Asset. In this respect, we consider that the proposals would not pose harm to the building or any features of architectural or historical interest and therefore accords with national and local policy guidance.
- 7.5 Furthermore, we consider that the proposals are connected to the wider refurbishment of the building to deliver circa 3,000-4,000sqm of high quality, grade A office space (B1a use class), providing accommodation for approximately 250-330 new jobs in central Bristol. Approval of these detailed design proposals would facilitate the on-going construction works on site and ultimately the building's refurbishment and optimal re-use.

Appendix I

Site Location Plan



Rev	Note	Date	By	Checked
-	-	-	-	-



5.20 The Paintworks
Bath Road
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Drawn	TP	Project	Generator Building
Scale	1:1250 @ A3	Drawing	Site Location Plan
Date	Apr2019	Number	3473-TBC-V1-00-DR-A-0001
Rev -			

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