

CONSULTATION RESPONSE: **OBJECT**

Mr Conrad Rodzaj
Development Management,
City Hall,
Bristol City Council,
Bristol,
BS1 9NE

By email to: conrad.rodzaj@bristol.gov.uk & development.management@bristol.gov.uk

Our reference: 24007

8th February 2024

Dear Mr Rodzaj,

23/04490/F | Demolition of existing buildings and erection of a mixed use development comprising residential (Class C3) and commercial (Class E) floorspace, together with amenity space, landscaping and public realm works, car parking, vehicular access, and servicing arrangements | (Former Debenhams & Building To West) 33-47 (odds) The Horsefair, 6-10 (consec) The Haymarket, St James Barton & 29 - 31 (odds) The Horsefair Bristol BS1 3JE

SAVE Britain's Heritage **objects** to the above planning application for the demolition of the former Debenhams building in Bristol. We consider the demolition of this important Non-Designated Heritage Asset (NDHA) and the proposed 28-storey building in its place would be substantially harmful in heritage terms, and the failure to seek reuse and conversion of the existing building unsustainable in planning terms. For these reasons, we object to this application and call on the Local Planning Authority to refuse planning permission.

Proposal

This application proposes the demolition of the former Debenhams building, including buildings to the west, and the erection of two buildings of up to 28 storeys to provide 502 dwellings.

Significance

The former Debenhams building opened its doors in May 1957 as the department store Jones & Co, built to designs by the architect Thomas Overbury of Healing and Overbury. The handsome building was conceived as part of the new post-war shopping precinct for the Broadmead area, planned by the City Architect John Meredith after it was devastated by heavy bombing during the Second World War. The site, which faces north onto St James Barton roundabout and south onto The Horsefair, is highly visible from multiple approaches and notably terminates views north from within Broadmead's central, circular hub.

It shares a harmonious architectural vocabulary with Meredith's planned shopping district and the neighbouring Lewis's store, currently in use by Primark. Both buildings are recognised within the City Centre Framework (June 2020) as '*distinguished and remarkable structures to survive from the post-war redevelopment scheme*', a strong endorsement of their architectural and historic merit. Healing and Overbury are well-regarded architects whose work elsewhere includes listed buildings such as the grade II listed Cheltenham House in Gloucestershire. The practice was also responsible for a number of other purpose-built department stores, including Handleys in Southsea and J.C Smiths in Nuneaton, both of which later became branches of Debenhams.

On this basis, we consider the existing building a landmark building within Bristol and a Non-Designated Heritage Asset (NDHA) of high historic and architectural significance, which makes a significant and positive contribution to Bristol's urban townscape. This status is affirmed by the specialist advice of the Twentieth Century Society and the objection of the Government's heritage advisor Historic England.

Policy

- National Planning Policy Framework (December, 2023) Para 203 requires that in determining 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'.
- NPPF (2023) Para 209 provides that when weighing applications which affect a NDHA, 'a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.
- NPPF (2023) Para 157 states that the planning system should, 'encourage the reuse of existing resources, including the conversion of existing buildings'. Sustainable development is one of the three overarching core objectives of the NPPF.
- Bristol's City Centre Framework (June 2020) Aim 17 sets out that where plans come forward for the Debenhams building: 'proposals should carefully consider...retention and re-use'.

Assessment

1. Impact of demolition

We **object** to this proposal on the grounds that it would entail the total demolition of a NDHA of considerable heritage significance. As identified above, this building is of clear architectural quality, and we consider its total loss would constitute substantial harm in NPPF terms. The former Debenham's building is a key element of the post-war master planning and redevelopment of Bristol's city centre, a civic achievement which remains remarkably intact and legible today. The building is also of landmark quality, echoing the wider area's architectural language, scale and civic grandeur. Its positive contribution to the surrounding townscape is recognised in the City Centre Framework (June 2020).

Total demolition would therefore have a substantially harmful impact, both through the loss of a landmark building, but also the breaking up of the wider historic civic townscape. On this basis and having regard for para 209 of the NPPF (2023) and Bristol's City Centre Framework (June 2020), this application fails to comply with national and local policy for the protection of non-designated heritage assets.

2. Impact of proposed tower

We also object to the radical scale and massing of the proposed tower block, which at 28 storeys would dominate its setting and render incoherent the city centre's intact post-war urban plan. The scale and materiality of the existing building strikes a positive and harmonious relationship with its surroundings where it occupies a prominent, landmark location. The proposed tower in such a prominent location would be a radical departure in scale and materiality with far reaching harmful impacts on the historic character of the city. Whilst we consider this harm to be less-than-substantial in Framework terms, the cumulative instances of the harm caused by the tower across a larger area could be considered to reach the bar of substantial harm.

3. Opportunity for retention and reuse

SAVE has been actively involved in raising the profile and civic qualities of department stores and identifying the threats they face in its report [Departing Stores: Emporia at Risk](#), published in April 2022. The adaptive re-use of department stores is now a major theme and opportunity for towns and cities across the UK, with many Local Planning Authorities and developers favouring sustainable reuse over demolition in order to set positive sustainability and heritage precedents. Reuse is not only more sustainable in terms of embodied carbon terms, but also brings clear heritage benefits, maintaining both the historic relationship people have with these buildings and their architectural contribution as landmark buildings within town centres across the country.

Bristol Debenhams features in SAVE's report as a strong candidate for such retention and reuse, as has been the case with the neighbouring Lewis' building, which dates from the same year (1957). The potential for this site's practicable reuse is also signposted in the applicant's Planning Statement, which states that the building has generous floor heights and floor plate depths. Whilst conversion can present challenges, the building's sizable floor to ceiling heights would greatly facilitate a successful conversion scheme.

4. Unsustainable development

In this context, the applicant's demolition and rebuild approach carries an extreme and unjustified embodied carbon footprint and cannot therefore be considered compliant with NPPF para 157 and the overarching goal of the planning system to promote sustainable development.

In the recent landmark ruling to refuse the demolition of M&S Oxford Street, the Secretary of State found that national Net Zero legislation for carbon reduction (including embodied carbon) and the requirements of NPPF 157 (2023) weighed clearly against the proposal. The decision states that "*in respect of paragraph 152 [now 157] of the Framework, the Secretary of State agrees that a substantial amount of carbon would go into construction, and that this would impede the UK's transition to a zero-carbon economy*", and that it "*would overall fail to encourage the reuse of existing resources, including the conversion of existing buildings.*"

In that decision, the Secretary of State was highly critical of the applicant's failure to properly consider alternatives to demolition, stating: "*that there has not been an appropriately thorough exploration of alternatives to demolition.*" It is clear from the documentation provided with this application that a similarly insufficient degree of consideration has been given to alternative approaches to demolition and the opportunities to retain and reuse this historic building.

Taking this with the substantial degree of heritage harm identified above, these proposals cannot therefore be considered sustainable development in Framework terms and should be refused.

Conclusion

For the reasons outlined above, SAVE **objects** to this planning application on heritage and sustainability grounds, and we call on the Local Planning Authority to refuse planning permission.

I trust that these comments are useful to you, and I ask that you keep SAVE informed of further decisions or consultation regarding this application.

Yours sincerely,



Ben Dewfield-Oakley
Senior Conservation Officer, SAVE Britain's Heritage